

Draft Initial Study/Mitigated Negative Declaration Proposed Center Park Residential Project City of Riverside, California

Prepared for:

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

Prepared by:

LSA 1500 Iowa Avenue, Suite 200 Riverside, California 92507

August 2019

Exhibit 8 - Draft Initial Study, MND, and Appendices

Exhibit 8 - Draft Initial Study, MND, and Appendices

TABLE OF CONTENTS

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION	1
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	
DETERMINATION	
ENVIRONMENTAL INITIAL STUDY	27
EVALUATION OF ENVIRONMENTAL IMPACTS	
1. Aesthetics	
2. Agriculture and Forest Resources	
3. Air Quality	
4. Biological Resources	
5. Cultural Resources	
6. Geology and Soils	
7. Greenhouse Gas Emissions	
8. Hazards and Hazardous Materials	
9. Hydrology and Water Quality	
10. Land Use and Planning	
11. Mineral Resources	
12. Noise	
13. Population and Housing	
14. Public Services	
15. Recreation	
16. Transportation and Traffic	
17. Tribal Cultural Resources	
18. Utilities and Service Systems	
19. Mandatory Findings of Significance	
MITIGATION MONITORING AND REPORTING PROGRAM	
REFERENCES	

Tables

Table 1.A: Existing Land Uses and Land Use Designations	2
Table 3.A: Short-Term Regional Construction Emissions	35
Table 3.B: Construction Localized Significance Threshold Impacts	36
Table 3.C: Opening Year Regional Operational Emissions	36
Table 3.D: Long-Term Operational Localized Significance Thresholds	37
Table 4.A: Potential Jurisdictional Features on the Project Site	43
Table 6.A: Lateral Earth Pressures for Permanent Retaining Structures	57
Table 7.A: Construction Greenhouse Gas Emissions	61
Table 7.B: Operational Greenhouse Gas Emissions	63
Table 7.C: Project Compliance with Greenhouse Gas Emission Reduction Strategies	64
Table 9.A: Hydrologic Conditions of Concern Summary	73
Table 9.B: Hydromodification BMP Sump Basins Summary	73
Initial Study Exhibit 8 - Draft Initial Study, MND, and Appendices P18-0022 (CUP), and P18-0023 ((RZ) (DR)

Table 12.A: City of Riverside Sound Level Limits (dBA)	80
Fable 12.B: Vibration Damage Threshold Criteria	82
Fable 12.C: Vibration Annoyance Threshold Criteria	83
Table 12.D: Vibration Source Amplitudes for Construction Equipment	83
Table 13.A: SCAG Population Projections	85
Table 16.A: Level of Service Criteria for Unsignalized and Signalized Intersections	91
Table 16.B: Project Trip Generation	92
Table 16.C: Existing Intersection Levels of Service	92
Table 16.D: Project Completion (2019) Intersection Levels of Service	92
Table 16.E: Cumulative (2019) Intersection Levels of Service.	92
Table 16.F: Cumulative (2019) Intersection Levels of Service with Mitigation	93
Table 17.A: Native American Consultation	96
Table 18.A: Projected Water Supply/Demand (acre-feet/year)	99

Figures

Figure 1: Regional and Project Location	7
Figure 2: Site Photograph Key Map	9
Figure 3: Site Photographs	11
Figure 4: Conceptual Site Plan	23

Appendices

A: Air Quality and Greenhouse Gas Analysis
B1: Biological Resources Assessment and MSHCP Consistency Analysis and Habitat Assessment
B2: Results of Burrowing Owl Survey
B3: Jurisdictional Delineation
B4: Determination of Biologically Equivalent or Superior Preservation
C: Cultural Resources Assessment
D: Geotechnical Exploration and Design Report
E: Phase 1 Environmental Site Assessment
F1: Preliminary Water Quality Management Plan
F2: Preliminary Hydrology & Hydraulics Report
G: Traffic Impact Analysis



COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

City of Arts & Innovation

Draft Initial Study/Mitigated Negative Declaration

Ward: 1

- 1. Case Numbers: P18-0020 (Rezone), P18-0022 (Conditional Use Permit), and P18-0023 (Design Review)
- 2. **Project Title:** Center Park Residential Project
- Lead Agency: City of Riverside Community & Economic Development Department Planning Division 3900 Main Street, 3rd Floor Riverside, California 92522
- 4. **Contact Person:** Veronica Hernandez, Associate Planner **Phone Number:** (951) 826-3965 <u>vhernandez@riversideca.gov</u>
- 5. Project Location: 3444 Center Street, Riverside, California 92501
- 6. Project Applicant/Project Sponsor's Name and Address: King Co., LLC

ATTN: Joel Farkas 903 East Easter Place, Suite 112 Centennial, Colorado 80112

- 7. General Plan Designation: MDR—Medium Density Residential
- 8. Zoning: R-1-7000—Single Family Residential Zone
- 9. Description of Project:

Proposal by Joel Farkas, on behalf of King Company, LLC, to consider the following entitlements for the establishment of a 99-unit Mobile Home Park: 1) A Zoning Amendment to rezone the 12.87-acre project site to apply the MH - Mobile Home Park Overlay Zone, 2) a Conditional Use Permit to permit a Mobile Home Park; and 3) a Design Review of project plans for the construction of 99 manufactured mobile homes on a single vacant parcel totaling 12.87 acres. The existing on-site and surrounding land use is identified below in Table 1.A

The project's community amenities include a recreational center comprising a swimming pool, picnic tables, shade structures, and restroom facilities with showers, dog-park, and tot lot. Access to the project site will occur via a single-lane (one lane each direction) private driveway off of Center Street. The driveway will not be gated. Figure 4 illustrates the conceptual site plan.

The project site is located in the Northside Neighborhood of the City of Riverside, California at 3444 Center Street (Assessor's Parcel Number 246-130-001) on the south side of Center Street, west of Interstate 215 (I-215) and east of Orange Street. The project site is on the United States Geological Survey (USGS) *San Bernardino South, California* 7.5-minute topographic quadrangle map in Township 2 South, Ranges 4 and 5 West within the Jurupa (Stearns) Land Grant, San Bernardino Baseline and Meridian (SBBM). The project location is detailed in Figure 1.

The topography of the project site is a rolling hill sloping from the northeast corner to the southwest corner of the project site. The elevation ranges from 850 feet to 890 feet above mean sea level. The site is currently vacant and

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

Initial Study, MND, and Appendices

undeveloped. It is bounded by single-family residential neighborhoods to the north, south, and east, and light industrial development to the west consisting of a trailer staging and automobile tow yard.

10. Surrounding Land Uses and Setting:

The project site is surrounded primarily by single-family residential development to the north, south, and east and light industrial development comprising a trailer staging and automobile tow yard to the west. The nearest residential uses lie directly east of the project site, with the structure located within 10 feet of the property line. Additionally, single-family residential development is located directly north of the site and across Center Street. Residential uses to the south are separated from the site by an intermittent channel and riparian vegetation fed by urban runoff.

	City General Plan City Zoning County General Plan County Zoning						
	Existing Land Use	Designation	Designation	Designation	Designation		
Project Site	Vacant/Undeveloped	MDR – Medium Density Residential	R-1-7000 – Single Family Residential Zone	Not Applicable	Not Applicable		
North	Single-family Residential	City Sphere of Influence	Not Applicable	MDR – Medium Density Residential	R-1– Single Family Residential		
East	Single-family Residential	City Sphere of Influence	Not Applicable	MDR – Medium Density Residential	R-1– Single Family Residential		
South	Single-Family Residential	City Sphere of Influence	Not Applicable	MDR – Medium Density Residential	R-1– Single Family Residential		
West	Vacant land	B/OP – Business/Office Park	BMP – Business and Manufacturing Park Zone and R-1-7000 – Single Family Residential Zone	Not Applicable	Not Applicable		

Table 1.A: Existing Land Uses and Land Use Designations

Sources: Zoning Map of the City of Riverside. City of Riverside. September 30, 2007.

Land Use Policy Map. City of Riverside General Plan Figure LU-10. March 1, 2013.

Riverside County: Map My County. https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public (accessed July 5, 2018).

11. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement):

- a. South Coast Air Quality Management District (SCAQMD) Dust Control Plan
- b. Regional Water Quality Control Board (RWQCB), Santa Ana Region National Pollutant Discharge Elimination System (NPDES) Construction General Permit
- c. RWQCB, Santa Ana Region Storm Water Pollution Prevention Plan (SWPPP)
- d. RWQCB, Santa Ana Region 401 Water Quality Certification Waste Discharge Requirement (WDR)
- e. CDFW Jurisdictional Delineation Report for Streambed Alteration Agreement.
- f. USACE United States Army Corps of Engineers 404 Permit (as required)

12. Other Environmental Reviews Incorporated by Reference in this Review:

- a. City of Riverside General Plan 2025 (GP 2025)
- b. City of Riverside General Plan 2025 Final Programmatic EIR (FPEIR)
- c. City of Riverside Municipal Code, Title 19 Zoning
- d. City of Riverside Municipal Code, Title 20 Cultural Resources

13. California Native American tribes traditionally and currently affiliated with the project area requesting consultation pursuant to Public Resources Code Section 21080.3.1:

- a. San Manuel Band of Mission Indians
- b. Morongo Band of Mission Indians
- c. Agua Caliente Band of Cahuilla Indians
- d. Soboba Band of Luiseño Indians

14. List of Appendices

- a. Air Quality and Greenhouse Gas Analysis
- b. Biological Resources Assessment and MSHCP Consistency Analysis, Burrowing Owl Survey, Jurisdictional Delineation, Determination of Biologically Equivalent or Superior Preservation
- c. Cultural Resources Assessment
- d. Geotechnical Exploration and Design Report
- e. Phase 1 Environmental Site Assessment
- f. Preliminary Water Quality Management Plan, Preliminary Hydrology & Hydraulics Report
- g. Traffic Impact Analysis

15. Acronyms

AB	Assembly Bill
ADT	Average Daily Trips
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
ASTM	American Society for Testing and Materials
Basin	South Coast Air Basin
BAU	Business As Usual
BMP	Best Management Practice
Cal/OSHA	California Occupational Safety and Health Administration
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDR	Conceptual Design Review
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CH4	Methane
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
City	City of Riverside
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
СО	Carbon monoxide
CO ₂	Carbon Dioxide
CPHI	California Points of Historical Interest
CUP	Conditional Use Permit
CVC	California Vehicle Code
CWA	Federal Clean Water Act
DAMP	Drainage Area Management Plan
dBA	A-weighted decibels
DCV	Design Capture Volume
Division	Planning Division
DMA	Drainage Management Area
DOC	California Department of Conservation
EIC	Eastern Information Center

Initial Study, MND, and Appendices

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

EIR	Environmental Impact Report
ЕО	Executive Order
ЕОР	Emergency Operations Plan
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FPEIR	Final Programmatic Environmental Impact Report
FTA	Federal Transit Administration
GAP	Green accountability performance
GCC	Global Climate Change
GHG	Greenhouse Gas
GIS	Geographic Information System
GP	General Plan
GP 2025	General Plan 2025
НСМ	Highway Canacity Manual
НСОС	Hydrologic Condition of Concern
НСР	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HRI	Historic Resource Inventory
HVAC	Heating Ventilation and Air-Conditioning
I_215	Interctate 215
IS	Initial Study
lbs/day	Dounds per day
IUS/Udy	L coal Hazard Mitigation Plan
т т	movimum noise lovel
L _{max}	maximum noise level
	L S A Aggagiatag Inc
LSA	Leasting Significance Threshold
	Localized Significance Threshold
MBIA	Migratory Bird Treaty Act
MDR	Medium Density Residential
MGD	Million Gallons Per Day
MH	Mobile Home
MLD	Most Likely Descendant
MND	Mitigated Negative Declaration
mph	Mile per Hour
MS4	Municipal Separate Storm Sewer Systems
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MT CO ₂ e	metric tons of carbon dioxide-equivalent gases
N ₂ O	Nitrous Oxide
NAHC	Native American Heritage Commission
National Register	National Register of Historic Places
NEPSSA	Narrow Endemic Plant Species Survey Area
NPDES	National Pollutant Discharge Elimination System
NOx	Nitrogen oxides
O ₃	Ozone
OEM	Office of Emergency Services
OHWM	Ordinary High Water Mark
PEV	plug-in electric vehicle
PF	Public Facilities
PFCs	Perfluorocarbons
PM ₁₀	Particulate matter less than 10 microns in size
PM _{2.5}	Particulate matter less than 2.5 microns in size

P18-0020 (RZ), P18-0022 (CUP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

Initial Study

ppm	parts per million
ppv	peak particle velocity
PRC	Public Resources Code
PRD	Planned Residential Development
PRIMP	Paleontological Resource Impact Mitigation Program
R-1-7000	Single-Family Residential Zone
RCALUCP	Riverside County Airport Land Use Compatibility Plan
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
RFD	Riverside Fire Department
RMC	Riverside Municipal Code
ROC	Reactive Organic Compounds
RPD	Riverside Police Department
RPU	Riverside Public Utilities
RPWD	Riverside Public Works Department
RRG	Riverside Restorative Growthprint
RRG-CAP	Riverside Restorative Growthprint Climate Action Plan
RRG-EPAP	Riverside Restorative Growthprint Economic Prosperity Action Plan
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCS	Sustainable Communities Strategy
SF ₆	Sulfur Hexafluoride
SKR	Stephens' Kangaroo Rat
SLCP	Short-Lived Climate Pollutant
SLF	Sacred Lands File
SOx	Sulfur oxides
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
ТАС	Toxic Air Contaminant
TIA	Traffic Impact Analysis
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VOC	Volatile Organic Compounds
WDR	Waste Discharge Requirement
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments





2000

Center Park Residential Project **Regional and Project Location**

SOURCE: GoogleEarth, 2016; ESRI Streetmap, 2013. I:\KCL1701(FEXH)HUts&_MND(getkgluchtigl/Study, MND, and Appendices





FEET

Center Park Residential Project Site Photograph Key Map

SOURCE: Google Earth, 2016 I:\KCL1701(FECX01)\Keports\S__MND(Ag2_S)Reprint Initial Study, MND, and Appendices



Photograph 1: View of storm water flowing into project site and the end of Viola Drive.



Photograph 3: View of dense cattails and short pod mustard in the narrow channel.

LSA



Photograph 2: View of dense vegetation at the beginning of the stream due to frequent street and urban runoff onto the project site.



Photograph 4: View of the end of the moist soil area at ash tree in the center of the streambed.

Center Park Residential Project Site Photographs



Photograph 5: View of stream and mixed upland and riparian trees in the channel.



Photograph 6: View of the north edge of the field and stream.



Photograph 7: View of southwestern corner of the project area.

LSA



Photograph 8: View of debris piles and removed trees in the southeast corner of the project site.

Center Park Residential Project Site Photographs



Photograph 9: View of ground squirrel burrows in the dirt piles at the southeast corner of the project site.



Photograph 11: View of lower bench near the southwest corner of the project site.

LSA



Photograph 10: View of deeply furrowed ground in the entire project site and view of invasive trees growing in the northern area of the project site.



Photograph 12: View of the stream west of the project site, which empties into a field within one block.

FIGURE 3c

Center Park Residential Project Site Photographs



Photograph 13: View of the culvert where the stream exits the biological study area in the southwest corner of the project site.



Photograph 14: View along Center Street toward the northwest showing invasive tree of heaven.



Photograph 15: View of the northeastern corner of the project site showing the area with the most abundant tree of heaven.



Photograph 16: View looking north from the highest location in the center of the project site.

LSA

FIGURE 3d

Center Park Residential Project Site Photographs



Photograph 17: View looking south from the highest location in the center of the project site.



Photograph 18: View of Goodding's willow trees at the end of Viola Street.



Photograph 19: View along the north bank the stream showing annual non-native grasses on the arroyo slope and castor bean on the lower stream banks.



Photograph 20: View of one of three unauthorized dumping sites on the project site.

LSA

FIGURE 3e



Photograph 21: View of typical vegetation in the upper reach of the stream with willows, ash, palm, mulefat, and castor bean.

FIGURE 3f



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

		P18-002	$\overline{0(\mathbf{RZ})}$	
Printed Name & Title		For <u>City of Riverside</u>		
Signature		Date		
The City of Riverside finds that although because all potentially significant effect DECLARATION pursuant to applicable EIR or NEGATIVE DECLARATION, proposed project, nothing further is requi	the proposed project could have a signifits (a) have been analyzed adequately in standards, and (b) have been avoided or n including revisions or mitigation measured.	cant effect on the environment, an earlier EIR or NEGATIVE nitigated pursuant to that earlier res that are imposed upon the		
The City of Riverside finds that the prop significant unless mitigated" impact on the an earlier document pursuant to applicate based on the earlier analysis as describ required, but it must analyze only the effect	osed project MAY have a "potentially sig he environment, but at least one effect 1) he ble legal standards, and 2) has been add ed on attached sheets. An ENVIRONM texts that remain to be addressed.	nificant impact" or "potentially has been adequately analyzed in lressed by mitigation measures ENTAL IMPACT REPORT is		
The City of Riverside finds that the propo ENVIRONMENTAL IMPACT REPORT	osed project MAY have a significant effec is required.	t on the environment, and an		
The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.				
The City of Riverside finds that the propo and a NEGATIVE DECLARATION will	osed project COULD NOT have a signific. be prepared.	ant effect on the environment,		
On the basis of this initial evaluation, recommended that:	which reflects the independent judgm	ent of the City of Riverside, it is		
DETERMINATION (To be comp	pleted by the Lead Agency)			
Mandatory Findings of Significance				
Transportation and Traffic	Tribal Cultural Resources	Utility Systems		
Population and Housing	Public Service	Recreation		
Land Use and Planning	Mineral Resources	Noise		
Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality		
Biological Resources	Cultural Resources	Geology and Soils		
Aesthetics	Agriculture & Forest Resources	Air Quality		

Initial Study, MND, and Appendices

P18-0022 (CUP), and P18-0023 (DR)



City of Arts & Innovation

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:

Initial Study, MND, and Appendices

- a. The significance criteria or threshold, if any, used to evaluate each question; and
- b. The mitigation measure identified, if any, to reduce the impact to less than significance.
- 9) Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?			\boxtimes	

1a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)

Less Than Significant Impact. The General Plan identifies hillsides and ridgelines above the City, as well as the City's natural terrain and vegetation, as scenic vistas. For example, the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, Box Springs Park, as well as the peaks of Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, Alessandro Heights and the La Sierra/Norco Hills, provide scenic view points of the City and the region. The project does not constitute hillside development (on slopes greater than 15 percent) where special considerations of the City's natural terrain must be considered for impacts to scenic vistas. The site and immediate vicinity are not designated by the City's General Plan for the preservation of scenic views.

The project site is located within an urbanized area surrounded by existing development (Figure 2). The nearest scenic resources in proximity to the site are the La Loma Hills located approximately 0.3 mile (1,600 feet) to the north. Other scenic features in proximity to the project area include Mount Rubidoux approximately 3 miles to the southwest and the distant San Gabriel and San Bernardino Mountains approximately 13 miles to the north. However, views from public areas in the vicinity of the project site are dominated by vacant lands mixed with single-family homes, light industrial staging yards, ornamental landscape, and utility poles. The project consists of the development of a manufactured home community, which is consistent with the current pattern of residential development in the project area.

Due to the nature (low profile) of the proposed homes, the project would not have significant adverse impacts on local or regional scenic vistas.

Views of the La Loma Hills located approximately 0.3 mile (1,600 feet) to the north from existing residential uses adjacent to the east and south of the project site are already obstructed by existing residential structures, vegetation within the drainage along the southern project site boundary, and existing perimeter walls delineating property boundaries. Travelers on local roadways would experience changes in on-site scenery, but existing views to more distant geographic features would be maintained. Since the project would be consistent with the residential nature of existing land uses, views currently available to local residents would be maintained because single-family homes, light industrial staging yards, ornamental landscape, and utility poles already obstruct scenic vistas in the project area. Through implementation of the development standards provided in Table 19.210.040 (MH Overlay Zone Development Standards) and Section 19.210.050 (Additional Development Standards), development of the project would have a less than significant impact directly, indirectly, or cumulatively to scenic vistas. No mitigation is required.

b. Substantially damage scenic resources, including, but not		\bowtie
limited to, trees, rock outcroppings, and historic buildings		
within a state scenic highway?		

1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, Title 20 – Cultural Resources, and Caltrans 2011)

No Impact. The site is currently vacant. No structures (historic or otherwise) or prominent geologic feature (e.g., rock outcropping) is located on site. The site has been recently plowed for weed abatement. Plant debris and remaining standing vegetation (3–4 feet in height) remains on site. No designated scenic resource is located on the project site.

There are no state scenic highways located near the project site. As designated by the City's General Plan 2025, the proposed project is not located along or within view of a scenic boulevard, parkway, or special boulevard. The nearest scenic boulevard and parkway to the project site is Market Street approximately 3.5 miles southwest of the project site, and the

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

nearest special boulevard to the project site is Palmyrita Avenue approximately 1.4 miles south of the project site. The project site cannot be seen from either of these roadways due to intervening structures, trees, and topography.

No designated scenic resources, State scenic highways, or locally-designated scenic roadways are located on or adjacent to the project site; therefore, the project would have no impact directly, indirectly, or cumulatively to scenic resources within a State scenic highway. No mitigation is required.

c.	Substantially degrade the existing visual character or		\square	
	quality of the site and its surroundings?			

1c. Response: (Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, and Citywide Design Guidelines and Sign Guidelines)

Less Than Significant Impact. The site is currently vacant land. Existing adjacent land uses include single-family homes to the north, south, and east and light industrial uses to the west consisting of a trailer staging and automobile tow yard.

The proposed project envisions the ultimate development of 99 manufactured single-family homes and associated improvements within an existing residential area, which would continue the existing pattern of residential development on three sides of the project site in accordance with the City's General Plan and Zoning designations.

The project would be developed in accordance with development standards detailed in Table 19.210.040 (MH Overlay Zone Development Standards) and Section 19.210.050 (Additional Development Standards), which specify maximum density and lot coverage; setback and landscape requirements; building separation; lot depth and width; building and structure heights; property management; site use and improvements; roadway design; fences, walls, and accessory structures; common open space; utilities; parking; lighting; and trash receptacles and enclosures to ensure compatibility between the mobile home park and the surrounding area. Furthermore, the project's visual character with regard to surrounding land uses would be subject to Design Review pursuant to Chapter 19.710 of the Riverside MunicipalCode.

The project would buffer on-site development from surrounding land uses by meeting or exceeding the minimum setbacks specified in Table 19.210.040 (MH Overlay Zone Development Standards) of the RMC. Additionally all common boundaries shared with adjacent residential uses will incorporate a minimum 10-foot setback permanently landscaped and maintained with groundcover, trees, and shrubs in accordance with City's water efficient landscape and irrigation standards pursuant to RMC Section 19.210.050(E) and (F). Through compliance with the City's Municipal Code, the proposed project would not degrade the existing visual character of the area. The project would have a less than significant impact directly, indirectly, and cumulatively related to visual character and quality of the site and surrounding area. No mitigation is required.

d.	Create a new source of substantial light or glare which		\square	
	would adversely affect day or nighttime views in the area?			

1d. Response: (Source: General Plan 2025, Chapter 19.556 – Lighting, Citywide Design Guidelines and Sign Guidelines, and Title 19 – Article VIII – Chapter 19.710 – Design Review)

Less Than Significant Impact. The project site is located in an area with existing outdoor lighting sources. Currently, sources of nighttime light originate from surrounding residential uses and streetlights, as well as from the trailer staging and automobile tow yard adjacent to the west. The proposed lighting on the project site would include lighting typical of a residential neighborhood, including lights from inside and outside the homes, entrance lighting, accent lights on landscaping features, and streetlights. The proposed lighting would be directed, oriented, and shielded to prevent light from shining onto the adjacent properties. Although the lighting proposed by the project would increase lighting on the project site, compared to current conditions, the lighting would not result in substantial light or glare compared to surrounding development. Any new lighting proposed or required for the project would be constructed in accordance with *Section 19.590.070 – Light and Glare* and the provisions of *Chapter 19.556 – Lighting* of the City's Municipal Code. Additionally, any exterior building materials would be constructed in accordance with *Chapter 19.710 – Design Review* of the City's Municipal Code. As such, the project would have less than significant impacts directly, indirectly, or cumulatively that would adversely affect day or nighttime views due to glare and lighting. No mitigation is required.

ISSUES (AND SUPPORTING		Potentially	Less Than	Less Than	No
INFORMATION SOURCES):		Impact	With	Impact	Impact
	,	•	Mitigation		
			Incorporated		
2. AGRICULTURE AND F	UKEST KESUUKCES.		annantal affa		
to the California Agricultural Department of Conservation (Du determining whether impacts to agencies may refer to information state's inventory of forest land, in project; and the forest carbon me Resources Board Would the pro-	Land Evaluation and Site A: DC) as an optional model to us o forest resources, including t n complied by the California D ncluding the Forest and Range asurement methodology provid	ssessment Mo se in assessing imberland, ard epartment of I Assessment F ed in the Fore	bine (1997) p g impacts on a e significant e Forestry and F Project and the st Protocols ac	repared by the griculture and environmental ire Protection Forest Legac lopted by the 0	he Californi farmland. I effects, lea regarding th y Assessmen California A
a. Convert Prime Farmland, Uni Statewide Importance (Farm prepared pursuant to the Monitoring Program of the to non-agricultural use?	que Farmland, or Farmland of nland), as shown on the maps Farmland Mapping and California Resources Agency,				
2a. Response: (Source: General Conservation 2016a)	Plan 2025 – Figure OS-2 – Ag	ricultural Sui	tability and D	epartment of	
designated "Urban and Built-Up Lan OS-2, Agricultural Suitability, in the	d" by the DOC Farmland Mapp City's General Plan 2025. The	DOC defines	toring Program "Urban and H	n and as depic Built-Up Land	ted in Figure as occupie
designated "Urban and Built-Up Lan OS-2, Agricultural Suitability, in the structures with a building density of a the site is zoned for residential uses Unique Farmland, or Farmland of St have no impact directly, indirectly, or	d" by the DOC Farmland Mapp City's General Plan 2025. The at least one unit to 1.5 acres, or and is not located on any de atewide Importance to non-agri cumulatively to Farmland. No	bing and Moni DOC defines approximatel signated Farm cultural use w mitigation is r	toring Program "Urban and F y six structure land, no conv ould occur. T equired.	n and as depic Built-Up Land s to a 10-acre version of Prin herefore, the p	eted in Figur as occupie parcel. Sinc ne Farmland project woul
 designated "Urban and Built-Up Lan OS-2, Agricultural Suitability, in the structures with a building density of a the site is zoned for residential uses Unique Farmland, or Farmland of St have no impact directly, indirectly, or b. Conflict with existing zoni Williamson Act contract? 	d" by the DOC Farmland Mapp City's General Plan 2025. The at least one unit to 1.5 acres, or and is not located on any de atewide Importance to non-agri cumulatively to Farmland. No	bing and Moni DOC defines approximatel signated Farm cultural use w mitigation is r	toring Program "Urban and F y six structure land, no conv ould occur. T equired.	n and as depic Built-Up Land s to a 10-acre version of Prin herefore, the p	eted in Figur as occupie parcel. Since ne Farmlan project woul
 designated "Urban and Built-Up Lan OS-2, Agricultural Suitability, in the structures with a building density of a the site is zoned for residential uses Unique Farmland, or Farmland of St have no impact directly, indirectly, or b. Conflict with existing zoni Williamson Act contract? 2b. Response: (Source: CADMI FPEIR – Figure 5.2-4 – Pro 2016b) 	d" by the DOC Farmland Mapp City's General Plan 2025. The at least one unit to 1.5 acres, or and is not located on any de atewide Importance to non-agri cumulatively to Farmland. No ng for agricultural use, or a <i>E, General Plan 2025– Figure</i> <i>posed Zones Permitting Agricu</i>	bing and Moni DOC defines approximatel signated Farm cultural use w mitigation is r OS-3 - Willia ultural Uses, T	toring Program "Urban and H y six structure land, no conv rould occur. T equired. mson Act Pre- Fitle 19, and D	n and as depic Built-Up Land s to a 10-acre rersion of Prin herefore, the p serves, Gener epartment of	eted in Figur as occupie parcel. Sinc ne Farmlan project wou
 b. Conflict with existing zoni Williamson Act contract? 2b. Response: (Source: CADMI FPEIR – Figure 5.2-4 – Pro 2016b) No Impact. The project site is with agricultural use. According to the Do General Plan 2025, there are no Will directly, indirectly, or cumulatively to 	d" by the DOC Farmland Mapp City's General Plan 2025. The at least one unit to 1.5 acres, or and is not located on any de atewide Importance to non-agri cumulatively to Farmland. No ng for agricultural use, or a <i>E, General Plan 2025– Figure</i> <i>posed Zones Permitting Agricu</i> hin the R-1-7000 – Single Fan DC's Williamson Act map and iamson Act contracts on the pr	bing and Moni DOC defines approximatel signated Farm cultural use w mitigation is r OS-3 - Willia ditural Uses, T nily Resident Figure OS-3, oject site. The Act contract 1	toring Program "Urban and H y six structure land, no conv rould occur. T equired. <i>Imson Act Pre</i> <i>Tile 19, and D</i> ial Zone; thus Williamson A refore, the pro- ands. No mitig	n and as depic Built-Up Land s to a 10-acre version of Prin herefore, the p serves, Gener epartment of a, the site is r Act Preserves, oject would has gation is requir	ted in Figure as occupie parcel. Since parcel. Since project woul and Plan 202 Conservation not zoned for in the City we no impact red.
 A gricultural Proposed project with designated "Urban and Built-Up Lan OS-2, Agricultural Suitability, in the structures with a building density of a the site is zoned for residential uses Unique Farmland, or Farmland of St have no impact directly, indirectly, or b. Conflict with existing zoni Williamson Act contract? 2b. Response: (Source: CADMI FPEIR – Figure 5.2-4 – Pro 2016b) No Impact. The project site is with agricultural use. According to the De General Plan 2025, there are no Will directly, indirectly, or cumulatively to c. Conflict with existing zoning forest land (as defined in F 12220(g)) timberland (as defined in Gas defined by Government C) 	d" by the DOC Farmland Mapp City's General Plan 2025. The at least one unit to 1.5 acres, or and is not located on any de atewide Importance to non-agri cumulatively to Farmland. No ng for agricultural use, or a <i>E, General Plan 2025– Figure</i> <i>posed Zones Permitting Agricu</i> nin the R-1-7000 – Single Fan DC's Williamson Act map and iamson Act contracts on the pr agricultural use or Williamson for, or cause rezoning of, public Resources Code section fined in Public Resources Code zoned Timberland Production Code section 51104(g))?	bing and Moni DOC defines approximatel signated Farm cultural use w mitigation is r OS-3 - Willia ditural Uses, T nily Resident Figure OS-3, oject site. The Act contract 1	toring Program "Urban and H y six structure land, no conv rould occur. T equired. <i>Imson Act Pre</i> <i>Tile 19, and D</i> ial Zone; thus Williamson A refore, the pro ands. No mitig	n and as depic Built-Up Land s to a 10-acre rersion of Prin herefore, the p serves, Gener repartment of a, the site is r Act Preserves, oject would ha gation is requir	ted in Figure as occupie parcel. Since ne Farmlan project wou al Plan 202 Conservation not zoned for in the City we no impa- red.
 A conflict with existing zoning forest land (as defined by Government C 2220(g)) timberland (as defined by Government C 26. Response: (Source: GIS Mag 	d" by the DOC Farmland Mapp City's General Plan 2025. The at least one unit to 1.5 acres, or and is not located on any de atewide Importance to non-agric cumulatively to Farmland. No ng for agricultural use, or a <i>E, General Plan 2025– Figure</i> <i>posed Zones Permitting Agricu</i> nin the R-1-7000 – Single Fan OC's Williamson Act map and iamson Act contracts on the pr agricultural use or Williamson for, or cause rezoning of, public Resources Code section fined in Public Resources Code zoned Timberland Production Code section 51104(g))? <i>p – Forest Data</i>	bing and Moni DOC defines approximatel signated Farm cultural use w mitigation is r OS-3 - Willia altural Uses, T nily Resident Figure OS-3, oject site. The Act contract l	toring Program "Urban and F y six structure land, no conv vould occur. T equired. <i>Imson Act Pre</i> <i>Title 19, and D</i> tal Zone; thus Williamson A refore, the pro ands. No mitig	n and as depic Built-Up Land s to a 10-acre version of Prin herefore, the p serves, Gener epartment of a, the site is r Act Preserves, oject would ha gation is requin	ted in Figu as occupid parcel. Sim ne Farmlan project wou <i>Cal Plan 202</i> <i>Conservatio</i> not zoned f in the City we no impa- red.

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
d. Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes		
2d. Response: (Source: GIS Map – Forest Data)						
No Impact. The City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland, therefore no impacts will occur from this project directly, indirectly or cumulatively.						
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				\boxtimes		
2e. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025 FPEIR – Appendix I – Designated Farmland Table, Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone)						
No Impact. The proposed project would be constructed within the existing undeveloped vacant site. The subject site is designated "Urban and Built-Up Land" by the DOC Farmland Mapping and Monitoring Program and as depicted in Figure OS-2, Agricultural Suitability, in the City's General Plan 2025. The project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. The City of Riverside has no forest land that can support 10-percent native tree cover. Therefore, no impacts would occur from this project directly, indirectly, or cumulatively related to conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No mitigation is required.						
3. AIR QUALITY.						
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:						
a. Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes			
3a. Response: (Sources: Air Quality and Greenhouse Gas Analysis (Appendix A); General Plan 2025, LU – 141 Land Use, SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy)						
Less Than Significant Impact. The project site is located in the jurisdiction of the South Coast Air Quality Management District (SC the non-desert portions of Los Angeles, Riverside, and San Bernardin Association of Governments (SCAG) are responsible for formulatin	e South Coas AQMD). The o Counties. T g and implem	t Air Basin (1 Basin include he SCAQMD henting the Air	Basin), which all of Orang and the South Quality Man	is under the e County and ern California agement Plar		

(AQMP), which has a 20-year horizon for the Basin. The SCAQMD and SCAG must update the AQMP every three years. The current regional air quality plan is the Final 2016 AQMP adopted by the SCAQMD on March 10, 2017. The Final 2016 AQMP proposes policies and measures currently contemplated by responsible agencies to achieve federal standards for healthful air quality in the Basin and those portions of the Salton Sea Air Basin that are under SCAQMD jurisdiction. This Final Plan also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. This Final Plan builds upon the approaches taken in the 2012 AQMP for the Basin for the attainment of the Federal ozone air quality standard.¹ The Basin is currently a federal and State nonattainment area for particulate matter less than 10 microns in size (PM₁₀), particulate matter less than 2.5 microns in size (PM_{2.5}), and ozone.

The Final 2016 AQMP proposes attainment demonstration of the federal $PM_{2.5}$ standards through a more focused control of sulfur oxides (SOx), directly-emitted $PM_{2.5}$, nitrogen oxides (NOx), and volatile organic compounds (VOC). Consistency with the AQMP for the Basin means that a project would be consistent with the goals, objectives, and assumptions in the respective plan to achieve the Federal and State air quality standards. For a project to be consistent with the AQMP adopted

¹ *Final 2013 Air Quality Management Plan,* South Coast Air Quality Management District, February 2014.

