

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:

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| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
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2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability & General Plan 2025)

No Impact. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the project site is not designated as and is not in proximity to any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency. The proposed project would be constructed within the 5.67-acre project site which is designated as “Urban and Built-Up Land” by the Department of Conservation Farmland Mapping and Monitoring Program and as depicted in Figure OS-2 Agricultural Sustainability, in the City’s General Plan 2025. The Department of Conservation defines “Urban and Built-Up Land” as structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not convert Prime, Unique or Farmland of Statewide Importance to a non-agricultural use. **No impact** will occur and no mitigation is required.

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| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
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2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)

No Impact. The project site is within the O - Office and R-1-7000 - Single Family Residential land use designations. The proposed project would require a General Plan Amendment from O - Office and MDR - Medium-Density Residential to O - Office and HDR - High-Density Residential. A Zone Change will be needed from O - Office and R-1-7000 - Single-Family Residential to O - Office to reflect the reconfigured office parcel for the Broadcast Center on the western side of the site and R-3-1500 - Multi-Family Residential to permit additional density for the residential development on the eastern portion of the site. A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR reveals that the project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Moreover, the project site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the project (including the General Plan Amendment, Zone Change, and Design Review) will have **no impact** directly, indirectly, or cumulatively. No mitigation is required.

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| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | ☐ | ☐ | ☐ | ☒ |
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2c. 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. The project site is not zoned for forest land, timberland, or timberland zoned Timberland Production; as such,

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implementation of the project would not conflict with such zoning designations. Therefore, **no impacts** will occur from this project (including the General Plan Amendment, Zone Change, and Design Review) directly, indirectly or cumulatively. No mitigation is required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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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. The project site is fully developed and is not occupied by forestland; as such, implementation of the project will not result in the loss of forest land or conversion of forest land to non-forest use. **No impacts** will occur from this project (including the General Plan Amendment, Zone Change, and Design Review) directly, indirectly, or cumulatively. No mitigation is required.

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?	☐	☐	☐	☒
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2e. Response: (Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025 FPEIR Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data)

No Impact. Implementation of the proposed Project will occur on a developed site which is designated as “Urban and Built-Up Land” by the Department of Conservation FMMP and as depicted in Figure OS-2, Agricultural Suitability in the City’s General Plan 2025. As such, no conversion of Farmland to non-agricultural use would occur. There is no forest land on site. Parcels surrounding the subject site are not designated as agricultural or forest land use; as such, implementation of the proposed project would not result in conversion of nearby Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the proposed project (including the General Plan Amendment, Zone Change, and Design Review) will have **no impact** 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 district 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?	☐	☐	☒	☐
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3a. Response: (Source: South Coast Air Quality Management District’s 2007 Air Quality Management Plan (AQMP))

Less Than Significant Impact. The project site is located in the South Coast Air Basin (Basin) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for formulating and implementing the Air Quality Management (AQMP), which has a 20-year horizon for the Basin. 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

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attainment of the federal ozone air quality standard.² 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 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 80 residential apartment buildings, a 3,500-square foot office space, and recreational pool on approximately 4.1 acres. Based on the household size of 2.8625 persons per residential unit used in the California Emissions Estimator Model (CalEEMod) v2016.3.2, the proposed project could increase the City's population by approximately 229 persons.

The project would require a General Plan Amendment from the current O - Office and MDR - Medium-Density Residential to O - Office and R-3-1500 - Multi-Family Residential. As part of the application process, the General Plan Amendment, when approved, would allow the project to be developed on the parcel. The General Plan Amendment is required to ensure the project to be consistent with the Riverside General Plan 2025. 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.
2. 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 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, unaccounted for population growth, as the addition of 80 residential units represents 0.06 percent of the projected 127,692 housing units anticipated by 2025 in the City's General Plan. Based on the household size of 2.8625 persons per residential unit used in the CalEEMod v2016.3.2, the proposed project could increase the City's population by approximately 229 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 the anticipated increase of 229 persons, project residents would account for 0.027 percent of the population growth forecast by SCAG in the County of Riverside Subregion between 2015 and 2040.

² Final 2013 Air Quality Management Plan, South Coast Air Quality Management District, February 2014.

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SCAG foresees that population will increase in the City and region over the next 25 years, and the anticipated population growth rate 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 and will continue to be designated for residential use with the General Plan Amendment and Zoning Change request, the proposed increase in population by approximately 229 persons has been anticipated and planned for in the City's General Plan. Furthermore, as discussed below in Checklist Question 3b, the project-specific short-term construction and long-term pollutant emissions would be less than the emission thresholds established in the SCAQMD's *CEQA Air Quality Handbook*. Therefore, the project (including the General Plan Amendment, Zone Change, and Design Review) 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 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.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
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3b. Response: (*Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, URBEMIS 2007 Model or CalEEMod 2007 Model, EMFAC 2007 Model and Air Quality Analysis prepared by LSA, August 2019 (Appendix A of the Initial Study)*)

Less Than Significant Impact. Construction activities produce combustion emissions from various sources (e.g., demolition, 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 project site would result in localized exhaust emissions.

The construction calculations prepared for the project assumed that dust control measures (watering a minimum of three times daily) would be employed to reduce emissions of fugitive dust during site grading. Further, all construction would need to comply with SCAQMD Rule 403 regarding emission of fugitive dust. The most recent version of CalEEMod (Version 2016.3.2) was used to calculate the construction emissions. Table 3.A shows the estimated construction emissions and the determination if generation of such emissions exceeds SCAQMD thresholds.

No exceedances of any criteria pollutants are expected; therefore, project-related short-term construction air quality impacts would be **less than significant** and no mitigation is required.

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 Rule 403 to control fugitive dust.

Long-term air pollutant emissions impacts are those associated with stationary sources and mobile sources involving project-related changes. The proposed project would result in net increases in both stationary-and-mobile source emissions. The stationary-source emissions would come from many sources.

Based on the Traffic Impact Analysis (July 2019), the proposed project would generate approximately 564 trips per day. The project's average daily trips were entered in the CalEEMod. The results are shown in Table 3.B, which demonstrates that none of the criteria pollutants would exceed SCAQMD emission thresholds. Therefore, project-related long-term air quality impacts would be **less than significant** and no mitigation is required.

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Table 3.A: Estimated Construction Emissions

Construction Phase	Total Regional Pollutant Emissions (lbs/day)							
	VOC	NOx	CO	SOx	Fugitive PM ₁₀	Exhaust PM ₁₀	Fugitive PM _{2.5}	Exhaust PM _{2.5}
Demolition	3.43	35.35	22.62	0.05	1.07	1.67	0.20	1.55
Site Preparation	4.17	42.47	22.24	0.04	7.25	2.20	3.93	2.02
Grading	2.51	26.43	16.66	0.03	2.72	1.27	1.36	1.17
Building Construction	2.80	22.83	22.17	0.05	1.51	1.14	0.41	1.08
Paving	1.64	10.90	13.00	0.02	0.22	0.58	0.06	0.54
Architectural Coating	34.75	1.59	2.67	0.01	0.26	0.10	0.07	0.10
Peak Daily	34.75	42.47	22.62	0.05	9.45		5.95	
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00		55.00	
Significant Emissions?	No	No	No	No	No		No	

Source: Compiled by LSA (August 2019).

CO = carbon monoxide

NOx = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns in size

SOx = sulfur oxides

lbs/day = pounds per day

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

SCAQMD = South Coast Air Quality Management District

VOC = volatile organic compounds

Table 3.B: Regional Operational Emissions

Source	Pollutant Emissions, lbs/day					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Area	2.22	0.08	6.61	<0.01	0.04	0.04
Energy	0.04	0.32	0.14	<0.01	0.03	0.03
Mobile	1.06	7.62	12.65	0.06	4.15	1.13
Total Project Emissions	3.32	8.02	19.40	0.06	4.21	1.20
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant?	No	No	No	No	No	No

Source: Compiled by LSA (August 2019).

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 oxides

VOC = volatile organic compounds

Localized Impacts: CalEEMod was used to calculate localized nitrogen dioxide (NO₂), carbon monoxide (CO), PM₁₀, and PM_{2.5} pollutant concentrations for project operational activities. Table 3.C shows that the operational emissions rates would not exceed the localized significance thresholds (LSTs) for residents in the project area. Localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. Motor vehicle emissions are estimated based on the average trip length for residential land uses. The average trip length used in the CalEEMod does not break down the portion of the motor vehicle emissions generated on site. For a worst-case scenario vehicle emission assessment of the mobile source, the emissions shown in Table 3.C include all on-site project-related area sources and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related new vehicle traffic that will occur on site. During operation, the proposed project would not exceed NOx, CO, PM₁₀, or PM_{2.5} thresholds. Therefore, the proposed operational activity would not result in a locally significant air quality impact. Impacts would be **less than significant**.

Long-Term Microscale (Co Hot Spot) Analysis: Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, this, of traffic flow conditions. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high

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traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

Table 3.C: Operational Localized Impacts Analysis

Emissions Sources	NOx (lbs/day)	CO (lbs/day)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Maximum On-site Emissions	1	7	0.2	0.1
LST Thresholds – 4-acre site	270	1,577	4.0	2.0
Significant Emissions?	No	No	No	No

Source: Compiled by LSA (August 2019).

Note: Source Receptor Area – Metropolitan Riverside County, 4 acres, receptors at less than 25 meters (82.02 feet).

CO = carbon monoxide

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

LST = local significance threshold

PM₁₀ = particulate matter less than 10 microns in size

NO_x = nitrogen oxides

Since the SCAQMD modeled intersections do not exceed the CO standards, intersections within the proposed project study area with less volumes of traffic and under less extreme conditions would not exceed the CO standards. Buildout of the proposed project would not produce the volume of traffic, as described above, required to generate a CO hot spot. Therefore, implementation of the proposed project would not be expected to result in CO hot spots, and impacts would be **less than significant**.

The project would contribute to criteria pollutants to the area during project construction. A number of individual projects in the area may be under construction simultaneously with the proposed project. Depending on construction schedules and actual implementation of projects in the area, generation of fugitive dust and pollutant emissions during construction could result in substantial short-term increases in air pollutants. However, each project would be required to comply with the SCAQMD's standard construction measures. The proposed project's short-term construction CO, NO₂, PM₁₀ and PM_{2.5} emissions would not exceed the LSTs. Therefore, construction of the proposed project would have a **less than significant impact** with regard to regional and localized emissions and impacts would not be cumulatively considerable.

As a result, the proposed project does not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, cumulative air quality emissions impacts are **less than significant**. No mitigation is required.

c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
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3c. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 Air Quality Management Plan, CalEEMod, EMFAC 2017 Model and Air Quality Analysis prepared by LSA Associates, Inc. on July 2019)

Less Than Significant Impact. The nearest sensitive receptors (i.e., single-family residential land uses) are adjacent to the south and west of the project site. Accordingly, LSTs for receptors at approximately 82 feet (25 meters) are utilized in this analysis and provide for a conservative, i.e., "health protective" standard of analysis.

Table 3.D identifies the emissions thresholds for local pollutants with receptors at a distance of less than 82 feet (25 meters) for a 4-acre site and shows that the emissions threshold increases with the size of the site. This area is consistent with the anticipated intensity of construction and based on the number of pieces of construction equipment to be used. Emissions shown in Table 3.D are less than those in Table 3.C because the sources of local concentration include only on-site emission sources. The emissions of each of the pollutants analyzed would be less than the LST threshold shown in Table 3.D and would therefore be **less than significant**. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Tables 3.A through 3.D show that daily construction emissions would not exceed the daily thresholds and the air quality standards of the CO, NO₂, PM₁₀, and PM_{2.5} pollutant emission thresholds established by the SCAQMD. No additional mitigation is required for the construction equipment.

In conformance with the General Plan 2025 FPEIR MM AIR 1 and MM AIR 7, CalEEMod analyzed short-term construction and long-term operational related impacts of the project and determined that the proposed project would not exceed SCAQMD thresholds for short-term construction and long-term operational impacts. Therefore, the project will not expose sensitive receptors to substantial pollutant concentrations and a less than significant impact will occur directly, indirectly, or cumulatively for this project. No mitigation is required.

Table 3.D: Construction Localized Impacts Analysis

Emissions Sources	NOx (lbs/day)	CO (lbs/day)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Maximum On-site Emissions	42	22	9.2	5.9
LST Thresholds – 4-acre site	240	1,369	11.2	6.8
Significant Emissions?	No	No	No	No

Source: Compiled by LSA (August 2019).

Note: Source Receptor Area – Metropolitan Riverside County, 4 acres, receptors at less than 25 meters (82.02 feet).

CO = carbon monoxide

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

LST = local significance threshold

PM₁₀ = particulate matter less than 10 microns in size

NOx = nitrogen oxides

- d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?



3d. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 Air Quality Management Plan, CalEEMod, EMFAC 2017 Model and Air Quality Analysis prepared by LSA Associates, Inc. on August 2019 Appendix A of the Initial Study)

Less Than Significant Impact. Construction equipment exhaust, the application of architectural coatings, and the installation of asphalt surfaces may create odors in the project vicinity during its construction. 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 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 that 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. Direct, indirect, or cumulative project (including the General Plan Amendment, Zone Change, and Design Review) impacts are considered **less than significant** and no mitigation is required.

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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?	☐	☐	☐	☒
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4a. Response: (Source: General Plan 2025 – Figure OS-6 – Stephen’s 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; Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report for the National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., July 2019 Appendix B of the Initial Study)

No Impact. The Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report was prepared by LSA Associates, Inc., July 2019, to ensure the proposed project was consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and to analyze potential impacts to biological resources. The project site is located within the MSHCP Cities of Riverside and Norco Area Plan. The MSHCP provides for the assembly of a Conservation Area consisting of Core Areas and Linkages for the conservation of covered species. The Conservation Area is to be assembled from portions of the MSHCP Criteria Area, which consist of quarter-section (i.e., approximately 160-acre) Criteria Cells, each with specific criteria for the species conservation within that cell. The project site is not within the MSHCP Criteria Area and it is not within or adjacent to Public/Quasi Public lands. Therefore, no cell or criteria analysis is required.

Vegetation within the project site consists of ornamental trees and shrubs and non-native grasslands. The ornamental trees and shrubs are associated with the existing residences and structures. The non-native grasslands are associated with the vacant land and dominant species identified include ripgut brome grass (*Bromus diandrus*) and cheeseweed (*Malva parviflora*). Three species noted within the non-native grasslands include tree of heaven (*Ailanthus altissima*) and planted cottonwood (*Populus* sp.). There are no other plant communities within the project site. Section 6.1.3 of the MSHCP requires focused surveys for specified sensitive plant species if the project is located within a Narrow Endemic Plant Species Area (NEPSSA) and suitable habitat is present. The project is not located within a NEPSSA survey area; therefore, a NEPSSA focused survey is not required.

The project site is located on a previously developed/improved site within an urbanized area and a search of the MSHCP database and other appropriate databases identified no potential for candidate, sensitive, or special-status species, or suitable habitat for such species on site. Federal Species of Concern, California Species of Special Concern, and California Species Animal or Plants on lists 1-4 of the California Native Plant Society (CNPS) Inventory are also not located on the project site. Therefore, the project (including the General Plan Amendment, Zone Change, and Design Review) will have **no impact** directly, indirectly, or cumulatively on habitat modifications, species identified as a candidate, sensitive, or special status species in local or regional plans, and policies or regulations of the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). No mitigation is warranted.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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4b. Response: (Source: General Plan 2025 – Figure OS-6 – Stephen’s 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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools; Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report for the National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., July 2019 Appendix B of the Initial Study).