P18-0020 (RZ),

P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

by the SCAQMD, the pollutants emitted from the project should not exceed the SCAQMD daily threshold or cause a significant impact on air quality, or the project must already have been included in the AQMP projections. However, if feasible mitigation measures are implemented and shown to reduce the impact level from significant to less than significant, a project may be deemed consistent with the AQMP. The AQMP uses the assumptions and projections of local planning agencies to determine control strategies for regional compliance status. Since the AQMP is based on the local General Plan, projects that are deemed consistent with the General Plan are found to be consistent with the AQMP.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. The proposed project includes an application to apply the MH – Mobile Home Park Overlay to the project site, which would permit an increase in dwelling units per acre from up to 6.2 currently permitted under the base zone of R-1-7000 – Single Family Residential Zone to up to 10 dwelling units per acre. However, the proposed project would be developed at an overall density of approximately 7.7 dwelling units per acre. As detailed in Table LU-5 of the General Plan, both the R-1-7000 – Single Family Residential Zone and MH – Mobile Home Park Overlay are consistent with the MDR – Medium Density Residential General Plan designation. The City's General Plan and the AQMP assumed the current MDR - Medium Density Residential designation with a maximum density of 6.2 dwelling units per acre in its air quality estimates. The emissions associated with the proposed project at 7.7 dwelling units per acre were not included in the City's land use projections; therefore, the AQMP also does not anticipate emissions from the proposed project's slightly more intensive land uses based on dwelling units per acre.

Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD *CEQA Air Quality Handbook*, consistency for project development proposals that differ from the land use designation assumed within the Basin's 2016 AQMP is affirmed when a project: (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation; and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented below:

- 1. The project would result in short-term construction and long-term pollutant emissions that are less than the CEQA significance emissions thresholds established by the SCAQMD, as demonstrated in Checklist Response 3b below; therefore, the project would not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.
- The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant.

The projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) regarding population, housing, and growth trends. The project is in an urbanized area and would not induce substantial population growth, as the addition of 99 single-family manufactured housing units represents less than 0.08 percent of the projected 127,692 housing units anticipated by 2025 in the City's General Plan. Based on the household size of 2.86 persons per unit for manufactured housing units used in the CalEEMod v2016.3.2, the proposed project could increase the City's population by approximately 283 persons. According to the 2016 RTP/SCS, the forecast population for the County of Riverside Subregion in 2040 is approximately 3,167,584 persons. In 2015, the County of Riverside Subregion was reported to have a population of approximately 2,316,438 persons. Therefore, the forecast population for the County of Riverside subregion will grow by approximately 851,146 persons between 2015 and 2040. Based on an anticipated increase of 283 persons, project residents would account for 0.033 percent of the population growth forecast by SCAG in the County of Riverside subregion between 2015 and 2040.

SCAG foresees that population will increase in the City and region over the next 25 years, and the anticipated rate of population growth in the City (2.4 percent) is roughly similar to that of Riverside County (2.0 percent) and the SCAG region (2.5 percent) for the same period. Because the project site has been designated for residential uses by the City, the proposed increase in population by approximately 283 persons has been anticipated and planned for in the City's General Plan. Furthermore, as discussed in Checklist Response 3b, below, the project-specific short-term construction and long-term pollutant emissions would be less than the emissions thresholds established in the SCAQMD's *CEQA Air Quality Handbook*. Therefore, the project would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation. Through adherence to standard SCAQMD regional rules required for all development activity with

Initial Study, MND, and Appendices

	Mitigation Incorporated						
the Basin that assist in reducing air pollutant emissions, the proposed project would not conflict with or obstruct implementation of the AQMP. Impacts would be less than significant and no mitigation is required.							
		\boxtimes					

3b. Response: (Source: Air Quality and Greenhouse Gas Analysis (Appendix A); CEQA Air Quality Handbook, South Coast Air Quality Management District (SCAQMD), April 1993; Traffic Impact Analysis (Appendix G))

Less Than Significant Impact. The proposed project would generate pollutant emissions associated with construction activities, vehicle trip generation, power and gas consumption, and stationary activities. However, as a matter of regulatory policy, the proposed project would comply with pertinent SCAQMD rules, California Code of Regulations (CCR), and California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations. Specific criteria for determining whether the potential air quality impacts of a project are significant are set forth in the SCAQMD's *CEQA Air Quality Handbook* (April 1993). The criteria include emission thresholds and compliance with State and national air quality standards. Through compliance with existing regulations developed to reduce emissions of criteria pollutants, the project would not exceed SCAQMD significance thresholds.

Short-Term (Construction) Emissions. Air quality impacts could occur during construction of the proposed project from demolition activities, site preparation, soil disturbance, building construction, architectural coating, paving, and emissions from equipment exhaust. Major sources of emissions during grading and site preparation include: (1) exhaust emissions from construction vehicles; (2) equipment and fugitive dust generated by construction vehicles and equipment traveling over exposed surfaces; and (3) soil disturbances from grading and backfilling. The following summarizes construction emissions and associated impacts of the proposed project.

Equipment Exhaust and Related Construction Activities. Construction activities produce combustion emissions from various sources (e.g., site preparation, grading, utility engines, tenant improvements, and motor vehicles transporting the construction crew). Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. The use of construction equipment on site would result in localized exhaust emissions. Construction emissions were calculated using the California Emissions Estimator Model (CalEEMod Version 2016.3.1) and are summarized in Table 3.A.

The proposed project is required to comply with SCAQMD Rules 402 and 403, applicable California Code of Regulations, and CalRecycle Sustainable (Green) Building Program regulations, which include implementation of standard control measures for fugitive dust and construction equipment emissions. Pursuant to Title 13, Section 2449(d)(d) of the California Code of Regulations, operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) are required to limit vehicle idling to five minutes or less. Additionally, at least 50 percent of all construction materials (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) shall be recycled/reused and "green building materials" (e.g., those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way) shall be used for at least 10 percent of the project in accordance with California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations, and CalRecycle Sustainable (Green) Building Program regulations, and CalRecycle Sustainable (Green) Building Program regulations, construction vehicle and equipment emissions would not exceed any of the SCAQMD-established daily emissions thresholds.

Fugitive Dust. Fugitive dust emissions are generally associated with land clearing and exposure of soils to the air and wind, as well as cut-and-fill grading operations. Dust generated during construction varies substantially on a project-by-project basis, depending on the level of activity, the specific operations, and weather conditions at the time of construction. The proposed project will be required to comply with SCAQMD Rules 402 and 403 to control fugitive dust, which shall be controlled with best-available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, dust suppression techniques shall be implemented to prevent fugitive dust from creating a nuisance off site. Table 3.A lists total construction emissions (i.e., fugitive dust emissions and construction equipment exhausts). Since construction operations on site must comply with dust control and other measures

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

prescribed by SCAQMD Rules 402 and 403 to ensure that short-term construction impacts are minimized, compliance with these rules is assumed in Table 3.A, which demonstrates construction of the project would not exceed any of the SCAQMD thresholds regarding fugitive dust.

Table 3.A: Short-Term Regional Construction Emissions

	Total Regional Pollutant Emissions (lbs/day)							
Construction Phase	VOC	NOx	со	SOx	Fugitive PM ₁₀	Exhaust PM ₁₀	Fugitive PM _{2.5}	Exhaust PM _{2.5}
Site Preparation	4.43	45.64	22.86	0.04	7.25	0.71	3.93	0.71
Grading	4.85	54.59	34.27	0.06	2.75	1.00	1.37	1.00
Building Construction	3.04	24.30	22.50	0.05	1.37	0.73	0.37	0.73
Paving	1.80	15.30	15.33	0.02	0.17	0.50	0.04	0.50
Architectural Coating	38.77	1.91	2.82	0.01	0.25	0.13	0.07	0.13
Maximum daily emissions	38.77	54.59	37.83	0.07	7.	96	4.	64
SCAQMD Pollutant Thresholds	75	100	550	150	15	50	5	55
Threshold exceeded?	No	No	No	No	N	lo	Ν	lo

Source: Table I, Air Quality and Greenhouse Gas Analysis (Appendix A)

Notes: These estimates reflect control of fugitive dust required by SCAQMD Rules 402 and 403, Title 13-Section 2449(d)(d) of the California Code of Regulations, and CalRecycle Sustainable (Green) Building Program regulations.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

CO = carbon monoxide lbs/day = pounds per day NOx = nitrogen oxides

 $PM_{2.5}$ = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size SCAQMD = South Coast Air Quality Management District SOx = sulfur dioxide VOC = volatile organic compounds

Architectural Coatings. Architectural coatings contain volatile organic compounds (VOC) that are similar to reactive organic compounds (ROC) and are part of the ozone (O₃) precursors. Based on the proposed project, application of the architectural coatings, in conjunction with site preparation, grading, building construction, and paving, for the proposed peak construction day is estimated to result in a combined peak of 38.77 lbs/day of VOC, as detailed in Table 3.A. This VOC emission would not exceed the SCAQMD VOC threshold of 75 lbs/day.

Localized Impacts Analysis (Construction). Localized Significance Thresholds (LSTs) are developed based upon the size or total area of the emissions source from the construction equipment activities, the ambient air quality levels in each source receptor area (SRA) in which the emission source is located, and the distance to the sensitive receptor. LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each SRA. For the proposed project, the appropriate SRA for the LST is SRA 23 (Metropolitan Riverside).

The LST methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to construct new data points within the range of the values given or distances measured in order to determine the thresholds. If receptors are within 25 meters of the site, the methodology document says that the threshold for the 25-meter distance should be used.

Local pollutant concentrations are initially addressed using the SCAQMD LST look-up table methodology. The maximum daily disturbed acreage is assumed to be approximately 12.87 acres. In order to determine the applicability of the SCAQMD's LST look-up tables for the minor amount of construction activities and the small amount of equipment utilized, the look-up table for the 5-acre LST threshold is considered sufficient for the manufactured home residential land uses.² The

² SCAQMD recommends using the LST mass rate look-up tables only for projects that would have the equivalent construction and operational emission source activities. Based on the land use size comparison data listed under Table 2.1-Land Use Size Comparisons in Appendix D of the CalEEMod

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

nearest sensitive receptors in proximity to the project site are residential uses located approximately 12.5 feet from the project site's eastern property line. Per the SCAQMD LST guidance, for receptors less than 82 feet (25 meters) away, LST screening thresholds at 82 feet (25 meters) are used as the SCAQMD-recommended LST thresholds. Table 3.B identifies the on-site construction emissions of CO, NOx, PM₁₀, and PM_{2.5} and demonstrates that all concentrations of pollutants would be below the SCAQMD thresholds of significance.

Table 3.B: Construction Localized Significance Threshold Impacts

Emissions Sources	NOx	CO	\mathbf{PM}_{10}	PM _{2.5}
Maximum On-site Emissions (lbs/day)	55	33	7.8	4.6
LST Thresholds (5-Acre Site)	270	1,577	13	8
Threshold exceeded?	No	No	No	No

Source: Table J, Air Quality and Greenhouse Gas Analysis (Appendix A)

Source Receptor Area: Metropolitan Riverside County Area; 5 acres; Receptors at 25 meter (82 feet) distance.

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

Long-Term Project Operational Emissions. Long-term air pollutant emission impacts are those associated with stationary sources and mobile sources involving any project-related changes. The proposed project would result in area-, energy-, and mobile-source emissions. The stationary-source emissions would come from many sources, including the use of consumer products, landscape equipment, general energy, and solid waste.

As part of the *Air Quality and Greenhouse Gas Analysis* (Appendix A), long-term operational emissions associated with the existing site and the proposed project were calculated using CalEEMod Version 2016.3.1 and are shown in Table 3.C. Area sources include architectural coatings, consumer products, hearths, and landscaping. Energy sources include natural gas consumption for heating and cooking. Mobile-source emissions usually result from vehicle trips associated with a project. Table 3.C reveals the increase of all criteria pollutants as a result of the proposed project would not exceed the corresponding SCAQMD daily emission thresholds for any criteria pollutants.

Pollutant Emissions, lbs/day Source VOC NOx CO SOx **PM**₁₀ PM_{2.5} 8.88 < 0.01 Area 3.02 1.62 0.16 0.16 0.07 0.60 0.26 < 0.01 0.05 0.05 Energy 1.09 7.80 13.10 0.05 3.65 1.01 Mobile **Total Project Emissions** 4.17 10.02 22.24 0.05 3.87 1.22 **SCAOMD** Thresholds 55 55 550 150 150 55 **Threshold exceeded?** No No No No No No

Table 3.C: Opening Year Regional Operational Emissions

Source: Table K, *Air Quality and Greenhouse Gas Analysis* (Appendix A)

Notes: These estimates reflect compliance with Title 24, Energy Conservation and Green Building Standards

The values provided are the maximum summer or winter daily emissions results from CalEEMod.

CO = carbon monoxide	
lbs/day = nounds ner day	

NOx = nitrogen oxides

 $PM_{2.5}$ = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size SCAQMD = South Coast Air Quality Management District SOx = sulfur oxides VOC = volatile organic compounds

The project would be designed in accordance with Title 24, Energy Conservation and Green Building Standards, as established by the California Energy Commission (CEC). Pursuant to this regulation, the project would include low-emission water heaters,

Model User Guide, the estimated size of the emission sources for the SCAQMD's estimated 5-acre project area is equivalent to an approximately 218,000-square foot general office park, which would generate an average of 2,490 vehicle trips per day. The proposed project is expected to generate an average of 494 trips per day, so utilizing the look-up table for a 5-acre LST threshold is conservative and would represent a "worst-case" scenario.

P18-0020 (RZ), P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

and exterior windows that have window treatments for efficient energy conservation to reduce operational air pollutant emissions. Therefore, through compliance with Title 24, Energy Conservation and Green Building Standards, operation of the project would not exceed any of the SCAQMD thresholds for criteria pollutants.

Localized Impacts Analysis (Operation). Table 3.D details the calculated emissions for the proposed operational activities compared with the appropriate LSTs. By design, the localized impacts analysis only includes on-site sources; however, CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. The emissions shown in Table 3.D include all on-site project-related area sources. Because on-site mobile source emissions are limited by trip length, an average on-site trip length of 1,000 feet was identified. This distance is a fraction of the trip lengths assumed in the CalEEMod; therefore, the LST analysis uses only a percentage of new project-related mobile sources.³ Table 3.D demonstrates the operational emission rates would not exceed the NOx, CO, PM_{10} , and $PM_{2.5}$ LSTs for the existing sensitive receptors (adjacent residential uses) located within the 82-foot minimum distance for LST analyses. Therefore, locally significant air quality impacts would be less than significant, and no mitigation is required.

Table 3.D: Long-Term Operational Localized Significance Thresholds

Emissions Sources	NOx	СО	PM ₁₀	PM _{2.5}
Maximum On-site Emissions (lbs/day)	1.7	9.0	0.20	0.17
LST Thresholds (5-Acre Site)	270	1,577	4	2
Threshold exceeded?	No	No	No	No

NOx = nitrogen oxides

Source: Table L, Air Quality and Greenhouse Gas Analysis (Appendix A)

Source Receptor Area: Metropolitan Riverside County Area; 5 acres; Receptors at 25 meter (82 feet) distance; On-site traffic 4 percent of total.

CO = carbon monoxide

lbs/day = pounds per day LST = localized significance thresholds $PM_{2.5}$ = particulate matter less than 2.5 microns in size PM_{10} = particulate matter less than 10 microns in size

Long-Term Microscale (CO Hotspot) Analysis. Local ambient air quality is most affected by CO emissions from motor vehicles. CO is typically the contaminant of greatest concern because it is the pollutant created in greatest abundance by motor vehicles and does not readily disperse into the air. Because CO does not readily disperse into the atmosphere, areas of vehicle congestion create pockets of high CO concentrations called "hotspots." These pockets have the potential to exceed the State 1-hour standard of 20 parts per million (ppm) of CO and/or the 8-hour standard of 9.0 ppm.

The proposed project is expected to contribute an average of 494 vehicle trips per day to local roadways and intersections. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

The SCAQMD, together with the California Air Resources Board (ARB), maintains ambient air quality monitoring stations in the Basin. The air quality monitoring station that monitors criteria air pollutant data closest to the project site is the Riverside-Rubidoux Station located at 5888 Mission Boulevard, approximately 3.8 miles southwest of the project site. The air quality trends from this station are used to represent the ambient air quality in the project area. Ambient CO levels monitored at the Riverside-Rubidoux Station showed a highest recorded 1-hour concentration of 4.1 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 2.0 ppm (the State standard is 9 ppm) during the past 3 years. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

As described in the project-specific *Traffic Impact Analysis* (TIA) (Appendix G), all study area intersections currently operate at a satisfactory level of service (LOS). With addition of the project in the project area with recommended improvements, all study area intersections would continue to operate at satisfactory LOS.

³ Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California Air Districts to account for local requirements and conditions. The average round trip lengths assumed in the CalEEMod are 14.70 miles for home-work, 5.90 miles for home-shop, and 8.70 miles for home-other types of trips. It is unlikely that the average on-site distance driven will be even 1,000 feet, which is approximately 2 percent of the total miles traveled. Considering the total trip length included in the CalEEMod, the 4 percent assumption is a conservative estimate. Even using this estimate, operational LST impacts do not exceed established thresholds.

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

CO levels have dropped dramatically throughout the Basin over the last several decades. The entire Basin is in attainment for the State standards for CO. The Basin is designated as an attainment area under the State CO standards and as an attainment/ maintenance area under the federal CO standards. Baseline levels can accommodate substantial local emission increases without the creation of any CO "hotspots." It has been demonstrated in the regional CO attainment/maintenance plan that even the most congested intersection with the highest traffic volumes anywhere in the Basin no longer poses any risk of a CO "hotspot." Given the extremely low level of CO concentrations in the project vicinity and the mitigation of traffic impacts at all study area intersections, project-related vehicles are not expected to contribute significantly to CO concentrations exceeding the State or federal CO standards.

As stated previously, the proposed project is required to comply with SCAQMD Rules 402 and 403, applicable California Code of Regulations, the CalRecycle Sustainable (Green) Building Program, and Title 24-Energy Conservation and Green Building Standards, which include implementation of standard control measures for fugitive dust and construction equipment emissions, as well as energy-efficient building design and construction for energy conservation. Tables 3.A through 3.D demonstrate that, with compliance with applicable regulatory policy designed to reduce emissions, the proposed project would not exceed any SCAQMD threshold during construction or operation. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant and no mitigation is required.

3c. Response: (Source: Air Quality and Greenhouse Gas Analysis (Appendix A), Traffic Impact Analysis (Appendix G))

Less Than Significant Impact. The cumulative impacts analysis is based on projections in the regional AQMP. The existing General Plan land use designation of the site (MDR – Medium Density Residential) allows the development and operation of single-family homes, town houses, and row houses up to a maximum of 6.2 dwelling units per acre. The proposed project would develop single-family manufactured homes at approximately 7.7 dwelling units per acre. However, as detailed in Checklist Response 3a, above, the proposed project is consistent with the overall growth projections of the General Plan and would not conflict with or obstruct implementation of the regional AQMP.

No single project is sufficient in size to, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which a project's individual emissions would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also have a cumulatively considerable contribution to a significant cumulative impact. As described in Checklist Response 3b, the proposed project's operational emissions would not exceed air quality emissions thresholds. Therefore, the proposed project would not result in a cumulatively considerable contribution to significant air quality impacts. Long-term cumulative air quality impacts would be less than significant. No mitigation is required.

d.	Expose	sensitive	receptors	to	substantial	pollutant		\times	
	concentr	ations?							

3d. Response: (Source: Air Quality and Greenhouse Gas Analysis (Appendix A))

Less Than Significant Impact. The SCAQMD recommends the evaluation of localized NOx, CO, PM_{10} , and $PM_{2.5}$ concentration-related impacts to sensitive receptors in the immediate vicinity of the project site. Sensitive receptors include but are not limited to residential land uses, schools, open space and parks, recreational facilities, hospitals, resident care facilities, daycare facilities, or other facilities that may house individuals with health conditions that would be affected by poor air quality.

The project site is surrounded primarily by single-family homes. The nearest residential use east of the project site is located within 10 feet of the property line. Per the SCAQMD LST guidance, for receptors less than 82 feet (25 meters) away, LST

P18-0020 (RZ), P18-0022 (CUP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

screening thresholds at 82 feet (25 meters) are used as the SCAQMD-recommended LST thresholds. Table 3.B presented in Checklist Response 3b, above, identifies the on-site construction emissions of CO, NOx, PM₁₀, and PM_{2.5} and demonstrates that all concentrations of pollutants would be below the SCAQMD thresholds of significance. Table 3.D presented in Response 3b, above, details the calculated emissions for the proposed operational activities compared with the appropriate LSTs. Table 3.D demonstrates the operational emission rates would not exceed the NOx, CO, PM₁₀, and PM_{2.5} LSTs for the existing sensitive receptors located within the 82-foot minimum distance for LST analyses. Therefore, both short-term (i.e., construction) and long-term (i.e., operational) LST air quality impacts would be less than significant. No mitigation is required.

|--|

3e. Response: (Source: Air Quality and Greenhouse Gas Analysis (Appendix A))

Less Than Significant Impact. Equipment exhaust from heavy-duty equipment, the application of architectural coatings, and the installation of asphalt surfaces may create odors in the project vicinity during construction of the project. These construction activities are of a temporary duration and would not occur after completion of construction. The project would be required to comply with SCAQMD Rule 1113 standards for paint applications and Rule 1108 standards regarding the application of asphalt as a matter of regulatory policy.

Land uses generally associated with long-term (i.e., operational) objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and/or various heavy industrial uses. The proposed project does not propose any such uses or activities that would result in a potentially significant operational-source odor impact. Potential sources of project-generated operational odors include disposal of miscellaneous domestic refuse. Consistent with City requirements, all project-generated refuse would be stored in covered containers and removed at regular intervals in accordance with solid waste regulations, thereby precluding substantial generation of odors which could result from temporary holding of refuse on site. Additionally, the proposed project would be required to comply with SCAQMD Rule 402, which regulates nuisance odors.

Through compliance with SCAQMD Rule 1108, 1113, and 402, the project would not involve any substantial short-term or long-term sources of odors. Impacts are considered less than significant and no mitigation is required.

4.	BIOLOGICAL RESOURCES. Would the project:		
	a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		

4a. Response: (Source: General Plan 2025 – Figure OS-6 – Stephens' Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 – MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, Riverside County Integrated Project Conservation Summary Report Generator, Biological Resources Assessment and MSHCP Consistency Analysis and Habitat Assessment for the Center Park Residential Project (Appendix B1), Jurisdictional Delineation Report for the Center Park Residential Project (Appendix B3), Results of Burrowing Owl Survey for the Center Park Manufactured Home Residential Project (Appendix B2))

Less Than Significant With Mitigation Incorporated. The project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Cities of Riverside and Norco Area Plan. The project is not located in a criteria cell and is not adjacent to Public/Quasi-Public or Conservation Land. A search of the MSHCP database identified

P18-0020 (RZ)

Initial Study, MND, and Appendices P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

the northwest portion of the project site to be within the MSHCP survey area for burrowing owl (*Athene cunicularia*), as well as Narrow Endemic Plant Species Survey Area (NEPSSA) 7, within which three plant species, San Diego ambrosia (*Ambrosia pumila*), Brand's phacelia (*Phacelia stellaris*), and San Miguel savory (*Satureja chandleri*), are listed for consideration. Vegetation communities occurring along the intermittent stream within the project site were inspected for suitability to support listed species associated with riparian, riverine, aquatic, or vernal pools areas. Species of concern with potential to occur on the site are least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*).

Existing On-site Vegetation and Wildlife. Habitat assessments and focused surveys were conducted by LSA on August 18, 22, and 23, 2017. Historical aerial imagery shows this field has been regularly disced or plowed, which has prevented any rare or native vegetation from establishing. Plant debris identified from the plowed cuttings includes short pod mustard (*Hirschfeldia incana*), cheeseweed mallow (*Malva parviflora*), and tree of heaven (*Ailanthus altissima*). Vegetation present is best classified as ruderal and occurs as scattered individuals. This vegetation is denser along the boundaries of the site, which have been less disturbed by weed abatement and previous land use activities.

The south side of the project site includes a drainage feature containing a mix of ornamental and native shrub and tree species. Dominant species include Goodding's willow (*Salix gooddingii*) and velvet ash (*Fraxinus velutina*) with mule fat (*Baccharis salicifolia*) and castor bean (*Ricinus communis*). Mexican fan palms (Washingtonia robusta) were located in the upper drainage. Vegetation within approximately 0.03 acre of disturbed wetlands includes cattails (*Typha* sp.), bindweed (*Convolvulus althaeoides*), and Johnson grass (*Sorghum halepense*.) The wetland area with cattail understory occurs within standing water or moist soils approximately 174 feet below Viola Street. The upper reaches of the drainage contain approximately 0.40 acre of *Salix gooddingii* Alliance (Black Willow Thicket) and *Baccharis salicifolia* Alliance (Mule Fat Thicket) vegetation communities. The remainder of the stream is a dry, eroded barren channel along 904 linear feet vegetated by upland ornamental species.

Common wildlife species observed within the project site during the field survey include California ground squirrel (*Spermophilus beecheyi*), cottontail rabbit (*Sylvilagus audubonii*), western fence lizard (*Sceloporus occidentalis*) and mourning dove (*Zenaida macroura*). The lack of non-native and native vegetation would result in a less than ideal habitat for wildlife. A few burrows occur under tree stumps and at the base of the trees. Three dirt mounds also have numerous squirrel burrows within the household trash, tree debris, and concrete rubble. Squirrel burrows can support nesting burrowing owls; however, in a 2017 burrowing owl survey no owls were observed on site. Two domestic dogs were observed living with the occupant of an unauthorized encampment during the field survey.

Critical Habitats. No federally designated critical habitats occur within the project area. Coastal California gnatcatcher critical habitat is designated within 0.25 mile north of the project site, but is separated from the area by development. The project site lacks suitable habitat for the coastal California gnatcatcher. The project site is located within one mile of designated critical habitat for southwestern willow flycatcher, federally/State listed as endangered. The project site does not currently support riparian forest habitat essential to this species. The project area is located less than one mile from designated Critical Habitat for Santa Ana sucker (*Catostomus santaanae*), federally listed as endangered. The project site does not harbor the constituent elements (e.g., habitat, stream flow, connectivity, consistent hydrologic connection) to support these species; therefore, the site was not included in any such Critical Habitat designation. Furthermore, these species were not identified during on-site biological surveys; therefore, the project would have no significant direct, indirect, or cumulative impact to federally designated critical habitats.

Nesting Birds. The trees and shrubs that occur on site may support nests utilized by birds protected under the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code (Sections 3503, 3503.5, and 3515). The project may have direct and indirect effects to migratory birds. Direct effects may result from the removal and destruction of nesting bird habitat (e.g., trees and shrubs), and indirect effects may result from increased noise and human presence during construction activities that may cause birds to abandon nests or that may negatively affect nestlings. Therefore, the potential exists for direct and indirect construction-related disturbance for nesting birds. Mitigation Measure BIO-1 requires that a nesting bird survey be conducted prior to any ground-disturbing or demolition activities.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

Riparian/Riverine Habitat. The south side of the project site includes an intermittent drainage. The Santa Ana River is located one mile west of the project site. Runoff conveyed through the intermittent stream channel on the southern portion of the project site is discharged off site and into a culvert that directs runoff under Orange Street and discharges into a concrete-lined channel as concentrated flow on the western side of Orange Street where it discharges into a vacant field. Although no drainage or ordinary high water mark (OHWM) were visible in the vacant field downstream, historical imagery indicates that flows have potential to sheet flow intermittently across the vacant field to the concrete channel to the southwest along Garner Road and drain into Lake Evans, the Santa Ana River, and eventually the Pacific Ocean.

Special Interest Plants and Wildlife Species. Based on literature review, some special-interest species, including federal/ State listed species, are known to occur in the region. The species records provided by the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS) detail observations of Santa Ana sucker and least Bell's vireo in the Santa Ana River. Without contiguous suitable habitats or permanent hydrologic connectivity (Figure 1), there is no opportunity for these two species to occur on the project site. These species are also unlikely to occur on site because the project site is in an upland setting without any natural connectivity to the river, there is a lack of aquatic habitat, and there is very limited and isolated willow scrub/mixed ornamental riparian habitat on the project site. There would be no direct, indirect, or cumulative impact related to least Bell's vireo and Santa Ana sucker.

Based on field surveys of the project site, there is no suitable habitat present on the project site for special-interest plant and animal species known to have occurred in this region of Riverside and San Bernardino Counties. Refer to Appendix B1 for tables listing plant and animal species of special concern known to occur in the region. The limited amount of standing water and the small size of quality stands of native riparian vegetation with native understory and an active stream is not sufficient to support breeding of the silvery legless lizard (*Anniella pulchura pulchura*), two-striped garter snake (*Thamnophis hammondii*), least Bell's vireo, yellow-breasted chat (*Icteria virens*), or yellow warbler (*Setophaga petechia*). Therefore, the proposed project will have no significant impact either directly, indirectly, or cumulatively on the listed special interest wildlife species.

NEPSSA Plant Species. The project site does not provide suitable habitat conditions for the three target NEPSSA plant species identified in the MSHCP due to historic agricultural land use disturbances and lack of suitable soil characteristics. The three NEPSSA plant species require suitable sandy, clayey, or volcanic soils occurring in native coastal sage scrub and chaparral habitats. These conditions do not occur in the region or on the project site. As a result, focused surveys are not required for these plant species, and they are considered absent from the project site. Listed plant species associated with the Santa Ana River, such as the Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*), would not occur on site due to lack of suitable fluvial processes, lack of sandy soils, and the absence of riverine and floodplain habitat. The likelihood of occurrences for additional plant species of special interest is detailed in Appendix B1. The site is not suitable for narrow endemic species due to lack of suitable soil characteristics and current site disturbances. Therefore, the proposed project will have no significant impact either directly, indirectly, or cumulatively on NEPSSA plant species.

Burrowing Owl. The project site is located within the MSHCP Survey Area for burrowing owl. Moderately suitable habitat for the burrowing owl is present within the non-native grassland portions of the project site. Many ground squirrel burrows were also observed, which could provide suitable nesting habitat. A burrowing owl habitat assessment and burrow survey was conducted on August 23, 2017. The results were negative for owls, owl sign, and/or evidence of previously occupied burrows (Appendix B2). Distribution power lines on the north and east perimeter, as well as several scattered ornamental trees, provide potential perches for avian predators, thus deterring burrowing owl from using the site. Per the MSHCP 30-day Pre-Construction Burrowing Owl Survey Guidelines (revised August 17, 2006), an additional pre-construction survey for burrowing owl is required within 30 days prior to beginning of site grading to determine if site conditions change (e.g., establishment of ground squirrel burrows) and result in suitable habitat for burrowing owl. Mitigation Measure BIO-2 requires pre-construction burrowing owl surveys prior to any ground-disturbing activities.

Other Listed Animal Species. The Delhi sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*), federally listed as endangered, has been recorded (CNDDB) throughout the region. The Delhi sands flower-loving fly is restricted to Delhi series sands in western Riverside and San Bernardino Counties. No Delhi series sands occur within the study area; therefore, the project area is not suitable to support Delhi sands flower-loving fly. There are several records within one mile of the