No Impact. Section 6.1.2 of the MSHCP requires assessment of impacts to riparian habitats, riverine areas, and vernal pools, including focused surveys for sensitive riparian bird and fairy shrimp species when suitable habitat is present. The intent of the assessment requirement is to provide for the protection of resources used by MSHCP-covered species, as well as existing and future downstream conservation areas. Riverine/riparian areas and vernal pools are defined in Section 6.1.2 of the MSHCP as follows: *Riparian/Riverine Areas are lands which contain Habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year.*

The project site was assessed for riparian/riverine areas on June 20, 2019. The assessment included identification and mapping of plant communities within the project site as well as any drainage features. Results of the assessment indicated there are no drainage features or riparian vegetation that would meet the MSHCP definition of riparian/riverine areas within the project site.

Habitat suitability for riparian birds, including least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and yellow-billed cuckoo (*Coccyzus americanus*) was assessed in conjunction with the assessment for riverine/riparian areas. There are no riparian/riverine areas or habitat suitable for riparian birds within the project site. Therefore, no surveys for riparian birds are required.

The project is located on a previously developed/improved site within an urbanized area where no riparian habitat or other sensitive natural community exists on site or within proximity to the project site. Therefore, the project (including the General Plan Amendment, Zone Change, and Design Review) will have **no impact** on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS directly, indirectly, or cumulatively. No mitigation is warranted.

c. Have a substantial adverse effect on State or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?



4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map, Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report for the National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., July 2019 Appendix B of the Initial Study)

No Impact. Section 6.1.2 of the MSHCP requires assessment of impacts to riparian habitats, riverine areas, and vernal pools, including focused surveys for sensitive riparian bird and fairy shrimp species when suitable habitat is present. The intent of the assessment requirement is to provide for the protection of resources used by MSHCP-covered species, as well as existing and future downstream conservation areas. Riverine/riparian areas and vernal pools are defined in Section 6.1.2 of the MSHCP as follows: *Vernal pools are seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the drier portion of the growing season. The determination that an area exhibits vernal pool characteristics, and the definition of the watershed supporting vernal pool hydrology, must be made on a case-by-case basis. Such determinations should consider the length of the time the area exhibits upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. Evidence concerning the persistence of an area's wetness can be obtained from its history, vegetation, soils, and drainage characteristics, uses to which it has been subjected, and weather and hydrologic records. For Riverside, vernal pool and Santa Rosa fairy shrimp, mapping of stock ponds, ephemeral pools and other features shall also be undertaken as determined appropriate by a qualified biologist.*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site was assessed for vernal pools during the June 20, 2019, site visit. The assessment included a search for depressions, indicators of wetland hydrology, suitable soils, and hydrophytic vegetation. The assessment also included a review of seasonally appropriate aerial photographs (Google Earth) from 1993 through 2018. No ponded areas or features resembling vernal pools were observed during the site visit, nor were any seen in aerial photographs on the project site. The soil mapped and observed within the project site is sandy loam, which is unlikely to support ponding sufficient for vernal pool formation. Therefore, there are no vernal pools located on the project site.

The project site was assessed for fairy shrimp habitat at the same time and using the same methods as the assessment for vernal pools. The MSHCP calls for habitat assessments for three sensitive species of fairy shrimp: Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*), Riverside fairy shrimp (*Streptocephalus woottoni*), and vernal pool fairy shrimp (*Brachinecta lynchi*). Santa Rosa Plateau fairy shrimp occurs only on the Santa Rosa Plateau of extreme southwest Riverside County. As noted above, there are no vernal pools within the project site. No inundation was observed within the project site or in seasonally appropriate aerial photographs. The loamy soils are unlikely to support ponding for long enough to provide suitable habitat conditions. Given these factors, the project site does not have habitat suitable for sensitive fairy shrimp species and no surveys are required.

The project is located within an urbanized area where no federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on site or within proximity to the project site. The project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include U.S. Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. Therefore, the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would have **no impact** to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly, or cumulatively. No mitigation is required.

- 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; Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report for the National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., July 2019 Appendix B of the Initial Study)

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 to 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.

The project site is not identified as 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. There would be no indirect effects to downstream waters (i.e., Santa Ana River) because there is no clear or direct hydrological connection to such bodies of water. Based on this, implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not interfere substantially with movement of native resident, migratory fish, or wildlife species.

The project site is occupied with ornamental trees that have the potential to provide areas for nesting birds. During the bird breeding season (typically February 1 through August 31), large trees on or adjacent to the project site may be used by hawks, ravens, or other large birds for nesting. Trees, shrubs, and other vegetation on site may provide nest sites for smaller birds, and burrowing owls may nest in ground squirrel burrows, pipes, or some similar feature. Nesting bird species, with potential to occur are protected by California Fish and Game Code Sections 3503, 3503.5, and 3800, and by the Migratory Bird Treaty

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Act (MBTA) (16 USC 703-711). These laws regulate the take, possession, or destruction of the nest or eggs of any migratory bird or bird of prey. However, the USFWS has recently determined that the MBTA should apply only to "... affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs" and will not be applied to incidental take of migratory birds pursuant to otherwise lawful activities. To avoid potential effects to fully protected raptors, special-status bird species, and other nesting birds protected by the California Fish and Game Code, and for compliance with MSHCP Incidental Take Permit Condition 5, State regulations require a nesting bird pre-construction survey to be conducted by a qualified biologist three days prior to ground-disturbing activities. Should nesting birds be found, an exclusionary buffer will be established by the qualified biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer will be clearly marked in the field by construction personnel under guidance of the qualified biologist and construction or clearing will not be conducted within this zone until the qualified biologist determines that the young have fledged or the nest is no longer active. Nesting bird habitat within the biological study area will be resurveyed during bird breeding season if there is a lapse in construction activities longer than seven days.

Implementation of State regulations would ensure that nesting birds in the project area are not disturbed during construction activities. Direct, indirect, or cumulative project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation is warranted.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual; Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report for the National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., July 2019 Appendix B of the Initial Study)

Less Than Significant Impact. Implementation of the project is subject to all applicable federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. Additionally, the project is required to comply with Riverside Municipal Code 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees. Construction of the proposed project would require the removal of ornamental trees on site; however, the project will not be subject to the Riverside Urban Tree Policy Manual pertaining to tree removal as none of the ornamental trees are located in City owned right-of-way. The project includes a Landscape Plan (see previously referenced Figure 7), which will be subject to City Design Review and Approval. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would have a **less than significant impact** directly, indirectly, or cumulatively related to local policies or ordinances protecting biological resources. No mitigation is required.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☒	☐
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4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s 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, and El Sobrante Landfill Habitat Conservation Plan; Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report for the National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., July 2019 Appendix B of the Initial Study)

Less Than Significant Impact. The project site is located within an urbanized area and 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, and 4d above. The MSHCP provides for the assembly of a Conservation Area consisting of Core Areas and Linkages for the conservation of covered species. The Conservation Area is to be assembled from portions of the MSHCP Criteria Area, which consist of quarter-section (i.e., approximately 160-acre) Criteria Cells, each with specific

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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criteria for the species conservation within that cell. The project site is not within the MSHCP Criteria Area, therefore, no cell or criteria analysis is required. Therefore, there are no conservation requirements toward building out the MSHCP Reserve. The project site is not located within the MSHCP survey area for burrowing owl and NEPSSA.

The MSHCP Consistency Analysis and Biology Report prepared for the project concluded that implementation of the proposed project would not affect covered MSHCP plant and animal species. Ornamental trees and vegetated landscaping occurring on site could potentially provide habitat for migratory nesting birds. Compliance with California Fish and Game Code Sections 3503, 3503.5, and 3800 and MSHCP Incidental Take Permit Condition 5 would reduce potential impacts to migratory nesting birds if found on site before and during the commencement of construction. Compliance with State regulations would ensure the project (including the General Plan Amendment, Zone Change, and Design Review) would have a **less than significant impact** directly, indirectly, or cumulatively related to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No mitigation is required.

5. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the <i>CEQA Guidelines</i> ?	☐	☐	☒	☐
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5a. Response: (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code; Cultural Resources Assessment for the National Community Renaissance – La Sierra Apartments Project prepared by LSA Associates, Inc., January 2020, Appendix C of the Initial Study)

Less Than Significant Impact. A *Cultural Resources Assessment* (CRA), July 2019, was prepared for the proposed project to provide the City of Riverside the necessary information and analysis to determine, as mandated by CEQA, whether the proposed project would cause substantial adverse changes to any historical resources that may exist in or around the project site. The CRA evaluated potential historical significance of the risk management/broadcast building (11291 Pierce Street) and five single-family residential rental units on the project site (at 4936 Hollyhock Lane, 4920 Hollyhock Lane, 11266 Huguley Drive, 11278 Huguley Drive, and 11286 Huguley Drive). As a result of the CRA study, the risk management/broadcast building was evaluated as eligible for designation as a Structure of Merit under Criteria 4 and 6 of Title 20, Chapter 20.50 of the City of Riverside Landmark and Structure Merit Criteria, as a good example of Mid-Century Modern architecture as applied to a commercial property. The following defines Structure of Merit Criteria 4 and 6:

- **Structure of Merit Criterion 4.** A cultural resource that could be eligible under landmark criteria no longer exhibiting a high level of integrity, however, retaining sufficient integrity to convey significance under one or more of the landmark criteria.
- **Structure of Merit Criterion 6.** An improvement or resource that no longer exhibits the high degree of integrity sufficient for landmark designation, yet still retains sufficient integrity under one or more of the landmark criteria to convey cultural resource significance as a structure or resource of merit.

As such, it qualifies as a “historical resource,” as defined by CEQA. None of the other historic-period resources was determined to be historically significant under any of the federal, State, or local criteria. Although the proposed project will change the setting of the historical resource, it will not physically affect it or its character-defining features. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would result in a **less than significant impact** directly, indirectly, or cumulatively to a historical resource pursuant to §15064.5 of the *CEQA Guidelines*. No mitigation is required.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the <i>CEQA Guidelines</i> ?	☐	☐	☒	☐
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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5b. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity, Appendix D – Cultural Resources Study; Cultural Resources Assessment for the National Community Renaissance – La Sierra Apartments Project prepared by LSA Associates, Inc., January 2020, Appendix C of the Initial Study)

Less Than Significant Impact. A records search was conducted as part of the CRA that was prepared for the proposed project. Results of the records search indicated there have been 30 previous cultural resources studies conducted within a 1-mile radius of the project site, one of which (an overview of archaeological sensitivity) included the project site. Although no cultural resources have been documented in the project area, four historic resources (33-01444, bedrock milling complex and artifact scatter; 33-01453, a bedrock milling complex, petroglyph feature, and artifact scatter; and 33-005566 and 33-005567, isolated artifacts) and 15 historic period built environment resources (one residence and two church properties) were identified in the records search. The nearest prehistoric resource (33-005567) is approximately 0.38 mile to the south of the project site. An archaeological field survey was conducted on the project site on May 14, 2019. The ground surface at the time of the survey was obscured by vegetation; however, landscape dumping, concrete rubble, and modern refuse were noted on the surface throughout the project site. No cultural resources were identified within the project site during the May 2019 archaeological field survey. Despite the low surface visibility, the findings described above suggest the potential for subsurface prehistoric resources is low.

In accordance with State law and Title 20 of the Riverside Municipal Code (RMC), the proposed project would be required to comply with Title 14, California Code of Regulations (CCR) § 15064.5 and [California] Public Resources Code (PRC) § 21083.2 *California Environmental Quality Act-Archeological Resources*, which enable the City to require the project applicant to make reasonable effort to preserve or mitigate impacts to any affected significant or unique archaeological resource. Penal Code § 622 *Destruction of Sites*, establishes as a misdemeanor the willful injury, disfiguration, defacement, or destruction of any object or thing of archaeological or historical interest or value, whether situated on private or public lands. California Administrative Code, Title 14, Section 4307 states that no person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value. Furthermore, California Code of Regulations Section 1427 recognizes that California's archaeological resources need to be preserved and that every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.

Since the project footprint is within a previously cleared and partially developed site, and the field survey failed to identify any archaeological resources on the site, there is no indication that archaeological resources occur therein. The proposed project would be required to comply with all applicable regulations protecting archaeological resources and would be conditioned to cease excavation or construction activities if archaeological resources are identified during execution of the project. Therefore, impacts related to previously undiscovered archaeological resources would be **less than significant** directly, indirectly, and cumulatively. No mitigation is required.

c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
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5c. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity; Cultural Resources Assessment for the National Community Renaissance – La Sierra Apartments Project prepared by LSA Associates, Inc., January 2020, Appendix C of the Initial Study)

Less Than Significant with Mitigation Incorporated. An on-site archaeological field survey was conducted in May 2019. No known human remains were present on the proposed project site and there were no facts or evidence to support the idea that Native Americans or people of European descent are buried on the subject site. Conditions on site remain substantially unchanged. In the unlikely event that human remains are encountered during proposed project grading, the proper authorities will be notified, and standard procedures for the respectful handling of human remains during earthmoving activities will be followed in accordance with State law.

Consistent with the requirement of CCR Section 15064.5(e), if human remains are encountered, work within 25 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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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disposition pursuant to 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 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. As determined necessary by the City and MLD, **Mitigation Measures TCR-2** and **TCR-3** shall apply (refer to response to Checklist Question 18a for additional detail).

Compliance with these provisions would ensure that any potential impacts to unknown buried human remains would be **less than significant** by ensuring appropriate examination, treatment, and protection of human remains as required by State law. No additional mitigation is required.

6. ENERGY

Would the project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
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6a. Response: (Source: California Code of Regulations Title 24, Part 6 and Part 24, SCAQMD, Project Plan Set)

Less Than Significant Impact. The Riverside Public Utilities (RPU) provides electrical services to approximately 109,300 customers across the City of Riverside. As of December 2017, RPU served approximately 97,400 residential uses, 11,000 small and medium-sized commercial uses, and 850 industrial uses. Riverside receives 14 percent of its power from geothermal resources, less than 1 percent from solar resources, 3 percent from wind resources, 2 percent from hydro-power resources, 31 percent from coal-fired resources, 4 percent from nuclear resources, and 262 megawatts (mw) from internal generation resources. As of 2017, the peak electrical demand in the City of Riverside is 604.4 mw per day.

The proposed project will include the demolition of existing residential rental units on site and the development of an 80-unit low-income apartment complex within seven buildings on site. The increase in residential units on the site will generate a nominal increase in energy demand from the RPU. To conserve energy usage, the proposed project will comply with Building Energy Efficient Standards included in Title 24 of the CCR, which requires new residential development to incorporate energy efficiency standards into the proposed project design. The project would be required to comply with 2019 Title 24 standards because its building construction phase would commence after January 1, 2020. The project would include the following energy conservation standards during construction and into its design per the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;
- Mandatory reduction in outdoor water use through compliance with a local water-efficient landscaping ordinance or the California Department of Water Resources' Model;
- Water Efficient Landscape Ordinance;
- 65 percent of construction and demolition waste must be diverted from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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During construction, the construction contractor will apply the requirements of the SCAQMD to ensure energy-efficient equipment and vehicles are used for the duration of construction. Implementation of these standards into the design features of the project and during construction would minimize wasteful, inefficient, or unnecessary consumption of energy resources. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would have a **less than significant impact** directly, indirectly, or cumulatively on energy resources. No mitigation is warranted.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
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6b. Response: (Source: California Code of Regulations Title 24, Part 6 and Part 24, SCAQMD, Project Plan Set; City of Riverside Economic Prosperity Action Plan and Climate Action Plan January 2016)

Less Than Significant Impact. The proposed project will be designed to comply with the California Green Building Standards Code; Title 24, Part 6 of the California Code of Regulations; California Building Code and Energy Code standards, as applicable to the type of use being developed on site. After January 1, 2020, residential development applications in California will be required to include solar panels for on-site renewable energy generation, as part of the statewide effort in becoming more energy efficient and generating cleaner energy options. The proposed project will also comply with measures that are presented in the Riverside *Economic Prosperity Action Plan and Climate Action Plan January 2016* by implementing different design elements that increase energy efficiency. The measures and how the project will comply are presented below:

- **Measure E-2: Shade Trees.** The applicant of the proposed project has prepared a Landscape Plan for the site which includes shade trees in various locations where buildings will be located.
- **Measure SR-3: Utility Programs.** The proposed project will be designed to support the City's utility programs to promote energy efficiency and the use of renewable energy.
- **Measure T-2: Bicycle Parking.** The applicant, as shown on the Site Design Plans, will develop six short-term and six long-term bicycle parking spaces in Parcel B.
- **Measure T-6: Density.** The proposed project is requesting a zone change from MDR - Medium Density Residential to HDR - High-Density Residential to allow for an increased number of residential units on the site. The project also includes a community center, a central open space area, a pool, tot lot, activity lawn, BBQ patio, and common areas to reduce resident trips off site for such amenities.
- **Measure T-14: Neighborhood Electric Vehicle Programs.** The project in itself will not offer a neighborhood electric vehicle program, but will provide electric vehicle charging stations for residents to promote the use of electric vehicles and promote the City of Riverside in establishing neighborhood electric vehicle programs.
- **Measure W-1: Water Conservation and Efficiency.** The proposed project will comply with the California Green Building Standards Code through implementation of fixture flow rates, standards for plumbing fixtures and fittings, and automatic irrigation systems utilizing weather and/or soil moisture based irrigation controllers.

Based on the project design features incorporated into the project, the proposed project would not conflict with or obstruct a state or local plan related to renewable energy or energy efficiency. Direct, indirect, or cumulative project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation measures are required.

7. GEOLOGY AND SOILS

Would the project:

a. Directly or indirectly cause 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	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
7i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report; Preliminary Geotechnical Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study Appendix D of the Initial Study]) Less Than Significant Impact. The project site does not lie within an “Earthquake Fault Zone” as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act. The closest known active fault is the Chino, alt 2 Fault located about 7.49 miles to the southwest of the project. Therefore, the potential for ground rupture due to an earthquake beneath the site is considered low. 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 than Uniform Building Code (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, includes 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. 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. Compliance with CBC regulations and implementation of recommended measures in Sections 6.1 through 6.9 of the project-specific geotechnical study will ensure that project (including the General Plan Amendment, Zone Change, and Design Review) impacts will be less than significant directly, indirectly, or cumulatively.				
ii. Strong seismic ground shaking?	☐	☐	☒	☐
7ii. Response: (Source: General Plan 2025 FPEIR Appendix E – Geotechnical Report; Preliminary Geotechnical Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study Appendix D of the Initial Study])				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Less Than Significant Impact. The project site is located in a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion. The site lies in close proximity to several active faults (11 faults within 8.5 miles of the project site); therefore, during the life of the project, the property will most likely experience similar moderate to occasionally high ground shaking from these fault zones, as well as some background shaking from other seismically active areas of the Southern California region. The peak ground acceleration is anticipated to be 0.501 g, which equates to potentially severe ground shaking. No known active faults are known to cross through the site and the closest known active fault is the Chino, alt 2 Fault located about 7.49 miles to the southwest.

Design and construction in accordance with the current CBC requirements is anticipated to adequately address potential ground shaking effects on the newly developed buildings on the site. 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, grading plans will be subject to City review and approval in accordance with RMC, Section 17.16.010.

Because the proposed project (including the General Plan Amendment, Zone Change, and Design Review) will comply with CBC regulations that protect habitable structures from seismic hazards and will implement recommended measures in Sections 6.1 through 6.9 of the project-specific geotechnical study, direct, indirect, or cumulative impacts associated with strong seismic ground shaking will have a **less than significant impact** and no mitigation is required.

iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
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7iii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report; Preliminary Geotechnical Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study Appendix D of the Initial Study])

Less Than Significant Impact. According to Figure PS-2 – Liquefaction Zones of the General Plan 2025, the project site is in an area with a very low potential for liquefaction. As part of the project-specific geotechnical report (Appendix D), five borings were drilled to a maximum depth of approximately 50.7 feet below ground surface. Groundwater was found in four of the borings at depths ranging between 20.3 to 26.6 feet below the ground surface. Fine-grained soils were also observed in the borings and evaluation of the soils indicated they were not susceptible to liquefaction events. Based on site-specific testing, liquefaction hazard susceptibility on site would be 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 (including seismic-related ground failure and liquefaction) 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 recommendations in Sections 6.1 through 6.9 of the project-specific geotechnical study 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?	☐	☐	☒	☐
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7iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code; Preliminary Geotechnical

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study Appendix D of the Initial Study]

Less Than Significant Impact. The Geology and Soils section of the City’s General Plan 2025 FPEIR identifies “areas of high susceptibility to seismically induced landslides and rock falls 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. Landslides may occur from heavy rainfall, erosion, and removal of vegetation, seismic activity or other factors. Slope stability depends on many factors and their interrelationships.

A geotechnical study/preliminary soils report has been prepared to determine the soil properties and specific potential for landslides based upon the proposed development. The project-specific geotechnical report recommends retaining walls supporting 6 feet of backfill or less are not required to be designed for seismic earth pressures, as is required in Section 1803.5.12 of the 2016 CBC. The values are based on drained backfill conditions and do not consider hydrostatic pressure. Retaining walls should be designed to support adjacent surcharge loads imposed by other nearby footings or traffic loads in addition to the earth pressure values as shown below in Table 7.A.

Table 7.A: Earth Pressure Values

Value	Backfill Condition	
	Level	2H:IV Slope
A	40H	74H
B	14.5H	14.5H
C	27H	44H

Source: Section 6.4, Preliminary Geotechnical Investigation for Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505.(Appendix D of the Initial Study)

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 the 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. Incorporation of the recommended design measures of the geotechnical study in Sections 6.1 through 6.9, compliance with the California Building Code regulations and compliance with Title 17 – Grading Code will ensure that impacts related to landslides are reduced to **less than significant** levels directly, indirectly, or cumulatively. No mitigation measures are required.

b. Result in substantial soil erosion or the loss of topsoil?

☐
☐
☒
☐

7b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, and SWPPP; Preliminary Geotechnical Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study, Appendix D of the Initial Study])

Less Than Significant Impact. On-site soils consist of alluvial sandy loam. The site consists of Artificial Fill (Af), Older Alluvium (Qoal) and granitic bedrock (Kcg). The artificial fill materials consist of locally derived silty sand that is slightly moist and loose with minor miscellaneous debris. The thickness of the artificial fills encountered measured approximately 2.5 feet below the existing ground surface; however, deeper fills associated with existing underground utilities and other improvements are anticipated within the site. The older alluvium consists of coarse-grained deposits near the surface overlying fine-grained deposits. The deposits consist of silty sand with some clay. These materials are generally dry to slightly moist and loose to medium dense with varying degrees of porosity. The fine-grained deposits consist of interlayered sandy silt, silt, sandy clay, clay with sand, and clay. These materials are generally damp to wet and stiff to hard. Occasional layers of medium-dense to dense, slightly moist to wet clayey sand were also encountered at depth. The granitic bedrock consists of medium to

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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coarse grained, hard, and moderately to highly weathered with local shears and fractures. The depth to granitic bedrock varied from 26 to 50 feet beneath the existing ground surface.

Erosion and loss of topsoil could occur as a result of the project. 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, with the erosion control standards for which all development activity must comply (Title 18), the Grading Code (Title 17) also requires the implementation of measures designed to minimize soil erosion. Development of the project site will include incorporation of the recommended design measures of the geotechnical study in Sections 6.1 through 6.9. Compliance with State and federal requirements as well as with Titles 18 and 17 will ensure that soil erosion or loss of topsoil impacts will be **less than significant** directly, indirectly, or cumulatively. No mitigation is required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
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7c. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report; Preliminary Geotechnical Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study, Appendix D of the Initial Study])

Less Than Significant Impact. The project site is regionally located in the north-central portion of the Perris block within the northern peninsular ranges Geomorphic Province. The general topography of the subject site is a structurally stable area between the Elsinore and San Jacinto Fault Zones. This section of the Perris Block generally comprises Cretaceous-age plutonic and meta-sedimentary bedrock that has been heavily eroded and covered by variable thickness of alluvium. The project site is located within Arlington Valley adjacent to the eastern flanks of the northern Temescal Mountains. The site is underlain by older alluvium overlying granitic bedrock. The alluvial soils are porous and prone to slight to moderate hydrocollapse; however, evaluation of the site indicates a total settlement of less than 1 inch if existing soils are removed and recompacted to a depth of 5 feet. Compliance with the City's existing codes and the policies contained in the General Plan 2025 help to ensure that impacts related to geologic conditions are reduced to **less than significant** levels directly, indirectly, and cumulatively.

Landslides: See response 7(a)(iv).

Lateral Spreading: Adherence to the City's Grading and Subdivision Codes as well as the California Building Code in the design of this project will prevent lateral spreading. The design features that are preventing lateral spreading are retaining walls and the proposed residential buildings will be wood-framed structures with concrete slabs on grade yielding light foundation loads.

Subsidence: The geotechnical study prepared for this project indicates that the volumetric changes in earth quantities will occur when the site is excavated and on-site soil materials are replaced with compacted fill. It is estimated that the existing upper 5 feet of earth material will shrink up to approximately 10 to 15 percent. Based on the properties of the soil, subsidence could occur but, with adherence to the recommendations found in the geotechnical study, the impact will be reduced to **less than significant** levels.

Liquefaction: Liquefaction occurs primarily in saturated, loose, fine-to-medium grained alluvial soils in areas where the groundwater 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 very low potential for liquefaction. As part of the project-specific geotechnical report (Appendix D), five borings were drilled to a maximum depth of approximately 50.7 feet below ground surface. Groundwater was found in four of the borings at depths ranging between 20.3 to 26.6 feet below the ground surface. Fine-grained soils were also observed in the borings and evaluation of the soils

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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indicated they were not susceptible to liquefaction events. Based on site-specific testing, liquefaction hazard susceptibility on site would be very low.

Collapse: Adherence to the City's grading and building requirements will ensure that the property is adequately prepared to prevent the collapse of the graded pads and/or slopes.

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 direct or indirect risks to life or property?	☐	☐	☐	☒
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7d. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code; Preliminary Geotechnical Investigation, Proposed Multi-Family Residential Development, Golden Avenue and Pierce Street, Riverside, CA 92505 May 16, 2019 [Project-Specific Geotechnical Study, Appendix D of the Initial Study])

No 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. As evaluated by the project-specific geotechnical study, on-site soils are mostly sands and silts, and have a low potential for expansion. Figure 5.6-5 of the General Plan 2025 FPEIR indicates that the project site is not located in an area containing soils with a high shrink-swell potential. Additionally, as part of the project-specific geotechnical study, expansion testing was conducted on soil samples and the on-site soils were determined to have a very low expansion potential. Therefore, the project site does not overlie expansive soils. The project is located on a site that does not have expansive soils and therefore there will be **no impact** directly, indirectly, or cumulatively. No mitigation is required.

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?	☐	☐	☐	☒
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7e. Response: (Source: Project Set Plans)

No Impact. The proposed project would develop an internal wastewater infrastructure system that will connect directly to existing wastewater infrastructure in adjacent roadways. The proposed project does not include the installation of septic tanks or alternative wastewater disposal systems in its design, as existing off-site sewer connections are available. **No impact** directly, indirectly, or cumulatively would occur with implementation of the proposed project. No mitigation is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
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7f. Response: (Source: General Plan 2025 Policy HP-1.3; Project Plan Set)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Less Than Significant With Mitigation Incorporated. The project-specific geotechnical report that was prepared for the project indicated that the site is underlain by older alluvium overlying granitic bedrock. Minor artificial fills were also locally encountered and were mainly from previous site development. According to the General Plan 2025, as of 2004, the area south of Mockingbird Canyon Reservoir, 4.5 miles southeast of the project site, is the only portion of the City considered as a place of paleontological importance. Accordingly, the project site is categorized as having a *low potential* to yield paleontological resources.

This category includes sedimentary rock units that: (1) are potentially fossiliferous but have not yielded significant fossils in the past; (2) have not yet yielded fossils but possess a potential to contain fossil remains; or (3) contain common and/or widespread invertebrate fossils if the taxonomy, phylogeny, and ecology of the species contained in the rock are well understood. Sedimentary rocks expected to contain vertebrate fossils are not placed in this category because vertebrates are generally rare and found in more localized strata. Rock units designated as low potential generally do not require monitoring and mitigation during grading and excavation. However, as excavation for construction gets underway, it is possible that new and unanticipated paleontological resources might be encountered. If the resource is determined to be significant, monitoring and mitigation are required during grading and excavation from that time on.

Due to the prior grading activities on site and extensive surface disturbance required to establish the existing uses, the likelihood of encountering subsurface paleontological resources during excavation for the proposed project is low. In accordance with State law, the proposed project would be required to comply with Section 5097.5 of the California PRC and California Administrative Code, Title 14, Section 4307, which state that no person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value. Penal Code Section 622.5 establishes as a misdemeanor the willful injury, disfigurement, defacement, or destruction of any object or thing of paleontological interest or value, whether situated on private or public lands. Finally, Section 17.28.010(H)(3) of the RMC enables the City to require the project applicant to make reasonable effort to preserve or mitigate impacts to any affected significant or unique paleontological resource. Pursuant to Section 17.28.010(H)(3) of the RMC, the City's Community & Economic Development Department may inspect construction activities onsite for compliance with project conditions of approval, including protection of paleontological resources.

Since the proposed project footprint is within a previously cleared and partially developed site, there is no indication that paleontological resources occur therein. The proposed project would be required to comply with all applicable regulations protecting paleontological resources and would be conditioned to cease excavation or construction activities if paleontological resources are identified during execution of the project. Therefore, impacts related to previously undiscovered paleontological resources would be **less than significant** directly, indirectly, and cumulatively. No mitigation is required.

8. GREENHOUSE GAS EMISSIONS

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
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8a. Response: *(Source: Air Quality and Greenhouse Gas Analysis Technical Report National Community Renaissance – La Sierra PSH Project; 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 (GHG) emissions threshold used to determine potential GHG emissions impacts of a project. The SCAQMD uses the following tiered approach for evaluating GHG emissions for development

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 metric ton of carbon dioxide equivalent per year (MT CO ₂ e/year) 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 CO ₂ e/year), commercial projects (1,400 MT CO ₂ e/year), and mixed-use projects (3,000 MT CO ₂ e/year). Under Option 2, a single numerical screening threshold of 3,000 MT CO ₂ e/year 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). ○ 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.
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 of Riverside was one of 12 cities that collaborated with the Western Riverside Council of Governments on a Subregional Climate Action Plan (CAP) that includes 36 measures to guide the City’s GHG reduction efforts through 2020. Through the Western Riverside Council of Governments Subregional Climate Action Plan process, the City has a Climate Action Plan that identifies emissions target of 2,224,908 MT CO₂e, which is 26.4 percent below the City’s 2007 baseline and 15 percent below 2010 emissions. To further develop local GHG reduction measures for the Riverside Restorative Growthprint Economic Prosperity Action Plan and CAP, 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). The project is consistent with the Riverside Restorative Growthprint Economic Prosperity Action Plan and CAP and Assembly Bill (AB) 32. Nonetheless, for informational purposes, the project’s construction- and operational-related GHG emissions have been identified below. The Tier 3, Option 1 approach for residential projects (3,000 metric tons of CO₂e) is utilized in order to determine the significance for the proposed project’s GHG emissions. Overall, the following activities associated with the proposed project could directly or indirectly contribute to the generation of GHG emissions.	
Construction Activities: During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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of fossil-fuel based fuels creates GHGs (e.g., CO₂, methane [CH₄] and nitrous oxide [N₂O]). Furthermore, CH₄ is emitted during the fueling of heavy equipment.