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

Initial Study, MND, and Appendices

INFORMATION SOURCES): Significant Impact Significant Impact Significant Impact Impact Impact Impact Impact Impact Impact Impact project for San Bernardino kangaroo rat (Dipodomys merriami parvus; SBKR), a federally endangered species. SBKI habitat consists of alluvial serul or Riversidean sage serul vegetation. The project site does not contain suitable vegetation communities or soils; therefore, SBKR are considered absent from the project site. Mitigation Measures. In accordance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Cod (Sections 3503, 3503, 5, and 3515), a nesting bird survey must be conducted for five consecutive days no more tha three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbe by on-site activities. Any such survey(s) shall be conducted by qualified biologist. If na citive nests are found, no additional actions related to this measure are required. If activi nests are found, the nest locations shall be mapped by the biologist. The nesting bird speciec shall be domined by a qualified biologist and confirmed by the biologist in the conducted by a pualified biologist and be identified by a qualified biologist and confirmed by the biologist in the utiffer shall be ounstruction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas doring the August 2017 survey. Because the burrowing owl is norbit species areas doring the August 2017 survey. Because the burrowing owl is unoble species areas found in the resurve of suctions survey does not result in duving wells weredived within	ISSUES (AND SUP	PORTING	Potentially	Less Than	Less Than	No
Mitigation Mitigation project for San Bernardino kangaroo rat (Dipodomys merriami parvus; SBKR), a federally endangered species. SBKI habitat consists of alluvial scrub or Riversidean sage scrub vegetation. The project site does not contain suitable vegetatio communities or soils; therefore, SBKR are considered absent from the project site. Mitigation Measures. In accordance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Cod (Sections 3503, 5503, 5 and 3515), a nesting bird survey must be conducted prior to any ground-disturbing, as detailed i Mitigation Measures BIO-1 and BIO-2: Mitigation Measure BIO-1 If grading or construction activities are planned during the bird nesting season (February 1 the August 31), a nesting bird survey shall be conducted for five consecutive days no more that three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbe by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. The nests are found, the nest locations shall be biologist. The nest: The burger shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surroundin habitat, an o-disturbance buffer shall be established around each active nest. The buffer shall be identified up to 280 fect. Ni construction supervisor that activities may resume. Mitigation Measure BIO-2: No torrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conducted by a qualified biologist and confirmed by the City; on -apa	INFORMATION S	OURCES):	Significant	With	Significant	Impact
Incorporated I			puee	Mitigation	Imputt	
project for San Bernardino kangaroo rat (Dipotonys merriani parws: SBKR), a tederally endangered species. SBKR are considered absent from the project site does not contain suitable vegetation communities or soils; therefore, SBKR are considered absent from the project site. Mitigation Measures. In accordance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Cod (Sections 3503, 3503, 5, and 3515), a nesting bird survey must be conducted prior to any ground-disturbing, as detailed i Mitigation Measure BIO-1 if grading or construction activities are planned during the bird nesting season (February 1 to August 31), a nesting bird survey shall be conducted for five consecutive days no more that three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbe by on-site activities. Any such survey(s) shall be conducted to this measure are required. If activ nests are found, the nest locations related to this measure are required. If a ctiv nests are found, the nest locations shall be mapped by the biologist. If no active nests are found, the degree feasible, the nesting stage (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surroundin habitat, a no-disturbance buffer shall be established around each have nest. The buffer shall be identified by a qualified biologist and confirmed by the City: non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. No construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas during the August 217 survey. Because the burrowing owl surve Giudelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Supervisor to beginning of site grading, eer the M		1	(DVD)	Incorporated	1 1	· ODVI
Mitigation Measures In accordance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Cod (Sections 3503, 3503.5, and 3515), a nesting bird survey must be conducted prior to any ground-disturbing, as detailed i Mitigation Measures BIO-1 and BIO-2: Mitigation Measure BIO-1: If grading or construction activities are planned during the bird nesting season (February 1 the August 31), a nesting bird survey shall be conducted for five consecutive days no more that three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbed by on site activities. Any such survey(s) shall be conducted by a qualified biologist. If n active nests are found, no additional actions related to this measure are required. If active nests are found, the nest locations shall be mapped by the biologist. The nesting bird species shall be documented and, to the degree feasible, the nesting state (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surrounding habitat, an o-disturbance buffer shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by hurrowing owls were detected on the project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species as distic conditions may change, a pre-construction survey would be required with 30 days prior to he synowing owls are found to be present at that time, the California Department of Fish and Wildlife, (CDPW), United State Fish and Wildlife Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified with three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protect	project for San Bernardino	kangaroo rat (<i>Dipodomys merriami pa</i>	<i>rvus;</i> SBKR) n. The project	, a federally	endangered sp	ble vegetation
Mitigation Measures. In accordance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Cod (Sections 3503, 3503, 5, and 3515), a nesting bird survey must be conducted prior to any ground-disturbing, as detailed i Mitigation Measures BIO-1 and BIO-2: Mitigation Measure BIO-1: If grading or construction activities are planned during the bird nesting season (February 1 t August 31), a nesting bird survey shall be conducted for five consecutive days no more tha three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbe by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. If n active nests are found, no additional actions related to this measure are required. If active nests are found, no additional actions related to this measure are required. If active nests are found, no real tocations shall be builogist. The nesting bird specie shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surrounding habitat, a no-disturbance buffer shall be established around each active nest. The buffer shall be identified by a qualified biologist and confirmed by the City; non-raptor bird species shall be buffered up to 280 feet, While raptor nests shall be buffered up to 280 feet, While raptor nests shall be buffered up to 280 feet. No construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas during the August 2017 survey. Because the burrowing owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, the California Department of Fish and Wildliff Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within the plan prior to th	communities or soils; therefo	ore, SBKR are considered absent from th	e project site.	t site does not	contain suita	Je vegetation
Mitigation Measure BIO-1: If grading or construction activities are planned during the bird nesting season (February 1 t August 31), a nesting bird survey shall be conducted for five consecutive days no more tha three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbe by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. If n active nests are found, no additional actions related to this measure are required. If activ nests are found, no near fledging) determined. Based on the species present and surroundin habitat, a no-disturbance buffer shall be established around each active nest. The buffer shall be identified by a qualified biologist and confirmed by the City, non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. No construction or ground disturbance activities shall be conducted within the buffer until th biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing owl survey didelines. Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of fish and Wildlife (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified with the agnetices. Relocation and protection plan will developed and approved by all three agencies. Relocation and protection plan will deve	Mitigation Measures. In ac (Sections 3503, 3503.5, and Mitigation Measures BIO-1 a	cordance with the Migratory Bird Treat, 3515), a nesting bird survey must be c and BIO-2:	y Act (MBTA onducted prio) and the Cali r to any grour	fornia Fish an nd-disturbing,	d Game Code as detailed in
August 31, a nesting bird survey shall be conducted to Twe consecutive days no more that three days prior to any ground-disturbing activities, including, but not limited to clearing grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbee by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. If n active nests are found, the nest locations shall be mapped by the biologist. The nesting bird specie shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surroundin habitat, a no-disturbance buffer shall be established around each active nest. The buffer shal be identified by a qualified biologist and confirmed by the City, non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. Ni construction or ground disturbance activities shall be conducted within the buffer until th biologist has determined the nest is no longer active and has informed the City an construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls sumobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Ovl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and protection nanger activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly or through habitat or other sensitive and regulations or by the California Department of Fish and Wil	Mitigation Measure BIO-1	: If grading or construction activities ar	e planned duri	ing the bird ne	esting season (February 1 to
grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbe by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. Th active nests are found, the nest locations shall be mapped by the biologist. The nesting bird specie shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of egg feeding of young, or near fledging) determined. Based on the species present and surroundin, habitat, a no-disturbance buffer shall be established around each active nest. The buffer sha be identified by a qualified biologist and confirmed by the City; non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. No construction or ground disturbance activities shall be conduced within the buffer until th biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildliff Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified with three agencies. Relocation and protection plan will developed and approved by all three agencies. Relocation and protection plan will developed and approved by all duret e agencies. Relocation and protection plan will developed and approved by all duret e agencies. Relocation and protection plan will developed and approved by all durete qietted diverse effect o		August 31), a nesting bird survey sha three days prior to any ground-distu	Il be conducte	ed for five con	secutive days	no more than d to clearing
by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. If n active nests are found, no additional actions related to this measure are required. If active nests are found, the nest locations shall be mapped by the biologist. The nesting bird specie shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surroundin, habitat, a no-disturbance buffer shall be established around each active nest. The buffer shall be either shall be subfrered up to 280 feet, while raptor nests shall be buffered up to 820 feet. N construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing OWl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, the California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified with three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. with implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly on nesting bi		grubbing, and/or rough grading, to en	sure birds pro	otected under t	he MBTA are	not disturbed
active nests are found, no additional actions related to this measure are required. If active nests are found, the nest locations shall be mapped by the biologist. The nesting bird specie shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs feeding of young, or near fledging) determined. Based on the species present and surroundin, habitat, a no-disturbance buffer shall be established around each active nest. The buffer shal be identified by a qualified biologist and confirmed by the City, non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. N construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildliff Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mititigation Measures BIO-1 and BIO-2, the propos		by on-site activities. Any such surve	y(s) shall be	conducted by	a qualified b	iologist. If no
with implementation of Mitigation Measures BIO-1 and BIO-2, the proposed number of Mitigation Authority (CDFW) in Status Stat		active nests are found, no additional	actions relate	ed to this mea	sure are requise The nesting	red. If active
feeding of young, or near fledging) determined. Based on the species present and surroundin habitat, a no-disturbance buffer shall be established around each active nest. The buffer shall be identified by a qualified biologist and confirmed by the City; non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. N construction or ground disturbance activities shall be conducted within the buffer until th biologist has determined the nest is no longer active and has informed the City an construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant inpact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect on any riparian habitat or other sensitive, or special-status species in local or regional pla		shall be documented and, to the degr	ee feasible, the	ne nesting stag	ge (e.g., incub	ation of eggs
habitat, a no-disturbance buffer shall be established around each active nest. The buffer shall be identified by a qualified biologist and confirmed by the City; non-raptor bird species nest shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. N construction or ground disturbance activities shall be conducted within the buffer until th biologist has determined the nest is no longer active and has informed the City an construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection plan will developed and approved by all three days. A burrowing owl relocation and protection plan will developed and approved by all three days. A burrowing owl relocation and protection plan will developed and approved by all three days. A burrowing own relocation and protection plan will developed and approved by all three agencies. Relocation and protection plan will developed and approved by all three agencies. Relocation and protection plan will developed and approved by all three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection plan will developed and approveloud disu pre-construction survey does not result in		feeding of young, or near fledging) de	termined. Bas	sed on the spec	ies present an	d surrounding
be identified by a quartice biologist and commuted by inecrify, indirapho biol species least shall be buffered up to 880 feet, while raptor nests shall be buffered up to 880 feet. N construction or ground disturbance activities shall be conducted within the buffer until th biologist has determined the nest is no longer active and has informed the City an construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve; Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved b all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect on any riparian habitat or other sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community ide		habitat, a no-disturbance buffer shall	be established	around each	active nest. The	e buffer shal
construction or ground disturbance activities shall be conducted within the buffer until th biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve; Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, or any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and re		shall be buffered up to 280 feet. wi	nile raptor ne	sts shall be b	uffered up to	820 feet. No
 biologist has determined the nest is no longer active and has informed the City an construction supervisor that activities may resume. Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve, Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 		construction or ground disturbance a	ctivities shall	be conducted	within the bu	affer until the
Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on th project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within three days. A burrowing owl relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, or any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife Service?<		biologist has determined the nest is	s no longer	active and h	as informed	the City and
Mitigation Measure BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas during the August 2017 survey. Because the burrowing owl is mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, the California Department of Fish and Wildlife, (CDFW), United States Fish and Wildliff Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		Not a supervisor that activities				1 .1
 mobile species and site conditions may change, a pre-construction survey would be require within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Rinarian/Riverine Areas and State States States and Wildlife Service? 	Mitigation Measure BIO-2	: No burrowing owls or features potent project or adjacent areas during the	August 2017	by burrowing survey Beca	g owls were douse the burrow	etected on the wing owl is a
 within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Surve Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Rinarian/Riverine Areas and States and States and States and States States and States and States States and Stat		mobile species and site conditions ma	iy change, a p	pre-constructio	n survey wou	ld be required
 Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, th California Department of Fish and Wildlife, (CDFW), United States Fish and Wildlif Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Rivering Areas and State St		within 30 days prior to beginning of	site grading,	per the MSH	CP Burrowing	g Owl Surve
 Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified withit three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Rinarian/Riverine Areas and section of the sensitive of the sensitive context of the sensi		Guidelines Section 6.3.2. If burrow	ung owls are Wildlife (Cl	e found to be	e present at t I States Fish	hat time, the
three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and species in the specific of t		Service (USFWS), and the Riverside	Conservation	Authority (R	CA) will be n	otified within
all three agencies. Relocation and protection measures shall be completed pursuant to th plan prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		three days. A burrowing owl relocation	on and protect	tion plan will	developed and	l approved by
bill prior to the start of ground disturbance activities. No further action is required if the 30 day pre-construction survey does not result in burrowing owl sign or observations. With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and section of the sec		all three agencies. Relocation and p	otection mea	sures shall be	completed pu	irsuant to the
With implementation of Mitigation Measures BIO-1 and BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nesting birds and/or burrowing owls. The project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and section of the s		day pre-construction survey does not	result in burro	es. No further wing owl sign	or observation	ired if the 30 is.
 b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and species in the sensitive sensitive regulation of the sensitive regulation of the sensitive regulation of the sensitive regulations of the sensitive? 	With implementation of Mit	tigation Measures BIO-1 and BIO-2 th	e proposed pi	oiect would h	ave a less the	an significant
 substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and species and speci	impact directly, indirectly, o	or cumulatively on nesting birds and/o	r burrowing of	owls. The pro	ject would no	ot result in a
 b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection 2.1.2 – Protection	substantial adverse effect, e	either directly or through habitat modified	ications, on a	any species ic	lentified as	a candidate,
 b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection 2.1.2 – Protection	sensitive, or special-status sp	ectes in local or regional plans, policies,	or regulations	s, or by the CD	OF W or USF W	S.
 sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Section 2.1.2 – Protection 2.1.2	b. Have a substantial adv	erse effect on any riparian habitat or other		\square		
policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and	sensitive natural com	munity identified in local or regional plans,				
4b. Response: (Source: MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and	policies, and regulation	ons or by the California Department of Fish Fish and Wildlife Service?				
THE ANALYSING AND	4h. Response: (Source:	MSHCP Section 6.1.2 - Protection of	Snecies Asso	ciated with Ri	inarian/Riveri	ne Areas and

the Center Park Residential Project (Appendix B1), Results of Burrowing Owl Survey for the Center Park Manufactured Home Residential Project (Appendix B2), Jurisdictional Delineation Report for the Center Park Residential Project (Appendix B3), Determination of Biologically Equivalent or Superior Preservation for the Center Park Residential Project (Appendix B4))

P18-0020 (RZ),

P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

Less Than Significant Impact With Mitigation Incorporated. The project site has been disturbed by agriculture and weed abatement activities. The adjacent and downstream areas are built out with residential, commercial, and industrial land uses. LSA conducted a project-specific habitat assessment (Appendix B1), jurisdictional delineation (Appendix B3), and focused surveys (Appendix B2) on August 18, 22, and 23, 2017, at which time it was determined the south side of the project site includes a drainage containing riparian vegetation. Trees within the upper drainage include Goodding's willow, velvet ash, and Mexican fan palm. The remainder of the stream is a dry eroded barren channel vegetated by upland ornamental species. This site is the only stream with some native trees and shrubs in the vicinity. The stream does not connect directly to the Santa Ana River, which is located one mile to the west.

Runoff conveyed through this drainage flows off site and into a culvert that directs runoff under Orange Street and discharges into a concrete-lined channel as concentrated flow on the western side of Orange Street. From this point, flows discharge into a vacant field approximately 250 feet to the west where flows generally dissipate and percolate into the ground. Although no drainage or OHWM were visible in the vacant field, historical imagery indicates that flows have potential to sheet flow intermittently across the vacant field to the concrete channel to the southwest along Garner Road and drain into Lake Evans, the Santa Ana River, and eventually the Pacific Ocean.

The area of the physical streambed and bank and associated riparian habitat along the 1,078-linear foot stream includes 0.03 acre of isolated wetland within the streambed. The riparian/riverine vegetation community includes, 0.40 acre of *Salix gooddingii* Alliance (Black Willow Thicket) and *Baccharis salicifolia* Alliance (Mule Fat Thicket) in its upper reach, and 0.27 acre comprises Mule Fat Alliance with ornamental trees as overstory species. The remaining 0.03 acre comprises isolated wetland within the streambed. The drainage appears in historical aerial photos as far back as 1938 (NETRonline).

Traditional Navigable Water. The wetland vegetation is composed of cattails (*Typha domingensis*), bind weed (*Convolvulus arvensis*), and Johnson grass (*Sorghum halepense*). Adjacent shrubs are mule fat and castor bean. The delineation identified a total of 0.32 acre along the 1,078-linear foot stream as "waters of the State" comprising only the streambed-and-bank, which would be subject to the California Porter-Cologne Act.

Table 4.A: Potential Jurisdictional Features on the Project Site

		Potential W United Sta	aters of the ates (acres)	Potential California Fish and	Potential "Waters of the State" subject to California
Drainage Feature	Length (linear feet)	Non- Wetland	Wetland	Game Code Section 1600 for a Streambed Alteration Agreement (Acres) ¹	Porter Cologne Act (acres) and U.S. Army Corps of Engineers Jurisdiction ²
Ephemeral Stream	1,078	0.00	0.03	0.67	0.32

¹ Includes acreage of streambed and bank plus potential CDFW riparian (Willow Scrub & Mule Fat) habitat.

² Should the U.S. Army Corps of Engineers exercise jurisdiction. RWQCB jurisdiction, includes acreage of streambed and bank only.

Source: Jurisdictional Delineation Report for the Center Park Residential Project (Appendix B3)

Riparian/Riverine Species. A habitat assessment of the vegetation communities occurring along the drainage within the project site was conducted to determine if it was suitable for listed species associated with riparian, riverine, aquatic, or vernal pool areas. Species of concern with potential to occur on the site are least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. In accordance with Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, a project-specific *Determination of Biologically Equivalent or Superior Preservation* Report was completed (Appendix B4). These bird species associated with riverine/riparian shrub and woodland habitats are not expected to occur on the site due to the lack of adequate nesting and foraging habitat area, lack of adjacency to other suitable habitat, and the lack of required habitat characteristics (e.g., surface water, dense shrub understory, and mature tree canopy).

As detailed in the project-specific MSHCP Consistency Analysis and Habitat Assessment Report, the soil conditions are not suitable for rare and listed fairy shrimp known to occur in the region. The species records provided by the CDFW and the USFWS show observations of Santa Ana sucker and least Bell's vireo in the Santa Ana River. The river is one mile west of the project site without contiguous suitable habitats or uninterrupted hydrologic connectivity. There is no opportunity for Santa Ana

Initial Study, MND, and Appendices P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

sucker or least Bell's vireo to occur on site due to the upland setting without any natural connectivity to the river, the lack of aquatic habitat, and the very limited and isolated willow scrub/mixed ornamental riparian habitat on the project site.

There would be no direct impact on habitat for the riparian/riverine and vernal plant species identified for protection under the MSHCP due to the lack of suitable topography, soils, and hydrology on site, as well as a high degree of land disturbance. The area would provide cover, foraging, and live-in habitat on site, but it is not contiguous with similar habitats or other undisturbed vegetation communities or streams, as demonstrated in the Response to Checklist Question 4a. The habitats for the riparian/riverine and vernal wildlife species identified for protection under MSHCP Section 6.1.2 are not on the project site due to the lack of suitable vegetative cover, lack of upstream and downstream connectivity, and the high degree of land disturbance. Furthermore, the drainage feature located on the project site is ephemeral and arid and the project site contains no habitat for fish or amphibians listed in MSHCP Section 6.1.2.

The riparian drainage appears in historical aerial photos as far back as 1938 (NETRonline). The drainage appears to be an isolated feature and the U.S. Army Corps of Engineers (USACE) is unlikely to assert jurisdiction under Federal Clean Water Act (CWA) Section 404 because the drainage OHWM disappears downstream in a vacant agriculture field west of Orange Street and thus lacks a clear nexus to traditional navigable waters. However, the USACE may determine that there is a surface hydrology connection to the Santa Ana River and thus assert jurisdiction of the riparian drainage and potentially require Section 401 and 404 permitting for impacts to waters of the U.S. If the riparian drainage is not subject to USACE jurisdiction, it may still be regulated by the Regional Water Quality Control Board (RWQCB) under the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act) with Waste Discharge Requirements (WDR). The 0.67 acre of the stream comprising both the bed-and-bank and associated wildlife habitat would require a Streambed Alteration Agreement administered by the CDFW pursuant to California Fish and Game Code Section 1600. However, the proposed project is not required to provide riparian habitat mitigation or preservation pursuant to the California Porter-Cologne Act and/or California Fish and Game Code Section 1600 since no riparian habitat with long-term conservation value is present within or in the immediate vicinity of the project site.

Except for the installation of a drain outlet from the proposed storm water detention basin, the project will avoid the drainage. Direct effects to the drainage include the installation of an outlet pipe and dissipater in the channel, as well as periodic maintenance of the outlet pipe and dissipater, including the removal of trash. During operation of the project, further avoidance of the drainage will be ensured through the recordation of a Conservation Easement pursuant to CDFW requirements to preserve its current condition in perpetuity. Construction, planting, dumping, filling, and similar activities will be prohibited within the area covered under the Conservation Easement. Activities within the drainage will be limited to those allowed by the CDFW that preserve and enhance native species, their habitat, and natural communities, in a manner consistent with habitat conservation purposes.

Mitigation Measures. The following measures have been identified to minimize project effects to the riparian drainage.

Mitigation Measure BIO-3: Prior to the issuance of a grading permit, the applicant shall record a Conservation Easement pursuant to CDFW requirements to preserve the riparian drainage in its current condition in perpetuity. Construction, planting, dumping, filling, and similar activities will be prohibited within the area covered under the Conservation Easement. Activities within the drainage will be limited to those allowed by the CDFW that preserve and enhance native species, their habitat, and natural communities, in a manner consistent with habitat conservation purposes.

Mitigation Measure BIO-4: Prior to the issuance of a grading permit, the applicant shall coordinate with the USACE to determine if jurisdiction will be asserted over the riparian drainage under the Federal Clean Water Act (CWA) Section 404. If USACE jurisdiction over the riparian drainage is asserted, the applicant shall provide evidence that USACE has issued a CWA Section 404 permit, the Regional Water Quality Control Board (RWQCB) has issued a CWA Section 401 certification, and that applicable USACE permit and RWQCB certification requirements have been satisfied prior to the issuance of a grading permit. If the riparian drainage is not subject to USACE jurisdiction, the applicant shall comply with applicable Waste

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Requirements (WDR) established by the RWQCB under the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act).

Prior to the issuance of a grading permit, the applicant shall obtain a Streambed Alteration Agreement administered by the CDFW pursuant to California Fish and Game Code Section 1600 for the 0.67 acre of the stream comprising both the bed-and-bank and associated wildlife habitat.

There is potential for increased pollution from the proposed residential development depending upon the type of water quality protection measures to be installed on the project site and the maintenance requirements. There would be no impacts to potential habitat for MSHCP Section 6.1.2 species and other MSHCP Covered Species due to the developed land uses on and surrounding the project site. The project would be developed in compliance with project-specific National Pollutant Discharge Elimination System (NPDES) requirements. Standard construction best management practices (BMPs) and water quality control measures for construction and post-development as required by the City (detailed in Section 9 below) would be implemented to avoid downstream indirect effects. The grading permit and Storm Water Pollution Prevention Plan (SWPPP) would contain requirements for necessary BMP compliance for project completion.

The project site has been historically disturbed by agriculture and weed abatement activities. The drainage feature is ephemeral and erosional in nature. While the adjacent and downstream areas are developed with a variety of uses, avoidance of the channel and adherence during project operation to activity prohibitions identified in the Conservation Easement will ensure the preservation of the drainage's current condition and the maintenance of its existing habitat and conservation value.

The requirement for establishment of the Conservation Easement and satisfaction of any regulatory permit conditions would be addressed though Mitigation Measures BIO-3 and BIO-4, respectively. Adherence to the identified mitigation will ensure no significant direct, indirect, or cumulative impacts would occur. With implementation of Mitigation Measures BIO-3 and BIO-4, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nriparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

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

4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer, Jurisdictional Delineation Report for the Center Park Residential Project (Appendix B3))

Less Than Significant Impact With Mitigation Incorporated. LSA conducted a jurisdictional delineation on August 23, 2017. As indicated in the Responses to Checklist Questions 4a and 4b, there is a flow of runoff from the concrete-lined storm drains constructed between Center Street and La Cadena Avenue on the south side of the project site. Runoff conveyed through the riparian drainage is discharged off site and into a culvert that directs runoff under Orange Street and discharges into a concrete-lined channel on the western side of Orange Street where it discharges into a vacant field approximately 250 feet to the west. In this vacant field, flows generally dissipate and percolate into the ground. Although no drainage or OHWM were visible in the vacant field downstream, historical imagery indicates that flows have potential to sheet flow intermittently across the vacant field to the concrete channel to the southwest along Garner Road, draining and drain into Lake Evans, the Santa Ana River, and eventually the Pacific Ocean. The drainage lacks a clear nexus to traditional navigable waters. However, the USACE may determine that there is a surface hydrology connection to the Santa Ana River and thus assert jurisdiction of the riparian drainage and potentially require Section 401 and 404 permitting for impacts to waters of the U.S.

Except for the installation of a drain outlet from the proposed storm water detention basin, the project will avoid the drainage. Direct effects to the drainage include the installation of an outlet pipe and dissipater in the channel, as well as

^{Initial Study}, MND, and Appendices ^P

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

periodic maintenance of the outlet pipe and dissipater, including the removal of trash. During operation of the project, further avoidance of the drainage will be ensured through the recordation of a Conservation Easement pursuant to CDFW requirements to preserve its current condition in perpetuity. Construction, planting, dumping, filling, and similar activities will be prohibited within the area covered under the Conservation Easement. Activities within the drainage will be limited to those allowed by the CDFW that preserve and enhance native species, their habitat, and natural communities, in a manner consistent with habitat conservation purposes.

The requirement for establishment of the Conservation Easement and satisfaction of any regulatory permit conditions would be addressed though Mitigation Measures BIO-3 and BIO-4, respectively. Adherence to the identified mitigation will ensure no significant direct, indirect, or cumulative impacts would occur. With implementation of Mitigation Measures BIO-3 and BIO-4, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on nriparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

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



4d. Response: (Source: MSHCP, General Plan 2025 – Figure OS-7 – MSHCP Cores and Linkage, Biological Resources Assessment and MSHCP Consistency Analysis and Habitat Assessment for the Center Park Residential Project (Appendix B1), Results of Burrowing Owl Survey for the Center Park Manufactured Home Residential Project (Appendix B2), Determination of Biologically Equivalent or Superior Preservation for the Center Park Residential Project (Appendix B4))

Less Than Significant Impact. Habitat fragmentation occurs when a single, contiguous habitat area is divided into two or more areas, or where an action isolates the two or more new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or to/from one habitat type to another. Habitat fragmentation may occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. Examples of migration corridors may include areas of unobstructed movement for deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds.

Runoff from the site is conveyed through on-site drainage to a culvert that directs runoff under Orange Street and discharges into a concrete-lined channel on the western side of Orange Street where it percolates into a vacant field approximately 250 feet to the west. While no OHWM or evidence of drainage is visible in this field downstream, historical imagery indicates that flows have potential to sheet flow intermittently across the vacant field to the concrete channel to the southwest along Garner Road and drain into Lake Evans, the Santa Ana River, and eventually the Pacific Ocean. There is no opportunity for Santa Ana sucker or least Bell's vireo to occur on site due to the upland setting without any clear or current connectivity to the river, the lack of aquatic habitat, and the very limited and isolated willow scrub/mixed ornamental riparian habitat on site.

The project site is not identified as a regionally important dispersal or seasonal migration corridor. The project site does not contain any critical habitat, has minimal vegetation, and is heavily disturbed. The project site does not provide any resources necessary to support local or regional wildlife movement and migration. Wildlife species will still be able to travel through and use the riparian drainage to undeveloped areas south of the project site because the project has been designed with minimal encroachment in the drainage resulting from the installation of a storm drain outlet and energy dissipater. A Conservtion Easement will be established over the drainage to preserve the current condition of this feature. There would be no indirect effects to downstream waters (i.e., Santa Ana River) because there is no clear or direct hydrological connection. There would be no impacts to potential habitat for MSHCP Section 6.1.2 species and other MSHCP Covered Species due to the developed land uses on and surrounding the project site.

Due to existing development, absence of clear or current downstream connectivity, the existing fragmented nature of surrounding habitat, and the preservation of the drainage in its current condition during project operation, the proposed

ISSUES (AND SUPPORTING INFORMATION SOURCES):	tentially gnificant mpact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	---------------------------------	--	------------------------------------	--------------

project would not significantly affect a native or migratory wildlife corridor or cause habitat fragmentation. Implementation of the proposed project would have a less than significant impact directly, indirectly, or cumulatively, on wildlife movement and migratory species. No mitigation is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

4e. Response: (Source: City of Riverside Urban Forestry Policy Manual, Biological Resources Assessment and MSHCP Consistency Analysis and Habitat Assessment for the Center Park Residential Project (Appendix B1); General Plan 2025 – Figure OS-6 – Stephens' Kangaroo Rat (SKR) Core Reserves and Other Habitat Conservation Plans (HCP))

 \times

Less Than Significant Impact with Mitigation Incorporated. Should project grading occur during the nesting bird season, Mitigation Measure BIO-1 requires the completion of a pre-construction nesting bird survey to pursuant to the MBTA and the California Fish and Game Code. With implementation of Mitigation Measure BIO-1, the proposed project would have a less than significant direct, indirect, or cumulative impact on nesting birds.

The project site is located within the MSHCP Cities of Riverside and Norco Area Plan. As an MSHCP permittee, the City of Riverside is required to implement the appropriate provisions of the MSHCP. The project is not located in a criteria cell and is not adjacent to Public/Quasi-Public or Conservation Land. However, the northwest portion of the project site is within the MSHCP survey area for burrowing owl and is also in Narrow Endemic Plant Species Survey Area (NEPSSA) 7.

A burrowing owl habitat assessment and burrow survey was conducted on August 23, 2017. The results were negative for owls, owl sign, and/or evidence of previously occupied burrows (Appendix B2). Per the MSHCP 30-day Pre-Construction Burrowing Owl Survey Guidelines (revised August 17, 2006), a pre-construction survey for burrowing owl is required within 30 days prior site grading to determine if site conditions have changed (e.g., establishment of ground squirrel burrows). Mitigation Measure BIO-2 establishes the project requirement of a pre-construction burrowing owl surveys prior to any ground-disturbing activities. With implementation of Mitigation Measure BIO-2, the proposed project would have a less than significant direct, indirect, or cumulatively impact on burrowing owls

The NEPSSA species include three plant species—San Diego ambrosia, Brand's phacelia, and San Miguel savory—that require evaluation. The three NEPSSA plant species require suitable sandy, clayey, or volcanic soils occurring in native coastal sage scrub and chaparral habitats. It was determined through a habitat assessment that these conditions no longer occur in the region or on the project site. As a result, focused surveys are not required for these plant species and they are considered absent from the project site.

A habitat assessment of the vegetation communities occurring along the drainage within the project site was conducted to determine if it was suitable for listed species associated with riparian, riverine, aquatic, or vernal pool areas. Species of concern with potential to occur on the site are least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. In accordance with Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, a project-specific *Determination of Biologically Equivalent or Superior Preservation* Report was completed (Appendix B4). As detailed in Response to Checklist Question 4b, there is no on-site habitat to support the least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, or vernal pools. Therefore, it was determined that the project site lacks suitable habitat and long-term conservation value for covered species associated with riparian/riverine and vernal pool habitats and there would be a less than significant direct, indirect, or cumulative impact related to MSHCP covered species.

The City is a party to the Stephen's kangaroo rat (*Dipodomys stephensi*) (SKR) Habitat Conservation Plan (HCP). The nearest SKR HCP Core Reserve is located approximately 4.7 miles southeast of the site in Sycamore Canyon; therefore, no impact to the SKR, it's habitat, or the SKR HCP would occur.

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Any project within the City's boundaries that proposes planting a street tree within a City right-of-way must follow the *Urban Forestry Policy Manual*, which documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. The proposed project would be in compliance with the *Urban Forestry Policy Manual* when planting a tree within a City right-of-way. The *Urban Forestry Policy Manual* does not regulate the existing trees on the project site, which are privately owned.

The project is also required to comply with Riverside Municipal Code (RMC) Section 16.72 (Western Riverside Multiple Species Habitat Conservation Plan Fee Program). Implementation of Mitigation Measures BIO-1 and BIO-2 and adherence to RMC Section 16.72 would ensure no significant direct, indirect, or cumulative impact related to local policies or ordinances protecting biological resources would result from project development.



4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephens' Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, El Sobrante Landfill Habitat Conservation Plan, Biological Resources Assessment and MSHCP Consistency Analysis and Habitat Assessment for the Center Park Residential Project (Appendix B1))

Less Than Significant Impact. The project site is located within an urbanized area and has been previously disked for weed abatement. The project site is located within the MSHCP Cities of Riverside and Norco Area Plan; therefore, the project is subject to applicable provisions of the MSHCP as specified in Checklist Responses 4a, 4b, 4c, 4d, and 4e, above. The project site is not located in an area subject to Cell Criteria under the MSHCP and, therefore, has no conservation requirements toward building out the MSHCP Reserve. However as stated in Checklist Response 4a, the northwest portion of the project site is within the MSHCP survey area for burrowing owl and Narrow Endemic Plant Species Survey Area (NEPSSA) 7. Also because there is the potential of on-site riparian habitat, the project is subject to Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools and a project-specific *Determination of Biologically Equivalent or Superior Preservation* Report was completed (Appendix B4).

A burrowing owl habitat assessment and burrow survey was conducted on August 23, 2017, for the project. The results were negative for owls, owl sign, and/or evidence of previously occupied burrows (Appendix B2). However, per the MSHCP 30day Pre-Construction Burrowing Owl Survey Guidelines (revised August 17, 2006), an additional pre-construction survey for burrowing owl is required within 30 days prior to beginning of site grading to determine if site conditions have changed (e.g., establishment of ground squirrel burrows) and resulted in suitable habitat for burrowing owl. Mitigation Measure BIO-2 requires pre-construction burrowing owl surveys prior to any ground-disturbing activities. With implementation of Mitigation Measure BIO-2, the proposed project would have a less than significant impact directly, indirectly, or cumulatively on burrowing owls.

The NEPSSA species include three plant species—San Diego ambrosia, Brand's phacelia, and San Miguel savory—that require evaluation. The three NEPSSA plant species require suitable sandy, clayey, or volcanic soils occurring in native coastal sage scrub and chaparral habitats. It was determined through a habitat assessment that these conditions no longer occur in the region or on the project site. As a result, focused surveys are not required for these plant species and they are considered absent from the project site.

A habitat assessment of the vegetation communities occurring along the drainage within the project site was conducted to determine if it was suitable for listed species associated with riparian, riverine, aquatic, or vernal pool areas. Species of concern with potential to occur on the site are least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. As detailed in Response to Checklist Question 4b, there is no on-site habitat to support the least Bell's vireo,

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

southwestern willow flycatcher, western yellow-billed cuckoo, or vernal pools. The project site lacks suitable habitat and long-term conservation value for covered species associated with riparian/riverine and vernal pool habitats. A less than significant direct, indirect, or cumulative impact related to MSHCP covered species would occur.

The project is also required to comply with RMC Section 16.72.040 establishing the MSHCP mitigation fee. Additionally, the project is located within the Stephens' kangaroo rat (*Dipodomys stephensi*) Habitat Conservation Plan and would contribute funds to the Stephens' Kangaroo Rat Habitat Conservation Plan as part of the City development entitlement process in accordance with RMC Section 16.40.040 establishing the Threatened and Endangered Species Fees.

Through adherence to the RMC, the project would have no impact on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly, or cumulatively. No mitigation is required.

5.	CULTURAL RESOURCES. Would the project:		
	a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?	\boxtimes	

5a. Response: (Source: Cultural Resources Assessment-Center Park Residential Project (Appendix C))

Less Than Significant With Mitigation Incorporated. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria:

- (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register);
- (2) is listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);
- (3) is identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or
- (4) is determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5[a]). A "substantial adverse change" to a historical resource, according to \$5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

The project site is currently vacant and subject to disking for weed abatement. No improvements exist on the project site. A cultural resources records search, additional research, Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), and an intensive pedestrian field survey were conducted as part of the *Cultural Resources Assessment* (Appendix C) for the project.

The cultural resources records search was conducted at the Eastern Information Center (EIC) and South Central Coastal Information Center (SCCIC) on August 16 and 17, 2017, respectively. Data from the EIC and SCCIC indicate 59 cultural resources have been recorded within one mile of the project site in Riverside County and 41 cultural resources within one mile of the project site in San Bernardino County, including 20 prehistoric sites, 2 multi-component (prehistoric and historic) sites, 50 residential properties, 4 commercial/public use properties, 8 water conveyance resources, 2 power-generation sites, 1 commercial/public use property, remnants of 2 orchard houses, 3 historic railroad segments, 4 refuse deposits, 3 isolated artifacts, and the Trujillo Adobe. As indicated in Appendix C, several of these previously-recorded resources have been evaluated as eligible for listing in the California Register, 7 have been evaluated as eligible for listing in the California Register, 7 have been evaluated as eligible for listing in the California Register, and the site of the Highgrove Hydroelectric Plant is a California Point of Historic Interest.

Despite anecdotal information suggesting the Trujillo School, circa 1870s associated with the 19th century community of La Placita, may have been located within the project site, property-specific research identified the former location of the Trujillo

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

School on an adjacent parcel (APN 246-130-002). The closest resource in relation to the project site is the Trujillo Adobe, previously recorded approximately 480 feet to the west of the project site. Additional research and review of historic period maps indicated no historic-era buildings or structures have ever been on or adjacent to the project site, which was under cultivation from at least the mid-1950s to the mid-1960s, and no substantiation of the purported location of the Trujillo School site within or adjacent to the project site could be found.

The Roquet Ranch Project, located in the La Loma Hills in the City of Colton (San Bernardino County), anticipates development of up to 450 residential units, neighborhood commercial uses, a school site, and recreation uses on a 336-acre site abutting the Riverside/San Bernardino County line. The results of the records search conducted for the Roquet Ranch project identified 14 reported cultural resources located within that project site and an additional 49 cultural resources reported within the one-mile search radius. The field investigation for the Roquet Ranch project identified 25 archaeological sites (including the 14 previously recorded sites) within its project limits. Only two were determined to be significant and were located within areas of that project preserved as open space. The prehistoric resources are located in the vicinity of the La Loma Hills. However, none of the prehistoric sites within the one-mile records search radius has been collectively designated as, or attributed to, a village or subsumed under a single site number by those who documented or tested them. Of the approximately 75 percent that were tested, none yielded any artifacts, subsurface deposits, or other evidence of habitation (e.g., midden soils) associated with village sites. There is no evidence that the sites within the one-mile records search radius were utilized contemporaneously. Rather, they may represent the accumulated remains of sporadic prehistoric resource processing and other activities over centuries or millennia. The nearest historically known Native American village to the project area was the Gabrielino community of Horuwunga (also known to the Serrano as Jurupet and described to Alfred Kroeber as Hurumpa), purportedly located at least several miles to the west somewhere between the Jurupa Mountains and the Pedley Hills.

On August 21, 2017, a qualified archaeologist conducted an intensive pedestrian survey of the project site, using transects spaced 10 meters apart and paying particular attention to geological test borings and rodent back dirt for cultural residues. The purported site of the Trujillo School was also closely examined. The intensive pedestrian field survey identified only two isolated fragments of post-World War I amethyst glass on opposite sides of the project site. No remnants of the 1870s Trujillo school (e.g., foundation field stone, adobe fragments, or 19th century historic refuse) were identified at the purported former location (APN 246-130-002) or anywhere else on the project site or vicinity.

However, due to the proximity of the previously-recorded cultural resources eligible for listing in the National and California Registers in relation to the project site, including the Trujillo Adobe and the purported location of the Trujillo School associated with the 19th century community of La Placita, the project site retains some sensitivity for undocumented subsurface resources.

Mitigation Measures. Although the potential for the proposed project to affect subsurface historical resources is not high, implementation of Mitigation Measures CUL-1 through CUL-4 would help ensure that impacts to any historic or prehistoric resources from project grading would be less than significant with mitigation incorporated:

Mitigation Measure CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and interested tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. This measure shall be implemented to the satisfaction of the City Planning Division.

Mitigation Measure CUL-2: Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground-disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified

 $^{P18-0020}_{P18-0022}$ (CLIP) and $^{P18-0023}_{P18-0022}$ (CLIP) and $^{P18-0023}_{P18-0022}$ (DR) Study, MND, and Appendices

Initial Study

ISSUES (AND SUPI INFORMATION SC	POF DUF	RTING RCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	arcł unk	naeological monitor to monitor all nown archaeological resources.	ground-distur	bing activities	in an effort to	identify any
	1.	The project archaeologist, in consustant develop an Archaeological responsibility of all archaeological Details in the plan shall include:	Iltation with in Monitoring and cultural a	terested tribes, Plan to addre activities that v	the Developer ess the details vill occur on th	, and the City, , timing, and ne project site.
		a. Project grading and developm	nent schedulir	ng;		
		b. The development of a rotat developer/applicant and the Tribal Monitors from the co disturbing activities on the duties, scope of work, and N redirect grading activities in o	ing or simulta project archa nsulting tribes site, includi Jative Americ coordination v	aneous schedu eologist for d s during gradin ng the sched an Tribal Mon vith all project	le in coordina esignated Nat ng, excavation uling, safety nitors' authorit archaeologists	tion with the ive American , and ground- requirements, ty to stop and s;
		c. The protocols and stipulation paleontologist will follow discoveries, including any nonrenewable paleontologic resources evaluation;	ns that the Ap in the ever newly disc al resources	pplicant, tribes at of inadver covered cultu that shall be	s, and project a tent cultura ral resource subject to	archaeologist/ l resources deposits, or a cultural
		d. Treatment and final dispositi sites, and human remains if c	on of any cult liscovered on	tural and paleo the project site	ntological reso e; and	ources, sacred
		e. The scheduling and timing of Measure MM-CUL-4.	of the Cultura	l Sensitivity T	raining noted	in Mitigation
Mitigation Measure CUL-3	: Tro cult the	eatment and Disposition of Cu ural resources are inadvertently d following procedures will be carri	Itural Resou iscovered dur ed out for trea	rces: In the e ing the course tment and disp	event that Nat of grading fo position of the	ive American r this project, discoveries:
	1.	Temporary Curation and Stor resources shall be temporarily cu project archaeologist. The remove thoroughly inventoried with triba	age: During rated in a secural of any arti- l monitor over	the course of ure location or facts from the rsight of the pr	construction, a n site or at the project site w ocess.	all discovered offices of the ill need to be
	2.	Treatment and Final Dispositic cultural resources, including sacr and non-human remains as par resources. The applicant shall following methods and provide Development Department with ev	on: The landored items, bur the of the required inquish the end of the City of vidence of sam	owner(s) shall ial goods, and uired mitigati e artifacts thr f Riverside (ne:	relinquish ow l all archaeolo on for impact ough one or Community an	nership of all gical artifacts ts to cultural more of the nd Economic
		a. Accommodate the process consulting Native America provisions to protect the futu not occur until all cataloguin	for on-site re n tribes or b re reburial are g and basic re	burial of the bands. This sl ea from any fu cordation have	discovered it hall include r ture impacts.	ems with the neasures and Reburial shall ed.
		b. A curation agreement with County that meets federal professionally curated and further study. The collection title, to an appropriate curati by payment of the fees neces	an appropria standards per made availabl s and association on facility with sary for perma	te qualified n 36 CFR Par le to other ar- ted records sh thin Riverside anent curation.	repository with t 79 and ther chaeologists/re all be transfer County, to be	hin Riverside efore will be esearchers for red, including accompanied

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

- c. If more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default.
- d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and interested tribes.
- Mitigation Measure CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	\square	

5b. Response: (Source: Cultural Resources Assessment-Center Park Residential Project (Appendix C))

Less Than Significant With Mitigation Incorporated. As detailed in Checklist Response to 5a, data from the EIC and SCCIC indicate 59 cultural resources have been recorded within one mile of the project site in Riverside County and 41 cultural resources within one mile of the project site in San Bernardino County, including 20 prehistoric sites, 2 multi-component (prehistoric and historic) sites, 50 residential properties, 4 commercial/public use properties, 8 water conveyance resources, 2 power-generation sites, 1 commercial/public use property, remnants of 2 orchard houses, 3 historic railroad segments, 4 refuse deposits, 3 isolated artifacts, and the Trujillo Adobe.

The prehistoric resources are located along the west-facing slope of the La Loma Hills. However, none of the prehistoric sites within the one-mile records search radius has been collectively designated as, or attributed to, a village or subsumed under a single site number by those who documented or tested them. Of the approximately 75 percent that were tested, none yielded any artifacts, subsurface deposits, or other evidence of habitation (e.g., midden soils) associated with village sites. There is no evidence that the sites within the one-mile records search radius were utilized contemporaneously. Rather, they may represent the accumulated remains of sporadic prehistoric resource processing and other activities over centuries or millennia. The nearest historically known Native American village to the project area was the Gabrielino community of *Horuwunga* (also known to the Serrano as *Jurupet* and described to Alfred Kroeber as *Hurumpa*), purportedly located at least several miles to the west somewhere between the Jurupa Mountains and the Pedley Hills.

On August 21, 2017, a qualified archaeologist conducted an intensive pedestrian survey of the project site, using transects spaced 10 meters apart and paying particular attention to geological test borings and rodent back dirt for cultural residues. No prehistoric resources were previously documented within or adjacent to the project site. Archaeological testing of the project site yielded no archaeological resources and there were no indications of subsurface deposits or features identified by the survey. Therefore, sensitivity for subsurface prehistoric resources is low. However, due to the proximity of the previously-recorded cultural resources eligible for listing in the National and California Registers in relation to the project

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

site, including the Trujillo Adobe and the purported location of the Trujillo School associated with the 19th century community of La Placita, the project site retains some sensitivity for undocumented subsurface resources.

Mitigation Measures. Although the potential for the proposed project to affect subsurface archaeological resources is low, implementation of Mitigation Measures CUL-1 through CUL-4 would help ensure that impacts to any archaeological resources from project grading would be less than significant with mitigation incorporated.

c.	Directly or indirectly destroy a unique paleontological	\times	
	resource or site or unique geologic feature?		

5c. Response: (Source: General Plan 2025 Policy HP-1.3, Preliminary Geologic Map of the San Bernardino 30' x 60' Quadrangle, California)

Less Than Significant With Mitigation Incorporated. The project site and vicinity are underlain by very old alluvial-fan deposits (middle to early Pleistocene). Older alluvial fan deposits may contain fossils including mammoths, mastodons, horses, bison, camels, saber-toothed cats, coyotes, deer, and sloths, as well as smaller animals like rodents, rabbits, birds, reptiles, and fish. For this reason, these deposits are considered to have high paleontological sensitivity. Ground-disturbing activities for the project are expected to extend into very old alluvial-fan deposits with high paleontological sensitivity. Therefore, there is a potential that ground-disturbing activities within native sediments could uncover previously unidentified paleontological resources. Implementation of Mitigation Measure CUL-5, requires the preparation of a Paleontological Resource Impact Mitigation Program (PRIMP) for this project that will be used to protect paleontological resources that may exist within the project area, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. Implementation of the mitigation measure would reduce potential impacts to a level less than significant.

Mitigation Measure. The following mitigation measure is provided to ensure if paleontological resources are unearthed during construction, they are protected.

Mitigation Measure CUL-5: A paleontologist shall be hired to develop a Paleontological Resource Impact Mitigation Program (PRIMP) for this project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the project area, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading.

- Excavation and grading activities in deposits with high paleontological sensitivity (very old alluvial-fan deposits) shall be monitored by a paleontological monitor in accordance with the PRIMP. No monitoring is required for excavations in soil with no paleontological sensitivity (Artificial Fill).
- If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance.
- Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution.
- At the conclusion of the monitoring program, a report of findings shall be prepared to document the results of the monitoring program.
- In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and a paleontologist should be contacted to assess the find for significance. If determined to be significant, the fossil shall be collected from the field.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact				
CEQA Significance After Mitigation. With Implementation of Mitigation Measure CUL-5 indirect, direct, and cumulative impacts to paleontological resources would be reduced to less than significant.								
d. Disturb any human remains, including those interred outside of dedicated cemeteries?			\boxtimes					
5d. Response: (Source: General Plan 2025 FPEIR Figure 5.5-1 – Archaeological Sensitivity and Figure 5.5-2 – Prehistoric								

Cultural Resources Sensitivity, Cultural Resources Assessment-Center Park Residential Project (Appendix C)).

Less Than Significant Impact. As detailed in Checklist Response to 5a, data from the EIC and SCCIC indicate 59 cultural resources have been recorded within one mile of the project site in Riverside County and 41 cultural resources within one mile of the project site in San Bernardino County, including 20 prehistoric sites, 2 multi-component (prehistoric and historic) sites, 50 residential properties, 4 commercial/public use properties, 8 water conveyance resources, 2 power-generation sites, 1 commercial/public use property, remnants of 2 orchard houses, 3 historic railroad segments, 4 refuse deposits, 3 isolated artifacts, and the Trujillo Adobe. The Roquet Ranch Project, located in the La Loma Hills in the City of Colton (San Bernardino County), anticipates development of up to 450 residential units, neighborhood commercial uses, a school site, and recreation uses on a 336-acre site abutting the Riverside/San Bernardino County line. The results of the records search conducted for the Roquet Ranch project identified 14 reported cultural resources located within that project site and an additional 49 cultural resources reported within the one-mile search radius. The field investigation for the Roquet Ranch project identified 25 archaeological sites (including the 14 previously recorded sites) within its project limits. Only two were determined to be significant and were located within areas of that project preserved as open space. The prehistoric resources are located along the west-facing slope of the La Loma Hills. However, none of the prehistoric sites within the one-mile records search radius has been collectively designated as, or attributed to, a village or subsumed under a single site number by those who documented or tested them. Of the approximately 75 percent that were tested, none yielded any artifacts, subsurface deposits, or other evidence of habitation (e.g., midden soils) associated with village sites. There is no evidence that the sites within the one-mile records search radius were utilized contemporaneously. Rather, they may represent the accumulated remains of sporadic prehistoric resource processing and other activities over centuries or millennia. The nearest historically known Native American village to the project area was the Gabrielino community of Horuuvunga (also known to the Serrano as Jurupet and described to Alfred Kroeber as Hurumpa), purportedly located at least several miles to the west somewhere between the Jurupa Mountains and the PedleyHills.

On August 21, 2017, a qualified archaeologist conducted an intensive pedestrian survey of the project site, using transects spaced 10 meters apart and paying particular attention to geological test borings and rodent back dirt for cultural residues. No prehistoric resources or evidence of human remains were previously documented within or adjacent to the project site. Archaeological testing of the project site yielded no archaeological resources or human remains and there were no indications of subsurface deposits or features identified by the survey. Therefore, the likelihood of encountering human remains on the project site is low.

In the unlikely event that human remains are encountered during project grading, the proper authorities would be notified, and standard procedures for the respectful handling of human remains during the earthmoving activities would be followed. Construction contractors are required to adhere to California Code of Regulations (CCR) Section 15064.5(e), PRC Section 5097, and Section 7050.5 of the State Health and Safety Code. To ensure proper treatment of burials, in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, the law requires that all excavation or grading in the vicinity of the find halt immediately, the area of the find be protected, and the contractor immediately notify the County Coroner of the find. The construction contractor, developer, and the County Coroner are required to comply with the provisions of CCR Section 15064.5(e), PRC Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State Health and Safety Code.

Consistent with the requirements of CCR Section 15064.5(e), if human remains are encountered, work within 50 feet of the discovery shall be redirected and the Riverside County Coroner notified immediately. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Compliance with these provisions is required of all development projects in the City as a matter of regulatory policy in accordance with State law and would ensure that any potential impacts to unknown buried human remains would be less than significant. No mitigation is required.

6.	GI Wo	EOLOGY AND SOILS. build the project:		
	a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:		
		i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.		

6ai. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, State of California Special Studies Zones-San Bernardino South Quadrangle-January 1, 1977, Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D))

Less Than Significant Impact. Seismic activity is expected in Southern California; however, the project site is not located within an Alquist-Priolo zone. The project site does not overlie any known fault; therefore, potential for on-site fault rupture is very low. The closest known fault, the San Jacinto (San Bernardino) Fault, proceeds along the eastern edge of the City of Colton, passing directly under the Interstate 10 (I-10)/I-215 interchange approximately 4.5 miles northeast of the project site.

CCR Title 24, Part 2, the California Building Code (CBC), establishes minimum standards for building design in the State, and it is consistent with or more stringent that UBC requirements. Local codes are permitted to be more restrictive than Title 24, but are required to be no less restrictive. The CBC is designed and implemented to improve building safety, sustainability, and consistency, and to integrate new technology and construction methods to construction projects throughout California. The CBC is published every three years and intervening Code Adoption Cycles produce Supplement pages 18 months into each three-year period. All proposed amendments to California's building standards are subject to a lengthy and transparent public participation process throughout each code adoption cycle.

Chapter 16 of the CBC regards General Design Requirements, including regulations governing seismically resistant construction (Chapter 16, Division IV) and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapter 18 and Appendix Chapter 33 regard site demolition, excavations, foundations, retaining walls, and grading, including requirements for seismically resistant design, foundation investigations, stable cut and fill slopes, and drainage and erosion control. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic zoning. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR, Title 8).

State law requires the design and construction of new structures comply with current CBC requirements, which address general geologic, seismic (including ground shaking), and soil constraints for new buildings. Additionally, General Plan Policy PS-1.1 requires the City to ensure all new development in the City abides by the most recently adopted City and State seismic and geotechnical requirements. In accordance with RMC, Section 17.16.010, the project applicant's application for a grading permit shall be accompanied with the following:

- Detailed grading plans; and
- Soils report as prepared by a registered soils engineer (geotechnical engineer), unless waived by the Public Works

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Director. The recommendations specified in the report shall be incorporated into the design of the grading plans. All soils engineers (geotechnical engineers) performing work within the City shall have a current City Business Tax Certificate.

Pursuant to State law, and in accordance with General Plan Policy PS-1.1, the proposed project will be designed to resist seismic impacts in accordance with current CBC requirements and Title 16 (Buildings and Construction) of the RMC. Prior to issuance of any entitlements, the City will review and approve plans to confirm that the siting, design, and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Additionally, all grading plans will be subject to City review in accordance with RMC, Section 17.16.010. As required by RMC, Section 17/16.010, the recommendations cited in the project-specific soils and geotechnical reports must be incorporated into the design of the site-specific grading plans; therefore, it is reasonable to conclude the appropriate project-specific geotechnical recommendations will be reviewed and approved as part of the grading permit. Proper engineering design and construction in conformance with the 2016 CBC standards and project-specific geotechnical recommendations would ensure that seismic ground shaking would be reduced to less than significant levels directly, indirectly, and cumulatively. No mitigation is required.

ii. Strong seismic ground shaking?			\square	
(all Descentes (Courses Coursed Disc 2025 EDEID	Ctata of Cal	Course Coo	aint Chadian	Zaman Cam

6aii. Response: (Source: General Plan 2025 FPEIR, State of California Special Studies Zones-San Bernardino South Quadrangle-January 1, 1977, Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D))

Less Than Significant Impact. The project site does not overlie any known fault. The closest known fault, the San Jacinto (San Bernardino) Fault, lies approximately 4.5 miles northeast of the project site. The second closest known fault is the Elsinore Fault, proceeding along the base of the Santa Ana Mountains in the southern portion of the City's Sphere of Influence approximately 17 miles west of the project site. Both the San Jacinto Fault Zone and the Elsinore Fault Zone have the potential to cause moderate to large earthquakes that would cause intense ground shaking.

Pursuant to State law and in accordance with General Plan Policy PS-1.1, the proposed project will be designed to resist seismic impacts in accordance with current CBC requirements and Title 16 (Buildings and Construction) of the RMC. Prior to issuance of any permit(s), the City will review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Additionally, all grading plans will be subject to City review in accordance with RMC, Section 17.16.010. Because the proposed project must comply with current CBC regulations that protect habitable structures from seismic hazards, direct, indirect, and cumulative impacts associated with strong seismic ground shaking would be less than significant. No mitigation is required.

iii. Seismic-related ground failure, including liquefaction?			\boxtimes	
--	--	--	-------------	--

6aiii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, Figure PS-3 – Soils with High Shrink-Swell Potential, State of California Special Studies Zones-San Bernardino South Quadrangle-January 1, 1977, Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D))

Less Than Significant Impact. According to *Figure PS-2 – Liquefaction Zones* of the General Plan 2025, the project site is located in an area with a moderate to high potential for liquefaction. Liquefaction is a phenomenon that occurs when strong seismic ground shaking causes soils to collapse from a sudden loss of cohesion and undergo a transformation from a solid to a liquefied state. There are three basic factors that must exist concurrently in order for liquefaction to occur:

- A source of ground shaking, such as an earthquake, capable of generating soil mass distortions;
- A relatively loose silty and/or sandy soil; and
- A relatively shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that would allow positive pore pressure generation.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

As part of the project-specific geotechnical report (Appendix D), seven 8-inch-diameter hollow-stem auger borings were excavated to depths of 5.0 to 51.5 feet below ground surface, none of which encountered groundwater. Considering the absence of groundwater in the upper 50 feet and the high relative density of the on-site soils, the potential for seismic-related ground failure, including liquefaction, at the project site is considered very low.

Pursuant to State law and in accordance with General Plan Policy PS-1.1, the proposed project will be designed to resist seismic impacts in accordance with current CBC requirements and Title 16 (Buildings and Construction) of the RMC. Prior to issuance of any permit(s), the City will review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Additionally, all grading plans will be subject to City Staff review for regulatory compliance in accordance with RMC, Section 17.16.010. Proper engineering design and construction in conformance with the current CBC standards and project-specific geotechnical recommendations would ensure that seismic-related ground failure, including liquefaction, would be reduced to less than significant levels directly, indirectly, and cumulatively. No mitigation is required.

iv. Landslides?		\times	

6aiv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Title 18 – Subdivision Code, Title 17 – Grading Code, and Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D))

Less Than Significant Impact. The Geology and Soils section of the City's General Plan 2025 FPEIR states that "areas of high susceptibility to seismically induced landslides and rockfalls correspond to steep slopes in excess of 30 percent." Figure 5.6-1 of the General Plan 2025 FPEIR indicates that the project site is located on land identified as having a 0 to 10 percent slope. The project-specific geotechnical report states benching will be required when natural slopes are equal to or steeper than 5:1 or when recommended by the geotechnical engineer. Where the natural slope approaches or exceeds the design slope ratio, the recommendations shown in Table 6.A apply for lateral earth pressures for retaining walls and structures (if any) with approved on-site drained soils.

These parameters are based on a soil internal friction angle of 30 degrees and soil unit weight of 120 pounds per cubic foot (pcf). To design an unrestrained retaining wall, such as a cantilever wall, the active earth pressure may be used. For a restrained retaining wall, the at-rest pressure should be used. Passive pressure is used to compute lateral soils resistance developed against lateral structural movement. The passive pressures provided above may be increased by one-third for wind and seismic loads. The passive resistance is taken into account only if it is ensured that the soil against embedded structure will remain intact with time. Future landscaping/planting and improvements adjacent to the retaining walls shall also be taken into account in the design of the retaining walls. Excessive soil disturbance, trenches (excavation and backfill), future landscaping adjacent to footings, and over-saturation can adversely affect retaining structures and result in reduced lateral resistance.

Table 6.A: Lateral Earth Pressures for Permanent Retaining Structures

ft = foot

Equivalent Fluid Pressure (psf/ft)						
Conditions Level 2:1 Slope						
Active	40	65				
At Rest	60	90				
Passive	360	180 (if sloping in front of wall)				

Source: Section 3.7, Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project, 3444 Center Street, City of Riverside, California (Appendix D)

psf = pounds per square foot

For sliding resistance, the friction coefficient of 0.35 may be used at the concrete and soil interface. The coefficient of friction may be increased by one-third for wind and seismic loading. The retaining walls may also need to be designed for additional lateral loads if other structures or walls are planned within a 1 horizontal to 1 vertical (1H:1V) projection.

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

The seismic lateral earth pressure for walls retaining more than 6 feet of soil and level backfill conditions may be estimated to be an additional 14 pcf for active and at-rest conditions. The earthquake soil pressure has a triangular distribution and is added to the static pressures. For the active and at-rest conditions, the additional earthquake loading is zero at the top and maximum at the base. Pursuant to 2016 CBC Section 1803.5.12, the seismic lateral earth pressure does not apply to walls retaining less than, or equal to, 6 feet of soil. Specific drainage connections, outlets, and avoiding open joints shall be considered for the retaining wall design.

Pursuant to State law and in accordance with General Plan Policy PS-1.1, the proposed project will be designed to resist landslides in accordance with current CBC requirements and Title 16 (Buildings and Construction) of the RMC. Prior to issuance of any permit(s), the City will review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Additionally, all grading plans will be subject to City Staff review for regulatory compliance in accordance with RMC, Section 17.16.010. Proper engineering design and construction in conformance with the current CBC standards and project-specific geotechnical recommendations would ensure that impacts related to landslides would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

b. Result in substantial soil erosion or the loss of topsoil?			\boxtimes			
6h Response: (Source: Coneral Plan 2025 EPEIR Figure 5 6-1 - Areas Underlain by Steen Slope Figure 5 6-4 -						

b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6 Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, and Title 17 – Grading Code)

Less Than Significant Impact. On-site soils consist of alluvial sandy loam. Native alluvial soils, medium dense silty fine to medium sands, and fine sandy silts are present underneath superficial sediments. During grading and construction, disturbance of soil by heavy construction equipment could result in erosion. State and federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, the erosion control standards with which all development activity must comply pursuant to RMC (Title 18) and Grading Code (Title 17) also require the implementation of measures designed to minimize soil erosion. Proper engineering design and construction in conformance with the current CBC standards, RMC Titles 18 and 17, and project-specific geotechnical recommendations would ensure that soil erosion or loss of topsoil would result in a less than significant impact directly, indirectly, and cumulatively. No mitigation is required.

c. Be located on a geologic unit or soil that is unstable, or that		\boxtimes	
would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral			
spreading, subsidence, liquefaction or collapse?			

6c. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, Figure PS-3 – Soils with High Shrink-Swell Potential; General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D))

Less Than Significant Impact. The project site gently slopes from northeast to southwest. Native alluvial sandy loam soils, medium dense silty fine to medium sands, and fine sandy silts are present underneath superficial deposits. Benching will be required when natural slopes are equal to or steeper than 5:1 or when recommended by the geotechnical engineer. Where the natural slope approaches or exceeds the design slope ratio, special recommendations apply as described in Checklist Response to 6.a.iv.

Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Ground subsidence and associated fissuring have occurred in various places in Riverside County due to falling and rising groundwater tables,

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

but the proposed project is located in an area with a water table greater than 50 feet below ground surface and does not propose any activity which would induce subsidence.

In general, anticipated settlement depends upon the loads from the proposed grading and improvements for the site, and the geotechnical properties of the supporting subgrade. Based on review of the site plans, the total settlement due to the proposed grading and anticipated structures at the site should not exceed one inch total and ½-inch differential over a span of 40-feet at the site. Also, based on analysis of non-saturated sands at the site, in the event of a large earthquake, seismic settlement is estimated to vary from less than 0.1 to approximately 0.5 inch.

Liquefaction occurs primarily in saturated, loose, fine-to-medium grained alluvial soils in areas where the groundwater table is within 50 feet of the surface. Shaking suddenly causes soils to lose strength and behave as a liquid. Liquefaction-related effects include loss of bearing strength, lateral spreading, and flow failures or slumping. According to *Figure PS-2 – Liquefaction Zones* of the General Plan 2025, the project site is located in an area with a moderate to high potential for liquefaction. However, as part of the project-specific geotechnical report (Appendix D), seven, 8-inch-diameter hollow-stem auger borings were excavated to depths of 5.0 to 51.5 feet below ground surface, none of which encountered groundwater. Considering the absence of groundwater in the upper 50 feet and the high relative density of the on-site soils, the potential for seismic liquefaction at the project site is considered very low.

Pursuant to State law and in accordance with General Plan Policy PS-1.1, the proposed project will be designed to resist impacts related to unstable geologic units or soils in accordance with current CBC requirements and Title 16 (Buildings and Construction) of the RMC. Prior to issuance of any entitlements, the City will review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the soil types on which such construction may occur.

As stated in the project-specific geotechnical report, additional geotechnical evaluation is required once grading plans, development plans, foundation plans, and structural loads become available. Upon further geotechnical evaluation, additional recommendations may be proposed by the geotechnical engineer, the implementation of which would be required pursuant to 2016 CBC regulations, RMC Title 16 (Buildings and Construction) and Title 17 (Grading), and General Plan Policy PS-1.1. Additionally, all grading plans will be subject to City Staff review for regulatory compliance in accordance with RMC, Section 17.16.010. Because the proposed project must comply with current CBC regulations that protect habitable structures from unstable geologic units or soils, direct, indirect, and cumulative impacts associated with unstable geologic units or soils would be less than significant. No mitigation is required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		\square	

6d. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D), and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)

Less Than Significant Impact. Expansive soils, defined under CBC, expand when wet and shrink when dry. The amount or type of clay present in soil determines its shrink-swell potential. On-site soils are mostly sands and silts, and have low potential for expansion. Figure 5.6-5 of the General Plan 2025 FPEIR indicates that the project site is not located on land containing soils with a high shrink-swell potential. Additionally, as part of the project-specific geotechnical report (Appendix D), expansion testing was conducted on soil samples and the on-site soils were determined to have low expansion potential. Therefore, the project site does not overlie expansive soils. Proper engineering design and construction in conformance with the current CBC standards and project-specific geotechnical recommendations, and compliance with City codes pertaining to grading (RMC Title 17) would ensure that impacts related to expansive soils would be less than significant directly, indirectly, or cumulatively. No mitigation is required.

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				\boxtimes

6e. Response: (Source: Project plans)

No Impact. The proposed project would be served by sewer infrastructure and would not require septic tanks or alternative waste water disposal systems. No impact would occur directly, indirectly, or cumulatively, and no mitigation is required.

7. (GREENHOUSE GAS EMISSIONS.			
1	Would the project:			
a	. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		\boxtimes	

7a. Response: (Source: Air Quality and Greenhouse Gas Analysis– (Appendix A), SCAQMD Greenhouse Gases CEQA Significance Thresholds Working Group Meeting No. 15. September 28, 2010, City of Riverside Restorative Growthprint - Climate Action Plan RRG, 2015)

Less Than Significant Impact. *State CEQA Guidelines* Section 15064(b) provides that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

Currently, there is no statewide greenhouse gas emissions threshold used to determine potential greenhouse gas emissions impacts of a project. SCAQMD utilized uses the following tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency.

- Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- **Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- **Tier 3** Consider whether the proposed project generates GHG emissions in excess of screening thresholds for individual land uses. A 10,000 MT CO₂e/yr threshold for industrial uses would be recommended for use by all lead agencies. Under Option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e/yr), commercial projects (1,400 MT CO₂e/yr), and mixed-use projects (3,000 MT CO₂e/yr). Under Option 2, a single numerical screening threshold of 3,000 MT CO₂e/yr would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- **Tier 4** Establishes a decision tree approach that includes compliance options for projects that have incorporated design features into the project and/or implement GHG mitigation measures.
 - Efficiency Target (2020 Targets).
 - 4.8 MT CO₂e per service population, (the number of jobs and the number of residents provided by a project), for project level threshold (land use emissions only).
 - 6.6 MT CO₂e per service population for plan level thresholds (all sectors).
 - Efficiency Target (2035 Targets).
 - o 3.0 MT CO₂e per service population for project level threshold.
 - 4.1 MT CO₂e per service population for plan level threshold.

If a project fails to meet any of these emissions reduction targets and efficiency targets, the project would move to Tier 5.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

In 2014, the City was one of 12 that collaborated with the Western Riverside Council of Governments on a Subregional Climate Action Plan that includes 36 measures to guide the City's greenhouse gas reduction efforts through 2020. Through the Western Riverside Council of Governments Subregional Climate Action Plan process, the City has committed to a 2020 emissions target of 2,224,908 metric tons of carbon dioxide-equivalent gases, which is 26.4 percent below the City's 2007 baseline and 15 percent below 2010 emissions. To further develop local greenhouse gas reduction measures for the Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan, the City conducted a detailed assessment of local strategies and actions related to the measures identified in the Subregional CAP and expanded the discussion and analysis with respect to implementation (particularly post-2020), costs and funding, performance metrics, and local co-benefits. Importantly, the discussions identify local economic and entrepreneurship opportunities that can be integrated with local, regional, and global greenhouse gas reductions (e.g., the development of green enterprise zones). As detailed Section 7.b, the project is consistent with the Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan and Climate Action Plan and Climate Action Plan and AB-32. Nonetheless, for informational purposes, the project's construction- and operational-related greenhouse gas emissions have been identified below. The Tier 3 Option 1 approach for residential project's greenhouse gas emissions.

Overall, the following activities associated with the proposed project could directly or indirectly contribute to the generation of greenhouse gas emissions:

- Construction Activities: During construction of the project, greenhouse gas would be emitted through the operation of construction equipment and from worker and vendor vehicles.
- Gas, Electricity, and Water Use: Natural gas use results in the emission of two greenhouse gases: CH₄ (the major component of natural gas) and CO₂ (from the combustion of natural gas).
- Solid Waste Disposal: Solid waste generated by the project could contribute to greenhouse gas emissions in a variety of
 ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce
 additional greenhouse gas to varying degrees.
- Motor Vehicle Use: Transportation associated with the proposed project would result in greenhouse gas emissions from the combustion of fossil fuels in daily automobile and truck trips.

Short-Term (Construction) Emissions. Table 7.A lists the CO_2 emissions for each of the planned construction phases. For construction phase project emissions, GHGs are quantified and amortized over the life of the project in accordance with SCAQMD recommendations by calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase greenhouse gas emissions. As detailed in Table 7.A, the project would generate 11 metric tons of carbon dioxide-equivalent gases over the course of 30 years.

	Total	Regional Polluta	ant Emissions (N	MT/yr)	Total Emissions per
Construction Phase	CO ₂	CH4	N ₂ O	CO ₂ e	Calendar Year (MT/CO ₂ e ₎
Site Preparation	18	< 0.01	0	18	
Grading	86	0.03	0	87	
Building Construction	200	0.03	0	201	332
Paving	22	< 0.01	0	22	
Architectural Coating	4.6	< 0.01	0	4.6	
	Total Co	onstruction Emis	sions Amortize	d over 30 years	11
Source: Table M, Air Quality and Gr	eenhouse Gas Analys	is (Appendix A)			
Notes: CH ₄ = methane MT/yr = metric tons per year	between $CO_2 = carbon dioxide$ $CO_2 = carbon dioxide eq$ $H_4 = methane$ $CO_2 = carbon dioxide methaneCO_2 = carbon dioxide eqT/yr = metric tons per yearN_2O = nitrous oxideCO_2 = carbon dioxide eq$				
					P18-0020 (RZ

Table 7.A: Construction Greenhouse Gas Emissions

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

The emissions detailed in Table 7.A would be generated from the proposed project constructed in compliance with the latest California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations. Specifically, at least 50 percent of all construction materials (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) shall be recycled/reused and "green building materials" (e.g., those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way) shall be used for at least 10 percent of the project.

Long-Term (Operational) Emissions. Long-term operation of the proposed project would generate greenhouse gas emissions from area and mobile sources and indirect emissions from stationary sources associated with energy consumption. Mobile-source emissions of greenhouse gases would include project-generated vehicle trips associated with on-site facilities and customers and visitors to the project site. Area-source emissions would be associated with activities (e.g., landscaping and maintenance of proposed land uses, natural gas for heating, and other sources). Increases in stationary-source emissions would also occur at off-site utility providers as a result of demand for electricity, natural gas, and water by the proposed uses. Construction emissions were amortized over a 30-year period and added to the annual operational phase greenhouse gas emissions. The greenhouse gas emission estimates presented in Table 7.B detail the emissions associated with the level of development envisioned by the proposed project.

The remaining carbon dioxide-equivalent gas emissions are primarily associated with building heating systems and increased regional power plant electricity generation due to the proposed project's electrical demands. At present, there is a federal ban on chlorofluorocarbons; therefore, it is assumed the project would not generate emissions of chlorofluorocarbons. The project may emit a small amount of hydrofluorocarbons from leakage and service of refrigeration and air-conditioning equipment and from disposal at the end of the life of the equipment. However, the details regarding refrigerants to be used at the project site are unknown at this time. Perfluorocarbons and Sulfur hexafluoride are typically used in industrial applications, which would not occur on the project site. Therefore, the project is not anticipated to contribute significant emissions of these additional GHGs.

Because climate change impacts are cumulative in nature, no typical single project can result in emission of such a magnitude that it, in and of itself, would be significant on a project basis. The project's greenhouse gas emissions of 1,431 metric tons of carbon dioxide-equivalent gases are less than the SCAQMD-recommended interim Option 1 threshold of 3,000 metric tons of carbon dioxide-equivalent gases for all land use types.

The emissions detailed in Table 7.B would be generated from the proposed project operated in compliance with the latest California Building Code's Title 24 energy standards. Specifically, the project design would incorporate increased insulation such that heat transfer and thermal bridging is minimized, as well as ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment. All on-site lighting would be energy efficient, and daylight would be utilized as an integral component of building lighting systems. On-site landscaping would be drought tolerant and incorporate water-efficient irrigation systems and devices such as soil moisture-based irrigation controls. Additionally, buildings would be designed to be water efficient and incorporate water-efficient fixtures and appliances. including low-flow faucets and toilets. Furthermore, project design would restrict watering methods to prohibit systems that apply water to non-vegetated surfaces and to control runoff. To facilitate and encourage recycling to reduce landfill-associated emissions, among others, the project will provide trash enclosures that include additional enclosed area(s) for collection of recyclable materials. The recycling collection area(s) will be located within, near, or adjacent to each trash and rubbish disposal area. The recycling collection area will be a minimum of 50 percent of the area provided for the trash/rubbish enclosure(s) or as approved by the City Waste Management Department. To facilitate and encourage non-motorized transportation, the project will construct pedestrian walkways and trails along its frontage with Center Street in accordance with the Master Plan of Trails and Bikeways and Objective PR-2/Policy PR-2.4 of the General Plan 2025 to improve the connectivity of the proposed development to the nearby Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex.

Furthermore, this analysis considers greenhouse gas emission significance by determining the project's consistency with the policies and goals in the Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan, Assembly 32, and Executive Order S-3-05. As discussed in Checklist Response 7b, below, the project would be consistent with the strategies and goals from the Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Action Plan and would not conflict with Assembly Bill 32, which establishes a goal of reducing greenhouse gas emissions to 1990 levels by the year 2020, or Executive Order S-3-05, which establishes a goal of reducing greenhouse gas emissions 80 percent below 1990 levels by 2050. In order to ensure that the proposed project complies with and would not conflict with or impede the implementation of reduction goals identified by the City or State, the proposed project would comply with the latest California Building Code's Title 24 energy standards regarding the energy efficiency of buildings, appliances, and lighting, which would reduce the project's electricity demand by enhancing the design and construction of proposed buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices.