Gas, Electricity, and Water Use: Natural gas use results in the emission of two GHGs: CH₄ (the major component of natural gas) and CO₂ (from combustion of natural gas). Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the State per year.

Solid Waste Disposal: Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH₄ from the anaerobic decomposition of organic materials. CH₄ is 25 times more potent a GHG than CO₂. However, landfill CH₄ can also be a source of energy. In addition, many materials in landfills do not decompose fully and the carbon that remains is sequestered in the landfill and not released into the atmosphere.

Motor Vehicle Use: Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

Short-Term (Construction) Emissions. The project construction emissions were calculated using CalEEMod, which calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecast based on the proposed construction schedule and applying the mobile source derived from the SCAQMD-recommended CalEEMod. The calculations of the emissions generated during the project construction activities reflects the types and quantities of construction equipment that would be used to grade and excavate the project site, construct the proposed buildings and related improvements, and plant new landscaping within the project site. Table 8.A lists the CO₂ emissions for each of the planned construction phases.

The emissions detailed in Table 8.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.

Table 8.A: Construction Greenhouse Gas Emissions

Construction Phase	Peak Annual Emissions (MT/yr)				Total Emissions per Calendar Year (MT/CO ₂ e)
	CO ₂	CH ₄	N ₂ O	CO ₂ e	
Demolition	42	0.01	0	42	560
Site Preparation	9	<0.01	0	9	
Grading	11	<0.01	0	1	
Building Construction	476	0.07	0	478	
Paving	16	<0.01	0	16	
Architectural Coatings	4	<0.01	0	4	
Total Construction Emissions Amortized over 30 years					19

Source: Compiled by LSA (August 2019).

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

MT/CO₂e = metric tons of carbon dioxide equivalent

MT/yr = metric tons per year

N₂O = nitrous oxide

Long-Term (Operational) Emissions. Long-term operation of the proposed project would generate GHG emissions from area and mobile sources and indirect emissions from stationary sources associated with energy consumption. Mobile-source emissions of greenhouse gases would include project-generated vehicle trips associated with on-site uses. Area-source

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 GHG emissions. The GHG emission estimates presented in Table 8.B detail the emissions associated with the level of development envisioned by the proposed project.

Table 8.B: Operational Greenhouse Gas Emissions

Source	Pollutant Emissions (MT/yr)					
	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Construction Emissions Amortized over 30 Years	0	19	19	<0.01	0	19
Operational Emissions						
Area	0	1	1	<0.01	<0.01	1
Energy	0	217	217	<0.01	<0.01	218
Mobile	0	878	878	0.04	0	879
Waste	13	0	13	0.79	0	33
Water	2	39	41	0.20	<0.01	47
Total Project Emissions	15	1,154	1,169	1	0	1,197
SCAQMD Tier 3 Threshold						3,000
Significant?						No

Source: Compiled by LSA (August 2019).

Bio-CO₂ = biologically generated CO₂

CO₂ = carbon dioxide

MT/yr = metric tons per year

NBio-CO₂ = non-biologically generated CO₂

CH₄ = methane

CO₂e = carbon dioxide equivalent

N₂O = nitrous oxide

SCAQMD = South Coast Air Quality Management District

The remaining CO₂e 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 GHG emissions of 1,197 MT CO₂e are less than the SCAQMD-recommended interim Option 1 threshold of 3,000 MT CO₂e for all land use types.

The emissions detailed in Table 8.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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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will install seven electric vehicle charging stations and four short-term and four long-term bicycle parking spaces on Parcel A and eleven electric vehicle charging stations and six short-term and six long-term bicycle parking spaces on Parcel B.

Furthermore, this analysis considers GHG 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 Bill 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 Action Plan and would not conflict with Assembly Bill 32, which establishes a goal of reducing GHG emissions to 1990 levels by the year 2020, or Executive Order S-3-05, which establishes a goal of reducing GHG 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.

As detailed in detailed in Tables 8.A and 8.B, the project's greenhouse gas emissions (1,197 metric tons of CO₂e) would not exceed the SCAQMD-recommended Tier 3, Option 1 threshold of 3,000 MT CO₂e. 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, directly, indirectly, or cumulatively that would have a significant impact on the environment. Impacts would be **less than significant** and 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 greenhouse gases?	☐	☐	☒	☐
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8b. Response: (Source: *Air Quality and Greenhouse Gas Analysis Technical Report National Community Renaissance – La Sierra PSH Project prepared by LSA Associates, Inc., August 2019, Appendix A of the Initial Study*)

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 MT CO₂e, which is 26.4 percent below the City's 2007 baseline and 15 percent below 2010 emissions. This represents a reduction of 779,304 MT CO₂e from the City's 2020 business-as-usual forecast. The City is aiming for a 2035 emissions target of 1,542,274 MT CO₂e, which is 49 percent below the 2007 baseline and represents a reduction of 2,120,931 MT CO₂e 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.

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 GHG 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 8.C lists the applicable strategies and goals from the Riverside Growthprint Climate Action Plan and identifies how the proposed project achieves compliance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 8.C: Riverside Restorative Growthprint Climate Action Plan Emission Reduction Strategies Consistency	
Measure/Regulation	Project Consistency
State and Regional Regulations	
Energy	
California Building Energy Efficiency Standards (Title 24, Part 6). Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	Consistent. The proposed project will comply with the requirements of the 2020 California Building Energy Efficiency Standards (Title 24, Part 6) including measures to incorporate energy-efficient building design features.
Water	
Water Use Efficiency. Reduce per capita water use by 20% by 2020. SB X7-7 is part of a California legislative package passed in 2009 that requires urban retail water suppliers to reduce per-capita water use by 10% from a baseline level by 2015, and to reduce per capita water use by 20% by 2020. Green accountability performance (GAP) Goal 16 directly aligns with SB X7-7. In Southern California, energy costs and GHG emissions associated with the transport, treatment, and delivery of water from outlying regions are high. Therefore, the region has extra incentive to reduce water consumption. While this is considered a state measure, it is up to the local water retailers, jurisdictions, and water users to meet these targets.	Consistent. The proposed project will comply with the requirements of Title 19 – Article VIII – Chapter 19.570 – Water Efficient Landscaping and Irrigation, including measures to increase water use efficiency. Water-efficient irrigation systems and devices and drought-tolerant landscaping will be installed on the project site.
Solid Waste	
Construction and Demolition Waste Diversion. Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 90% of C&D waste from landfills by 2035.	Consistent. In compliance with CalGreen requirements, at least 65 percent of all nonhazardous construction waste generated by the proposed project would be recycled and/or salvaged (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). Furthermore, 100 percent of excavated soil shall be reused or recycled.
Transportation	
Pavley and Low Carbon Fuel Standard (LCFS). ARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020.	Consistent. The Project does not involve the manufacture, sale, or purchase of vehicles. However, vehicles that operate within and access the Project site will comply with Pavley and Low Carbon Fuel Standard.
Riverside Restorative Growthprint Climate Action Plan Measures	
Energy Measures	
E-1: Traffic and Streetlights. Replace traffic and streetlights with high-efficiency bulbs.	Not Applicable. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable energy efficiency requirements related to lighting detailed in the Green Building Standards Code (Title 24, California Code of Regulations).
E-2: Shade Trees Strategically. Plant trees at new residential developments to reduce the urban heat island effect.	Consistent. The project would include trees along the perimeter of the project site.
E-3: Local Utility Programs. Electricity Financing and incentives for business and home owners to make energy efficient, renewable energy, and water conservation improvements.	Not Applicable. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable energy efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations).
E-4: Renewable Energy Production on Public Property. Large scale renewable energy installation on publicly owned property and in public rights of way.	Not Applicable. This objective is aimed at government agencies, not private developers.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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E-5: UCR Carbon Neutrality. Collaborate with UCR to achieve a carbon neutral campus.	Not Applicable. This objective is aimed at government agencies and the University of California Riverside, not private developers.
E-6: RPU Technology Grants. RPU grant programs to foster research, development and demonstration of innovative solutions to energy problems.	Not Applicable. This objective is aimed at government agencies, not private developers.
Transportation Measures	
T-1: Bicycle Infrastructure Improvements. Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.	Consistent. All collector and arterial streets around the proposed project have bike lanes. Shared bike lanes are provided on Pierce Street and Golden Avenue. These bike lanes are consistent with the bicycle routes shown in the Circulation/Transportation element of the City’s General Plan and connect with citywide routes.
T-2: Bicycle Parking. Provide additional options for bicycle parking.	Consistent. The project would comply with RMC Chapter 10.64 regarding bicycle accommodations.
T-3: End of Trip Facilities. Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.	Consistent. The project would comply with RMC Chapter 10.64 regarding bicycle accommodations.
T-4: Promotional Transportation Demand Management. Encourage Transportation Demand Management strategies.	Not Applicable. This objective is aimed at large employment centers with 100 or more employees. The project would have approximately 2 to 6 employees and would not be considered a large employment center.
T-5: Traffic Signal Coordination. Incorporate technology to synchronize and coordinate traffic signals along local arterials.	Not Applicable. This objective is aimed at government agencies, not private developers.
T-6: Density. Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.	Consistent. The project would increase household density with 19.5 dwelling units per acre and would increase employment opportunities in the City of Riverside by approximately 2 to 6 jobs. It is assumed that these jobs would be filled by local residents. By providing local jobs, the project would improve the jobs-housing balance and help reduce vehicle miles traveled by local residents.
T-7: Mixed-Use Development. Provide for a variety of development types and uses.	Not Applicable. The project is a multifamily residential apartment development.
T-8: Pedestrian-Only Areas. Encourage walking by providing pedestrian-only community areas.	Consistent. The La Sierra Apartments provides a pedestrian network along streets and on-site internal pedestrian walkways. Sidewalks are required on all arterial and collector streets. Inclusion of plans for pedestrian access and circulation for this project would be submitted for review and approval as a condition of the City’s Design Review Process. The project would also be required to comply with RMC Chapter 19.580.080 G regarding pedestrian access and circulation, with primary pedestrian access proposed from Pierce Street.
T-9: Limit Parking Requirements for New Development. Reduce requirements for vehicle parking in new development projects.	Consistent. The project would provide the minimum parking required comply with applicable City parking requirements. The project would utilize a mechanical parking system in order to achieve applicable parking requirements.
T-10: High Frequency Transit Service. Implement bus rapid transit service in the subregion to provide alternative transportation options.	Not Applicable. This objective is aimed at government agencies, not private developers. However, the proposed project would be located a half-mile from the Pierce Street bus stop, which would encourage employees and residents to use transit.
T-11: Voluntary Transportation Demand Management. Encourage employers to create TDM programs for their employees	Not Applicable. This objective is aimed at large employment centers with 100 or more employees. The project would include approximately 2 to 6 employees and would not be considered a large employment center.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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T-12: Accelerated Bike Plan. Accelerate the implementation of all or specified components of a jurisdiction’s adopted bike plan.	Not Applicable. This objective is aimed at government agencies, not private developers. However, the proposed project would not obstruct the implementation of the adopted bike plan.
T-13: Fixed Guideway Transit. By 2020, complete feasibility study and by 2025 introduce a fixed route transit service in the jurisdiction.	Not Applicable. This objective is aimed at government agencies, not private developers.
T-14: Neighborhood Electric Vehicle Programs. Implement development requirements to accommodate Neighborhood Electric Vehicles and supporting infrastructure.	Not Applicable. This objective is aimed at government agencies, not private developers.
T-15: Subsidized Transit. Increase access to transit by providing free or reduced passes	Not Applicable. This objective is aimed at large employment centers with 100 or more employees and is not applicable to the project.
T-16: Bike Share Program. Create nodes offering bike sharing at key locations throughout the City.	Not Applicable. This objective is aimed at government agencies, not private developers.
T-17: Car Share Program. Offer Riverside residents the opportunity to use car sharing to satisfy short-term mobility needs.	Consistent. The project would provide parking areas for residents and would not inhibit the opportunity to use car sharing.
T-18: SB 743 - Alternative to LOS. Use SB 743 to incentivize development in the downtown and other areas served by transit.	Not Applicable. This objective is aimed at government agencies, not private developers. Furthermore, the project is not located in a transit priority area.
T-19: Alternative Fuel & Vehicle Technology and Infrastructure. Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.	Consistent. The proposed project would be required to be consistent with applicable electric vehicle charging station requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations). As such, the project would be equipped with the electric vehicle changing plug-in infrastructure in the parking lot area.
T-20: Eco-Corridor/Green Enterprise Zone. Create a geographically defined area(s) featuring best practices in sustainable urban design and green building focused on supporting both clean-tech and green businesses.	Not Applicable. This objective is aimed at government agencies, not private developers.
Water Measure	
W-1: Water Conservation and Efficiency. Reduce per capita water use by 20 percent by 2020.	Consistent. The proposed project would be required to be consistent with applicable water efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations). As such, the project would be equipped with low-flow plumbing fixtures that reduce water use.
Solid Waste Measures	
SW-1: Yard Waste Collection. Provide green waste collection bins community-wide.	Consistent. The project would comply with applicable solid waste requirements.
SW-2: Food Scrap and Compostable Paper Diversion. Divert food and paper waste from landfills by implementing commercial and residential collection program.	Consistent. The project would be required to participate in applicable waste diversion programs. The project would also be subject to all applicable State and City requirements for solid waste reduction.
Food, Agriculture, and Urban Forest Measures	
A-1: Local Food and Agriculture. Promote local food and agricultural programs.	Not Applicable. This objective is aimed at government agencies, not private developers.
A-2: Urban Forest. Augment City’s Urban and Community Forest Program to include an Urban Forest Management Plan.	Consistent. The project would be required to comply with the La Sierra Neighborhood Plan Landscape Requirements, the City of Riverside Landscape Design Guidelines, and Chapter 19.62 of the RMC. The proposed landscape plan includes the planting of trees around the perimeter of the project site.
Source: LSA (August 2019).	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The SCAQMD supports State, Federal, and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim GHG threshold. The project would comply with the City's General Plan policies and CBC provisions designed to reduce GHG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction and, as demonstrated in the Climate Change Analysis, will not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Based upon the prepared modeling for this project and the discussion above, the project will not conflict with any applicable plan, policy, or regulation related to the reduction in the emissions of GHG and thus a **less than significant impact** will occur directly, indirectly, and cumulatively in this regard.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
9a. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan) 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 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 to the public at large. In accordance with the City's Hazardous Materials Policy, the transport, use, and storage of 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 (CFR) implemented by Title 13 of the CCR describes strict regulations for the safe transportation 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 CFR 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. Direct, indirect and cumulative project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be less than significant and no mitigation is required.				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
9b. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan; Phase I Environmental Site Assessment for Adventist Management, Inc. 11253, 11291 Pierce Street, 11266, 11278, and 11286 Huguley Drive Appendix E-1 of the Initial Study, 4920 Hollyhock Lane, December 2012; Phase II Subsurface Investigation, 11291 Pierce Street, April 29, 2013, Appendix E-2 of the Initial Study) Less Than Significant With Mitigation Incorporated. A Phase I Environmental Site Assessment (ESA) (Appendix E-1) for the site was prepared (in 2012) 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 I ESA was to identify, to the extent feasible, and pursuant to the processes prescribed therein, recognized environmental conditions in connection with the subject site.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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There is no evidence of agricultural use in the past. 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. Furthermore, data from the Regional Water Quality Control Board (RWQCB) and California Department of Toxic Substances Control (DTSC) EnviroStor website indicate that there are no potential sites of contamination on or in the general area of the project site.