Table 7.B: Operational Greenhouse Gas Emissions

	Pollutant Emissions, MT/yr					
Source	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Construction emissions amortized over 30 years	0	11	11	< 0.01	0	11
Operational Emissions						
Area Sources	0	23	23	< 0.01	< 0.01	23
Energy Sources	0	493	493	0.01	< 0.01	494
Mobile Sources	0	792	792	0.04	0	793
Waste Sources	9.2	0	9.2	0.55	0	23
Water Usage	2.0	78	80	0.21	< 0.01	87
Total Project Emissions ¹	11	1,397	1,408	0.81	0	1,431
SCAQMD Tier 3 Threshold						3,000
Significant Emissions?					No	

Source: Table N, Air Quality and Greenhouse Gas Analysis (Appendix A)

 $CH_4 = methane$

Bio- CO_2 = biologically generated CO_2 CO_2e = carbon dioxide equivalent $CO_2 = carbon dioxide$

MT/yr = metric tons per year $N_2O =$ nitrous oxide $NBio-CO_2 =$ Nonbiologically generated CO_2

As detailed in detailed in Tables 7.A and 7.B, the project's greenhouse gas emissions (1,431 metric tons of carbon dioxideequivalent gases) would not exceed the SCAQMD-recommended Tire 3 Option 1 threshold of 3,000 metric tons of carbon dioxide-equivalent gases. Accordingly, the proposed project would not conflict with or impede implementation of the reduction goals identified in AB 32, EO S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor. Therefore, the proposed project would not generate GHG emissions, either directly, indirectly or cumulatively which would have a significant impact on the environment. No mitigation is required.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of		\boxtimes	
greenhouse gases?			

7b. Response: (Source: Air Quality and Greenhouse Gas Analysis– (Appendix A), SCAQMD Greenhouse Gases CEQA Significance Thresholds Working Group Meeting No. 15. September 28, 2010, City of Riverside Restorative Growthprint - Climate Action Plan RRG, 2015)

Less Than Significant Impact. In 2014, the City was one of 12 that collaborated with the Western Riverside Council of Governments on a Subregional Climate Action Plan that includes 36 measures to guide the City's greenhouse gas reduction efforts through 2020. Through the Western Riverside Council of Governments Subregional Climate Action Plan process, the City has committed to a 2020 emissions target of 2,224,908 metric tons of carbon dioxide-equivalent gases, which is 26.4 percent below the City's 2007 baseline and 15 percent below 2010 emissions. This represents a reduction of 779,304 metric tons of carbon dioxide-equivalent gases from the City's 2020 business-as-usual forecast. The City is aiming for a 2035 emissions target of 1,542,274 metric tons of carbon dioxide-equivalent gases from the 2007 baseline and represents a reduction of 2,120,931 metric tons of carbon dioxide-equivalent gases from the 2035 business-as-usual forecast. The City adopted its Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan in January 2016.

^{Initial Study}, MND, and Appendices ^{P18}

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

The Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan expands upon the efforts of the Western Riverside Council of Governments Subregional Climate Action Plan, employing local measures to help the City achieve deep greenhouse gas reductions through the year 2035. To further develop local greenhouse gas reduction measures for the Riverside Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan, the City conducted a detailed assessment of local strategies and actions related to the measures identified in the Subregional CAP and expanded the discussion and analysis with respect to implementation (particularly post-2020), costs and funding, performance metrics, and local co-benefits. Importantly, the discussions identify local economic and entrepreneurship opportunities that can be integrated with local, regional, and global greenhouse gas reductions (e.g., the development of green enterprise zones).

Table 7.C lists the applicable strategies and goals from the Riverside Restorative Growthprint Climate Action Plan and identifies how the proposed project achieves compliance. In order to ensure that the proposed project complies with and would not conflict with or impede the implementation of reduction goals identified in AB 32, EO S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor, the proposed project would be constructed in compliance with the latest California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations and California Building Code's Title 24 energy standards. Specifically, at least 50 percent of all construction materials (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) shall be recycled/reused and "green building materials" (e.g., those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way) shall be used for at least 10 percent of the project. The project design would incorporate increased insulation such that heat transfer and thermal bridging is minimized, as well as ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment. All on-site lighting would be energy efficient and daylight would be utilized as an integral component of building lighting systems. On-site landscaping would be drought tolerant and incorporate water-efficient irrigation systems and devices such as soil moisture-based irrigation controls. Additionally, buildings would be designed to be water efficient and incorporate water-efficient fixtures and appliances, including low-flow faucets and toilets. Furthermore, project design would restrict watering methods to prohibit systems that apply water to non-vegetated surfaces and to control runoff. To facilitate and encourage recycling to reduce landfill-associated emissions, among others, the project will provide trash enclosures that include additional enclosed area(s) for collection of recyclable materials. The recycling collection area(s) will be located within, near, or adjacent to each trash and rubbish disposal area. The recycling collection area will be a minimum of 50 percent of the area provided for the trash/rubbish enclosure(s) or as approved by the City Waste Management Department. To facilitate and encourage non-motorized transportation the project will construct pedestrian walkways and trails along its frontage with Center Street in accordance with the Master Plan of Trails and Bikeways and Objective PR-2/Policy PR-2.4 of the General Plan 2025 to improve the connectivity of the proposed development to the nearby Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex.

Compliance with the latest California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations and California Building Code's Title 24 energy standards includes implementation of reduction goals identified in the Riverside RRG-CAP, AB 32, the EO S-3-05, and other strategies to help reduce GHGs, as detailed in Table 7.C.

Table 7.C: Project Compliance with Greenhouse Gas Emission Reduction Strategies

Strategy	Project Compliance			
Energy Efficiency Measures				
 Measure SR-2: 2016 California Building Energy Efficiency Standards (Title 24, Part 6). Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities). Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. 	Compliant. The proposed project would comply with the requirements of Measure SR-2: 2016 California Building Energy Efficiency Standards (Title 24, Part 6), ¹ including measures to incorporate energy-efficient building design features detailed in Subchapter 7 (Low-rise Residential Buildings) Section 150.0 (Mandatory Features and Devices.)			
Water Conservation and Efficiency Measures				

P18-0022 (CLIP) and P18-0023 (DR) Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Poten Signif Imp	tially ficant pact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Measure W-1: Water Use Efficiency. Reduce per capita water use by 20% by 2020. SB X7-7 is part of a California legislative package passed in 2009 that requires urban retail water suppliers to reduce per-capita water use by 10% from a baseline level by 2015, and to reduce per-capita water use by 20% by 2020. Green accountability performance (GAP) Goal 16 directly aligns with SB X7-7. In Southern California, energy costs and GHG emissions associated with the transport, treatment, and delivery of water from outlying regions are high. Therefore, the region has extra incentive to reduce water consumption. While this is considered a state measure, it is up to the local water retailers, jurisdictions, and water to be accounted by the state measure.			liant. The pro- ements of M ency. Water-eff s and drought-t ed on the project	ject would con leasure W-1: icient irrigation olerant landscap et site.	nply with the Water Use a systems and bing would be
Solid Waste Reduction I	Measur	es			
Measure SR-13: Construction and Demolition (C&D) Waste Diversion. mandatory requirement to divert 50% of C&D waste from landfills by 202 exceed requirement by diverting 90% of C&D waste from landfills by 2035. Eff July 1, 2014, CALGreen, the State's Green Building Standards Code, rec jurisdictions to divert a minimum of 50% of their nonhazardous C&D waste landfills. Reductions for the year 2020 assume that 100% of new construction applicable retrofit projects meet the minimum diversion rates established by the For 2035, this measure assumes that C&D waste diversion would increase to 90 new construction and retrofit projects. This increase is in line with GAP Goa which aims to develop measures to encourage that a minimum of 90% of recov waste from all construction sites be recycled throughout Riverside by 2015, begin with 40% in 2010 and increasing by 10% each year thereafter.	Meet 20 and fective puires from on and state. % for al 6.A erable inning	Comp Measu Waste demol (includ concre reused	liant. The p re SR-13: C Diversion. ished and/or g ling, but not te, lumber, mo /recycled.	roject would Construction a At least 50 po rubbed constru limited to, s etal, and cardbo	comply with nd Demolition ercent of the ction materials oil, vegetation, oard) would be
Transportation and Motor Ve	ehicle N	leasure	s		
 Measure SR-6: Pavley and Low Carbon Fuel Standard (LCFS). identified this measure as a Discrete Early Action Measure. This measure wereduce the carbon intensity of California's transportation fuels by at 10 percent by 2020. Measure SR-12: Electric Vehicle Plan and Infrastructure. SCAG has development plug-in electric vehicle (PEV) readiness plan, and WRCOG has a sub regional plan for PEV readiness. Together, these plans identify viable loc for charging stations, changes to development codes, and other strategies encourage the purchase and use of electric vehicles. This measure is anticipated reduce nearly 82,000 MT CO₂e in participating WRCOG jurisdictions by 20 	ARB would least eloped similar ations s to ated to)20.	Comp petrole intensi quarte percen addres reason site wi Per th City ha Standa wiring the in (Section compliant) and In	liant. The L0 cum-based fur ity of their p r of a percent in t total reduction ses the larger able to conclud Il utilize fuels n e Municipal C as adopted the C rds Code (2014 of new resident stallation and on 4.106.4); the y with Measure frastructure.	CFS requires els to reduce products, begin a 2011 culminat on in 2020. As petroleum ir le that vehicles meeting the LCF Code (Section 1 California Green 6) which requir ntial development use of EV cha herefore, the SR-12: Electric	producers of the carbon ning with a ing in a 10 this standard dustry, it is accessing the 7S. 6.07.020), the Building es the pre- ent to facilitate rging stations project would c Vehicle Plan
Measure E-2: Shade Trees. Strategically plant trees at new developm reduce the urban heat island effect. Planting additional trees in urban environm has a number of benefits, including lowering peak-load energy demands during hottest months, enhancing the visual aesthetic of a community, and nat sequestering carbon dioxide. Properly selected and located shade trees can keep indoor temperatures low, thereby reducing air conditioner demands and u costs. Trees can also provide shade for parking lots and other paved areas, red urban heat island effect communitywide.	ents to ments g the urally help ttility lucing	Comp Measu landsc owner site.	liant. The pre E-2: Shade ape plan ar /residents, shad	project would Trees. As estat Id/or determin e trees would be	comply with blished by the ed by the e provided on-
Source: Riverside Restorative Growthprint, Climate Action Plan RRG – Part B, Octo 1. http://www.energy.ca.gov/title24/2016standards/ (Accessed November 15, 2017). ARB = California Air Resources Board GHG = greenhous	ber 2015 e gas				
With implementation of greenhouse gas emission reduction strate Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Code's Title 24 energy standards, the proposed project would be cons	egies d) Buildi istent v	etailed ing Pro vith the	in the latest gram regulati RGG-EPAP,	California D ons and Califo RRG-CAP, A	Department of ornia Building AB 32.

Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
Impacts related to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases would be less than significant. No mitigation is required.					
8. HAZARDS AND HAZARDOUS MATERIALS.					
Would the project:					

8a. Response: (Source: Phase I Environmental Site Assessment (Appendix E), California Health and Safety Code, Title 49 of the Code of Federal Regulations.)

Less Than Significant Impact. Construction of the project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials. These materials are typical of materials delivered to construction sites. However, due to the limited quantities of these materials to be used by the proposed project, they are not considered hazardous materials during the construction and operation of the site would be conducted pursuant to all applicable local, State, and federal laws, and in cooperation with the County's Department of Environmental Health. Title 49 of the Code of Federal Regulations implemented by Title 13 of the California Code of Regulations (CCR) describes strict regulations for the safe transportation, use, and storage of hazardous materials. Compliance with all applicable local, State, and federal laws related to the transportation, use, and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use, and storage.

Compliance with all applicable local, State, and federal laws, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, would ensure a less than significant impact directly, indirectly, and cumulatively from the routine transport, use, or disposal of hazardous materials. No mitigation is required.

b. Create a significant hazard to the public or the environment		X	
through reasonably foregoeship upset and encident			
through reasonably foreseeable upset and accident			
conditions involving the release of hazardous materials into)		
the environment?			

8b. Response: (Source: Phase I Environmental Site Assessment (Appendix E), California Health and Safety Code, Title 49 of the Code of Federal Regulations.)

Less Than Significant Impact. A Phase 1 Environmental Site Assessment (ESA) for the project was prepared in accordance with the standards and procedures outlined in the American Society for Testing and Materials (ASTM) E 1527-13, as applicable. The purpose of the Phase 1 ESA is to identify, to the extent feasible, and pursuant to the processes prescribed therein, recognized environmental conditions in connection with the property.

There is evidence the property was used as a citrus grove until the mid-1950s. However, there is no evidence of agricultural use in the past 60 years, and the property has remained vacant since the grove was removed prior to 1959, with occasional overland vehicle travel and domestic refuse dumping observed. The Riverside County Environmental Health Department, Hazardous Materials Division, maintains a list of the underground tank cleanup sites and emergency response activity within the County and was contacted on August 18, 2017, as part of the Phase 1 ESA work on the subject 12.87-acre property. The agency responded on September 6, 2017, and indicated that there were no files of any incidents or accidents involving hazardous materials on site. Furthermore, data from the Regional Water Quality Control Board indicate that there are no potential sites of contamination on or in the general area of the subject property.

The Phase I ESA concluded no hazardous materials were located on the subject 12.87-acre project property (Appendix E). The project site was inspected to assess if any on-site changes had occurred since development of the Phase I ESA. No structures or structural foundations, soil staining, or foul odors were observed on the property.

P18-0020 (RZ), P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

The Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) Information System maintains a list (last updated October 31, 2016) of large- and small-quantity hazardous waste generators. EPA RCRA large-quantity generators are facilities that generate at least 1,000 kilogram (kg)/month of non-acutely hazardous waste, or 1 kg/month of acutely hazardous waste. RCRA small-quantity generators are facilities that 1,000 kg/month of non-acutely hazardous waste. Based on a search of the RCRA Information System, the Phase I ESA concluded there are 28 nearby land uses that handle hazardous materials of various kinds, as summarized below:

- Twenty-one (21) sites are from the HAZNET CA database (list of sites that handle hazardous materials);
- Two (2) sites are from RCRA_NONGEN (C17 and Site 5) (Permits only for storage of hazardous materials; no hazardous materials generation);
- Two (2) sites are from HIST UST CA database (Historic underground storage tanks database; C13 and C16 operating gas stations);
- One (1) UST CA listing (Underground storage tanks database; Site C24) for permitted gasoline station;
- One (1) site on LUST REG 8 (Site C21 leaking underground storage tank; remediated and case closed in 2009); and
- One (1) CORRACTS site that overlaps Site C21 (LUST REG 8 listing).

None of the land uses identified in the Phase 1 ESA have any activities or materials that would represent a significant risk to public health or safety (e.g., on-site storage, leaking tanks, or vapor migration) on the subject property. One facility (EZ Service Unocal Gas Station (Site C21) at 350 Stephens Avenue, Riverside) was reported to have a leaking underground (gasoline) storage tank discovered in 1986 with possible groundwater contamination approximately 0.2 mile east of the project site. The facility was monitored by the Santa Ana Regional Water Quality Control Board with extensive documentation of well and soil tests, and the case regarding groundwater contamination was closed in 2009. Additionally, the facility was subject to "corrective action" (CORRACTS). A "corrective action order" is issued pursuant to RCRA Section 3008(h) when there has been a release of hazardous waste or constituents into the environment from a RCRA facility. Corrective actions may be required beyond the facility's boundary and can be required regardless of when the release occurred, even if it predates RCRA. Through the CORRACTS process, the leaking underground storage tank was remedied, and the CORRACTS case was closed in 2005. According to the Phase 1 ESA, the leak from the EZ Service Unocal Gas Station (Site C21) at 350 Stephens Avenue, Riverside was not of sufficient size to represent vapor migration risk to the subject property (i.e., project site).

The subject property does not currently contain any Recognized Environmental Conditions, Controlled Recognized Environmental Conditions, or Historical Recognized Environmental Conditions, nor is it subject to vapor migration from any on-site or off-site sources. Compliance with local, State, and federal laws would reduce impacts directly, indirectly, and cumulatively from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment to less than significant levels. No mitigation is required.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within onequarter mile of an existing or proposed school?



8c. Response: (Source: General Plan 2025 Public Safety and Education Elements, General Plan 2025 FPEIR Table 5.7-D – CalARP RMP Facilities in the Project Area, Figure 5.13-2 – Riverside Unified School District (RUSD) Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-4 – Other School District Boundaries, Riverside Unified School District (RUSD) Website).

No Impact. Grand Terrace High School (21810 Main Street, Grand Terrace) is located approximately 0.9 mile east of the project site, Highgrove Elementary School (690 Center Street, Riverside) is located approximately 1.15 miles east of the project site. No schools are currently proposed within one quarter mile of the project site. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact directly, indirectly, or cumulatively would occur, and no mitigation is required.

^{Initial Study}, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				\boxtimes	
8d. Response: (Source: Phase I Environmental Site Assessment (Appendix E), General Plan 2025 Figure PS-5 – Hazardous Waste Sites, General Plan 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)					
No Impact. A search of the Department of Toxic Substances Control Protection Agency "Cortese List" compiled pursuant to Governmen concern regarding hazardous materials on the project site or in the General Plan 2025 FPEIR (Figure 5.7-1) does not list any hazardous no impact related to this issue would occur directly, indirectly, or cur	EnviroStor d t Code Sectio immediate vi waste sites on nulatively, and	latabase and th on 65962.5 inc cinity of the p or adjacent to l no mitigation	the California E dicates there a project site. In the project sit is required.	Environmental re no sites of addition, the te. Therefore,	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?					
8e. Response: (Source: General Plan 2025 FPEIR Figure 5.7-2 Riverside County Airport Land Use Compatibility Plan (RC	2 – Airport Sa JALUCP)	fety and Comp	oatibility Zone	rs and	
No Impact. The proposed project is not located within an Airport Safety Zone, as depicted in Figure 5.7-2 of the General Plan 2025 FPEIR. The project site is not within two miles of a public airport or public use airport. Because the project is not located in an airport zone or within two miles of an airport, no further compliance is necessary with any airport plan. No impact related to safety hazards for people residing or working in the project area directly, indirectly, or cumulatively would occur, and no mitigation is required.					
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				\boxtimes	
8f. Response: (Source: General Plan 2025 Figure PS-6 – Airpo	ort Safety Zon	es and Influe	nce Areas, RC	CALUCP)	
No Impact. Because the proposed project is not located within proximity of a private airstrip and does not propose a private airstrip, it would not expose people residing or working in the project area to safety hazards related to a private airstrip. No impact related to people residing or working in the project area directly, indirectly, or cumulatively would occur, and no mitigation is required.					
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuationplan?			\square		
8g. Response: (Source: City of Riverside Emergency Operations of the City of Riverside Public Works Department, The Pres Areas - December 29, 2016)	s Plan - Janu ss Enterprise	ary 2011. Traj - Local News	ffic Engineeri - Police Adjus	ng Section t Patrol	
Less Than Significant Impact. The proposed project would be conserved project would be conserved of the proposed project would be conserved of the project	onstructed and ned response ntrance (off C ropriate fire d	d operated in by the City Po enter Street) w lepartment acco	accordance w lice and Fire I ill not be gated ess to the proj	ith the City's Departments to d. The project, ect site in the	

The project is within an urbanized area and would be served by the surrounding network of existing, fully improved streets. All streets have been designed to meet the Public Works and Fire Department specifications. As part of the proposed
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

project's construction, a temporary street closure may be necessary, but if necessary would be implemented in accordance with a typical traffic control plan approved by the City and also would be of short duration so as not to interfere or impede with any emergency response or evacuation plan. Therefore, the project would have a less than significant impact directly, indirectly, and cumulatively to an emergency response or evacuation plan. No mitigation is required.

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

8h. Response: (Source: General Plan 2025 FPEIR Figure 5.7-3 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), 2004 Part 1/Part 2 and Office of Emergency Services' (OEM's) Strategic Plan, San Bernardino County Land Use Plan, General Plan, Hazard Overlays, Victorville/San Bernardino. March 9, 2010)

No Impact. The proposed project is located in an urbanized area where no wildlands exist, and the project site is not located adjacent to wildland areas or within a Fire Hazard Area as depicted in Figure 5.7-3 of the General Plan 2025 FPEIR or Fire Safety Overlay District pursuant to the San Bernardino County Land Use Plan. Therefore, no impact related to wildland fires either directly, indirectly, or cumulatively from this project would occur. No mitigation is required.

9.	HYDROLOGY AND WATER QUALITY. Would the project:			
	a. Violate any water quality standards or waste discharge requirements?		\square	

9a. Response: (Source: General Plan 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; Preliminary Water Quality Management Plan (WQMP) for Center Park (Appendix F1), Preliminary Hydrology & Hydraulics Report for Center Park (Appendix F2)).

Less Than Significant Impact. The project is located on a 12.87-acre property along Center Street within the Santa Ana River Watershed. The project site is undeveloped with 100 percent pervious earthen surface and would construct approximately 420,455 square feet (9.65 acres) of impervious surface area. The site clearing and grading phases would disturb vegetation and surface soils, potentially resulting in erosion and sedimentation. If left exposed and with no vegetative cover, the site's bare soil would be subject to wind and water erosion. Since the project involves more than one acre of ground disturbance, it is subject to NPDES requirements and must implement a SWPPP. Implementation of site-specific best management practices (BMPs) as established by the SWPPP would ensure all impacts related to erosion and sedimentation from ground disturbance are less than significant.

The Clean Water Act (CWA) establishes a framework for regulating municipal and industrial (including construction) storm water discharges under the National Pollutant Discharge Elimination System (NPDES) permit. Section 402(p) of the CWA requires NPDES permits for storm water discharges from municipal separate storm sewer systems (MS4), as well as other designated storm water discharges that are considered significant contributors of pollutants. The Santa Ana Regional Water Quality Control Board developed the NPDES Permit and Waste Discharge Requirements (WDR) (Order No. R8-2010-0033 or MS4 Permit) for the Riverside County Flood Control District and other local agencies. The City is a co-Permittee under this permit.

The City is located within the Riverside County Drainage Area Management Plan (DAMP), which describes a wide range of continuing and enhanced Best Management Practices (BMPs) and control techniques, which are being implemented during the term of the MS4 permit. As the City is an MS4 co-Permittee and because the DAMP addresses the requirements of the to meet MS4 permit conditions, the City is required to enforce and comply with the storm water discharge requirements detailed in the DAMP.

There are no known existing water quality problems associated with the project site. Under existing conditions, runoff from the southeastern portion of the site is conveyed as sheet flow in a southwesterly direction into the on-site intermittent stream. Additional off-site runoff from Viola Drive confluences with the on-site runoff within the on-site intermittent stream. Runoff

Initial Study, MND, and Appendices P18-0022 (CUP),

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

conveyed through the on-site intermittent stream is discharged off site and into a culvert that conveys runoff under Orange Street and discharges at grade as sheet flow on the western side of Orange Street. Runoff from the remaining northeastern portion of the project site is conveyed westerly as sheet flow and shallow concentrated flow into Center Street. Per City records, there are no storm drain improvements within the project vicinity.

The project-specific Water Quality Management Plan (WQMP) identifies two Drainage Management Areas (DMAs). Under proposed conditions, runoff from DMA 1A-C would be conveyed to new gutters and as sheet flow prior to being captured by proposed catch basins at the street ends and low points. From those points, runoff would be conveyed through an underground storm drain system and discharged into a proposed infiltration basin (sump basin BMP). This sump basin BMP would be designed to retain the project site's low flows and hydromodification volume. High flows beyond the basin's capacity would overflow via riser and be conveyed through an underground storm drain line and outlet at the southwestern corner of the project site into the intermittent stream and discharged off site as described above.

Runoff from DMA 2A-C would be conveyed to new gutters and as sheet flow prior to entering proposed catch basins located at the northwestern street end and low points. From those points, captured runoff would be conveyed through an underground storm drain system and into an underground infiltration gallery (sump basin BMP) that would be designed to handle the project site's low-flow runoff and hydromodification volume to be treated via infiltration. High flows beyond the infiltration gallery's capacity would bypass treatment and continue as surface flows through a culvert leading out to Center Street. Although a catch basin filter insert is proposed for DMA 2A-C, it would not be the primary BMP of treatment. Instead, the proposed catch basin filter insert would act as a pre-treatment to remove fine-grained sediment⁴ and prevent clogging prior to runoff flowing into the underground infiltration gallery.

All runoff is conveyed southwestward to Reach 4 of the Santa Ana River, flowing downstream through Reach 3 of the Santa Ana River, through the Prado Basin Management Zone, and ultimately into the Pacific Ocean. Both Reach 4 and Reach 3 of the Santa Ana River list pathogens (Bacterial Indicators) as EPA-approved 303(D) listed impairments to water quality and are the pollutants of concern of the proposed project.

To address potential water contaminants, the project is required to comply with applicable federal, State, and local water quality regulations, including the design and maintenance of the DMAs detailed in the project-specific WQMP and described above. The proposed sump basins, to where on-site runoff is designed to flow through the respective DMA, would infiltrate the maximum volume of runoff. Based on calculations from the project-specific WQMP, DMA 1A-C would collectively manage runoff from 490,490 square feet of the project site and would require a minimum Design Capture Volume (DCV) of 16,246 cubic feet of runoff. Accordingly, DMA 1A-C would be treated via infiltration basin with a footprint of 7,025 square feet and a ponding depth of 4 feet to provide a DCV of 42,253 cubic feet (storage and volume retention). DMA 2A-C would manage runoff from 70,308 square feet of the project site and would require a minimum DCV of 2,936 cubic feet of runoff. Accordingly, DMA 2A-C would be treated via an underground infiltration gallery that consists of 17 30-inch corrugated metal pipes measuring 59 linear feet, which would provide a DCV of 4,923 cubic feet (storage and volume retention). The combined DCV of the proposed BMP sump basins treating DMA 1A-C and DMA 2A-C would satisfy the estimated detention volume needed post-development for the project per the preliminary hydrology calculations by Fuscoe Engineering(Appendix F1). According to the WQMP, the full DCV would be met with the proposed infiltration BMP sump basins that would treat DMA 1A-C and DMA 2A-C, respectively.

The on-site drainage appears to be an isolated feature and the USACE is unlikely to assert jurisdiction under CWA Section 404 because the drainage OHWM disappears downstream in a vacant agriculture field west of Orange Street and thus lacks a clear nexus to traditional navigable waters. However, the USACE may determine that there is a surface hydrology connection to the Santa Ana River and thus assert jurisdiction of the riparian drainage and potentially require Section 401 and 404 permitting for impacts to waters of the U.S. If the riparian drainage is not subject to USACE jurisdiction, it may still be regulated by the RWQCB under the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act) with

⁴ Particle sizes range from less than 0.002 mm (e.g., clay) to greater than 2 mm (e.g., fine gravel). "Fine-grained sediments" refers to the clay and siltsized fractions.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

Waste Discharge Requirements (WDR). The 0.67-acre of the stream comprising both the bed-and-bank and associated wildlife habitat would require a Streambed Alteration Agreement administered by the CDFW pursuant to California Fish and Game Code Section 1600. Mitigation Measure BIO-4 requires coordination between the applicant and the regulatory agencies to determine the jurisdiction (if any) and permit conditions (as appropriate and required) to address impacts to the on-site drainage. Prior to the issuance of a grading permit for the project, the project applicant must provide evidence that the applicable permit requirements have been satisfied. Furthermore, the WQMP would be reviewed and approved as a routine action during the processing of the project by the City; therefore, it is reasonable that the required measures and features detailed in the WQMP to safeguard water quality would be incorporated into the proposed project. Given compliance with all applicable federal, State, and local laws regulating surface water quality, the proposed project as designed is anticipated to result in a less than significant impact directly, indirectly, and cumulatively to any water quality standards or waste discharge. No mitigation is required.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pro existing peerby wells would drap to a lower			
rate of pre-existing nearby wells would drop to a level			
which would not support existing land uses or planned			
uses for which permits have been granted)?			

9b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, 2015 RPU Urban Water Management Plan).

Less Than Significant Impact. Water service for the site would be provided by Riverside Public Utilities (RPU). RPU extracts groundwater from five groundwater basins, which accounts for the majority of its supplies. Approximately 60 percent comes from the Bunker Hill Basin, within which water rights are adjudicated. RPU's water rights are based on the long-term yield of the basin estimated for normal, dry, and multiple-dry years. Pursuant to the 2015 Urban Water Management Plan (UWMP), the RPU maintains sufficient supplies of water (including groundwater) during normal, dry, and multiple-dry years and would have a reliable and sufficient water supply, which would exceed projected demand through the year 2040.

The UWMP bases its demand estimates on broad categories of uses (e.g., single-family residential, commercial/industrial/ institutional) and growth projections identified by the City. The project site has a land use designation of MDR – Medium Density Residential and a zoning designation of R-1-7000 – Single Family Residential Zone, and the proposed project would apply the MH – Mobile Home Park Overlay to the site. The MH – Mobile Home Park Overlay Zone establishes standards to ensure a suitable living environment for those persons residing within a mobile home park and to ensure compatibility of such park with the surrounding area. Therefore, the proposed project is consistent with the City's existing land use and zoning designations, and it is reasonable to conclude that a water demand for the project site has been previously included in the estimates of future demand.

The proposed project site has been designed to maximize the landscape areas, thereby minimizing the impervious area to the maximum extent possible; runoff from the site would disperse into infiltration facilities or landscaped areas prior to discharging into the city storm drain. Additionally, the proposed project would utilize water conservation project design features such as low-flush toilets, low-flow faucets, and drought-tolerant landscaping. The project does not include wells or excavations at a depth that would interfere with groundwater recharge.

Because local groundwater supplies are sufficient to supply project growth within the RPU service area, and because the UWMP anticipates adequate existing and future water supplies to accommodate this growth, the proposed project would result in a less than significant impact to groundwater supplies and recharge either directly, indirectly, or cumulatively. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite?			\square	

9c. Response: (Source: General Plan 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; Preliminary Water Quality Management Plan (WQMP) for Center Park (Appendix F1), Preliminary Hydrology & Hydraulics Report for Center Park (Appendix F2), Map 2 - HCOC Applicability Map SAR Permittees – Hydromodification Susceptibility Documentation Report and Mapping: Santa Ana Region - January 18, 2017.)

Less Than Significant Impact. The project site moderately slopes from northeast to southwest and would generally maintain the same drainage pattern. The project site does not have any features or facilities promoting infiltration except those that occur as surface runoff flows across the barren soil toward the intermittent drainage. The riparian drainage appears in historical aerial photos as far back as 1938 (NETRonline). Currently, the vast drainage stream is fed from runoff generated along impermeable surfaces (e.g., roads, gutters, and structures) upstream. General sheet flow conditions would be maintained, and the project site would be designed with infiltration BMP sump basins and permeable areas within DMA 1A-C and DMA 2A-C to ensure runoff from regular rain events are retained on site. No alterations to the course of the intermittent stream are proposed.

The proposed DMAs were analyzed to determine if their conveyance of storm water runoff would create a Hydrologic Condition of Concern (HCOC). A HCOC occurs when post-development runoff conditions exceed pre-development runoff conditions, and discharge from the project site has a flow rate greater than 110 percent of the pre-development two-year peak flow. Generally, projects are exempt from HCOC analysis if (1) they disturb less than one acre; (2) the volume and time of concentration of storm water runoff under post-development conditions are within five percent of pre- development conditions for a two-year return frequency 24-hour storm; or (3) all downstream conveyance channels to an adequate sump (e.g., Santa Ana River or Prado Dam) engineered and regularly maintained to ensure design flow capacity, no sensitive stream habitat areas would be adversely affected, or they are not identified on the Co-Permittees Hydromodification Sensitivity Maps. The proposed project is greater than one acre, would entail volume and time of concentration of storm water runoff under post-development conditions in excess of five percent of pre-development conditions for a two-year return frequency 24-hour storm, and is located within the Co-Permittees Hydromodification Sensitivity Map, as detailed in Map 2 - *HCOC Applicability Map SAR Permittees* of the *Hydromodification Susceptibility Documentation Report and Mapping: Santa Ana Region - January 18, 2017.* Therefore, the proposed project is required to conduct an analysis of HCOC. Table 9.A summarizes the project-specific HCOC of DMAs 1A-C and 2A-C.

As detailed in Table 9.A, the proposed DMAs under post-development conditions would increase storm water runoff over pre-development conditions 710 percent within DMA 1A-C and 158 percent within DMA 2A-C as a result of conversion of 420,455 square feet of pervious surface area into impervious surface area within the project site. The infiltration BMP sump basins are proposed to address the projected increase in storm water runoff and are analyzed to determine if their respective infiltration capacities would adequately mitigate HCOC. According to the project-specific WQMP, the project HCOC would be mitigated if, mimicking the pre-development hydrograph with the post-development hydrograph for a 2-year return frequency storm, the post-development hydrograph is no more than 10 percent greater than the pre-development hydrograph, and in cases where excess volume cannot be infiltrated or captured and reused, discharge from the site would be limited to a flow rate no greater than 110 percent of the pre-development 2-year peak flow. Table 9.B summarizes the hydromodification results of the proposed infiltration BMP sump basins for DMA1A-C and DMA2A-C, respectively.

ISSUES (AND SUF INFORMATION S	PPORTING SOURCES):		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 9.A: Hydrologic Co	onditions of Concern S	ummary				
	DMA 1A-C:	2-Year, 24-Hour S	Storm Summa	ry		
Condition	Acreage	Tc (Lag Tin Minutes	ne in) P	eak Runoff (cfs) Volum	e (acre-feet)
Pre-Development	8.3	3.17		0.22		0.131
Post-Development	11.2	10.98		1.70		1.061
Difference	2.9	+7.81		1.48		0.93
% Change	35%	+246%		+673%	+	-710%
	DMA 2A-C:	2-Year, 24-Hour S	Storm Summa	ry	·	
Pre-Development	4.6	1.77		0.12		0.073
Post-Development	1.7	9.47		0.30		0.188
Difference	-2.9	+7.7		0.18		0.115
% Change	-63%	+435%		+150%	+	-158%

Source: Table F-1, Preliminary Water Quality Management Plan (Appendix F1).

DMA = Drainage Management Area cfs = Cubic Feet per Second

Table 9.B: Hydromodification BMP Sump Basins Summary

	Hydromodification BMP Sump Basins Summary							
Drainage Area	Proposed Volume Mitigation (ac-ft)	Pre-Development Runoff Volume (ac-ft)	Post-Development Mitigated Volume (ac-ft)	% Change in Off-site Runoff Volume				
DMA-1A-C	0.97	0.131	0.091	-31%				
DMA-2A-C	0.113	0.073	0.075	+3%				

Source: Table F-2, Preliminary Water Quality Management Plan (Appendix F1).

DMA = Drainage Management Area ac-ft = acre-feet

As detailed in Table 9.B, the proposed infiltration BMP sump within DMA 1A-C would reduce off-site storm water runoff by 31 percent over pre-development volumes, so there would be no HCOC from DMA 1A-C. Furthermore, DMA 2A-C would infiltrate approximately 0.113 acre-feet of runoff and would result in a mitigated flow rate of 0.075 acre-feet, which exceeds the pre-development runoff volume of 0.073 acre-feet by 3 percent, and which is below the threshold of a 10 percent increase. There would be no HCOC from DMA 2A-C.

The WQMP would be reviewed and approved as a routine action during the processing of the project by the City; therefore, it is reasonable that the required measures and features detailed in the WQMP to safeguard the existing drainage pattern of the site and area would be incorporated into the proposed project. The project would not have any substantial effects on a stream or river, as the on-site intermittent stream generated by urban runoff ends 250 feet west of Orange Street where it dissipates into a vacant field and percolates into the ground. Additionally, since post-development storm water runoff would not exceed pre-development runoff by more than 10 percent, the project is designed and would be developed consistent with an approved Watershed Action Plan that addresses HCOC in receiving waters. Through compliance with all applicable federal, State, and local laws and regulations, the proposed project would not alter the existing drainage pattern of the on-site stream. Impacts from substantial erosion or siltation on or off site as a result of altering existing drainage patterns would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?



Initial Study, MND, and Appendices

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

9d. Response: (Source: General Plan 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; Preliminary Water Quality Management Plan (WQMP) for Center Park (Appendix F1), Preliminary Hydrology & Hydraulics Report for Center Park (Appendix F2), Map 2 - HCOC Applicability Map SAR Permittees – Hydromodification Susceptibility Documentation Report and Mapping: Santa Ana Region - January 18, 2017.)

Less Than Significant Impact. Refer to Checklist Response 9c. The riparian drainage appears in historical aerial photos as far back as 1938 (NETRonline). The riparian drainage discharges off site and into a culvert that directs runoff under Orange Street and discharges into a concrete-lined channel as concentrated flow on the western side of Orange Street where it discharges into a vacant field. Although no drainage or OHWM were visible in the vacant field downstream, historical imagery indicates that exceptional storm flows have potential to sheet flow across the vacant field to the concrete channel to the southwest along Garner Road and drain into Lake Evans, the Santa Ana River, and eventually the Pacific Ocean.

Post-development storm water runoff would not exceed pre-development runoff by more than 10 percent, so the project is designed and would be developed consistent with an approved Watershed Action Plan that addresses HCOC in receiving waters. Through compliance with all applicable federal, State, and local laws and regulations, the proposed project would not alter the existing drainage pattern of the on-site stream or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. Impacts from flooding on or off site as a result of altering existing drainage patterns or increasing the rate or amount of surface runoff would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

e.	Create or contribute runoff water which would exceed		\times	
	the capacity of existing or planned storm water drainage			
	systems or provide substantial additional sources of			
	polluted runoff?			

9e. Response: Source: (Source: General Plan 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; Preliminary Water Quality Management Plan (WQMP) for Center Park (Appendix F1), Preliminary Hydrology & Hydraulics Report for Center Park (Appendix F2), Map 2 - HCOC Applicability Map SAR Permittees – Hydromodification Susceptibility Documentation Report and Mapping: Santa Ana Region -January 18, 2017.)

Less Than Significant Impact. Refer to Checklist Response 9c. The Federal Clean Water Act delegates authority to the States to issue NPDES permits for discharges of storm water from construction, industrial, and municipal entities to Waters of the United States. The purpose of the California Municipal Separate Storm Water Sewer System (MS4) permit meets the California State Water Resources Control Board's requirements to mitigate for the negative impact of increases in storm water runoff caused by new development and redevelopment. The project storm water discharge rates cannot exceed the predevelopment runoff condition for 2-year 24-hour storm total or the 85th percentile 24-hour storm runoff event to be in compliance with the MS4 post-construction and site design requirements.

The proposed project would include retention features that would help prevent increases in the rate or volume of storm water runoff leaving the site. The project is over one acre in size and is required to have coverage under the State's General Permit for Construction Activities (SWPPP). As stated in the permit, during and after construction, BMPs would be implemented to reduce/eliminate adverse water quality impacts resulting from development. All impacts related to runoff during site preparation, demolition, and grading would be addressed by the SWPPP. The site has been designed to maximize the landscape areas, thereby minimizing the impervious area to the maximum extent practicable. All runoff from the built project site would disperse into infiltration facilities or adjacent landscape planted areas prior to discharging into the on-site intermittent stream. As detailed in Checklist Response 9a, the combined DCV of the proposed BMP sump basins treating DMA 1A-C (42,253 cubic feet of storage and volume retention) and DMA 2A-C (4,923 cubic feet of storage and volume retention) would satisfy the estimated detention volume needed post-development for the project per the preliminary hydrology calculations by Fuscoe Engineering (Appendix F1). According to the WQMP, the full DCV would be met with the proposed infiltration BMP sump basins that would treat DMA 1A-C and DMA 2A-C, respectively.

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant Impact	Significant With Mitigation Incorporated	Significant Impact	Impact
Any sources of storm water pollution would be addressed through adh storm water runoff would not exceed pre-development runoff by more developed consistent with an approved Watershed Action Plan that ac applicable federal, State, and local laws and regulations would ensure capacity of existing or planned storm water drainage systems or cont would be less than significant directly, indirectly, and cumulatively. No	erence to NPE than 10 perce ldresses HCOG impacts from ributing substa mitigation is r	DES permit req nt, so the proje c in receiving n generation of antial additionare quired.	uirements. Pos ect is designed waters. Comp f runoff water al sources of p	t-developmer and would b liance with a exceeding th colluted runof
f. Otherwise substantially degrade water quality?			\boxtimes	
9f. Response: (Source: Preliminary Water Quality Management	nt Plan (WQM	IP) for Center	Park (Appen	dix F1)
and wQMP during and after construction, respectively. As detailed proposed BMP sump basins treating DMA 1A-C (42,253 cubic feet of cubic feet of storage and volume retention) would satisfy the estim project per the preliminary hydrology calculations by Fuscoe Engined DCV would be met with the proposed infiltration BMP sump basins the As detailed in Checklist Response 9c, the WQMP would be reviewed of the project by the City; therefore, it is reasonable that the requ safeguard the existing drainage pattern of the site and area from storn project. The project would not have any substantial effects on a streat by urban storm water runoff ends 250 feet west of Orange Street we the ground. Furthermore, post-development storm water runoff wou percent, so the project is designed and would be developed const addresses HCOC in receiving waters. Through adherence to NPDES proposed infiltration BMP sump basins that would treat DMA 1A-C hydromodification effects either on-site or off-site as a result of the p than significant directly, indirectly, and cumulatively. No mitigation i	and approved and approved at would treat I and approved ired measures m water runof am or river, as here it dissipa ld not exceed sistent with a permit requir C and DMA 2 proposed proje s required.	Acsponse 9a, volume retent volume neede ix F1). Accord DMA 1A-C an d as a routine a s and features f would be inc s the on-site in tes into a vaca pre-developm n approved V rements, full I A-C, respective ct. Impacts to	the combined ion) and DMA ed post-develo ding to the We ad DMA 2A-C action during to detailed in the corporated into the detailed and p the field and p the trunoff by Vatershed Act DCV would be vely, and there water quality	bCV of th 2A-C (4,92 pment for th QMP, the ful , respectively he processing ne WQMP to the propose am generate percolates int more than 14 ion Plan that met with the would be les
g. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				

9g. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, FEMA Flood Insurance Rate Map Number 06065C00654G)

No Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06065C0065G, the project is proposed in Zone X, which is identified to be outside the 100-year (1 percent annual chance of flood) and 500-year (0.2 percent annual chance of flood) flood hazard areas. Therefore, no impact would occur directly, indirectly, or cumulatively, and no mitigation is required.

h.	Place within a 100-year flood hazard area structures		
	which would impede or redirect flood flows?		

9h. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Number 06065C0720G)

No Impact. According to FEMA Flood Insurance Rate Map No. 06065C0065G, the project is proposed in Zone X, which is identified to be outside the 100-year (1 percent annual chance of flood) and 500-year (0.2 percent annual chance of flood) flood hazard areas. Therefore, no impact would occur directly, indirectly, or cumulatively, and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				\boxtimes

9i. Response: (Source: General Plan 2025 FPEIR Figure 5.8-2 – Flood Hazard Areas, FEMA Flood Insurance Rate Map Number 06065C00654G)

No Impact. According to FEMA Flood Insurance Rate Map No. 06065C0065G, the project is proposed in Zone X, which is identified to be outside the 100-year (1 percent annual chance of flood) and 500-year (0.2 percent annual chance of flood) flood hazard areas. Additionally, according to General Plan 2025 FPEIR Figure 5.8-2 – Flood Hazard Areas, the project site is not located within a dam inundation area. Therefore, the proposed project would not place people or structures within an area subject to flooding, including flooding as a result of the failure of a levee or dam. No impact would occur directly, indirectly, or cumulatively. No mitigation is required.

j.	Expose people or structures to inundation by seiche,		\boxtimes	
	tsunami, or mudflow?	 		

9j. Response: (Source: General Plan 2025 Chapter 7.5.8 – Hydrology and Water Quality; General Plan 2025, Open Space and Conservation Element, Figure OS-4)

Less Than Significant Impact. The project site is not located near or adjacent to a lake or ocean; therefore, there is no potential for inundation of the site by a seiche (a wave or oscillation of the surface of water in an enclosed or semi-enclosed basin). The site is 44 miles from and over 800 feet higher in elevation than the Pacific Ocean, so there is no potential for impacts from a tsunami. The project site is relatively flat, and it is surrounded on all sides by flat terrain for at least 1,000 feet. There is some potential for mudflows from the nearby La Loma Hills under extreme rain events, but this risk is considered negligible given the area rainfall and granitic soils comprising the La Loma Hills. Therefore, potential impacts from seiche, tsunami, or mudflows would be less than significant directly, indirectly, or cumulatively. No mitigation is required.

10. LAND USE AND PLANNING.		
Would the project:		
a. Physically divide an established community?		\square

10a.Response: (Source: General Plan 2025 Land Use and Urban Design Element, General Plan 2025 Park and Recreation Element-Figure PR-1, City of Riverside GIS/CADME Map Layers).

No Impact. The proposed project would result in residential development on a vacant, undeveloped site. The site encompasses approximately 12.87 acres and would include 99 dwelling units, and a recreation facility. The site is surrounded primarily by existing residential development to the north, east, and south, while land uses to the west are light industrial in nature and consist of a trailer staging and automobile towyard.

The proposed project would not physically divide the adjacent residential communities to the north, east, or south, nor would it obstruct the existing commercial/light industrial uses to the west. The existing uses of the immediate surrounding area and the proposed uses of the project site are designated MDR – Medium Density Residential. Therefore, residential communities would become more contiguous through the conversion of the project site from undeveloped to residential. The proposed project includes an application for rezoning to apply the MH – Mobile Home Park Overlay Zone to the project site, which would permit an increase in dwelling units per acre from up to 6.2 currently permitted under the base zone of R-1-7000 – Single Family Residential Zone to up to 10 dwelling units per acre. However, the proposed project would be developed at a density of approximately 7.7 dwelling units per acre. As detailed in Table LU-5 of the General Plan, both the R-1-7000 – Single Family Residential Zone and MH – Mobile Home Park Overlay Zone are consistent with the MDR – Medium Density Residential General Plan designation. Additionally, new sidewalks and trails included along the proposed Center Street frontage improvements as part of the proposed project would improve the connectivity of nearby communities to the Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex, respectively 1,000 feet southwest and 1,500 feet west of the project site. Since development of the proposed project would entail residential uses in an area currently comprising residential uses, the

P18-0020 (RZ),

P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

Initial Study

	ISSUES (AND SUPPORTING INFORMATION SOURCES):		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--	---	--	--------------------------------------	--	------------------------------------	--------------

proposed project would promote residential connectivity in the area instead of physically divide an established community. Therefore, no impact directly, indirectly, or cumulatively to an established community would occur. No mitigation is required.

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



10b. Response: (Source: General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design Guidelines and Sign Guidelines, Title 19 – Zoning)

Less Than Significant Impact. The project site is designated for MDR – Medium Density Residential uses in the City's General Plan and is within the R-1-7000 – Single-Family Residential Zone. This designation provides for the development of single-family homes, town houses, and row houses. The project does not include a General Plan or Specific Plan amendment. However, the proposed project includes an application to rezone the property to apply the MH – Mobile Home Park Overlay Zone to the project site in accordance with RMC Chapters 19.100 and 19.210 and a request for a Conditional Use Permit in accordance with RMC Chapter 19.760. Application of the MH – Mobile Home Park Overlay Zone would permit an increase in dwelling units per acre from up to 6.2 currently permitted under the base zone of R-1-7000 – Single Family Residential Zone to up to 10 dwelling units per acre. The City's General Plan assumed the current MDR - Medium Density Residential designation with a maximum density of 6.2 dwelling units per acre, but the proposed project would be developed at a density of approximately 7.7 dwelling units per acre.

The MH – Mobile Home Park Overlay Zone establishes standards to ensure a suitable living environment for those persons residing within a mobile home park and to ensure compatibility of such a park with the surrounding area. The MH – Mobile Home Park Overlay Zone may only be applied in combination with a base zone of R-1-7000 Single Family Residential Zone. As detailed in Table LU-5 of the General Plan, both the R-1-7000 Single Family Residential Zone and MH – Mobile Home Park Overlay Zone are consistent with the MDR – Medium Density Residential General Plan designation.

Conditional Use Permits are intended to allow the establishment of uses that may have some special influence, uniqueness, or impression on the neighborhood surrounding the subject site. The permit application process allows for the review of the location and design of the proposed project, configuration of improvements, potential impact(s) on the surrounding neighborhood, and to ensure that development of the project protects the integrity of the zoning district in which it is proposed. In order for a Conditional Use Permit to be approved, the proposed land use must be consistent with the City's General Plan land use and zoning designations, and the proposed use must be substantially compatible with other existing and proposed uses in the area, including factors relating to the nature of its location, operation, building and site design, traffic characteristics, and environmental impacts.

The proposed project uses are consistent with uses permitted under the General Plan land use and zoning designations for the project site, compatible with surrounding residential uses to the north, east, and south, and, as detailed throughout this Initial Study, all impacts to the environment resulting from the proposed project are subject to applicable mitigation and local, State and/or federal regulations, which would reduce those impacts to less than significant levels. Therefore, impacts related to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect are less than significant. No mitigation is required.

|--|

10c. Response: (Source: Regional Conservation Authority, (http://www.wrc-rca.org/webimages/mshcpsize.pdf) General Plan 2025 – Figure OS-7 – MSHCP Core and Linkage, MSHCP, , Biological Resources Assessment and MSHCP

> P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
Consistency Analysis and Habitat Assessment for the Center Park Residential Project (Appendix B1)).					

No Impact. The project site is located within an urbanized area and has been previously disked for weed abatement. The project site is located within the MSHCP Cities of Riverside and Norco Area Plan; therefore, the project is subject to applicable provisions of the MSHCP as specified in Checklist Responses 4a, 4b, and 4e, above. The project site is not located in an area subject to Cell Criteria under the MSHCP and, therefore, has no conservation requirements toward building out the MSHCP Reserve. The project is required to comply with RMC Section 16.72.040 establishing the MSHCP mitigation fee. Through adherence to the RMC, the project would have no impact on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly, or cumulatively. No mitigation is required.

11. MINERAL RESOURCES.		
Would the project:		
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the		\square
residents of the state?		

11a. Response: (Source: General Plan 2025 FPEIR Figure 5.10-1, Mineral Resources)

No Impact. The proposed project is in Mineral Resource Zone IV, indicating that the presence or absence of mineral resources under the site is not known. The California Department of Conservation Division of Mines and Geology emphasizes that this does not necessarily mean that the presence of mineral resources at the site is unlikely; rather just that there is insufficient information available to determine presence or absence.

However, mining operations in the City have not been active for decades. According to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred; therefore, the proposed project would not result in any loss of availability of any known or unknown mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and surrounding land uses would preclude mining from occurring. Further, the designated land uses for the project site and for the surrounding area are incompatible for mining operations. No impact will occur and no mitigation is required.

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

11b. Response: (Source: General Plan 2025 Figure OS-1 – Mineral Resources)

No Impact. The General Plan 2025 FPEIR determined that there are no specific areas within the City of Sphere of Influence that have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The proposed project is consistent with the General Plan 2025. Therefore, the project will have no impact on locally significant mineral resources directly, indirectly, or cumulatively. No mitigation is required.

12. NOISE. Would the project result in:		
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		

12a. Response: (Source: General Plan 2025 FPEIR, City of Riverside Municipal Code Title 7 – Nose Control, Traffic Impact Analysis (Appendix G))

Less Than Significant Impact. The project would have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of

P18-0020 (RZ),	
P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study.	MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

the community in which it is located. The applicable noise standards governing the project site are the noise criteria listed in the Noise Element of the General Plan 2025 and in Title 7 - Noise Control of the City's Municipal Code.

City of Riverside General Plan Noise Element. The Noise Element specifies the maximum allowable unmitigated exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several policies to minimize the impacts of excessive noise levels throughout the community, and establishes noise level requirements for all land uses.

In its land use decisions, the City may consider its noise/land use compatibility guidelines. The *Noise/Land Use Compatibility Criteria* describes categories of compatibility and not specific noise standards. These guidelines generally identify conditions where development of a particular use may be "Normally Acceptable," "Conditionally Acceptable," "Normally Unacceptable," or "Conditionally Unacceptable." Single-family and multifamily residences are "Normally Acceptable" in exterior noise environments up to 60 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) and "Conditionally Acceptable" in exterior noise environments of up to 65 dBA CNEL. Interior noise levels within residential structures are acceptable up to 45 dBA CNEL. For "Conditionally Acceptable" single-family residential uses, new development should only be undertaken after an analysis of noise reduction requirements and identification of noise reduction/insulation features. As stated in the City's General Plan 2025 Noise Element "... Depending on the ambient environment of a particular community, these basic guidelines may be tailored to reflect existing noise and land use characteristics."

The City's General Plan 2025 identifies policies to address noise/land use compatibility issues, including:

- Policy N-1.1: Continue to enforce noise abatement and control measures, particularly within residential neighborhoods.
- Policy N-1.2: Require the inclusion of noise-reducing design features in development consistent with standards in the Municipal Code.
- Policy N-1.3: Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.
- Policy N–1-5: Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas.
- Policy N-1.7: Evaluate noise impacts from roadway improvement projects by using the City's Acoustical Assessment Procedure.
- Policy N-1.8: Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.
- Policy N-4.1: Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).

For the purposes of this analysis, single-family residential uses with outdoor active use areas (e.g., backyards or balconies) exposed to noise levels exceeding 60 dBA CNEL would require mitigation. In addition, interior noise levels for new residential development is required to comply with standards set forth in Title 24 of the State Health and Safety Code. New construction is required to incorporate special insulation, windows, and sealants in order to ensure that interior noise levels meet Title 24 standards. The interior noise standard for residences is 45 dBA CNEL.

City of Riverside Municipal Code Noise Ordinance. The purpose of the City's Municipal Code Noise Ordinance is to control unnecessary, excessive and/or annoying noises in the City by prohibiting such noise generated by the sources specified in Title 7 of the City's Municipal Code. It is the goal of the City to minimize noise levels and mitigate the effects of noise to provide a safe and healthy living environment. The City has incorporated the following standards in its Municipal Code to control loud, unnecessary, and unusual nuisance noises:

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

^{Initial Study}, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Exterior Sound Level Limits. Unless a variance has been granted, it shall be unlawful for any person to cause or allow the creation of any noise which exceeds the following:

- The exterior noise standard of the applicable land use category (see Table 12.A), up to 5 dB (up to 60 dBA during the day and up to 50 dBA during the night for residential uses), for a cumulative period of more than 30 minutes in an hour; or
- The exterior noise standard of the applicable land use category, plus 5 dB (60 dBA during the day and 50 dBA during the night for residential uses), for a cumulative period of more than 15 minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus 10 dB (65 dBA during the day and 55 dBA during the night for residential uses), for a cumulative period of more than 5 minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus 15 dB (70 dBA during the day and 60 dBA during the night for residential uses), for a cumulative period of more than 1 minute in any hour; or

Based on Table 12.A and Section 7.25.010 of the RMC, the maximum exterior noise level for residential uses is 70 dBA maximum noise level (L_{max}) (55 dB + 15 dB) during daytime hours and 60 dBA L_{max} (45 dB + 15 dB) during nighttime hours, or the maximum measured ambient noise level for any period of time.

Land Use Category	Time Period	Exterior Noise Standard (dBA)	Interior Noise Standard (dBA)			
Residential	Night (10:00 p.m. to 7:00 a.m.)	45	35			
	Day (7:00 a.m. to 10:00 p.m.)	55	45			
School	7:00 a.m. to 10:00 p.m. (while school is in session)	N/A ¹	45			
Hospital	Anytime	N/A	45			
Office/Commercial	Anytime	65	N/A			
Industrial	Anytime	70	N/A			
Community Support	Anytime	60	N/A			
Public Recreation Facility	Anytime	65	N/A			
Non-urban	Anytime	70	N/A			

Table 12.A: City of Riverside Sound Level Limits (dBA)

Source: Riverside Municipal Code Table 7.25.010A and Table 7.30.015

 1 N/A = Not Applicable; the City of Riverside has not established a sound level limit for this land use.

dBA = A-weighted decibels

Construction Impacts. Section 7.35.020.G, Exemptions, of the City's Noise Ordinance, states that "Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday" are exempt from the noise level limits of the Municipal Code. On August 18, 2016, Ordinance 7341 was adopted by the Riverside City Council, amending the Noise Ordinance to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays from the standards of the Noise Ordinance. Compliance with Section 7.35.020.G of the City's Noise Ordinance would ensure construction-related noise impacts to the nearby sensitive receptors remain less than significant.

Existing Conditions. The project site is adjacent to existing residential uses to the north, east, and south, and commercial/light industrial uses (i.e., trailer staging and automobile tow yard) to the west. According to Figure 5.11-3 of the General Plan 2025 FPEIR, the project site is currently experiencing 60 dBA CNEL on account of its proximity to I-215. Upon buildout of the 2025 General Plan, the project site would experience 65 dBA CNEL on account of its proximity to I-215, as detailed in Figure 5.11-7 of the General Plan 2025 FPEIR. Therefore, the project site is located in an area currently subjected to potentially high levels of noise from adjacent roadways and neighboring light industrial uses (i.e., trailer staging and automobile tow yard).

P18-0020 (RZ), P18-0022 (CUP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Operational Impacts. Long-term noise associated with the project site would be generated from vehicle traffic and on-site stationary sources associated with single-family residential uses. These activities are potential point sources of noise that could affect existing off-site residences to the north, east, and south of the project site. On-site noise-producing activities include traffic, door slamming, heating, ventilation, and air-conditioning (HVAC) equipment, and people conversing.

As previously stated, the project site is located in an area currently subjected to potentially high levels of noise from adjacent roadways and neighboring light industrial uses (i.e., trailer staging and automobile tow yard). *CEQA Guidelines* section 15126.2(a) generally requires an analysis of environmental conditions and hazards existing on a proposed project site if such conditions and hazards may cause substantial adverse impacts to future residents or users of the project. CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present. In *California Building Industry Association v. Bay Area Air Quality Management District (2015)*, the California Supreme Court held that CEQA generally does not require that public agencies analyze the impact existing environmental conditions that already exist. In those specific instances, it is the project's impact on the environment—and not the environment's impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions. As indicated in the following analysis, the project would not exacerbate existing noise levels; therefore, further discussion of the environment's impact on the project's residents (i.e., noise generated from I-215 and the adjacent light industrial uses) is not required.

As noise spreads from a source, it loses energy, so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6decibel reduction in the noise level for each doubling of distance from a single-point source of noise, such as an idling truck or an HVAC system, to the noise sensitive receptor of concern. Although individual activity associated with the proposed project could generate relatively high and intermittent noise, these noise levels would be compatible with noise levels generated by other traffic and residential-related noise sources that currently exist adjacent to the north, east, and south of the project site. Therefore, noise associated with residential uses is not expected to produce atypical or unusually high noise levels in excess of standards established in the local general plan or noise ordinance.

According to *Section 5.11* - *Noise* of the General Plan 2025 FPEIR, audible increases in noise levels generally refer to a change of 3 dBA or greater since this level has been found to be barely perceptible in exterior environments, and a clearly perceptible increase in noise exposure of +5 dBA to sensitive receptors would be considered significant. Generally, a doubling of traffic is required to generate a perceptible increase (3 dBA) in noise. The project site is located along Center Street between Stephens Avenue and Orange Street. Based on the project-specific *Traffic Impact Analysis* (TIA) (Appendix G), existing traffic along Center Street between Stephens Avenue and the eastern project boundary totals 877 and 1,019 vehicles during the a.m. and p.m. peak hours, respectively, while existing traffic along Center Street between Orange Street and the western project boundary totals 463 and 714 vehicles during the a.m. and p.m. peak hours, respectively. The proposed project is expected to generate 494 average daily vehicle trips (ADT) with 44 trips occurring during the a.m. peak hour and 58 trips occurring during the p.m. peak hour, which is well below a doubling of existing traffic volumes along Center Street in the vicinity of the project site. When compared to the existing traffic volumes on streets in the project vicinity, and its associated long-term noise level change would be less than both the barely perceptible audible increase of 3 dBA and the clearly perceptible audible increase of 5 dBA in exterior environments.

Since noise levels associated with the proposed operation of residential uses would be compatible with noise levels generated by other traffic and residential-related noise sources that currently exist adjacent to the north, east, and south of the project site, long-term operational noise impacts would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

b.	Exposure of persons to or generation of excessive		\square	
	groundborne vibration or groundborne noise levels?			

12b. Response: (Source: California Department of Transportation (Caltrans), Transportation and Construction Vibration Guidance Manual, September 2013; General Plan 2025 FPEIR; Nationwide Environmental Title Research, 2018, https://www.historicaerials.com/viewer (accessed July 12, 2018).

P18-0020 (RZ)

Initial Study, MND, and Appendices

P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Less Than Significant Impact. Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors where the motion may be discernible; without the effects associated with the shaking of a building, there is less adverse reaction. Typical sources of groundborne vibration are heavier construction activities (e.g., blasting and pile driving), steel-wheeled trains, and occasional traffic on rough roads. Construction of the proposed project would be temporary and would include rough grading, excavation for utilities, and placement of manufactured homes on finished pads. Operation of the project would entail activities typical of residential uses, including passenger vehicle traffic.

Vibration Thresholds. The City has not established vibration standards for structural damage. Noise and groundborne vibration levels anticipated by the proposed project are assessed using the data provided in the California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*. Table 12.B details the vibration damage threshold criteria established by the California Department of Transportation.

		Maximum PPV (in/sec)			
Structure and Condition	Transient Sources	Continuous/Frequent Intermittent Sources			
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08			
Fragile buildings	0.2	0.1			
Historic and some old buildings	0.5	0.25			
Older residential structures	0.5	0.3			
New residential structures	1.0	0.5			
Modern industrial/commercial buildings	2.0	0.5			

Table 12.B: Vibration Damage Threshold Criteria

Source: Table 10, Table 11, Table 12, *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.* PPV = Peak Particle Velocity. in/sec = Inch(es) per Second.

Note: Transient sources create a single isolated vibration event (e.g., blasting or drop balls). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Existing residential structures are located as close as 12.5 feet east of the project site boundary, which is considered the extent of the limits of grading as a worst-case scenario. These surrounding structures were constructed in the late 1950s and early 1960s and are considered older residential structures for the purposes of this analysis. However, the Trujillo Adobe located approximately 480 feet to the west of the project site is considered an extremely fragile historic building for the purposes of this analysis.

Based on the categories in Table 12.B, thresholds for the potential for vibration damage are categorized into transient and continuous/frequent intermittent sources. Transient sources are those that generate a single isolated vibration event, such as blasting. Continuous/frequent intermittent sources include impact pile drivers and vibratory compaction equipment. The off-site residential buildings located to the north, east, and south of the project site are not considered historic or fragile or extremely susceptible to vibration damage. A vibration level of 0.3 peak particle velocity (ppv) inch per second (in/sec) is considered a conservative threshold for a potentially significant structural damage vibration impact for older, but not historic, residential buildings; a threshold of 0.12 ppv in/sec is appropriate for the Trujillo Adobe located approximately 480 feet to the west of the project site.

The City has not established vibration standards for human annoyance. Vibration annoyance levels anticipated by the proposed project are assessed using the data provided in the California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*. Table 12.C details the vibration annoyance threshold criteria established by the California Department of Transportation.

Based on the guidance in Table 12.C, the "strongly perceptible" vibration level of 0.9 ppv in/sec is used in this analysis as threshold for a potentially significant vibration impact for human annoyance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 12.C: Vibration Annoyance Threshold Criteria				
Average Human Response PPV (in/sec)			/ (in/sec)	
Severe		0.2		
Strongly perceptible		0.9		
Distinctly perceptible		0.24		
Barely perceptible		0.035		

Source: Table 6, *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.* PPV = Peak Particle Velocity. in/sec = Inch(es) per Second.

Construction Impacts. As detailed in previously referenced Table 12.B, the California Department of Transportation guidelines indicate that a vibration level of 0.3 ppv in/sec is considered a conservative threshold for a potentially significant structural damage vibration impact for older, but not historic, residential buildings; a threshold of 0.12 ppv in/sec is appropriate for the Trujillo Adobe located approximately 480 feet to the west of the project site. Table 12.D details the ppv values at 25 feet from the construction vibration source and demonstrates that bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 0.089 ppv of groundborne vibration when measured at 25 feet, according to the California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*.

Table 12.D: Vibration Source Amplitudes for Construction Equipment

Equipment	PPV at 25 feet (in/sec)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003

Source: Table 6, *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.* PPV = Peak Particle Velocity. in/sec = Inch(es) per Second.

Construction vibration, similar to vibration from other sources, would not have any significant effects on outdoor activities (e.g., activities outside of residential structures in the project vicinity). Outdoor site preparation for the project is expected to use a bulldozer and loaded truck. The greatest levels of vibration are anticipated to occur during the site preparation phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts occur normally within the buildings. The formula for vibration transmission is provided below:

 $L_v dB (D) = L_v dB (25 \text{ feet}) - 30 \text{ Log} (D/25)$ $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 0.089 ppv at 25 feet. The closest residential structure from the project site is approximately 12.5 feet from the project construction boundary. Based on the information in Table 12.D, the closest residences from the project site would experience vibration levels of up to 0.252 ppv (in/sec). This range of vibration levels from construction equipment or activity would be below the 0.3 ppv (in/sec) threshold for a potentially significant structural damage vibration impact for older, but not historic, residential buildings and below the 0.9 ppv (in/sec) perception threshold for human annoyance. Furthermore, vibration levels expected to reach the Trujillo Adobe located approximately 480 feet to the west of the project construction boundary are expected to reach 0.0011 ppv (in/sec). This range of vibration levels from construction equipment or activity would be below the 0.12 ppv (in/sec) threshold for a potentially significant structural damage vibration impact for an extremely fragile historic building. Therefore, construction vibration impacts related to the potential for cosmetic or structural damage and/or human annoyance would be less than significant.

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
Operational Impacts. Operation of the proposed project would resul vehicles would have rubber tires on paved roads and would not ge from groundborne vibration would be less than significant directly, ind	t in additional merate any si directly, and c	l vehicles on the gnificant group of the gro	he surrounding indborne vibra No mitigation i	y roads. Thes ation. Impact s required.
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				
12c. Response: (Source: General Plan 2025 FPEIR, City of Riv Impact Analysis (Appendix G))	erside Munic	ipal Code Titl	e 7 – Nose Co	ntrol, Traffi
residences adjacent to the north, east, and south of the project site w line. The proposed project entails the development of residential us uses. Therefore, operational activities anticipated from the propor residential) to the existing surrounding uses.	ould be locate ses in an area sed project v	ed as close as currently con would be com	12.5 feet from taining existir mensurate in	the property ng residential nature (i.e.,
The current density permitted under the base zone of R-1-7000 – Si 10 dwelling units per acre, The proposed project includes an applicat Park Overlay Zone to the project site, which would permit an increa Mobile Home Park Overlay Zone, the project would be developed acre. As detailed in Response 12a, project-related traffic would not noise would occur. Noise associated with operation of the proposed noise levels at the nearest residential uses; therefore, no significant co occur. Impacts related to permanent increases in ambient noise levels cumulatively. No mitigation is required.	ngle Family F tion to rezone se in dwelling at a density increase to a on-site uses hange in ambi s would be les	Residential Zon the site to app g units. With the of approximate a level at whice would be subs ient noise leve is than signific	the ranges from by the MH $-$ M he application tely 7.7 dwell th a perceptibl tantially similar is in the projection ant directly, in	1 6.2 to up to Aobile Homo of the MH - ing units per e increase in ar to existing ct area would adirectly, and
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
12d. Response: (Source: General Plan 2025 FPEIR, City of Riv	erside Munic	cipal Code Titl	le 7 – Nose Co	ntrol)
Less Than Significant Impact. As discussed in Response 12a, in construction activities that would result in a substantial temporary inc above levels existing without the project, but would no longer occur the project vicinity are as close as 12.5 feet from proposed constr	nplementation crease in ambi once constru- uction areas	n of the propo ent noise leve ction is comp Compliance	osed project v ls in the project leted. Sensitiv with the hour	vould includ et site vicinit e receptors i

the project vicinity are as close as 12.5 feet from proposed construction areas. Compliance with the hours specified in Section 7.35.020.G, Exemptions, of the City's Noise Ordinance regarding construction activities would ensure construction noise impacts on adjacent noise-sensitive land uses would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

12e. Response: (Source: General Plan 2025 FPEIR Figure 5.7-2 – Airport Safety and Compatibility Zones, Riverside County Airport Land Use Compatibility Plan (RCALUCP), General Plan 2025 Noise Element Figures N-8 and N-9).

No Impact. The proposed project is not located within an Airport Land Use Plan or within two miles of a public airport or public use airport. As detailed in Figures N-8 and N-9 of the General Plan 2025 Noise Element, the proposed project is outside the 55 dBA noise contour for the Riverside Municipal Airport, Flabob Airport, and March Air Reserve Base. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels

P18-0020 (RZ),

P18-0022 (CLIP) and P18-0023 (DR) Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
from a public airport or public use airport. The project would have no cumulatively. No mitigation is required.	impact relate	d to airport no	ise directly, in	directly, or
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				\boxtimes
No Impact. The project site is not within the vicinity of a private airst noise from private airstrips directly, indirectly, or cumulatively. No mi	trip. Therefore	e, it would hav juired.	e no impact re	elated to
13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			\boxtimes	
13a. Response: <i>(Source: General Plan 2025 Table LU-3 – Land</i>	Use Designa	tions; Genera	l Plan 2025 F	

Section 5.12-Population and Housing, Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections–2025, Table 5.12-C – 2025 General Plan FPEIR and SCAG Comparisons, Table 5.12-D – General Plan Housing Projections 2025, Capital Improvement Program and SCAG's 2016-2040 Regional Transportation Plan (RCP) and RTP; Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011–2016, with 2010 Benchmark – California Department of Finance)

Less Than Significant Impact. The currently vacant project site would be developed with 99 single-family manufactured housing units. The project is in an urbanized area and would not induce substantial population growth, as the addition of 99 single-family manufactured housing units represents less than 0.08 percent of the projected 127,692 housing units anticipated by 2025 in the City's General Plan. Based on the household size of 2.86 persons per unit for manufactured housing units used in the CalEEMod v2016.3.2, the proposed project could increase the City's population by approximately 283 persons. The 2015 and projected future (2040) population of the City, Riverside County, and the region are detailed in Table 13.A.

Table 13.A: SCAG Population Projections

	2015		2040		
	Population	Employment	Population	Employment	
City of Riverside	310,700	120,000	386,600	200,500	
Riverside County	2,316,438	742,000	3,167,584	1,174,500	
SCAG	18,779,123	8,006,030	18,779123	9,871,441	

Source: Tables 8 and 11, Demographic and Growth Forecast, 2016–2040 RTP-SCS, Southern California Association of Governments, December 2015.

SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) establishes population, housing, and growth trends for the City, Riverside County, and SCAG region. Based on the household size of 2.86 persons per unit for manufactured housing units used in the CalEEMod v2016.3.2, the proposed project could increase the City's population by approximately 283 persons. According to the 2016 RTP/SCS, the forecast population for the County of Riverside Subregion in 2040 is approximately 3,167,584 persons. In 2015, the County of Riverside Subregion was reported to have a population of approximately 2,316,438 persons. Therefore, the forecast population for the County of Riverside subregion will grow by approximately 851,146 persons between 2015 and 2040. Based on an anticipated increase of 283 persons, project residents would account for 0.033 percent of the population growth forecast by SCAG in the County of Riverside

Initial Study, MND, and Appendices

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

subregion between 2015 and 2040.

The SCAG foresees that population will increase in the City and region over the next 25 years, and the anticipated rate of population growth in the City (2.4 percent) is roughly similar to that of Riverside County (2.0 percent) and the SCAG region (2.5 percent) for the same period. Because the project site has been designated for residential uses by the City, the proposed increase in population by approximately 283 persons has been anticipated and planned for in the City's General Plan. Additionally, the project does not include any significant infrastructure improvements or the extension of roads that could indirectly induce growth in the City. Therefore, this project would have a less than significant impact on population growth directly, indirectly, and cumulatively. No mitigation is required.

b.Displace substantial numbers of existing housing, necessitating			\square
the construction of replacement housing ensewhere?		1 '	

13b. Response: (Source: CADME Land Use 2003 Layer, Google imaging etc.)