The Phase 1 ESA concluded no hazardous materials were located on the project site. The project site was inspected to assess if any on-site changes had occurred since development of the Phase 1 ESA. No structures or structural foundations, soil staining, or foul odors were observed on the property.

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 generate less than 1,000 kg/month of non-acutely hazardous waste.

There are four conditions that were identified in the Phase 1 ESA that could potentially cause a risk to the public health or safety (e.g., on-site storage, leaking tanks, or vapor migration) on the project site.

- Condition #1:** There is historical evidence of two former underground storage tanks (USTs) at the project site's location. No agency closure documentation was obtained for this assessment. The owner (seller) believes that the USTs were removed in compliance with applicable requirements, but the owner (seller's) documents do not include final government sign offs on the removal of the two underground storage tanks. **Recommended Action:** Coordination with the Riverside County Department of Environmental Health or other agencies regarding closure of the tanks or site-specific soil testing to determine if prior activities on the site resulted in contamination that would adversely affect human health.
- Condition #2:** Given the construction date of the subject buildings (residences and office building), the past use of lead-based paints and leaded piping and/or fixtures is suspected. An area of peeling paint (door) in 11278 Huguley was observed in the residence. Deteriorating paint may pose a significant health hazard if ingested or inhaled, particularly for children. Lead-containing water is considered hazardous to health at certain levels. Because the residences are buildings where children could reside, if there is lead contamination on site, there is the likelihood that children could be affected. It is recommended to contact an environmental consultant to collect samples of paint (Lead Paint Inspection) and to collect water samples and analyze for the presence of lead in the residences. **Recommended Action:** Prior to remodeling or demolition of any of the structures on the project site, precautionary steps must be taken to reduce worker exposure to lead, according to occupational health standards. Removal of lead-based paint is subject to State and federal regulatory guidelines.
- Condition #3:** Given the pre-1981 construction date of the subject structures, during the site reconnaissance, materials were identified that are suspected of containing asbestos and are subsequently damaged or disturbed, as, for example, in the course of remodeling. Asbestos-containing materials are considered to be hazardous materials and their eventual disposal and handling are subject to federal and State regulatory guidelines. **Recommended Action:** It is recommended that prior to disturbing any suspected asbestos-containing materials, such as during remodeling or demolition, contact a consultant for sampling and analysis of the suspect materials. If samples test positive, develop an Operations and Maintenance Plan detailing the material-handling procedures to be implemented.
- Condition #4:** Pole-mounted transformers were observed on the subject site. Given the pre-1979 date of development of the project site, the presence of fluids containing polychlorinated biphenyls (PCBs) in the transformers is possible. No leakage or staining was visible on or around the transformers. **Recommended Action:** No action is suggested or recommended at this time based on visual observations. If leaks should develop, contact the utility company to sample the fluids for the presence of PCBs. If the analysis results indicate that the electrical transformers contain PCBs, the utility company would be responsible for mitigating any leakage and staining and for replacing the fluids and/or transformers.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Condition #5:** According to the owner representative, there is a capped water well on the 11291 Pierce Street parcel; the location of the well is in the area of land between the residence at 11278 and 11266 Huguley Drive. **Recommended Action:** It is recommended to verify the water well has been capped/abandoned in accordance with regulatory agency guidelines; if it has not been capped/abandoned in accordance and is no longer to be used, to carry out the proper well abandonment procedures in accordance with regulatory agency guidelines.

A Phase II Site Assessment (Appendix E-2) was prepared for the project site in 2013. The purpose of the Phase II site assessment was to assess subsurface soils and with regard to the two former USTs from historic on-site fueling station operations and to evaluate if the historic on-site fueling station operations had adversely affected the project site. A total of six borings were adjacent to the possible former USTs and fueling pump locations as identified through the geophysical survey on the project site for the collection of soil samples. The soil results were reviewed and compared to the California RWQCB Regional Screening Levels (RSLs), which are risk-based concentrations derived from standardized equations combining exposure information assumptions with EPA toxicity data. The California RWQCB considers RCLs protective for humans (including sensitive groups) over a lifetime, but they are not intended to be indicators of ecological impacts.

The results of the soil sampling indicate none of the borings contained contaminants above the laboratory detection limits (refer to Appendix E-2 for additional detail). Based on the fact that no undocumented USTs, buried drums, or any other anomalous buried objects were identified or discovered and due to the lack of a detected release, there are no further recommendations for remediation of USTs at the project site at this time.

Structures constructed prior to 1978 may contain lead-based materials (LBM) as well as asbestos-containing materials (ACM) incorporated into various construction components including paint, roof tiles, and thermal insulation. Current federal and State regulations (SCAQMD Rule 1403) require all contractors be properly trained in the correct handling of ACM during any repair, removal, or demolition activities to buildings or structures containing ACM. Additionally, the California Occupational Safety and Health Administration requires that all workers be properly protected when working with materials containing lead levels at or above 0.06 milligram per square centimeter (mg/cm²) or 600 parts per million pursuant to Code of Federal Regulations Chapter 29, Section 1926.62 and Title 8, CCR Section 1532.1. If the existing on-site residences contain LBM and/or ACM, demolition activities may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, mitigation is required.

Mitigation Measure HAZ-1 Prior to issuance of a demolition permit, a lead-based material (LBM) and asbestos-containing material (ACM) survey shall be completed for demolition of all structures constructed prior to 1978. A report of findings shall be submitted to the City of Riverside Community Development Director or designee, and/or Building and Safety Division, or designee. If the ACM survey is negative and if the LBM survey reveals lead levels below 0.06 milligram per square centimeter or 600 parts per million pursuant to Code of Federal Regulations Chapter 29, Section 1926.62 and Title 8, California Code of Regulations Section 1532.1, no further survey or remedial work is required. However, if ACM are identified within structures proposed for renovation or demolition, **Mitigation Measure HAZ-2** shall apply. Furthermore, if lead levels at or above 0.06 milligram per square centimeter or 600 parts per million are identified, **Mitigation Measure HAZ-3** shall apply. This measure shall be implemented to the satisfaction of the City of Riverside Community Development Director or designee, and/or Building and Safety Division, or designee.

Mitigation Measure HAZ-2 Prior to issuance of a demolition permit for any structure identified to contain asbestos-containing materials (ACM), all ACM shall be abated from the demolition site. An Asbestos Notification shall be prepared and submitted to the South Coast Air Quality Management District (SCAQMD) for approval before any asbestos abatement may commence. An asbestos construction and demolition plan shall be provided to the City of Riverside prior to the issuance of a demolition permit. The contractor shall provide disposal tickets from an SCAQMD-approved disposal facility and air clearances prior to final inspection. This measure shall be implemented to the satisfaction of the City of Riverside Community Development Director or designee, and/or Building and Safety Division, or designee.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation Measure HAZ-3 Prior to issuance of a demolition permit for any structure identified to contain lead-based materials (LBM), all LBM shall be abated from the demolition site. A lead construction and demolition plan shall be provided to the City of Riverside prior to the issuance of a demolition permit. The contractor shall provide disposal tickets from an SCAQMD-approved disposal facility and air clearances prior to final inspection. This measure shall be implemented to the satisfaction of the City of Riverside Community Development Director or designee, and/or Building and Safety Division, or designee. Pursuant to Riverside County Ordinance No. 682, the project applicant shall provide evidence to the City that the capped water well located on the 11291 Pierce Street parcel (area of land between the residence at 11278 and 11266 Huguley Drive) be verified as capped and abandoned³ in accordance with Section 22 and Section 23 of Ordinance No. 682. Any construction and/or development activity that affects the well will require a permit from the Riverside County Department of Environmental Health in accordance with Section 3 of Ordinance No. 682. The project may involve the use of hazardous materials but will comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste. These regulations include, but are not limited to, Title 49 of the CFR implemented by Title 13 of the CCR for the safe transportation of hazardous materials, SCAQMD Rule 1403 for ACM, Code of Federal Regulations Chapter 29, Section 1926.62 and Title 8, CCR Section 1532.1 for LBP, and Riverside County Ordinance No. 682 for the abandonment and destruction of wells. As condition of project approval, the above-recommended actions will be implemented as part of the project to reduce potential hazardous material releases. Compliance with all applicable federal, State, and local laws related to the transportation, use, and storage of hazardous materials, as well as implementation of Mitigation Measures HAZ-1 through HAZ-3, would reduce the likelihood and severity of accidents through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment to a less than significant impact directly, indirectly, and cumulatively.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
9c. Response: (Source: <i>General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code; Phase I Environmental Site Assessment for Adventist Management, Inc. 11253, 11291 Pierce Street, 11266, 11278, and 11286 Huguley Drive, 4920 Hollyhock Lane, December 2012, Appendix E-1; Phase II Subsurface Investigation, 11291 Pierce Street, April 29, 2013, Appendix E-2</i>) Less Than Significant Impact. There are two private schools within one-quarter mile of the proposed project site. La Sierra Academy (4900 Golden Avenue, Riverside) is located approximately 0.05 mile west of the project site and La Sierra University (4500 Riverwalk Parkway, Riverside) is located approximately 0.15 mile from the project site. Although hazardous materials and/or waste generated from the proposed project (including demolition materials with lead based paint and asbestos containing materials) may pose a health risk to nearby existing or proposed schools, all businesses that handle or have on-site transportation of hazardous materials are required to comply with the provisions of the City's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for the Business Emergency Plan. Compliance with existing federal and State regulations impacts associated with the exposure of schools to hazardous materials caused by this project (including the General Plan Amendment, Zone Change, and Design Review) will result in a less than significant impact directly, indirectly, and cumulatively. No mitigation is required.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code	☐	☐	☐	☒

³ "Abandonment" shall apply to a well whose original or functional purpose and use has been discontinued for a period of one year and which has not been declared for reuse with the Riverside County Department of Environmental Health by the legal owner, or a well in such a state of disrepair that it cannot be functional for its original purpose or any other function regulated under Riverside County Ordinance No. 682.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
9d. Response: (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 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 https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Riverside) No Impact. A search of the DTSC EnviroStor database (on August 21, 2019) and the California Environmental Protection Agency “Cortese List” complied pursuant to Government Code Section 65962.5 indicated there are no sites of concern regarding hazardous materials on the project site or in the immediate vicinity of the project site. In addition, the General Plan 2025 FPEIR (Figure 5.7-1) does not list any hazardous waste sites on or adjacent to the project site. Therefore, the project (including the General Plan Amendment, Zone Change, and Design Review) would have no impact related to creating any significant hazard to the public or environment due to being located on a recognized hazardous materials site, directly, indirectly, or cumulatively. No mitigation is required.				
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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
9e. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)) 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. The project site is not located within any airport land use plan area or compatibility zone. As such, implementation of the proposed project would not result in on-site residents or employees on site being affected by a safety hazard or excessive noise from an airport. No impact would occur directly, indirectly, or cumulatively with implementation of the project (including the General Plan Amendment, Zone Change, and Design Review). No mitigation is required.				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
9f. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM’s Strategic Plan) Less Than Significant Impact. The proposed project would be constructed and operated in accordance with the City’s Emergency Operations Plan to ensure a coordinated and effective planned response by the City Police and Fire Departments to extraordinary emergency situations and disasters. The proposed project will comply with the 2016 California Fire Code Section 503-Fire Apparatus Access Roads. Sections 503.1.1 Buildings and Facilities; 503.2.1 Dimensions; 506.1 Key Boxes; and, 503.6 Security Gates of the 2016 California Fire Code Section will all be followed in development of the proposed project. The project site is currently accessed by existing driveways on Pierce Street and Golden Avenue. Implementation of the proposed project would not require construction activities on the off-site roadway system and therefore would not impair the City’s adopted emergency response plan or emergency evacuation plan. Design of the project would include the development of an improved driveway on Pierce Street that will lead to an internal circulation system where the residential uses will be developed. An emergency vehicle access (EVA) driveway will be provided on Hollyhock Lane so fire apparatus can easily access and depart from the project site. Parcel A of the project site will be accessed via a driveway off of Golden Avenue and an exit (right turn only) will be provided on Pierce Street. If residents needed to evacuate the area, they could use Pierce Avenue to access La Sierra Avenue, which provides access to California State Route 91. California State Route 91 provides regional access to the City of Riverside. The design of the project will comply with the Riverside Municipal Code Section 19.100 related to the development standards for a multifamily residential use. Prior to the issuance of the final building permit, the City will review site plans for the				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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proposed project to ensure that design features will not substantially impair emergency response or emergency evacuation plans of the City. Direct, indirect, and cumulative project impacts (including the General Plan Amendment, Zone Change, and Design Review) will be **less than significant** and no mitigation is required.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐
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9g. Response: (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM's Strategic Plan)

Less Than Significant Impact. The proposed project is located approximately 1.55 miles from the La Sierra/Norco Hills rural interface area of fire risk as depicted in Figure 5.7-3 of the General Plan 2025 Program FPEIR but not within a Very High Fire Severity Zones (VHFSZ). The project has provided the required access roads around the proposed structures, meeting the minimum roadway widths of Title 18 (Subdivision Code) and the City's Fire Code Section 503 (California Fire Code 2007). Clearance around the proposed structures will be reviewed and approved by the Fire Department. With implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department review and approval, impacts from wildland fires due to project (including the General Plan Amendment, Zone Change, and Design Review) implementation are **less than significant** directly, indirectly, and cumulatively. No mitigation is required.

10. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
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10a. Response: (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water and La Sierra PSH Preliminary Project Specific Water Quality Management Plan, prepared by Adkan Engineers, July 16, 2019 Appendix F of the Initial Study)

Less Than Significant Impact. The project is located on 5.51 acres along Pierce Street within the Santa Ana River Watershed. The project site is partially development and has a total impervious surface area of 58,800 square feet on site. Once developed, the proposed project would increase the impervious surface of the site by 81,862 square feet to a total impervious surface area of 140,662 square feet. 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 National Pollutant Discharge Elimination System (NPDES) requirements and must implement a Storm Water Pollution Prevention Plan (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**. No mitigation is required.

The Federal Clean Water Act (CWA) establishes a framework for regulating municipal and industrial (including construction) storm water discharges under the 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 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.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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There are no known existing water quality problems associated with the project site. Drainage within the project site is generally directed as a sheet flow toward adjacent streets (Pierce Street, Golden Avenue, Hollyhock Lane, and Huguley Drive). Within the paved portion of the project site, drainage is captured via concrete gutters and directed to various area drain and storm drain inlets. Per City records, there are no storm water drain improvements within the project vicinity.

A preliminary project-specific Water Quality Management Plan (WQMP) has been prepared for the project per City of Riverside Water Quality Ordinance (Municipal Code Section 14.12.315) requirements. The WQMP identifies four Drainage Management Areas (DMAs). The four DMAs would drain approximately 202,708 square feet of area into four bioretention basins that will be developed on site.