No Impact. The project site is a vacant parcel. No housing units would be displaced, eliminating the requirement of constructing replacement housing elsewhere. There would be **no impact** on existing housing either directly, indirectly, or cumulatively. No mitigation is required.

c. Displace substantial numbers of people, necessitating t construction of replacement housing elsewhere?	e 🗌			\square
---	-----	--	--	-----------

13c. Response: (Source: CADME Land Use 2003 Layer, Google imaging etc.)

No Impact. The project site is a vacant parcel; therefore, no people would be displaced, and no construction of replacement housing would be necessary. Therefore, the project would have no impact related to displacement of substantial numbers of people, necessitating the need for replacement housing, either directly, indirectly, or cumulatively. No mitigation is required.

14. PUBLIC SERVICES.

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

a. Fire protection?

14a. Response: (General Plan 2025 FPEIR Figure 5.7-3 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), 2004 Part 1/Part 2 and Office of Emergency Services' (OEM's) Strategic Plan, San Bernardino County Land Use Plan, General Plan, Hazard Overlays, Victorville/San Bernardino. March 9, 2010, General Plan 2025 FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)

Less Than Significant Impact. Typical fire prevention and suppression services in the City are provided by the Riverside Fire Department (RFD). Under the California Master Mutual Aid Agreement, CalFire also assists the RFD in a disaster when RFD resources are available, regardless of the type of disaster. In turn, CalFire can access RFD through the same agreement for assistance in wildland fire suppression. RFD also has a mutual aid agreement with the Riverside County Fire Department.

There are 14 fire stations strategically placed throughout the City. The "first in" station to serve the project site would be Riverside City Fire Station 6 located at 1077 Orange Street, approximately 1 mile south of the project site. RFD's policy states that units would be located and staffed such that an effective response force of 4 units with 12 personnel minimum shall be available to all areas of the City within a maximum of 10 minutes (total response time). The project is located in an urbanized area and includes the development of 99 single-family manufactured homes. The local population would increase

P18-0020 (RZ), P18-0022 (CUP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices \times

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

by approximately 283 persons, which would incrementally increase the demand for fire protection.

Prior to issuance of occupancy permits, the project applicant will coordinate directly with the RFD to ensure the project's design and construction meets the fire protection requirements for this area or fire zone in accordance with Chapter 16.32 *Fire Prevention* of the City's Municipal Code. Compliance will be confirmed through the City's building plan check process. As part of this process the project is required to develop adequate vehicle access, adequate fire flow, the use of proper fire resistant construction methods, and a sufficient number of on-site fire hydrants. Additionally, the City participates in the *California Master Mutual Aid Agreement of 1950*, which provides assistance from other fire departments, without charge, during major emergencies to cities temporarily overwhelmed by an incident. The City also has entered into various *Automatic Aid* agreements with neighboring cities to ensure the quickest and most efficient fire response regardless of city boundaries. Therefore, it is possible that the Riverside County Fire Station 19 at 469 Center Street approximately 1.5 miles east of the project site with an estimated 4-minute response time, or the City of Colton Fire Station 213 at 1100 South La Cadena Drive approximately 3 miles north of the project site with an estimated 7-minute response time, would provide fire protection services in the event of an emergency.

The City collects fire service and development fees from all development projects proposed in the City. The proposed project would be required to pay the applicable development impact fees, which would be used to fund the capital costs associated with acquiring land for new fire stations, constructing new fire stations, purchasing new fire equipment for such stations, and providing additional staff as needed to serve the community. Additionally, the proposed project is located in an urbanized area where no wildlands exist, and the project site is not located adjacent to wildland areas or within a Fire Hazard Area as depicted in Figure 5.7-3 of the General Plan 2025 FPEIR or Fire Safety Overlay District pursuant to the San Bernardino County Land Use Plan. As with all development within the City, the project applicant would pay applicable development impact fees to support the provision of fire services. In addition, through compliance with Chapter 16.32 *Fire Prevention* of the City's Municipal Code, impacts on the demand for additional fire facilities or services would be less than significant either directly, indirectly, or cumulatively. No mitigation is required.

b. Police protection?		\boxtimes	

14b. Response: (Source: C General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)

Less Than Significant Impact. The Riverside Police Department (RPDdivides the City into 133 Reporting Districts, grouped into four neighborhood policing centers. Each of the four neighborhood policing centers is assigned a lieutenant Area Commander to oversee the day-to-day policing needs of the community. The site is located within the North Neighborhood Policing Center (Reporting District A01) which is served by the RPD Station located at 3775 Fairmount Boulevard, approximately 2.75 miles southwest of the project site.

Incoming calls requesting police services are assigned by urgency. Priority 1 calls are typically of a life-threatening nature, such as a robbery in process or an accident involving bodily injury. Police officers strive to respond within 7 minutes to Priority 1 calls. Officers would respond to less-urgent Priority 2 calls within 12 minutes. Priority 2 calls are not life threatening and include such incidents as burglary, petty theft, shoplifting, etc.

As stated previously, with development of 99 single-family manufactured homes, the proposed project would increase the local population by approximately 283 persons. As with all development within the City, the project applicant would pay applicable development impact fees to support the provision of police services. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through RPD practices, impacts on the demand for additional police facilities or services would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

c.	Schools?					\square	
	_	(-	-	 	 		

14c. Response: (Source: General Plan 2025 FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-4 – Other School District Boundaries, and School Facilities Needs Analysis – Riverside Unified School District, April 2019)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

Less Than Significant Impact. The project is a residential use that would involve the addition of housing units that would increase numbers of school-age children. Because the project site has been designated for residential uses by the City, the proposed increase in population by approximately 283 persons has been anticipated and planned for in the City's General Plan. An increase in local school population of up to 63⁵ students could result from development of the proposed project.

Senate Bill 50, also known as Proposition 1A, was enacted to direct development fees to local school districts for the expansion or construction of school facilities. The project applicant would pay school development impact fees, as required pursuant to Senate Bill 50 and California Government Code, Section 65995. Through compliance with Senate Bill 50 and California Government of required school fees would offset any impact to school services or facilities; therefore, impacts to schools would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

d. Parks?			~~	~	 	 -		 	
	d.	Parks?						\square	

14d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, General Plan 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)

Less Than Significant Impact. An increase in population would occur due to the addition of housing for the project. The closest parks to the project site are Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex, respectively 1,000 feet southwest and 1,500 feet west of the project site. As population increases, the need for park and other recreational facilities rises due to the additional strain on upkeep and maintenance that is required from the City. The proposed project site is not located in an area of the City identified to have a parkland shortage. The project's community amenities include a recreational center comprising a swimming pool, picnic tables, shade structures, restroom facilities with showers, dog run, and tot lot. (Figure 4). In accordance with the City's Parks, Recreation, and Community Services-Park Planning Division, all development projects are required to pay Park Development Impact Fees in order to ensure that adequate park facilities are available for all residents before issuance of building permits. Through the payment of these fees, the funds needed to accommodate additional maintenance and upkeep of parks and other recreational services is fulfilled. Therefore, impacts related to construction of new or expansion of existing park facilities caused by the increase in the demand for park facilities or services would be less than significant directly, indirectly, or cumulatively. No mitigation is required.

e.	Other public facilities?		\boxtimes	
14		<i>c</i> · · ·		2 7 7 7

14e. Response: (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 – Library Facilities, Figure 5.13-6 – Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)

Less Than Significant Impact. The project would develop residential uses within an urbanized area. Because the project site has been designated for residential uses by the City, the proposed increase in population by approximately 283 persons has been anticipated and planned for in the City's General Plan. It is reasonable to conclude the payment of required fees, taxes, and other payments by the project applicant would sufficiently offset any incremental increase in demand for public facilities. In the absence of any substantial increase in population, the construction of new or expansion of existing public facilities is not required. Impacts to these facilities would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

⁵ Student Population Increase: Elementary Students = 99 homes \times 0.4538 student generation rate = 45.37 (45) students; Middle School Students = 99 homes \times 0.0764 student generation rate = 7.56 (8) students; and High School Students = 99 homes \times 0.142 student generation rate = 10.32 (10) students.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. RECREATION. Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or beaccelerated?			\boxtimes	

15a. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master Plan of Trails and Bikeways, Parks Master Plan 2003; General Plan 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 – Local Park Development Fees, Bicycle Master Plan May 2007, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011–2016, with 2010 Benchmark-California Department of Finance)

Less Than Significant Impact. New housing is proposed with this project; therefore, an increase in residents is expected. The City's adopted standard for developed park acreage of three acres per 1,000 residents would not be adversely affected by the increase of 283 residents, as the proposed project site is not located in an area of the City identified to have a parkland shortage. The closest parks to the project site are Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex, respectively 1,000 feet southwest and 1,500 feet west of the project site. As population increases, the need for park and other recreational facilities rises due to the additional strain on upkeep and maintenance that is required from the City. The project's community amenities include a recreational center comprising a swimming pool, picnic tables, shade structures, restroom facilities with showers, dog run, and tot lot (Figure 4). Although these features would be available to project residents, the use of existing park and recreation areas may also occur, causing an incremental impact to existing facilities.

As detailed in Figure PR-1 *Parks, Open Space, and Trails* of the General Plan 2025, the Center Street corridor along the project site frontage is designated as a Primary Trail for equestrian, trail, bicycle, and pedestrian uses. The project proposes new sidewalks and trails along its frontage with Center Street in accordance with the Master Plan of Trails and Bikeways and Objective PR-2/Policy PR-2.4 of the General Plan 2025 to improve the connectivity of the proposed development to the nearby Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex. Additionally, the project is required to pay Quimby Act fees pursuant to Section 66477 of the California Government Code to cover the cost of elevated levels of maintenance. Payment of park fees would reduce impacts to parks and recreation facilities to less than significant levels directly, indirectly, and cumulatively. No mitigation is required.

b. Include recreational facilities or require the construction or		\times	
expansion of recreational facilities which might have an			
adverse physical effect on the environment?			

15b. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master Plan of Trails and Bikeways, Parks Master Plan 2003; General Plan 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 – Local Park Development Fees, Bicycle Master Plan May 2007, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011–2016, with 2010 Benchmark-California Department of Finance)

Less Than Significant Impact. The proposed project would be developed in accordance with the City's General Plan 2025, Park and Recreation Master Plan, and all other applicable local, State, and/or federal regulatory requirements. Payment of Quimby Act fees pursuant to Section 66477 of the California Government Code would support the provision of recreational facilities. The project's community amenities include a recreational center comprising a swimming pool, picnic tables, shade structures, restroom facilities with showers, dog run, and tot lot (Figure 4). As detailed in Figure PR-1 *Parks, Open Space, and Trails* of the General Plan 2025, the Center Street corridor along the project site frontage is designated as a Primary Trail for equestrian, trail, bicycle, and pedestrian uses. The project proposes new sidewalks and trails along its frontage with Center Street in accordance with the Master Plan of Trails and Bikeways and Objective PR-2/Policy PR-2.4 of the General Plan 2025 to improve the connectivity of the proposed development to the nearby Reid

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex. Since any recreational facilities proposed as part of the project would be constructed within the project footprint already analyzed throughout this Initial Study and mitigated as applicable to less than significant levels directly, indirectly, and cumulatively, no additional mitigation is necessary for the provision of new recreational facilities or expansion of existing recreational facilities.

16. TRANSPORTATION AND TRAFFIC. Would the project result in:		
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non- motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		

16a. Response: (Source: Traffic Impact Analysis (Appendix G), General Plan 2025 Figure CCM-4 – Master Plan of Roadways)

Less Than Significant with Mitigation Incorporated. A project-specific *Traffic Impact Analysis* (TIA) was prepared for the proposed project (Appendix G). The proposed project is expected to generate a daily traffic volume of 494 vehicle trips, with 44 trips occurring in the a.m. peak hour and 58 trips occurring in the p.m. peak hour. These traffic volumes are expected to travel on roadways in the project vicinity.

Construction. Construction-related trips generated on a daily basis throughout each phase of construction would derive from construction workers and delivery of materials. It is anticipated project construction would generate haul trips distributed throughout the day. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday a.m. peak period is 7:00 a.m. to 9:00 a.m., and the weekday p.m. peak period is 4:00 p.m. to 6:00 p.m. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day.

Project construction is anticipated to take six months, based on a probable start date in 2019 and a planned project opening in 2020. All construction equipment, including construction worker vehicles, would be staged on the project site for the duration of the construction period. In addition, the proposed project construction schedule would comply with the City's Municipal Code Section 7.35.010, which limits construction activities to Monday through Friday from 7:00 a.m. to 7:00 p.m., and Saturday from 8:00 a.m. to 5:00 p.m. No construction activities would occur on Sundays or federal holidays. In addition, as part of the grading plan and building plan review processes, the City would require the developer to submit a Traffic Management Plan that would provide appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Through compliance with Riverside Municipal Code Section 7.35.010, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

Operation. The project site is located along Center Street, between Orange Street and Stephens Avenue. Roadway performance is most often controlled by the performance of intersections, specifically during peak traffic periods. This is because traffic control at intersections interrupts traffic flow that would otherwise be relatively unimpeded except for the influences of on-street parking, access to adjacent land uses, or other factors resulting in interaction of vehicles between intersections. For this reason, traffic analyses for individual projects typically focus on peak-hour operating conditions for key intersections rather than roadway segments. Operating conditions at intersections are typically described in terms of level of service (LOS). LOS is a measure of a roadway's operating performance and is a tool used in defining thresholds of significance. LOS is described with a letter designation from A to F, with LOS A representing the best operating conditions (free-flow traffic) and LOS F the worst (traffic jammed). Table 16.A summarizes the relationship of delay and LOS at unsignalized and signalized intersections.

P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AN INFORMAT Table 16.A: Lev	ID SUPPORTING FION SOURCES): el of Service Criteria for Unsignalized and Signali	Potentially Significant Impact ized Interse	Less Than Significant With Mitigation Incorporated ctions	Less Than Significant Impact	No Impact		
Level of Service	Unsignalized Intersection Average Delay per Vehicle (sec.)	Signalized Intersection Average Delay per Vehicl (sec.)					
А	<u><10</u>		<u><10</u>				
В	> 10 and <u>< 15</u>		> 10	and <u>< 20</u>			
С	> 15 and <u>< 25</u>		> 20	and <u>< 35</u>			
D	> 25 and <u><</u> 35		> 35 and <u>< 55</u>				
Е	> 35 and <u>< 50</u>	> 55 and <u>< 80</u>					
F	> 50		> 80				

Source: Table 2-B, Traffic Impact Analysis (Appendix G)

The City's significance criteria are used for all study intersections under the City's jurisdiction, and the County's significance criteria are used for all study intersections under the County's jurisdiction. The City uses LOS D as its minimum level of service for intersections and roadways of Collector or higher classification; LOS C is to be maintained on local street intersections. The County uses LOS D as its minimum level of service for intersections. As detailed in General Plan 2025 Figure CCM-4 *Master Plan of Roadways*, Center Street is classified as an 88-foot Arterial Roadway; therefore, in conformance with the City's General Plan 2025 and County significance criteria, a significant project impact would occur at a study area intersection when the peak hour LOS falls below D (E or F).

Study intersections were selected based on discussion with City staff, and the study area was approved by City staff via the City's scoping agreement process. The study includes locations where project traffic has potential to cause a significant impact. Based on the coordination with the City, the study area for traffic includes the following three intersections:

- Orange Street/Center Street (City of Riverside);
- Mont Martre Avenue-Project Driveway/Center Street (City of Riverside); and
- Stephens Avenue/Center Street (Riverside County).

Consistent with the City's and County's Traffic Impact Analysis guidelines, the 2010 *Highway Capacity Manual* (HCM) analysis methodologies were used to determine intersection levels of service for all study area intersections. The traffic analysis examined traffic operations in the vicinity of the proposed project under the following six scenarios:

- Existing (2017) conditions;
- Existing (2017) with project conditions;
- Project completion (2019) without project conditions;
- Project completion (2019) with project conditions;
- Cumulative (2019) without project conditions; and
- Cumulative (2019) with project conditions.

For each scenario, traffic operations at study intersections are evaluated for the a.m. and p.m. peak hours. Table 16.B summarizes the a.m. and p.m. peak hour and daily project trip generation and reveals that the project is expected to generate 494 vehicle trips, with 44 trips occurring in the a.m. peak hour and 58 trips occurring in the p.m. peak hour.

Tables 16.C, 16.D, and 16.E summarize the delay and LOS at the study area intersections under "existing without project" and "existing with project" for the 2017 existing conditions, 2019 project completion, and 2019 cumulative scenarios, respectively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):			Potentially Significan Impact	y Less t Sign W Miti Incor	Less Than Significant With Mitigation Incorporated		han cant ict	No Impact	
Table 16.B: Project Trip Generation									
		A.N	1. Peak Hou	r	P.N	1. Peak I	Iour		
Land Uses	Units	In	Out	Total	In	Out	Total	Daily	
Mobile Home Park 99 ODU	J			•	•	•			
Trips/Unit ¹		0.09	0.35	0.44	0.37	0.22	0.59	4.99	
Trip Generation		9	35	44	36	22	58	494	
Total Trip Generation		9	35	44	36	22	58	494	

Source: Table 5-A, Traffic Impact Analysis (Appendix G)

ODU=Dwelling Units

Rates based on Land Use 240- "Mobile Home Park" from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition.

Table 16.C: Existing Intersection Levels of Service

			Without	t Project			With F	Project		
		A.M. Pea	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		eak Hour	
		Delay		Delay		Delay		Delay		Significant
Intersection	Control	(sec.)	LOS	(sec.)	LOS	(sec.)	LOS	(sec.)	LOS	Impact
Orange Street/Center Street	AWSC	8.5	Α	9.8	А	9.0	Α	10.0	Α	No
Mont Martre Avenue-Project Driveway/Center Street	TWSC	10.8	В	13.3	В	12.2	В	15.7	С	No
Stephens Avenue/Center Street	Signal	39.6	D	28.0	С	40.7	D	28.6	С	No

Source: Table 7-A, Traffic Impact Analysis (Appendix G)

AWSC = All-Way Stop Control TWSC = Two-Way Stop Control

Delay = Average control delay in seconds (For TWSC intersections, reported delay is for worst-case movement).

LOS = Level of Service

Table 16.D: Project Completion (2019) Intersection Levels of Service

			Withou	t Project						
		A.M. Pea	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		eak Hour	
		Delay		Delay		Delay		Delay		Significant
Intersection	Control	(sec.)	LOS	(sec.)	LOS	(sec.)	LOS	(sec.)	LOS	Impact
Orange Street/Center Street	AWSC	8.5	Α	10.1	В	8.6	Α	10.2	В	No
Mont Martre Avenue-Project Driveway/Center Street	TWSC	10.9	В	13.5	В	11.7	В	16.1	С	No
Stephens Avenue/Center Street	Signal	39.8	D	28.4	С	39.9	D	29.0	С	No

Source: Table 7-B, Traffic Impact Analysis (Appendix G)

AWSC = All-Way Stop Control TWSC = Two-Way Stop Control

Delay = Average control delay in seconds (For TWSC intersections, reported delay is for worst-case movement). LOS = Level of Service

Table 16.E: Cumulative (2019) Intersection Levels of Service

			Without Project			With Project				
		A.M. Pea	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		eak Hour	
		Delay		Delay		Delay		Delay		Significant
Intersection	Control	(sec.)	LOS	(sec.)	LOS	(sec.)	LOS	(sec.)	LOS	Impact
Orange Street/Center Street	AWSC	58.1	F*	>100	F*	62.2	F*	>100	F*	Yes
Mont Martre Avenue-Project Driveway/Center Street	TWSC	16.8	С	25.8	D	19.2	С	38.0	E*	Yes
Stephens Avenue/Center Street	Signal	55.5	E*	55.3	E*	56.5	E*	59.3	E*	Yes
Same Table 7 C. Tweffer Low and A	In a location (A second	C)								

Source: Table 7-C, *Traffic Impact Analysis* (Appendix G)

AWSC = All-Way Stop Control TWSC = Two-Way Stop Control

Delay = Average control delay in seconds (For TWSC intersections, reported delay is for worst-case movement).

LOS = Level of Service * = Exceeds LOS Standard

P18-0020 (RZ), P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

Table 16.E indicates two of the three study area intersections would operate at an unsatisfactory LOS under cumulative (2019) without project conditions, and all three study area intersections would operate at an unsatisfactory LOS under cumulative (2019) with project conditions. Based on the City's and County's significant impact criteria, a significant circulation impact (LOS E and F) at all three study area intersections would occur and mitigation is required.

Mitigation Measure. To reduce the significant impact of the proposed project on the three study intersections, Mitigation Measure TRA-1 has been identified.

- Mitigation Measure TRA-1: Fair-Share Payments: Prior to issuance of a Certificate of Occupancy, the City of Riverside Traffic Engineering Section City Engineer, or designee, shall verify that the project applicant has made payment of the project's fair share to the appropriate jurisdiction to fund improvements necessary for the following project study area intersections to operate at acceptable LOS under cumulative (2018) conditions:
 - Orange Street/Center Street (City of Riverside): Payment of 1.67 percent fair-share contribution for the installation of one eastbound lane, one westbound lane, and a traffic signal.
 - Mont Martre Avenue-Project Driveway/Center Street (City of Riverside): Payment of 7.38 percent fair-share contribution for the installation of one two-way left-turn lane along Center Street.
 - Stephens Avenue/Center Street (County of Riverside): Payment of 4.28 percent fairshare contribution for the installation of one eastbound lane, one westbound lane, and a change from split phasing to protected left-turn phasing in the east-west direction along Center Street.

CEQA Significance After Mitigation. As detailed in Table 16.F, with the implementation of Mitigation Measure TRA-1 all project study area intersections would operate at a satisfactory LOS. Operational impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be reduced to less than significant levels directly, indirectly, and cumulatively. No further mitigation is required.

		Witho	ut Mitiga	ition		With Mitigation				
		A.M. Pe	ak Hour	P.M. Pea	ak Hour		A.M. Pe	ak Hour	P.M. Pe	ak Hour
Intersection	Control	Delay (sec.)	LOS	Delay (sec.)	LOS	Control	Delay (sec.)	LOS	Delay (sec.)	LOS
Orange Street/Center Street	AWSC	62.2	F*	>100	F*	Signal	26.8	C	30.5	С
Mont Martre Avenue-Project Driveway/Center Street	TWSC	19.2	С	38.0	E*	TWSC ¹	13.8	В	17.7	С
Stephens Avenue/Center Street	Signal	56.5	E*	59.3	E*	Signal	42.5	D	35.5	D
Source: Table 8-B, <i>Traffic Impact Analysis</i> (Appendix G) AWSC = All-Way Stop Control TWSC = Two-Way Stop Control Delay = Average control delay in seconds (For TWSC intersections, reported delay is for worst-case movement). LOS = Level of Service * = Exceeds LOS Standard ¹ The addition of a two-way left-turn lane (TWLTL) on Center Street is being recommended as a mitigation measure at the intersection of Mont Martre Avenue- Project Driveway/Center Street under cumulative conditions. Synchro does not analyze the effects of a TWLTL at an unsignalized intersection. Therefore, traffic operations with the recommended improvements at this intersection were analyzed using <i>Highway Capacity Manual</i> 2010 methodologies.										
b. Conflict with an a program, including standards and travel established by the c	pplicable but not li demand m county cong	congestic mited to leasures, o estion ma	on ma level c or other anagemen	nagement of service standards nt agency]	\boxtimes			

Table 16.F: Cumulative (2019) Intersection Levels of Service with Mitigation

for designated roads or highways?

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

SSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

16b. Response: (Source: 2011 Riverside County Congestion Management Program, Traffic Impact Analysis (Appendix G), Transportation Research Board Special Report 209 – 2010 Highway Capacity Manual – Institute of Transportation Engineers (ITE) Trip Generation – 9th Edition, General Plan 2025 Circulation and Community Mobility Element)

Less Than Significant With Mitigation Incorporated. The 2011 Riverside County Congestion Management Program includes guidelines to more directly link land use, transportation and air quality, thereby prompting reasonable growth management programs that would effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. These guidelines establish a system of state highways and principal arterial roadways designated by the Riverside County Transportation Commission (RCTC). The adopted minimum LOS threshold for Congestion Management Program (CMP) state highways and principal arterial roadways is LOS E, unless the intersection or segment had a lower LOS (LOS F) in 1991; these facilities are exempt from CMP deficiency plan requirements.

Table 4-1 in the CMP lists the exempt facilities, which include the project study area intersections and highway segment on Center Street, which is the designated Arterial Roadway connecting the project site with I-215. Since the intersections and highway segment included in the study area are exempt from the CMP deficiency plan, a CMP analysis is not required. Additionally, the LOS standard and significance criteria used in the project-specific TIA for this analysis is more conservative than the CMP thresholds of significance. Since the proposed project would maintain LOS D or better under the "with the project" for the 2018 (project completion) and 2018 (cumulative) scenarios with implementation of **Mitigation Measure TRA-1**, and the proposed project TIA presents a more conservative analysis than the CMP thresholds of significances within the study area, the proposed project would not conflict with an applicable CMP, including but not limited to LOS standards and travel demand measures, or other standards established by the County Congestion Management Agency for designated roads or highways. Impacts would be **less than significant** directly, indirectly, and cumulatively, and no additional mitigation is required.



16c. Response: (Source: General Plan 2025 FPEIR Figure 5.7-2 – Airport Safety and Compatibility Zones and Riverside County Airport Land Use Compatibility Plan (RCALUCP))

No Impact. The proposed project is not located within an Airport Safety Zone, as depicted in Figure 5.7-2 of the General Plan 2025 FPEIR and Chapter 3 of the *Riverside County Airport Land Use Compatibility Plan*. Because the project is not in an airport zone, no further compliance is necessary with any airport plan, and the proposed project would not result in any change in air traffic patterns, including either an increase in traffic levels or a change in location, that would result in substantial safety risks. **No impacts** directly, indirectly, or cumulatively would occur, and no mitigation is required.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
--	--	--	--	--

16d. Response: (Source: Project Site Plans)

Less Than Significant Impact. Vehicular access to and from the project site would be provided via one driveway on Center Street/Mont Martre Avenue. Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project site. The proposed project would not introduce new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area.

Curb cuts, ingress, egress, traffic signage, and other streetscape changes proposed along the interior of the project site, as well as its frontage along Center Street, will be designed and constructed to ensure safe operation and vehicle circulation in and around the project site. The project includes a single access point along a central 25-foot wide central private roadway (Street A). Street B (25-foot wide) provides forms a T-intersection with Street A. Access to individuals lots is provided by 25-foot wide streets that branch off Streets A and B. Street widths exceed the minimum width (20 feet) identified in the RMC (Section 18.210.030). Private side streets provide access to no more five individual lots with lengths up to 234 feet,

P18-0020 (RZ), P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

which is less than the maximum permitted by the RMC (16 lots and 600 feet). As required, 5-foot wide sidewalks are proposed along Streets A and B. As requested by the City, the project will implement roadway frontage improvements including implementation of a two-way left-turn lane along and near the project frontage. Consistent with RMC 13.16.110, all roadway, sidewalk, parking and access improvements must be reviewed and approved by the City Engineer. It is reasonable to conclude that the access, emergency access, turning radii, corner visibility, parking, lane width, roadway and other project-specific characteristics will fully conform to standards and requirements established by the City and identified by the City Engineer during plan review and approval. It is reasonable to conclude that potential design hazards would be addressed during project review prior to construction or operation of the proposed uses. Impacts related to hazardous design features would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

e.	Result in inadequate emergency access?		\boxtimes	

16e. Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code)

Less Than Significant Impact. During construction, the City would require the developer to submit a Traffic Management Plan that would provide appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures as part of the plan review process. During project operation, access for emergency vehicles would be provided via the entrance to the community, which will not be gated. The proposed project would be constructed pursuant to the 2016 California Fire Code as adopted and amended by the City and in accordance with Chapter 16.32 *Fire Prevention* of the Riverside Municipal Code. Prior to occupancy, the RFD would inspect the project site to ensure compliance with applicable regulations. Adherence to these regulations would ensure potential impacts related to emergency access are less than significant directly, indirectly, and cumulatively. No mitigation is required.

	f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?				\boxtimes
--	--	--	--	--	-------------

16f. Response: (Source: General Plan 2025 Land Use and Urban Design, Circulation and Community Mobility and Education Elements, Bicycle Master Plan, School Safety Program – Walk Safe! – Drive Safe!)

No Impact. The project would not affect adopted policies supporting alternative transportation and would be subject to compliance with policies, plans, and programs of the City and other applicable agencies regarding alternative modes of transportation. Pedestrians accessing the project may utilize pedestrian facilities (e.g., sidewalks and crosswalks) that are part of the surrounding street system. Additionally, new sidewalks and trails included along the proposed Center Street frontage improvements as part of the proposed project would improve the connectivity of the project site and nearby communities to the Reid Park/Ruth H. Lewis Center Park and A.B. Brown Sports Complex, respectively 1,000 feet southwest and 1,500 feet west of the project site. All street-side frontage improvements would occur in accordance with the City's *Citywide Design and Sign Guidelines* and Title 19 - Zoning of the RMC.

Center Street and Orange Street are served by transit facilities (Riverside Transit Agency [RTA] Bus Route 12). Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments, which may lead to either enhanced or reduced service where appropriate. Bus stops along Center Street between Cliffhill Place and Stephens Avenue, approximately 650 feet east of the project site, and at the Orange Street/Placentia Lane intersection, approximately 1,500 feet southwest of the project site, are the closest bus stops to the project site. These two existing bus stops are approximately 0.5 mile apart and are conveniently placed on either side of the project site to serve future residents of the project.

The proposed project would improve connectivity for users of alternative transportation, is strategically located within several hundred feet of two existing bus stops, and would not remove or relocate any alternative transportation access points. Therefore, the project does not conflict with adopted plans, policies, or programs supporting alternative transportation. No impact related to public transit, bicycle, or pedestrian facilities plans would occur directly, indirectly, or cumulatively. No mitigation is required.

^{Initial} Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?		\boxtimes		

17a. Response: (Source: Cultural Resources Assessment-Center Park Residential Project (Appendix C); AB 52 Consultation between the City of Riverside and Interested Native American Tribes Pursuant to California Public Resources Code §21080.3.1 and §21080.3.2)

Less Than Significant with Mitigation Incorporated. Chapter 532, Statutes of 2014 (i.e., AB 52), requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

Per AB 52 (specifically PRC 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects. Table 17.A details the interested Native American tribes who responded to the City's consultation inquiry.

Native American Government/Contact	Date of Contact	Summary				
Assembly Bill 52 Notification						
Agua Caliente Band of Cahuilla Indians (Katie Croft, Cultural Resources Manager)	February 12, 2018	The Agua Caliente Band of Cahuilla Indians did not request to consult. However, they requested an approved Cultural Resources Monitor be present during any ground-disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer.				
San Manuel Band of Mission Indians (Jessica Mauck, Cultural Resources Analyst)	February 22, 2018	As part of the consultation, comments were provided to the City that had previously been forwarded to LSA. These comments have been addressed as part of the resubmittal to the City. The revised Cultural Resources Assessment (Appendix C) has been forwarded to San Manuel for review prior to the closing of consultation.				
Soboba Band of Luiseño Indians (Joseph Ontiveros, Tribal Historic Preservation Officer)	April 12, 2018	Closed Consultation with implementation of the City of Riverside Standard Mitigation Measures.				
Morongo Band of Mission Indians (Alicia Benally, Cultural Resources Specialist)	June 19, 2018	Closed Consultation with implementation of the City of Riverside Standard Mitigation Measures.				
City of Riverside, Email from Sean P. Kelleher (SKelleher@riversideca.gov), Associate Planner with the City of Riverside to Carl Winter (Carl.Winter@LSA.net), Associate with LSA. July 9, 2018.						

Table 17.A: Native American Consultation

P18-0020 (RZ), P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

The project-specific cultural resources assessment, which included an archaeological and historical records search, extended research into the local history of the project site and vicinity, and an intensive pedestrian survey of the project site (Appendix C), did not identify Native American resources on the surface of the project site. Nonetheless, a potential remains that previously undocumented cultural material (including Native American resources) could be unearthed during grading and construction operations. Previously identified Mitigation Measures CUL-1 through CUL-4 provided by the City and detailed in response to Checklist Question 5a are required.

With implementation of Mitigation Measures CUL-1 through CUL-4, impacts to tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) would be reduced to less than significant levels.

A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public		\boxtimes			
Resources Code Section 5024.1. In applying the criteria set					
forth in subdivision (c) of Public Resource Code Section					
5024.1, the lead agency shall consider the significance of					
the resource to a California Native American tribe?				1	
	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

17b. Response: (Source: Cultural Resources Assessment-Center Park Residential Project (Appendix C); City AB 52 Consultation between the City of Riverside and Interested Native American Tribes Pursuant to California Public Resources Code §21080.3.1 and §21080.3.2)

Less Than Significant with Mitigation Incorporated. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) is listed in a local register of historical resources as defined in PRC §5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC §5024.1(g); or (4) is determined to be a historical resource by a project's Lead Agency (PRC §21084.1 and *State CEQA Guidelines* §15064.5[a]).

A resource may be listed as a historical resource in the California Register if it meets any of the following National Register of Historic Places criteria as defined in PRC §5024.1(C):

- A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- B. Is associated with the lives of persons important in our past.
- C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- D. Has yielded, or may be likely to yield, information important in prehistory or history.

A "substantial adverse change" to a historical resource, according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

As detailed in response to Checklist Question 3.5a, a project-specific cultural resources assessment was conducted for the project site and included archaeological and historical records search, extended research into the local history of the project site and vicinity, and an intensive pedestrian survey of the project site (Appendix C). Data from the EIC and SCCIC indicate 59 cultural resources have been recorded within one mile of the project site in Riverside County and 41 cultural resources within one mile of the project site in San Bernardino County, including 20 prehistoric sites, two multi-component (prehistoric and historic) sites, 50 residential properties, 4 commercial/public use properties, 8 water conveyance resources, two power-generation sites, one commercial/public use property, remnants of two orchard houses, three historic railroad segments, four refuse deposits, three isolated artifacts, and the Trujillo Adobe. As indicated in Appendix C, several of these

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

^{Initial Study}, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

previously-recorded resources have been evaluated as eligible for listing in the California Register, seven have been evaluated as eligible for listing in the National Register of Historic Places (National Register), the Trujillo Adobe has been evaluated as eligible for listing in the California Register, and the site of the Highgrove Hydroelectric Plant is a California Point of Historic Interest.

The intensive pedestrian survey of the project site failed to identify any prehistoric archaeological remains. The project site is approximately one mile east of the channelized Santa Ana River (on the eastern edge of its floodplain) and is bracketed by multiple unnamed drainages that run west toward the river. These drainages and surface sheet flow have subjected the parcel and surrounding area to protracted erosional disturbance, resulting in a dynamic depositional context only marginally conducive to preservation of subsurface archaeological resources.

Despite the low likelihood any cultural resources are present at the project site, there remains some potential for the proposed project to unearth previously undocumented cultural resources during construction. Therefore, Mitigation Measure CUL-1 is proposed to ensure interested Native American tribes have opportunity to provide input in the event there are any changes to project site design and/or proposed grades; Mitigation Measure CUL-2 is proposed to ensure a Secretary of Interior Standards qualified archaeologist shall monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources; Mitigation Measure CUL-3 is proposed to ensure all unanticipated archaeological resources encountered are treated with appropriate dignity with Native American input; and Mitigation Measure CUL-4 is proposed to ensure the Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pregrading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel.

With implementation of Mitigation Measures CUL-1 through CUL-4, impacts to tribal cultural resources determined significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 with Native American input would be reduced to less than significant levels.

18. UTILITIES AND SYSTEM SERVICES. Would the project:			
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?		\boxtimes	

18a. Response: (Source: Riverside County Drainage Area Management Plan (DAMP), General Plan 2025 Figure PF-2 – Sewer Facilities Map, Riverside General Plan and Supporting Documents Environmental Impact Report Figure 5.16-5 – Sewer Service Areas, Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)

Less Than Significant Impact. The proposed project would connect to existing wastewater collection and conveyance facilities owned and operated by Riverside Public Works via sewer laterals from the project site, and wastewater from the project site and vicinity would be transported to the Riverside Regional Water Quality Control Plant. If an existing sewer lateral would be utilized, video inspection prior to connection would be required in accordance with the City's Municipal Separate Sewer Permit (MS4) as part of the City's Development Review Process through the Public Works Department.

All new development is required to comply with all provisions of the NPDES program and the City's MS4, as enforced by the RWQCB. The proposed project would result in typical wastewater discharges that would not require new methods or equipment for treatment that are not currently permitted for the Riverside Regional Water Quality Control Plant. Therefore, the proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or storm water system within the City. Since the project would discharge its wastewater to a facility that is legally required to meet wastewater standards and because the proposed project would be required to adhere to the above regulations related to wastewater treatment, the project would have a less than significant impact directly, indirectly, and cumulatively. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			\boxtimes	

18b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR); Table PF-2 – RPU Projected Water Demand, RPU; General Plan 2025 FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025; Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area; Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR; 2015 Urban Water Management Plan, City of Riverside Public Utilities, June 2016.; Riverside Wastewater Collection and Treatment Facilities Integrated Master Plan, February 2008)

Less Than Significant Impact. The project would not result in the construction of new or expanded water or wastewater treatment facilities. The proposed project would be required to connect to existing water and wastewater infrastructure to provide the necessary construction and water/sewer needs for the project. The connection point for the lines would be from lines within the existing adjacent roadway (Center Street). No new water and sewer infrastructure is anticipated with implementation of the project. The project is consistent with the Typical Growth Scenario of the General Plan 2025 wherein future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 FPEIR).

The RPU's 2015 UWMP estimates water supply and demand during normal, dry, and multiple-dry years (Table 18.A).

Condition	2020	2025	2030	2035	2040
Normal Year Supply Demand	116,903	121,093	124,703	124,703	124,703
	95,221	96,534	99,015	101,589	104,257
Dry Year Supply Demand	96,288	101,288	104,088	104,088	104,088
	95,221	96,534	99,015	101,589	104,257
Multiple-dry Year Supply Demand	102,364	107,364	110,614	110,164	110,164
	95,221	96,534	99,015	101,589	104,257

Table 18.A: Projected Water Supply/Demand (acre-feet/year)

Source: Tables 8-2, 8-3, and 8-4, 2015 Urban Water Management Plan for Riverside Public Utilities Water Division. June 2016.

According to RPU's 2015 UWMP, RPU would have a reliable and sufficient water supply that would exceed projected demand through the year 2040.⁶ As detailed in Checklist Response 13a, the project is proposed in an urbanized area and would not induce substantial population growth. The addition of 99 single-family manufactured homes represents less than 0.08 percent of the projected 127,692 housing units anticipated by 2025 in the City's General Plan. Demographic information from the General Plan 2025 and the SCAG were considered during the preparation of RPU's 2015 UWMP.

According to RPU's 2015 UWMP, Riverside Public Utilities' actual water consumption in 2015 was 180 gallons per capita per day.⁷ Based on the household size of 2.86 persons per unit for manufactured housing units used in the CalEEMod v2016.3.2, the proposed 99 manufactured homes could increase the City's population by approximately 283 persons, with an estimated water usage of 50,940 gallons per day (0.16 acre-foot). This represents between 0.057 and 0.053 percent of anticipated RPU water supplies in 2020 through 2040 (assuming worst-case multiple dry years). As established in Table 18.A, sufficient water supplies are available to serve existing and projected future water demand under normal year, single-dry year, and multiple-dry year conditions.

⁶2015 Urban Water Management Plan for Riverside Public Utilities Water Division. June 2016. Page 8-5. http://www.riversideca.gov/utilities/pdf/2016/ RPU_2015_UWMP_June_Draft.pdf (Accessed December 5, 2017).

Ibid. Page 5-2.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

According to the Riverside Public Works Department (RPWD), Table 3.4 of the Riverside Wastewater Collection and Treatment Facilities Integrated Master Plan projects future flow at 96.6 gallons per capita per day. The Riverside Regional Water Quality Control Plant has a wastewater treatment capacity of 40 million gallons per day; capacity is not expected to be reached prior to 2025, and a planned expansion of the facility is expected to increase capacity to 52.2 million gallons per day. According to the General Plan 2025 FPEIR, the Riverside Regional Water Quality Control Plant would adequately serve the City under a Typical Growth Scenario through 2025 but would not meet the estimated wastewater treatment demand of 55.3 million gallons per day for maximum build-out or 64.0 million gallons per day for maximum build-out with Planned Residential Development.

With an estimated increase in the City's population by approximately 283 persons, the proposed project would generate approximately 27,338 gallons of wastewater per day or 10 million gallons of wastewater per year.⁸ Given the plant's maximum treatment capacity of 40 million gallons per day and a planned expansion of the facility to increase capacity to 52.2 million gallons per day, the project would only incrementally increase the demand for wastewater treatment by approximately 0.05 percent.

The proposed project would connect to the existing municipal water and sewer system via on-site water and sewer lines to be constructed to interconnect to existing lines. The proposed uses are consistent with the General Plan 2025 land use designation and zoning ordinance and, therefore, population increase as a result of the proposed project is not considered substantial. As a result, the proposed project would not induce a population increase above that which has been planned for by the City, and the proposed project would remain consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater capacity was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J, and 5.16-K of the Riverside General Plan 2025 FPEIR). Through the payment of applicable development impact and hook-up fees, the project would have a less than significant impact directly, indirectly, and cumulatively to the environment from construction of new water or wastewater treatment facilities or the expansion of existing facilities. No mitigation is required.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the		\boxtimes	
construction of which could cause significant environmental effects?			

18c. Response: (Source: General Plan 2025; General Plan 2025 FPEIR Figure 5.16-2 – Drainage Facilities, Preliminary Water Quality Management Plan (WQMP) for Center Park (Appendix F1))

Less Than Significant Impact. The proposed project would result in an increase in impervious surface areas. The Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund that is maintained by Riverside County Flood Control and Water Conservation District. This section also complies with the California Government Code (Section 66483), which provides for the payment of fees for construction of drainage facilities. Fees are required to be paid as part of the conditions of approval/waiver for filing of a final map or parcel map.

General Plan 2025 Policies PF 4.1 and PF 4.3 require the City to continue to routinely monitor its storm drain system and to fund and improve those systems as identified in the City's Capital Improvement Plan. Implementation of these policies would ensure that the City is adequately served by drainage systems. The General Plan 2025 also includes policies and programs that would minimize the environmental effects of the development of such facilities. The approval of drainage features/improvements occurs through the City's building plan check process. As part of this process, all project-related drainage features would be required to meet the RPWD and RWQCB standards. Project-related drainage features would be designed, installed, and maintained per RPWD standards and the requirements identified in the project-specific WQMP. With implementation of these items, drainage impacts would be less than significant with mitigation incorporated directly, indirectly, and cumulatively. No additional mitigation is required.

⁸ 283 residents \times 96.6 gallons/resident/day = 27,338 gallons per day (10 million gallons/year).

P18-0020 (RZ),

P18-0022 (CLIP) and P18-0023 (DR) Exhibit 8 - Draft Initial Study, MND, and Appendices

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			\boxtimes	

18d. Response: (Source: General Plan 2025 FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025)

Less Than Significant Impact. The project would not exceed expected water supplies. As stated in Checklist Response 18b, the proposed 99 manufactured homes could increase the City's population by approximately 283 persons, with an estimated water usage of 50,940 gallons per day (0.16 acre-foot). This represents between 0.057 and 0.053 percent of anticipated RPU water supplies in 2020 through 2040 (assuming worst-case multiple dry years). As established in Table 18.A, above, sufficient water supplies are available to serve existing and projected future water demand under normal year, single-dry year, and multiple-dry year conditions. Additionally, the proposed project is consistent with the General Plan 2025 FPEIR Typical Growth Scenario where future water supplies were determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I and 5.16-J of the General Plan 2025 FPEIR). Therefore, the project would have less than significant impact related to insufficient water supplies either directly, indirectly, or cumulatively, and no mitigation is required.

e. Result in a determination by the wastewater treatmen	t 🗌	\boxtimes	
provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in			
addition to the provider's existing commitments?			

18e. Response: (Source: General Plan 2025 FPEIR Figure 5.16-5 – Sewer Service Areas, Figure 5.16-6 – Sewer Infrastructure, Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, and Wastewater Integrated Master Plan and Certified EIR)

Less Than Significant Impact. As stated in Checklist Response 18b, Table 3.4 of the Riverside Wastewater Collection and Treatment Facilities Integrated Master Plan projects future flow at 96.6 gallons per capita per day. The Riverside Regional Water Quality Control Plant has a wastewater treatment capacity of 40 million gallons per day, with capacity anticipated to be reached not before 2025, and a planned expansion of the facility to increase capacity to 52.2 million gallons per day. In its General Plan analysis, the City evaluated utility demands based on three levels of development ranging from typical growth to the most extreme growth (Typical, Maximum, and Maximum with PRD). According to the General Plan 2025 FPEIR, the Riverside Regional Water Quality Control Plant would adequately serve the City under a Typical Growth Scenario through 2025 but would not meet the estimated wastewater treatment demand of 55.3 million gallons per day for maximum build-out or 64.0 million gallons per day under the most intense level of growth (Maximum with Planned Residential Development).

With an estimated increase in the City's population by approximately 283 persons, the proposed project would generate approximately 27,338 gallons of wastewater per day or 10 million gallons of wastewater per year.⁹ Given the plant's maximum treatment capacity of 40 million gallons per day and a planned expansion of the facility to increase capacity to 52.2 million gallons per day, the project would only incrementally increase the demand for wastewater treatment by approximately 0.05 percent.

The proposed project would connect to the existing municipal water and sewer system via on-site water and sewer lines to be constructed to interconnect to existing lines. The proposed uses are consistent with the General Plan 2025 land use designation and zoning ordinance; therefore, population increase as a result of the proposed project would not be considered substantial. As a result, the proposed project would not induce a population increase above that which has been planned for by the City, and the proposed project would remain consistent with the Typical Growth Scenario of the General Plan 2025 where future wastewater treatment capacity was determined to be adequate (see Table 5.16-K of the Riverside General Plan 2025 FPEIR). Through the payment of applicable development impact and hook-up fees, the project would have a less than

 9 283 residents \times 96.6 gallons/resident/day = 27,338 gallons per day (10 million gallons/year).

Initial Study, MND, and Appendices

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact				
significant impact directly, indirectly, and cumulatively to the environment from the wastewater treatment provider's capacity to serve the proposed project. No mitigation is required.								
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			\boxtimes					

18f. Response: (Source: General Plan 2025 FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M)

Less Than Significant Impact. The project includes the development of a mobile home park. Construction of the project would generate waste, at least 50 percent of which would be diverted in accordance with the California Green Building Code. Additionally, in accordance with Public Resource Code Section 41780, the City diverts at least 50 percent of generated waste from landfills. Solid waste from construction and future operations would be transported to the Badlands Landfill, located east of the City of Moreno Valley. Badlands Landfill has a current remaining capacity of 9.8 million tons as of January 2015, a maximum daily load of 4,500 tons per day, and an average daily load of 2,500 tons per day, as specified via telephone phone call by Andy Cortez (principal engineer at Badlands Landfill). According to Table 5.16-M of the Riverside General Plan and Supporting Documents Environmental Impact Report, single-family residential uses generate approximately 10 pounds of solid waste per day.¹⁰ Based on an average daily load of 2,500 tons (5,000,000 pounds) per day capacity of the Badlands Landfill, the proposed project would contribute approximately 0.02 percent of the average daily load of solid waste to the Badlands Landfill.¹¹

The proposed uses are consistent with the General Plan 2025 land use designation and zoning ordinance; therefore, population increase as a result of the proposed project would not be considered substantial. As a result, the proposed project would not induce a population increase above that which has been planned for by the City, and the proposed project would remain consistent with the Typical Growth Scenario of the General Plan 2025 where permitted landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the Riverside General Plan and Supporting Documents Environmental Impact Report). Therefore, the proposed project would have a less than significant impact to landfill capacity directly, indirectly, and cumulatively. No mitigation is required.

g.	Comply with	Federal,	State,	and	local	statutes	and		\times
	regulations rela	ted to soli	d waste	?					<u> </u>

18g. Response: (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)

No Impact. The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The City is currently achieving a 60 percent diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50 percent of non-hazardous construction and demolition debris for all projects and all excavated soil beginning January 1, 2011. The proposed project must comply with the City's waste disposal requirements as well as the California Green Building Code. For these reasons, the project would not conflict with any federal, State, or local regulations related to solid waste. No impact related to solid waste statutes would occur directly, indirectly, or cumulatively, and no mitigation is required.

¹⁰ 99 dwelling units \times 10 pounds of solid waste per day = 990 pounds of solid waste per day from the proposed project.

¹¹ 990 pounds of solid waste per day from the proposed project ÷ 5,000,000 pounds of average daily load of solid waste = 0.02 percent of average daily load.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
19a. Response: (Source: Biological Resources Assessment Assessment for the Center Park Residential Project (Appendix J Park Manufactured Home Residential Project (Appendix B2), J Residential Project (Appendix B3), Determination of Biological Park Residential Project (Appendix B4), Cultural Resources As C))	and MSHC B1), Results o Jurisdictional ly Equivalent ssessment-Ce	CP Consistence of Burrowing Delineation H or Superior F nter Park Res	cy Analysis of Owl Survey fo Report for the Preservation fo idential Project	and Habitat or the Center Center Park or the Center ct (Appendix
resources were analyzed in this Initial Study, and all direct, indirect impact, a less than significant impact, or reduced to a less than sign endangered or threatened species were identified on the project site. fish or wildlife populations to drop below self-sustaining levels or res species. The proposed project would not affect any threatened or enda within the MSHCP burrowing owl survey area. Potential impacts t migratory and nesting birds would be mitigated to less than significa BIO-1 and BIO-2.	t, and cumula nificant impact Development strict the move angered species o special stat ant levels wit	tive impacts to biolo tive impacts w ct with implen t of the propos ement/distribu- es or associate us species, suc h implementat	tion of Mitigat	and cultural ed to have no nitigation. No uld not cause or endangered project site is ng owl, or to ion Measures
Development of the proposed project would not affect known histor are no known unique ethnic or cultural values associated with the associated with the project site. Mitigation Measure CUL-1 is prop opportunity to provide input in the event there are any changes to Measure CUL-2 is proposed to ensure a Secretary of Interior Stand disturbing activities in an effort to identify any unknown archaeolog to ensure all unanticipated archaeological resources encountered are input; and Mitigation Measure CUL-4 is proposed to ensure t archaeologist and Native American monitors shall attend the pre contractors to provide Cultural Sensitivity Training for all construction project applicant shall comply with California Code of Regulations Section 7050.5, and Public Resources Code Section 5097.98 in th Adherence to these measures and regulations would reduce potential than significant with implementation of mitigation.	ric, archaeolo project site, osed to ensur project site d lards qualified ical resources treated with a he Secretary -grading mee on personnel. Section 15064 e event huma impacts to cul	gical, or paleo nor are know e interested N esign and/or p d archaeologis s; Mitigation N appropriate dig of Interior S etting with the Additionally, a 4.5(e), Californ an remains are	ntological reso in religious o ative America roposed grade t shall monito feasure CUL- gnity with Nat Standards Cou developer/pe s required by hia Health and e encountered ontological res	ources. There r sacred uses in tribes have es; Mitigation or all ground- 3 is proposed ive American inty certified rmit holder's State law, the Safety Code at any time. ources to less
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				

Less Than Significant With Mitigation Incorporated. The proposed project has either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues pursuant to

 $^{Initia _Study}_{\mbox{Exhibit 8}}$ - Draft Initial Study, MND, and Appendices

P18-0020 (RZ) P18-0022 (CUP), and P18-0023 (DR)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

CEQA. Due to the limited scope of direct physical impacts to the environment associated with the proposed project, the project's impacts are primarily project-specific in nature.

The project-specific TIA (Appendix G) evaluated 13 residential, 17 non-residential, and three specific plans for analysis of cumulative conditions, and this Initial Study determined the proposed project would not generate significant amounts of cumulative traffic, air pollutants, or GHG emissions. With implementation of Mitigation Measure TRA-1, all project study area intersections under cumulative conditions would operate at satisfactory LOS. Additionally, the proposed project would comply with pertinent SCAQMD rules, California Code of Regulations, and California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations. Through compliance with existing regulations developed to reduce emissions of criteria pollutants, the project would not exceed SCAQMD significance thresholds. Pursuant to Title 13, Section 2449(d)(d) of the California Code of Regulations, operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) are required to limit vehicle idling to five minutes or less. Additionally, at least 50 percent of all construction materials (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) shall be recycled/reused and "green building materials" (e.g., those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way) shall be used for at least 10 percent of the project in accordance with California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations. Table 3.A details that by complying with SCAOMD's standard control measures, applicable California Code of Regulations, and CalRecycle Sustainable (Green) Building Program regulations, construction vehicle and equipment emissions would not exceed any of the SCAQMD-established daily emissions thresholds. Furthermore, the project would be designed in accordance with Title 24. Energy Conservation and Green Building Standards, as established by the California Energy Commission. Pursuant to this regulation, the project would include low-emission water heaters and exterior windows that have window treatments for efficient energy conservation to reduce operational air pollutant emissions. Therefore, through compliance with Title 24, Energy Conservation and Green Building Standards, operation of the project would not exceed any of the SCAQMD thresholds for criteria pollutants, which would ensure cumulatively considerable impacts to the environment regarding air quality and global climate change remain less than significant.

c. Does the project have environmental effects which will	\times	
cause substantial adverse effects on human beings, either		
directly or indirectly?		

19c. Response: (Source: Air Quality and Greenhouse Gas Analysis (Appendix A), Traffic Impact Analysis (Appendix G), Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project (Appendix D), Preliminary Water Quality Management Plan (WQMP) for Center Park (Appendix F1), Preliminary Hydrology & Hydraulics Report for Center Park (Appendix F2))

Less Than Significant With Mitigation Incorporated. The South Coast Air Basin is currently designated as a nonattainment area for ozone, PM₁₀, and PM_{2.5}. Development of the project would contribute to air pollutant emissions on a short-term basis. The proposed project is required to comply with SCAQMD Rules 402 and 403, applicable California Code of Regulations, and CalRecycle Sustainable (Green) Building Program regulations, which include implementation of standard control measures for fugitive dust and construction equipment emissions. Pursuant to Title 13, Section 2449(d)(d) of the California Code of Regulations, operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) are required to limit vehicle idling to five minutes or less. Additionally, at least 50 percent of all construction materials (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) shall be recycled/reused and "green building materials" (e.g., those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way) shall be used for at least 10 percent of the project in accordance with California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations. Table 3.A details that by complying with SCAQMD's standard control measures, applicable California Code of Regulations, and CalRecycle Sustainable (Green) Building Program regulations, construction vehicle and equipment emissions would not exceed any of the SCAOMD-established daily emissions thresholds. Furthermore, the project would be designed in accordance with Title 24, Energy Conservation and Green Building Standards, as established by the California Energy Commission. Pursuant to this regulation, the project would include low-emission water heaters and exterior windows that have window treatments for efficient energy conservation to
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------------	--	------------------------------------	--------------

reduce operational air pollutant emissions. Therefore, through compliance with Title 24, Energy Conservation and Green Building Standards, operation of the project would not exceed any of the SCAQMD thresholds for criteria pollutants. Through compliance with pertinent SCAQMD rules, California Code of Regulations, and California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program regulations, short-term (construction) air quality impacts would be less than significant directly and indirectly, and no mitigation is required.

Like all of Southern California, the project site could be subject to strong ground shaking resulting from large earthquakes. Proper engineering design and construction in conformance with the 2016 CBC standards, RMC Titles 18 and 17, and project-specific Geotechnical recommendations would ensure that soil erosion or loss of topsoil would result in a less than significant impact directly and indirectly. Due to the depth of groundwater, proper engineering design and construction in conformance with the 2016 CBC standards and project-specific Geotechnical recommendations, and compliance with City codes pertaining to grading (RMC Title 17) would sufficiently ensure that impacts related to unstable geologic conditions and expansive soils are reduced to less than significant levels directly and indirectly.

As stated in the project-specific geotechnical report, additional geotechnical evaluation is required once grading plans, development plans, foundation plans, and structural loads become available. Upon further geotechnical evaluation, additional recommendations may be proposed by the geotechnical engineer, the implementation of which would be required pursuant to 2016 CBC regulations, RMC Title 16 (Buildings and Construction) and Title 17 (Grading), and General Plan Policy PS-1.1. Additionally, all grading plans will be subject to City Staff review for regulatory compliance in accordance with RMC, Section 17.16.010. Because the proposed project must comply with 2016 CBC regulations that protect habitable structures from seismic activity and unstable geologic units or soils, direct, indirect, and cumulative impacts on human beings associated with geology would be less than significant. No mitigation is required.

Although potential hydrology and water quality impacts could result from the proposed project, implementation of NPDES permits ensures the State's mandatory standards for the maintenance of clean water and the Federal minimums are met. The proposed project includes two DMAs to be treated by infiltration BMP sump basins that would be designed to manage the full DCV of the developed impervious surfaces of the proposed project. As detailed in Table 9.B, the proposed infiltration BMP sump within DMA 1A-C would reduce off-site storm water runoff by 31 percent over pre-development volumes, so there would be no HCOC from DMA 1A-C. Furthermore, DMA 2A-C would infiltrate approximately 0.113 acre-feet of runoff and would result in a mitigated flow rate of 0.075 acre-feet, which exceeds the pre-development runoff volume of 0.073 acre-feet by 3 percent, and which is below the threshold of a 10 percent increase. There would be no HCOC from DMA 2A-C.

The WQMP would be reviewed and approved as a routine action during the processing of the project by the City; therefore, it is reasonable that the required measures and features detailed in the WQMP to safeguard the existing drainage pattern of the site and area would be incorporated into the proposed project. The project would not have any substantial effects on a stream or river, as the on-site intermittent stream generated by urban runoff ends 250 feet west of Orange Street where it dissipates into a vacant field and percolates into the ground. Additionally, since post-development storm water runoff would not exceed pre-development runoff by more than 10 percent, the project is designed and would be developed consistent with an approved Watershed Action Plan that addresses HCOC in receiving waters. Impacts to hydrology and water quality would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

Construction and operation of the proposed project has the potential to expose persons to noise levels in excess of standards in the local General Plan and Noise Ordinance. Compliance with Section 7.35.020.G of the City's Noise Ordinance would ensure construction-related noise impacts to the nearby sensitive receptors remain less than significant directly and indirectly, and no mitigation is required.

The proposed project would contribute traffic to local roadways, intersections, and regional freeways. With implementation of Mitigation Measure TRA-1, all project study area intersections under cumulative conditions would operate at satisfactory LOS and project-related traffic impacts on local roadways and intersections would be reduced to less than significant with implementation of mitigation directly and indirectly.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296 (1988); *Leonoff v. Monterey Board of Supervisors*, 222 Cal.App.3d 1337 (1990).

MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project Name: Center Park Residential Project			Applicant:IDate:4	Kings Company August 2019	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	Verified Date/ Initials	Sanctions for Non- Compliance
Biological Resources					
BIO-1: If grading or construction activities are planned during the bird nesting season (February 1 to August 31), a nesting bird survey shall be conducted for five consecutive days no more than three days prior to any ground-disturbing activities, including, but not limited to clearing, grubbing, and/or rough grading, to ensure birds protected under the MBTA are not disturbed by on-site activities. Any such survey(s) shall be conducted by a qualified biologist. If no active nests are found, no additional actions related to this measure are required. If active nests are found, the nest locations shall be mapped by the biologist. The nesting bird species shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, or near fledging) determined. Based on the species present and surrounding habitat, a no-disturbance buffer shall be identified by a qualified biologist and confirmed by the City; non-raptor bird species nests shall be buffered up to 280 feet, while raptor nests shall be buffered up to 820 feet. No construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the City and construction supervisor that activities may resume	Community & Economic Development Department, Planning and Building & Safety Divisions Public Works Department	Within three days of any ground disturbance activity.	Preconstruction Survey Repor submitted to the City (as applicable), the establishment and maintenance of appropriate buffers	t	Withhold permit(s) and/or issuance of a stop work order
BIO-2: No burrowing owls or features potentially occupied by burrowing owls were detected on the project or adjacent areas during the August 2017	Community & Economic Development	Within 30 days of site grading activities	Preconstruction Survey Repor submitted to the City (as applicable).	t	Withhold grading permit and/or issuance

Project Name: Center Park Residential Project			Applicant:	Kings Company	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	Verified Date/ Initials	Sanctions for Non- Compliance
survey. Because the burrowing owl is a mobile species and site conditions may change, a pre-construction survey would be required within 30 days prior to beginning of site grading, per the MSHCP Burrowing Owl Survey Guidelines Section 6.3.2. If burrowing owls are found to be present at that time, the California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife Service (USFWS), and the Riverside Conservation Authority (RCA) will be notified within three days. A burrowing owl relocation and protection plan will developed and approved by all three agencies. Relocation and protection measures shall be completed pursuant to the plan prior to the start of ground disturbance activities. No further action is required if the 30-day pre-construction survey does not result in burrowing owl sign or observations.	Department, Planning and Building & Safety Divisions Public Works Department California Department of Fish and Wildlife if relocation of owls is required	Prior to the start of ground disturbing activities.	As necessary, evidence the relocation and protection measures identified in the pl have been satisfied.	an	of a stop work order
BIO-3: Prior to the issuance of a grading permit, the applicant shall record a Conservation Easement pursuant to CDFW requirements to preserve the riparian drainage in its current condition in perpetuity. Construction, planting, dumping, filling, and similar activities will be prohibited within the area covered under the Conservation Easement. Activities within the drainage will be limited to those allowed by the CDFW that preserve and enhance native species, their habitat, and natural communities, in a manner consistent with habitat conservation purposes.	Community & Economic Development Department, Planning and Building & Safety Divisions Public Works Department City Attorney's Office	Prior to the issuance of grading permits and/or during grading activities	Evidence the Conservation Easement incorporating CDFW requirements has bee recorded.	en	Withhold grading permit and/or issuance of a stop work order

Duringt Names Conten David Devidential Duringt			Annlinente	Vin an Common	
Project Name: Center Park Residential Project			Аррисант: Data:	August 2019	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	Verified Date/ Initials	Sanctions for Non- Compliance
BIO-4: Prior to the issuance of a grading permit, the applicant shall coordinate with the USACE to determine if jurisdiction will be asserted over the riparian drainage under the Federal Clean Water Act (CWA) Section 404. If USACE jurisdiction over the riparian drainage is asserted, the applicant shall provide evidence that USACE has issued a CWA Section 404 permit, the Regional Water Quality Control Board (RWQCB) has issued a CWA Section 401 certification, and that applicable USACE permit and RWQCB certification requirements have been satisfied prior to the issuance of a grading permit. If the riparian drainage is not subject to USACE jurisdiction, the applicant shall comply with applicable Waste Discharge Requirements (WDR) established by the RWQCB under the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act). Prior to the issuance of a grading permit, the applicant shall obtain a Streambed Alteration Agreement administered by the CDFW pursuant to California Fish and Game Code Section 1600 for the 0.67 acre of the stream comprising both the bed-and-bank and associated wildlife habitat.	Community & Economic Development Department, Planning and Building & Safety Divisions Public Works Department	As required, prior to the issuance of grading permits	Evidence the required permit(s) have been obtained and the applicable permit conditions have been satisfied.		Withhold grading permit and/or issuance of a stop work order
BIO-5: Prior to the issuance of grading permits, the applicant will be required to satisfy (as required), USACE, RWQCB, and CDFW permit requirements.	CEDD – Planning & B&S Public Works	As required, prior to the issuance of grading permits	Evidence the required permit(s) h been obtained and the applicable permit conditions have been satis	ave fied	Withhold grading permit and/or issuance of a stop work order.
CULTURAL RESOURCES					
CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and interested tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the	Community & Economic Development Department, Planning and Historic Preservation Divisions Applicant	Prior to the issuance of grading permits, if there are any changes to project site design and/or proposed grades	Consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation		Withhold grading permit and/or issuance of a stop work order

Project Name: Center Park Residential Project			Applicant: Date:	Kings Company August 2019	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	Verified Date/ Initials	Sanctions for Non- Compliance
project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. This measure shall be implemented to the satisfaction of the City Planning Division.					
 CUL-2: Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. The project archaeologist, in consultation with interested tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a. Project grading and development scheduling; b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in 	Community & Economic Development Department, Planning and Historic Preservation Divisions Qualified Archeological Monitor	Prior to the issuance of grading permits	Evidence the developer/applicant retained a Secretary of Interior Standard qualified archaeological monitor. Evidence of preparation of ar Archaeological Monitoring P in accordance with the mitigation measure	a Is Ian	Withhold grading permit

Project Name: Center Park Residential Project			Applicant:	Kings Company, LLC		
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	August 2019 Verified Date/ Initials	Sanctions for Non- Compliance	
 coordination with all project archaeologists; c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resource evaluation; d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and e. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure MM-CUL-4. 						
 CUL-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and 2. Treatment and Final Disposition: The 	Community & Economic Development Department, Planning and Historic Preservation Divisions Project Applicant Landowner Qualified Archeological Monitor	On-going through ground disturbance	 Evidence all discovered resources are temporarily curated in a secure location, and as applicable, 1) Evidence landowner(s) relinquish ownership of all cultural resources; 2) Evidence of on-site reburi of the discovered items with the consulting Native American tribes or bands; 3) Evidence of curation agreement with an appropria 	al	Issuance of a stop work order	

Project Name: Center Park Residential Project			Applicant:	Kings Company,	LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Date: Method of Verification	August 2019 Verified Date/ Initials	Sanctions for Non- Compliance
 landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and nonhuman remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and 			 qualified repository within Riverside County that meets federal standards per 36 CFR Part 79; 4) Evidence of curation at the Western Science Center or Riverside Metropolitan Museum by default if agreement on disposition of cultural materials is not made AND 5) Completion of required Phase IV Monitoring Report by a qualified archaeologist. 		

Project Name: Center Park Residential Project			Applicant:	Kings Company	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Date: Method of Verification	August 2019 Verified Date/ Initials	Sanctions for Non- Compliance
d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre- grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and interested tribes.					
CUL-4 Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre- grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring	Community & Economic Development Department, Planning and Historic Preservation Divisions Qualified Archeological Monitor	During pre- grading meeting	A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	5	Issuance of stop work order.

Project Name: Center Park Residential Project			Applicant: Date:	Kings Company August 2019	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	Verified Date/ Initials	Sanctions for Non- Compliance
Report.					
 CUL-5: A paleontologist shall be hired to develop a Paleontological Resource Impact Mitigation Program (PRIMP) for this project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the project area, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. Excavation and grading activities in deposits with high paleontological sensitivity (very old alluvial-fan deposits) shall be monitored by a paleontological monitor in accordance with the PRIMP. No monitoring is required for excavations in soil with no paleontological 	Community & Economic Development Department, Planning and Historic Preservation Divisions Qualified Archeological Monitor	Prior to the issuance of grading permits and/or during grading activities	Submittal of evidence the required PRIMP has been developed for the project		Withhold grading permits and/or issuance of a stop work order
 If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. 					
• Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution.					
• At the conclusion of the monitoring program, a report of findings shall be prepared to document the results of the monitoring program.					
• In the event that paleontological resources are					

Project Name: Center Park Residential Project			Applicant: Date:	Kings Company August 2019	, LLC
Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification or Action	Method of Verification	Verified Date/ Initials	Sanctions for Non- Compliance
encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and a paleontologist should be contacted to assess the find for significance. If determined to be significant, the fossil shall be collected from the field.					
TRANSPORTATION AND TRAFFIC					
TRA-1: Fair-Share Payments: Prior to issuance of a Certificate of Occupancy, the City of Riverside Public Works - Traffic Engineering, City Traffic Engineer, or designee, shall verify that the project applicant has made payment of the project's fair share to the appropriate jurisdiction to fund improvements necessary for the following project study area intersections to operate at acceptable LOS under cumulative (2018) conditions:	City of Riverside Public Works - Traffic Engineering, City Traffic Engineer, or Designee	Prior to issuance of a Certificate of Occupancy	Evidence of payment of the project's fair share		Withhold Certificate of Occupancy
 Orange Street/Center Street (City of Riverside): Payment of 1.67 percent fair-share contribution for the installation of one eastbound lane, one westbound lane, and a traffic signal. Mont Martre Avenue-Project Driveway/Center Street (City of Riverside): Payment of 100 percent contribution for the installation of one two-way left-turn lane along Center Street. Stephens Avenue/Center Street (County of Riverside): Payment of 4.28 percent fair-share contribution for the installation of one eastbound lane, one westbound lane, and a change from split phasing to protected left-turn phasing in the east- west direction along Center Street. 					

This Page Intentionally Left Blank

REFERENCES

- Caltrans (California Department of Transportation). 2011. California Scenic Highway Mapping System. Accessed November 30, 2017. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.
- California Department of Conservation. 2016a. Riverside County Important Farmland 2014. Accessed November 30, 2017. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/riv14_w.pdf.
- California Department of Conservation. 2016b. Riverside County Williamson Act FY 2015/2016. Accessed November 30, 2017. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Riverside_w_15_16_WA.pdf.
- City of Riverside. 2015. Riverside Restorative Growthprint, Climate Action Plan RRG.

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

City of Riverside. 2007. General Plan 2025 Final Programmatic Environmental Impact Report.

Fuscoe Engineering, Inc. 2019. Preliminary Hydrology & Hydraulics Report, Center Park. (Appendix F2).

Fuscoe Engineering, Inc. 2019. Preliminary Water Quality Management Plan (WQMP), Center Park. (Appendix F1).

LSA Associates, Inc. 2018. Air Quality and Greenhouse Gas Analysis, Center Street Residential Project. (Appendix A).

- LSA Associates, Inc. 2019. Biological Resources Assessment and MSHCP Consistency Analysis and Habitat Assessment, Center Park Residential Project (Appendix B1).
- LSA Associates, Inc. 2019. Determination of Biologically Equivalent or Superior Preservation, Center Park Project (Appendix B4).
- LSA Associates, Inc. 2018. Jurisdictional Delineation Report, Center Park Residential Project (Appendix B3).
- LSA Associates, Inc. 2018. Results of Burrowing Owl Survey for the Center Park Manufactured Home Residential Project (Appendix B2).
- LSA Associates, Inc. 2018. Cultural Resource Assessment, Center Park Residential Project (Appendix C).

LSA Associates, Inc. 2018, Phase 1 Environmental Site Assessment (Appendix E).

- LSA Associates, Inc. 2018. Traffic Impact Analysis, Center Park Residential Project (Appendix G).
- NETRonline. 2018. Nationwide Environmental Title Research, Inc. www.historicaerials.com (Accessed July 16, 2018).
- NMG Geotechnical, Inc. 2017. Geotechnical Exploration and Design Report for Proposed Center Park Modular Home Project. (Appendix D).
- South Coast Air Quality Management District (SCAQMD). 2017. Final 2016 Air Quality Management Plan.

South Coast Air Quality Management District (SCAQMD). 2010. Greenhouse Gases CEQA Significance Thresholds Working Group Meeting No. 15. September 28, 2010.

Water Systems Consulting, Inc. 2016. 2015 Urban Water Management Plan for Riverside Public Utilities Water Division.

This Page Intentionally Left Blank