All runoff is conveyed to Reach 1 of Temescal Wash, flowing downstream to Reach 3 of the Santa Ana River, and ultimately into the Pacific Ocean. Reach 1 of Temescal Wash has no Section 303(d) impairments and Reach 3 of the Santa Ana River list pathogens (Bacterial Indicators) as EPA-approved Section 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-1 would collectively manage runoff from 30,475 square feet of the project site and would require a minimum Design Capture Volume (DCV) of 1,168 cubic feet of runoff. Accordingly, DMA-1 would be treated via infiltration basin with DCV of 1,236 cubic feet (storage and volume retention). DMA-2 would manage runoff from 47,734 square feet of the project site and would require a minimum DCV of 1,711.7 cubic feet of runoff. Accordingly, DMA-2 would be treated via infiltration basin with a DCV of 1,803 cubic feet (storage and volume retention). DMA-3 would manage runoff from 24,828 square feet of the project site and would require a minimum DCV of 886.8 cubic feet of runoff. Accordingly, DMA-3 would be treated via infiltration basin with a DCV of 1,109 cubic feet (storage and volume retention). DMA-4 would manage runoff from 99,671 square feet of the project site and would require a minimum DCV of 3,401 cubic feet of runoff. Accordingly, DMA-4 would be treated via infiltration basin with a DCV of 3,568 cubic feet (storage and volume retention). The combined DCV of the proposed BMP infiltration basins treating DMAs 1, 2, 3, and 4 would satisfy the estimated detention volume needed post-development for the project per the preliminary hydrology calculations. According to the preliminary WQMP, the full DCV would be met with the proposed infiltration BMP infiltration basins that would treat all four DMAs.

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 decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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10b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan, WMWD Urban Water Management Plan)

Less Than Significant Impact. Water service for the proposed project site will be provided by Riverside Public Utilities (RPU). RPU extracts groundwater from five groundwater basins, which accounts for the majority of RPU's water supplies. Approximately 60 percent of the groundwater 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. The UWMP bases its demand estimates on broad categories of uses (e.g., single-

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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family residential, commercial/industrial/institutional) and growth projections identified by the City. As the site has been previously developed, it is reasonable that a water demand for the site has been previously included in the estimates of future demand. RPU maintains sufficient water rights in local groundwater basins to meet current and projected future demands.

The RPU's 2015 UWMP prepared by the City of Riverside estimated a daily per capita water demand of 206 gallons (gpcd). Implementation of the proposed project will result in a maximum population of 229 residents (2.8625 persons/household × 80 units), with an estimated water usage of 47,174 gallons per day (0.14 acre-feet/day) or 17,218,510 gallons per year (52.8 acre-feet/year). This represents 0.05 percent of anticipated RPU water supplies in 2020 and represents 0.048 percent of anticipated RPU supplies in 2040 (assuming worst-case multiple dry years). Sufficient water supplies are available to serve existing and projected future water demand under normal, dry, and multiple-dry conditions. The proposed project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede substantial groundwater management of the Bunker Hill Basin. Therefore, the proposed project (including the General Plan Amendment, Zone Change, and Design Review) was found to have a **less than significant impact** directly, indirectly, or cumulatively to groundwater supplies. No mitigation is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	☐	☐	☒	☐

10i Response: (Source: Preliminary grading plan and Preliminary Project Specific Water Quality Management Plan, prepared by Adkan Engineers, July 16, 2019 Appendix F of the Initial Study)

Less Than Significant Impact. The project site is relatively flat and surface flows drain to adjacent streets. 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 existing drainage. General sheet flow conditions would be maintained, and the project site would be designed with infiltration BMP infiltration basins and permeable areas within DMAs 1, 2, 3, and 4 to ensure runoff from regular rain events are retained on site. No alterations to the course of intermittent streams or rivers would occur, as none are located on the project site.

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) 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. Based on analysis presented in the preliminary WQMP, the project does not create a Hydrologic Condition of Concern and meets and qualifies for HCOC Exemption 3.

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 none are located on or in close proximity to the project site. 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 an 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.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	☐	☐	☒	☐
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10ii Response: (Source: Preliminary grading plan and Preliminary Project Specific Water Quality Management Plan, prepared by Adkan Engineers, July 16, 2019 Appendix F of the Initial Study)

Less Than Significant Impact. 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.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
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10iii Response: (Source: Preliminary grading plan and Preliminary Project Specific Water Quality Management Plan, prepared by Adkan Engineers, July 16, 2019 Appendix F of the Initial Study)

Less Than Significant Impact. The CWA 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 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 pre-development 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 basins 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 basins or adjacent landscape planted areas prior to discharging into off-site storm water drainage infrastructure. The combined DCV (7,167.5 cubic feet) of the proposed BMP infiltration basins treating DMAs 1, 2, 3, and 4 would satisfy the estimated detention volume needed post-development for the project per the preliminary hydrology calculations. According to the WQMP, the full DCV would be met with the proposed infiltration BMP infiltration basins that would treat the four DMAs.

Any sources of storm water pollution would be addressed through adherence to NPDES permit requirements. 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. Compliance with all applicable federal, State, and local laws and regulations would ensure impacts from generation of runoff water exceeding the capacity of existing or planned storm water drainage systems or contributing substantial additional sources of polluted runoff would be **less than significant** directly, indirectly, and cumulatively. No mitigation is required.

iv. Impede or redirect flood flows?	☐	☐	☐	☒
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10iv 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 Flood Insurance Rate Map No. 06065C0715G, 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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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(0.2 percent annual chance of flood) flood hazard areas. Implementation of the proposed project would not impede or redirect flood flows. **No impact** would occur directly, indirectly, or cumulatively, and no mitigation is required.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
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10d. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)

Less Than Significant Impact. The proposed PROJECT site is located inland and no large bodies of water are located within the site's vicinity; therefore, the potential of tsunamis or seiches affecting the subject site is low. Further, the proposed project site and its surroundings have generally flat topography and are within an urbanized area not within proximity to Lake Mathews, Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain Area, or any of the nine arroyos that traverse the City and its sphere of influence. Given the proposed project's location and since there are no features nearby that would pose a threat from seiche, tsunami, or flooding, impacts are considered **less than significant** directly, indirectly, and cumulatively. No mitigation is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
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10e. Response: (Source: Preliminary Project Specific Water Quality Management Plan, prepared by Adkan Engineers, July 16, 2019 Appendix F of the Initial Study)

Less Than Significant Impact. The proposed project is located within an urbanized portion of the City of Riverside. Since the proposed project involves more than one acre of ground disturbance, it is subject to NPDES requirements and must implement an SWPPP. Compliance with NPDES and implementation of an SWPPP will ensure the proposed project does not conflict or obstruct applicable City water quality control plans. 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 proposed project will include a General Plan Amendment and Zone Change to allow for development of a multifamily residential use on the subject site. Water service for the proposed project site will be provided by RPU. RPU extracts groundwater from five groundwater basins, which accounts for the majority of RPU's water supplies. Approximately 60 percent of the groundwater 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 UWMP, the RPU maintains sufficient supplies of water (including groundwater) during normal, dry, and multiple-dry years. 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. As the site has been previously developed, it is reasonable that water demand for the site has been previously included in the estimates of future demand. Therefore, implementation of the proposed project will not conflict with or obstruct implementation of the current groundwater management plan for the City of Riverside. Impacts will be **less than significant** directly, indirectly, and cumulatively. No mitigation measures are required.

11. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?	☐	☐	☐	☒
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11a. Response: (Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers)

No Impact. The project site is located in a well-established community within the City of Riverside. The site is currently surrounded by single-family residential neighborhoods to the north, east, and south, a church to the south, and a school to the west. A portion of the site is currently occupied by the Church Risk Management and Broadcast Center, storage buildings, a surface parking lot, and five single-family rental homes that are owned and managed by the Church. The Project Applicant is requesting a General Plan Amendment and Zoning Change to allow for development of 80 apartments within seven buildings on the site. The project has been reviewed for consistency with the Zoning Code and State requirements for affordable housing and has been determined consistent in development density, building height, and landscaping on the site for multiple-family

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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residential uses. The project will not include features such as roads, highways, a transit system, or a non-consistent use that would constitute a physical divide in the established community. **No impact** directly, indirectly, or cumulatively to an established community will occur with implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review). No mitigation is required.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
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11b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Title 19 – Zoning Code, 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 and Sign Guidelines)

Less Than Significant Impact. A third of the project site has a General Plan land use designation and is currently zoned O - Office, and the remaining portion has a General Plan land use designation MDR - Medium Density Residential and is zoned R-1-7000 - Single-Family Residential. The Project Applicant is requesting a lot line adjustment to consolidate the site into two parcels: Parcel A would remain as an O - Office land use and zoning designation and Parcel B would require a General Plan Amendment to change the land use designation to HDR - High Density Residential and a Zoning Change request to change the zoning to R-3-1500 - Multi-Family Residential.

The project design plans indicated that the development occurring on Parcel B of the project site will be consistent with policies of the General Plan 2025 and site development standards of the R-3-1500 zoning designation. Table D, shown above in the Project Description, indicates that front, side, and rear setbacks will all comply with the zoning development standards; 120 parking spaces will be provided, which is the same amount required by the zoning development standards; a maximum density of 19.5 dwelling units per acre, which is less than the maximum amount allowable per the development standards; and building heights proposed at 34.5 feet, which is less than the maximum allowable. Additionally, the project will provide 25,855 square feet of common open space and 7,112 square feet of private open space, both of which are more than the required amounts per the zoning development standards. It should be noted that Parcel A will not require a land use or zoning change as the development that is currently occupying that area will remain unchanged with implementation of the proposed project. While the development is required to provide a 25-foot setback along Pierce Street and a 15-foot setback along Hollyhock Lane, to provide the maximum number of affordable housing units for low-income families, the project proposes a 15-foot setback along Pierce Street and a 10-foot setback along Hollyhock Lane. The project provides 100 percent affordable housing in partnership with the City to provide workforce housing in the La Sierra neighborhood.

The project uses will be consistent with uses permitted under the General Plan land use and zoning designations for the site and will also be compatible with surrounding uses. Furthermore, the reduction of setbacks is not contrary to the objectives of the General Plan as it is a direct implementation of the City's Housing Element goals to provide a variety of affordable housing options for working families that will address the current housing crisis. As such, the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would result in a **less than significant impact**. No mitigation is required.

12. 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 residents of the State?	☐	☐	☐	☒
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12a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

No Impact. According to General Plan 2025 Figure OS-1, the project site is not designated as a Mineral Resource Zone -2 (MRZ-2) or Mineral Resource Zone-3 (MRZ-3). The majority of the project site has already been disturbed and is currently occupied by five residential rental units, the Church Risk Management and Broadcast Center, and three storage buildings. Unknown mineral deposits would more than likely not be discovered or disturbed during proposed project construction activities. As such, implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would result in a **less than significant impact**. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Review) will have **no impact** on statewide and regional mineral deposits directly, indirectly, or cumulatively. No mitigation is required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
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12b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

No Impact. Review of the General Plan 2025 FPEIR indicates there are no mineral resource recovery sites delineated within the City of Riverside. Additionally, as described above in Response 12a, the subject site is not located within MRZ-2 or MRZ-3 areas and implementation of the proposed project will not result in mineral resource losses. As such, implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) will have **no impact** on locally-important mineral resources recovery sites directly, indirectly, or cumulatively. No mitigation is required.

13. NOISE

Would the project:

a. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
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13a. Response: (Source: General Plan 2025 Figure N-5 – 2025 Roadway Noise, Section 5.11 – Noise of the General Plan and Supporting Documents Environmental Impact Report, Project Set Plans, National Community Renaissance – La Sierra PSH Project Noise and Vibration Impact Analysis Technical Report prepared by LSA Associates, Inc., February 2020, Appendix G of the Initial Study)

Less Than Significant Impact. The construction and operational noise analysis under this response has been provided by the *Noise and Vibration Impact Analysis Technical Report* prepared for the project in August 2019 (Appendix G). Construction and operational noise standards for the City of Riverside are provided by the City of Riverside Noise Element of the General Plan 2025 and the City Municipal Code.

Noise Element of the General Plan 2025: In its land use decisions, the City may consider its noise/land use compatibility guidelines which describes categories of compatibility and not specific noise standards (please refer to Table D of the *Noise and Impact Analysis Technical Report* in Appendix G).

These guidelines generally identify conditions where development of a particular use may be “Normally Acceptable,” “Conditionally Acceptable,” “Normally Unacceptable,” or “Conditionally Unacceptable.” The development of infill single residential uses is Normally Acceptable in areas with noise levels of 65 dBA CNEL or less, and Conditionally Acceptable in areas with a noise levels between 65 and 75 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. However, the City does not provide exterior noise standards for multifamily residences. Therefore, the common outdoor recreation areas were evaluated under the infill single residential use standard. The City’s General Plan Noise Element requires interior noise levels for new residential development to comply with standards set forth in Title 24 of the State Health and Safety Code, which identifies an interior noise standard of 45 dBA CNEL for residences.

Municipal Code: 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: Noise Control of the City’s Municipal Code. Based on Sections 7.25.010 and 7.30.015 of the City’s Municipal Code (and as shown in Table E of the *Noise and Impact Analysis Technical Report* in Appendix G), the maximum exterior noise level for residential uses is 75 dBA L_{max} (i.e., 55 dBA plus 20 dBA) during daytime (7:00 a.m. to 10:00 p.m.) hours and 65 dBA L_{max} (i.e., 45 dBA plus 20 dBA) during nighttime (10:00 p.m. to 7:00 a.m.) hours, or the maximum measured ambient noise level for any period of time. Similarly, the maximum interior noise level for residential uses is 55 dBA L_{max} (i.e., 45 dBA plus 10 dBA) during daytime hours and 45 dBA L_{max} (i.e., 35 dBA plus 10 dBA) during nighttime hours, or the maximum measured ambient noise level for any period of time.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Section 7.35.020.G, Exemptions, of the City's Municipal Code Noise Ordinance states that "Noise source 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.

Existing Conditions: The project is located in an urbanized portion of the City of Riverside and is surrounded by existing residential uses, a church to the south, and a school to the west. The closest sensitive receptors include:

- An adjacent residence at 4936 Hollyhock Lane east of the project site that would be surrounded by the project on the northern, western, and southern sides of the residence;
- The single-family residences across Hollyhock Lane to the east of the project;
- The single-family residences and multifamily residences along Huguley Drive and Hollyhock Lane to the north of the project;
- A church to the south across Pierce Street; and
- A residential building approximately 10 feet north of the project boundary at 4948 Hollyhock Lane.

The primary existing noise sources in the project area are from vehicles on Pierce Street and Golden Avenue. In order to determine the existing ambient noise level in the project area, two long-term (24-hour) and two short-term (20 minute) noise level measurements were conducted and recorded on April 24, 2019. Noise levels from the long-term monitoring ranged between 60.1 to 71.3 dBA CNEL and the calculated CNEL noise level using the long-term measurement results at short-term monitoring locations ranged between 53.4 to 54.9 dBA CNEL, which is considered typical of an urbanized area.

Existing traffic noise levels were modeled using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) to evaluate traffic-related noise conditions along roadway segments in the project vicinity. Table 13.A shows the existing traffic noise levels on roadways in the project vicinity. As shown in Table 13.A, the 65 dBA CNEL noise contour of Pierce Street extend 86 feet from the roadway centerline and the 60 dBA CNEL noise contour of Golden Avenue extend to 52 feet from the roadway centerline.

Table 13.A: Existing Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Golden Avenue north of Proposed Driveway	6,400	< 50	< 50	< 50	58.8
Golden Avenue from Proposed Driveway to Existing Driveway	7,470	< 50	< 50	52	59.5
Golden Avenue from Existing Driveway to Pierce Street	7,490	< 50	< 50	52	59.5
Golden Avenue south of Pierce Street	16,180	< 50	87	183	66.2
Pierce Street west of Golden Avenue	4,310	< 50	< 50	79	60.5
Pierce Street from Golden Avenue to Proposed Residential Driveway	15,720	< 50	86	179	66.1
Pierce Street east of Proposed Residential Driveway	15,860	< 50	86	180	66.1

Source: Compiled by LSA (February 2020).

Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.

ADT = average daily traffic

dBA = A-weighted decibels

CNEL = Community Noise Equivalent Level

ft = foot/feet

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Short-Term Construction Noise: The proposed construction activities will comply with the allowable days and hours for construction (7:00 a.m. to 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays, no construction at any time on Sunday or a federal holiday) and therefore are exempt from the City's noise limit in the Municipal Code Noise Ordinance. The project will be conditioned by the City to comply with Section 7.35.020.G, Exemptions, of the City's Municipal Code Noise Ordinance. Therefore, noise generated from project construction activities would be less than significant. No mitigation measures are required.

Long-Term Off-Site Traffic Noise: The FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) was used to evaluate roadway traffic-related noise conditions along roadway segments in the vicinity of the proposed project under the following scenarios:

- Existing Year (2019) Traffic Noise Levels Without and With the Project;
- Opening Year (2022) Traffic Noise Levels Without and With the Project;
- Cumulative Opening Year (2022) Traffic Noise Levels Without and With the Project; and
- Buildout Year (2040) Traffic Noise Levels Without and With the Project.

Noise level increases below 3 dBA would not be perceptible to the human ear in an outdoor environment. Furthermore, an increase or decrease in noise level of at least 5 dBA is required before any noticeable change in community response would be expected.⁴ Therefore, the City's ambient noise threshold is a clearly perceptible increase of 5 dBA in for ambient noise increases to be considered significant.⁵ Tables M, N, O and P in the *Noise and Vibration Impact Analysis Report* show that the project-related traffic noise increase would be no greater than 0.1 dBA under all of the scenarios. As such, project-related traffic noise increases on off-site sensitive receptors would be less than significant. No mitigation measures are required.

Long-Term Off-Site Stationary Noise: Adjacent off-site land uses could potentially be exposed to stationary-source noise impacts from the proposed on-site heating, ventilation, and air conditioning (HVAC) equipment and relocation of the existing on-site generator.

The proposed project would have on-site rooftop HVAC units that could potentially operate 24 hours per day. Rooftop HVAC equipment would generate noise levels of 66.6 dBA L_{eq} at 5 feet based on previous measurements conducted by LSA for similar project types. Each residential building would have either eight or 12 HVAC units, assuming one HVAC unit per dwelling unit. These HVAC units would be shielded by parapets and rooflines that would reduce noise levels. Noise levels generated from on-site HVAC units would not exceed the City's exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) 30-minute (L_{eq}) noise standards of 55 dBA L_{eq} and 45 dBA L_{eq} , respectively. Therefore, no off-site noise impacts would occur from on-site HVAC equipment. No reduction measures are required.

As part of the project, an existing enclosed emergency back-up generator associated with the Seventh-day Adventist radio broadcast building would be relocated from the center of the project site to the northwestern portion of the project site and would be located approximately 255 feet northwest of its current location. The generator would be expected to operate only on an emergency basis during a loss of power and therefore would not be a major source of noise. There would be periodic testing of the generator, which would be exempt from the City's Municipal Noise Ordinance because the generator is emergency equipment. Though the generator would be exempt, noise levels at the nearest residence would also not exceed the City's noise standards. Based on a reference noise level for a Kohler 250RZXB propane generator with an enclosure of 71.9 dBA at 23 feet, noise levels at the nearest residence, located approximately 140 feet to the north, would reach 56 dBA L_{eq} .⁶ This noise level would not exceed the City's exterior daytime (7:00 a.m. to 10:00 p.m.) 15-minute (L_{25}) noise standard of 60

⁴ Section 5.11 – Noise of the General Plan and Supporting Documents Environmental Impact Report. Page 5.11-26. Albert A. Webb Associates. Certified November 2007.

⁵ Ibid.

⁶ Kohler Company. 2019. Industrial Generator Set Accessories. Website: http://resources.kohler.com/power/kohler/industrial/pdf/180-450REZX_G6109.pdf?_ga=2.265956743.986806727.1565046786-2071164992.1564609013 (accessed August 2019).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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dBA L_{eq}, which corresponds with the assumed testing duration of 15 minutes. Therefore, no noise impacts would occur from the relocation of the proposed emergency generator.

Land Use Compatibility Assessment: The land use compatibility of the project site was assessed based on the Noise/Land Use Compatibility Criteria in the City of Riverside General Plan Noise Element. Although the City does not list multifamily residences in the Noise/Land Use Noise Compatibility Criteria shown in Table G of the General Plan Noise Element, the proposed project would be equivalent to infill single-family residential. Table G shows that infill single-family residential uses are considered “Normally Acceptable” in areas with noise levels of 65 dBA CNEL or less and “Conditionally Acceptable” in areas with a noise levels between 65 and 75 dBA CNEL.

A total of nine on-site sensitive receptors were modeled to represent exterior areas façade of the residential building, private patio/balconies, and common outdoor use areas associated with the proposed project using the measured noise levels at LT-1 and LT-2 and the project traffic noise increase from existing no project conditions to the Buildout Year (2040) with project conditions. The detailed noise calculations are provided in Appendix C in the *Noise and Vibration Impact Analysis Report* (refer to Appendix G of this Initial Study). Figure 4 in the *Noise and Vibration Impact Analysis Report* shows the locations of these modeled receptors.

Table 13.B shows the Buildout year (2040) with Project traffic noise levels at all nine receptor locations on the project site. As shown in Table 13.B, residential dwelling units represented by Receptors R-1 through R-4 are considered “Conditionally Acceptable” while the residential dwelling units and outdoor common use areas represented by Receptors R-5 through R-9 are considered “Normally Acceptable.” As Table G in the *Noise and Vibration Impact Analysis Report* indicates, noise environments that are “Conditionally Acceptable” require a detailed noise analysis and needed noise insulation features included in the design.

Table 13.B: Buildout Year (2040) With Project Traffic Noise Levels

Receptor No.	Building or Area Represented	Noise Levels (dBA CNEL)		
		Projected Buildout Year (2040) With Project	Interior (Windows and Doors Open) ¹	Noise Reduction to Meet 45 dBA CNEL Interior Noise Standard
R-1	Buildings 200 & 300 (South Façade)	70	58	25
R-2	Buildings 200 & 300 (2nd Row Units)	69	57	24
R-3	Buildings 200 & 400 (South Façade)	70	58	25
R-4	Buildings 200 & 400 (2nd Row Units)	68	56	23
R-5	Building 400 (3rd and 4th Row Units)	63	51	18
R-6	Building 100 (South Façade)	63	51	18
R-7	Tot Lot and Barbeque Patio	62	N/A	N/A
R-8	Pool	61	N/A	N/A
R-9	Building 500	58	46	13

Source: Table S. *Noise and Vibration Impact Analysis Report*. LSA, February 2020. Appendix G.

¹ Numbers in bold represent noise levels that exceed the City’s interior noise standard of 45 dBA CNEL.

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

N/A = not applicable

Based on the United States Environmental Protection Agency’s (EPA) Protective Noise Levels (1978), standard construction for Southern California (warm climate) residential buildings would provide 12 dBA or more with windows and doors open (the national average is 15 dBA). Table 13.B shows the interior noise levels with windows and doors open and that all of the residences on-site would exceed the City’s interior noise standard of 45 dBA CNEL. Mechanical ventilation systems such as air conditioning would be required so that windows and doors can be closed for a prolonged period of time. However, as the Project would provide air conditioning as a standard feature, windows and doors can remain closed for a prolonged period of time.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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In order to assess the interior noise levels experience during a window-closed condition, the following assumptions were made based on assumptions for typical multifamily residential uses. The recommendations should be considered preliminary and confirmed upon final plan approval. The Project is assumed to comply with the construction standards of the 2019 California Building Code (Title 24) and use typical stucco construction that consists of a 7/8-inch stucco exterior façade, one layer of ½-inch plywood, 2 inch by 4 inch wood studs, 16-inches off-center filled with 3.5-inch fiberglass insulation, and one layer of 5/8-inch Type “X” gypsum board. Based on this assumed wall make up and standard windows of sound transmission class (STC) -28, an approximate 27 dBA exterior-to-interior noise reduction could be achieved. A 27 dBA exterior-to-interior reduction would reduce interior noise levels to 45 dBA CNEL or below, which would meet the City’s interior noise standard. Therefore, interior noise levels for front line residences adjacent to Pierce Street would be consistent with Title 24 standards.

The proposed residences would be exposed to noise from rooftop HVAC units at the existing Seventh-day Adventist radio broadcast building that could potentially operate 24 hours per day. Rooftop HVAC equipment would generate noise levels of 66.6 dBA L_{eq} at 5 feet based on previous measurements conducted by LSA. At the nearest proposed residences to the east, 13 HVAC units would produce a combined noise level of 41.8 feet after distance attenuation and reductions of 7 dBA to 8 dBA due to parapets and the roofline. This noise level would not exceed the City’s exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise standards of 55 dBA L_{eq} and 45 dBA L_{eq} , respectively. Therefore, no off-site noise impacts would occur from on-site HVAC equipment.

Compliance with Section 7.35.020.G, Exemptions, of the City’s Municipal Code Noise Ordinance and the 2019 California Building Code (Title 24) would reduce interior noise levels (with windows and doors closed) to 45 dBA CNEL or below,

Noise impacts from implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would be **less than significant**. Mitigation is not required.

b. Result in generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
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13b. Response: *(Source: Project Set Plans, Federal Transit Authority (FTA) Transit Noise and Vibration Impact Assessment Manual, National Community Renaissance – La Sierra PSH Project Noise and Vibration Impact Analysis Technical Report prepared by LSA Associates, Inc., August 2019, Appendix G of the Initial Study)*

Less Than Significant With Mitigation Incorporated. Vibration refers to groundborne noise and perceptible motion which is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernable, but without the effects associated with the shaking of a building there is less adverse reaction. The vibration standards included in the Federal Transit Authority’s (FTA) *Transit Noise and Vibration Impact Assessment Manual* were used to evaluate operational and construction vibration levels related to project implementation.

Occupation of the proposed multifamily residences is not expected to generate vibration. In addition, vibration generated from project-related traffic on the adjacent roadways would be unusual for on-road vehicles because the rubber tires and suspension systems of vehicles provide vibration isolation. Therefore, vibration generated from project-related traffic on the adjacent roadways, and project operation in general, would be **less than significant**.

Table 13.C shows the thresholds of human annoyance from groundborne vibrations and Table 13.D lists the potential vibration building damage criteria associated with construction activities. During construction, bulldozers and other heavy-tracked construction equipment would be used on site and is anticipated to generate approximately 87 velocity decibels (VdB) (0.089 peak particle velocity (PPV) [in/sec]) of groundborne vibration when measured at a distance of 25 feet. The closest residential building at 4948 Hollyhock Lane (north of the project site) and 4936 Hollyhock Lane (east of the project site) are within 15 feet of the construction boundary and would experience vibration levels above 94 VdB (0.2 PPV in in/sec). This vibration level would exceed the FTA threshold of 94 VdB (0.2 PPV in in/sec) for building damage to non-engineered timber and masonry structures when bulldozers and loaded trucks operate at the project construction boundary. Construction vibration levels at other residential buildings to the north, east, and south of construction boundary would not exceed the FTA damage threshold of 94 VdB (0.2 PPV in in/sec) for building damage to non-engineered timber and masonry structures when bulldozers and loaded trucks operate at the project construction boundary.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 13.C: Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment

Land Use Category	Groundborne Vibration Impact Levels (VdB re 1 μ in/sec)			Groundborne Noise Impact Levels (dB re 20 μ Pa)		
	Frequent ¹ Events	Occasional ² Events	Infrequent ³ Events	Frequent ¹ Events	Occasional ² Events	Infrequent ³ Events
Category 1: Buildings where low ambient vibration is essential for interior operations.	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴	N/A ⁵	N/A ⁵	N/A ⁵
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Source: Table E. *Noise and Vibration Impact Analysis Report*. LSA, February 2020. Appendix G.

¹ Frequent events are defined as more than 70 events per day.

² Occasional events are defined as between 30 and 70 events per day.

³ Infrequent events are defined as fewer than 30 events per day.

⁴ This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.

⁵ Vibration-sensitive equipment is not sensitive to groundborne noise.

μ in/sec = microinches per second

μ Pa = micropascals

dB = decibels

dBA = A-weighted decibels

FTA = Federal Transit Administration

HVAC = heating, ventilation, and air conditioning

N/A = not applicable

VdB = vibration velocity decibels

Table 13.D: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)	Approximate L_v (VdB) ¹
Reinforced concrete, steel, or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Non-engineered timber and masonry buildings	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

Source: Table F. *Noise and Vibration Impact Analysis Report*. LSA, February 2020. Appendix G.

¹ RMS vibration velocity in decibels (VdB) re 1 μ in/sec.

μ in/sec = microinches per second

FTA = Federal Transit Administration

in/sec = inch/inches per second

L_v = velocity in decibels

PPV = peak particle velocity

RMS = root-mean-square

VdB = vibration velocity decibels

To reduce construction vibration levels at the two residential structures (4948 Hollyhock Lane and 4936 Hollyhock Lane) to below the FTA damage threshold, **Mitigation Measure NOI-1** is required to ensure the construction contractor prohibits the use of heavy equipment (e.g., large tracked bulldozers or loaded trucks during) within 15 feet of the residential building and instead uses light construction equipment (e.g. small rubber tire bulldozer or pick-up trucks) within 15 feet of the residential building. Light construction equipment such as a small rubber tire bulldozer would generate a vibration level of 58 VdB (0.003 PPV [in/sec]) at 25 feet and would reduce vibration levels to 91 VdB (0.003 PPV [in/sec]) at these two residential buildings.

The existing Seventh-day Adventist radio broadcast building is located within the project site and would experience vibration levels of up to 79 VdB (0.037 PPV in in/sec) during construction. This vibration level would exceed the FTA vibration annoyance criteria of 65 VdB for buildings where vibration would interfere with interior operations. To reduce construction vibration to below the FTA damage threshold, **Mitigation Measure NOI-1** is required to ensure the construction contractor prohibits the use of heavy equipment (e.g., large tracked bulldozers or loaded trucks) within 145 feet of the broadcast building during its hours of operation and instead uses light construction equipment (e.g. small rubber tire bulldozer or pick-up trucks).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Light construction equipment (e.g., small rubber-tire bulldozer or pick-up trucks) would generate a vibration level of 58 VdB (0.003 PPV [in/sec]) at 25 feet and would reduce vibration levels to 91 VdB (0.003 PPV [in/sec]) at the radio broadcast center.

- Mitigation Measure NOI-1** Prior to the issuance of grading and building permits, the applicant shall submit to the City evidence that the project construction documents include the following restrictions:
- The construction contractor shall prohibit the use of heavy equipment (e.g., large tracked bulldozers or loaded trucks during) within 15 feet of the residential structures located immediately northeast and east of the project construction boundary. Light construction equipment (e.g., small rubber-tire bulldozer or pick-up trucks) is permitted within 15 feet of the residential structures located immediately northeast and east of the project construction boundary.
 - The construction contractor shall prohibit the use of heavy equipment (e.g., large tracked bulldozers or loaded trucks during) within 145 feet of the broadcast center during its hours of operation. Light construction equipment (e.g., small rubber-tire bulldozer or pick-up trucks) is permitted within 145 feet of the broadcast center during its hours of operation.

With the implementation of **Mitigation Measure NOI-1**, vibration generated by project construction activities would be **less than significant with mitigation incorporated**.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
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13c. Response: (Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours,; Project Set Plans; General Plan 2025 Figure N-9 March Air Reserve Base/Inland Port Airport Noise Impact Area; Project Set Plans; National Community Renaissance – La Sierra PSH Project Noise and Vibration Impact Analysis Technical Report prepared by LSA Associates, Inc., August 2019, Appendix G of the Initial Study)

No Impact. The nearest airports to the project site are the Riverside Municipal and Corona Municipal Airports located 3.2 miles northeast and 6.1 miles west of the project site, respectively. The project site is outside the 55 dBA CNEL noise contour of both airports per the Noise Compatibility Contours in the Riverside County Airport Environs Land Use Compatibility Plan. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not expose on-site construction workers, workers, or residents to excessive noise levels from nearby airport operations. **No impact** directly, indirectly, or cumulatively would occur with project implementation and no mitigation is required.

14. POPULATION AND HOUSING

Would the project:

a. Induce substantial unplanned 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)?	☐	☐	☒	☐
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14a. Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR 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 and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG's RCP and RTP)

Less Than Significant Impact. The project site will be consolidated into two parcels through approval of a lot line adjustment. The Church Broadcast Center would be retained on Parcel A; however, the existing storage facilities and surface parking lot would be demolished to allow for development of two new 1,000-square foot storage buildings and surface parking lot. On the remaining four acres, Parcel B, the project proposes to develop seven two-and-three-story residential buildings surrounding a community center and recreational amenities located in the center of the site. The project proposes the construction of 80

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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apartment homes. Developed at an overall density of 20 units per acre, there will be an estimated 40 1-bedroom units, 20 2-bedroom units, and 20 3-bedroom units.

The project is in an urbanized area and would not induce substantial population growth, as the addition of 80 apartment units represents approximately 0.067 percent of the projected 118,600 housing units anticipated by 2040 in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) housing projections for 2040. Based on the 2.8625 person per household estimated in Riverside in 2019⁷ the proposed project could increase the City's population by approximately 229 people. The 2015 and 2040 population of the City, Riverside County, and the region are detailed in Table 14.A.

Table 14.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	18,779,123	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 RTP/SCS establishes population, housing, and growth trends for the City, Riverside County, and SCAG region. According to the 2016 RTP/SCS, the forecast population for the County of Riverside Sub-region in 2040 is approximately 3,167,584 persons. In 2015, the County of Riverside was reported to have a population of approximately 2,316,438 persons. Therefore, the forecast population for the County of Riverside will grow by approximately 851,146 persons between 2015 and 2040. Based on an anticipated increase of 229 persons, project residents would account for 0.040 percent of the population growth forecast by SCAG in the County of Riverside 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 increase in population by approximately 229 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 (including the General Plan Amendment, Zone Change, and Design Review) would have a **less than significant impact** on population growth directly, indirectly, and cumulatively. No mitigation is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
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14b. Response: (Source: General Plan 2025, General Plan 2025 Housing Element Update 2014 – 2021; California Department of Finance)

Less Than Significant Impact. The project site is currently occupied by five single-family residential rental homes that are owned and managed by the Church. Implementation of the project will include demolition of the five single-family residential rental homes on site thus resulting in the displacement of up to 17 residents on the site (based on a 3.37 persons per household estimated for the City of Riverside). The displacement of the residents and housing on site would be temporary while construction activities occur.

Once the project site is developed, a total of 80 apartment homes in seven buildings will be built on site, thus replacing the five single-family residential rental homes previously occupying the site. The site will be developed at an overall density of 19.5 dwelling units/acre and will include an estimated 40 one-bedroom units, 20 two-bedroom units, and 20 three-bedroom units. The development on the project site, based on the current person per household estimate in the City, will provide housing

⁷ Based on the CalEEMod input of 2.8625 persons per household for low-rise apartments that was prepared as part of the Air Quality and Greenhouse Gas Analysis Technical Report prepared for the project.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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for approximately 229 residents. The project will also consist of affordable housing and therefore would provide a needed supply of such housing inventory within the City of Riverside.

Implementation of the project (including the General Plan Amendment, Zone Change, and Design Review) will not displace existing people or housing, necessitating the construction of replacement housing elsewhere as the project in itself will add needed housing to the City's inventory. There would be a **less than significant impact** on housing either directly, indirectly, or cumulatively. No mitigation is required.

15. 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?	☐	☐	☒	☐
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15a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)

Less Than Significant Impact. The City of Riverside Fire Department provides fire protection service to the subject site. Fire Station 8, located at 11076 Hole Avenue, approximately 0.24 mile east of the site, and will be the closest fire station serving the proposed project. The City's Fire Department policy states that stations will be located and staffed in 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).

Implementation of the proposed project would add 229 residents to the City of Riverside; however, this increase in residents is accounted for in the General Plan 2025 Land Use Plan and the development density of the site is consistent with City Zoning Development Standards. The operation of the City's Fire Department will continue to provide adequate service as the City develops to its buildout potential.

Implementation of the proposed project will generate an incremental increase in the demand for fire protection services; however, the increase in population will be limited by density development standards per the City's Zoning Code and will not demand an increase in fire service such that new or expanded facilities would be needed. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards (California Fire Code and Riverside Municipal Code Section 16.32.10), and through the City's Fire Prevention Bureau review of the project's final development plan, there will be a **less than significant impact** on the demand for additional fire facilities or services either directly, indirectly, or cumulatively. No mitigation is required.

b. Police protection?	☐	☐	☒	☐
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15b. Response: (Source: General Plan 2025 Public Safety Element pgs. 34-39; Project Set Plan)

Less Than Significant Impact. The Riverside Police Department (RPD) provides law enforcement services to the City of Riverside and the project site. The Magnolia Neighborhood Policing Center (NPC), opened in 2006 at 10540-B Magnolia Avenue, approximately 2.1 miles southeast of the Project site, is the base of operations for Central and West NPC Field Operations, Central and Special Investigations, Special Operations, Central and Special Investigations, Special Operations, Policing, Training, and the Record Bureau. As of February 2018, the RPD currently employs 367 officers and 144 civilian personnel. As part of the Riverside Renaissance Initiative, a new Public Safety Administrative building, 911 Dispatch and Data Center and Neighborhood Police Center are proposed in the future.

Implementation of the project will add 229 residents to the existing population of the City. Residential development, such as that proposed by the project, typically generates calls for law enforcement service due to residential break-ins, vehicle burglaries and break-ins, and general disturbances. The design of the proposed project will include security fencing, coded

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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access gates, exterior building lighting and landscape lighting, all considered features of Crime Prevention through Environmental Design technique, to reduce on-site crime and thus reduce law enforcement calls of service to the project site.

An incremental increase in law enforcement calls to the project site could occur; however, such calls would be consistent to the types of calls RPD responds to at similar residential developments within the City. Implementation of the project would not degrade the RPD's performance to the point that a new facility or expansion of an existing facility would be needed. With implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there will be a **less than significant impact** on the demand for additional law enforcement facilities of services either directly, indirectly, or cumulatively. No mitigation is required.

c. Schools?	☐	☐	☒	☐
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15c. Response: (Source: California Department of Education, <https://www.cde.ca.gov/ds/sd/cb/dataquest.asp>; General Plan 2025 Final EIR, Section 5.13 Public Services pgs. 5.13-8 to 5.13-14)

Less Than Significant Impact. The proposed project is located within the Alvord Unified School District (AUSD), which had a 2018–2019 total enrollment of 18,504 students. The following schools within the AUSD would provide education services to students of the proposed project:

- Valley View Elementary School is located at 11750 Gramercy Place, approximately 1 mile northwest of the project site. This school had a 2018–2019 enrollment of 571 students.
- Villegas Middle School is located at 3754 Harvil Lane, approximately 3.1 miles southwest of the project site. This school had a 2018–2019 enrollment of 1,398 students.
- La Sierra High School is located at 4145 La Sierra Avenue, approximately 1.5 miles south of the project site. This school had a 2019–2019 enrollment of 1,723 students.

According to the Final EIR of the General Plan 2025, AUSD contains many schools that are near or over capacity and are located in areas where vacant land to expand is not available. The school district is in need of new elementary and high school sites to meet the needs of the projected student population within its district as the City of Riverside reaches full buildout.

Based on the student generation factor of AUSD, the proposed project is estimated to generate 35 students (0.43×80 residential units) who will attend schools within AUSD. The total students generated includes 16 elementary school students (0.20×80 residential units), 9 middle school students (0.11×80 residential units), and 10 high school students (0.12×80 residential units).

The Project Applicant will be required to pay AUSD impact fees for new residential construction and, pursuant to Government Code Section 65995, such impact fee payment will offset potentially significant impacts to school facilities due to project implementation. Project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation is required.

d. Parks?	☐	☐	☒	☐
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15d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types; Project Set Plans)

Less Than Significant Impact. There are four parks that are near the project site: La Sierra Park (approximately 3,063 feet northeast of the site), Collett Park (approximately 4,483 feet southeast), Myra Linn Park (approximately 5,694 feet east of the site), and Doty Trust Park (approximately 4,902 feet north of the site).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The General Plan EIR indicates that the City currently has a parkland to population ratio standard of 3 acres per 1,000 population. The proposed project will develop 80 residential units and, if fully occupied, would house 229 residents. Based on the parkland to population ratio, the proposed project will generate a demand of 0.69 acre of parkland.

The proposed project, consistent with Zoning development standards, will include the development of common open space and private open space. The common open space will amount to 0.65 acre (or 28,381 square feet) and will include amenities such as a tot lot, pool, common building-multipurpose room, a BBQ patio, and activity lawn. Private open space (balconies/patios) will amount to 100 square feet per ground floor unit and 50 square feet per upper floor unit. The population generated by proposed project has the potential to incrementally increase the use of off-site nearby parks; however, such use would be nominal due to the fact that the project will provide private recreational uses as part of its design. Furthermore, the project applicant will be required to pay parkland development impact fees for regional parks, local parks, and aquatics facilities to ensure that enough parkland is provided to residents in the City of Riverside. The proposed project would not generate the need to develop new parks or expand existing parks within the City. Project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation is required.

e. Other public facilities?

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15e. 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 City of Riverside provides library services to its residents through a Main Library located at 3581 Mission Inn Avenue and six branch libraries (Arlington Neighborhood Library, Casa Blanca Family Learning Center, Marcy Branch, La Sierra Neighborhood Library, Orange Terrace Library, and Eastside Library and Cybrary) located throughout the City. The City of Riverside Public Library System provides over 600,000 books and other library materials to residents in the City. The La Sierra Neighborhood Library, located at 4600 La Sierra Avenue (approximately 0.46 mile southeast of the project site), is the closest library that would serve residents occupying the project site.

Community centers, senior centers, and service centers are other public facilities provided by the City to provide various services to residents. The centers offer a wide range of services that include computer training, English as a second language classes, fitness and wellness programs, early childhood programs, aquatics, social recreation programs, specialty classes, sports programs, field trips, and a variety of cultural and holiday activities. La Sierra Center, located at 5215 La Sierra Avenue, is the closest community center that would serve project residents; the Eric N. Solander Center, located at 7801 Gramercy Place, Suite B, is the closest service center that would serve project residents; and Janet Goeske Senior Center, located at 5257 Sierra Avenue, is the closest senior center that would serve project residents.

The population increase generated by the proposed project will result in an incremental increase in the use of public libraries and other public facilities. However, this increase would be nominal and would not require the construction of new public facilities or expansion of existing public facilities. Project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation is required.

16. 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 be accelerated?

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16a. 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, 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)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Less Than Significant Impact. There are four parks near the project site: La Sierra Park (approximately 3,063 feet northeast of the site), Collett Park (approximately 4,483 feet southeast), Myra Linn Park (approximately 5,694 feet east of the site), and Doty Trust Park (approximately 4,902 feet north of the site). As detailed in Figure PR-1 *Parks, Open Space, and Trails* of the General Plan 2025, the closest trail to the project site is designated as a Secondary Trail for equestrian, trail, bicycle, and pedestrian uses. As population increases in the City of Riverside, 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 will include the development of 25,855 square feet of common open space on site, which includes a tot lot, pool, common building-multipurpose room, a barbeque patio, and an activity lawn. The amount of common open space provided will exceed the 24,000 square feet of common open space required by Section 19.100.070 of the Riverside Municipal Code. Additionally, consistent with Section 19.100.070 of the Riverside Municipal Code, the project will include the development of 100 square feet per ground floor unit and 50 square feet per upper floor unit of private open space. The project features would help in reducing increased uses and deterioration of existing City recreational amenities as residents would be more apt to use the on-site facilities. In addition, as a condition of approval, the project applicant will be required to pay parkland development impacts fees for regional parks, local parks, and aquatics facilities, which would help in maintain recreation amenities within the City.

As the project will include on-site recreational amenities and pay parkland development impact fees as a condition of approval, implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not increase the use or deterioration of the City's recreational amenities. Direct, indirect, or cumulative impacts would be **less than significant** and no mitigation is required.

b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
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16b. Response: (Source: *Project Site Plan, 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, 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*)

Less Than Significant Impact. The proposed project will include the development of 25,855 square feet of common open space on site, which includes a tot lot, pool, common building-multipurpose room, a barbeque patio, and an activity lawn. The amount of common open space provided will exceed the 24,000 square feet of common open space required by Section 19.100.070 of the Riverside Municipal Code. Additionally, consistent with Section 19.100.070 of the Riverside Municipal Code, the project will include the development of 100 square feet per ground floor unit and 50 square feet per upper floor unit of private open space. The recreational amenities of 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. As the project includes recreational amenities that will be used by the project residents, the use of off-site City-owned recreational facilities will be nominal compared to existing conditions, and will not need to be expanded solely due to project implementation. Direct, indirect, and cumulative project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation is required.

17. TRANSPORTATION

Would the project:

a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
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17a. Response: (Source: *General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service,*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, National Community Renaissance-La Sierra PSH Project Traffic Impact Analysis prepared by LSA Associates, Inc., February 2020, Appendix H of the Initial Study)

Less Than Significant Impact. A project-specific Traffic Impact Analysis (TIA) was prepared for the proposed project (Appendix H). The proposed project is expected to generate a daily traffic volume of 564 vehicle trips, with 39 trips occurring the a.m. peak hour and 48 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 18-24 months, based on a probable start date in late 2020 and a planned project opening in 2022. 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 Pierce Street, between Golden Avenue and Hollyhock Lane. 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 17.A summarizes the relationship of delay and LOS at unsignalized and signalized intersections.

Table 17.A: Level of Service Criteria for Unsignalized and Signalized Intersections

Level of Service	Unsignalized Intersection Average Delay per Vehicle (sec.)	Signalized Intersection Average Delay per Vehicle (sec.)
A	≤ 10	≤ 10
B	> 10 and ≤ 15	> 10 and ≤ 20
C	> 15 and ≤ 25	> 20 and ≤ 35
D	> 25 and ≤ 35	> 35 and ≤ 55
E	> 35 and ≤ 50	> 55 and ≤ 80
F	> 50	> 80

Source: Table 2-C, *Traffic Impact Analysis* (Appendix H)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The City's significance criteria are used for all study intersections under the City'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. As detailed in General Plan 2025 Figure CCM-4 *Master Plan of Roadways*, Pierce Street and Riverwalk Parkway are classified as an 110-foot Arterial Roadway and Golden Avenue is designated as a 66-foot Collector Roadway; therefore, in conformance with the City's General Plan 2025 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 intersections:

- Golden Avenue/Proposed Driveway-La Sierra Academy Driveway;
- Golden Avenue/Old Broadcast Building Driveway;
- Golden Avenue-Riverwalk Parkway/Pierce Street; and
- Residential Project Driveway/Pierce Street.

Consistent with the City'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 eight scenarios:

- Existing (2019) Conditions;
- Existing (2019) with Project Conditions;
- Project Completion (2022) without Project Conditions;
- Project Completion (2022) with Project Conditions;
- Cumulative (2022) without Project Conditions;
- Cumulative (2022) with Project Conditions;
- Buildout (2040) without Project Conditions; and
- Buildout (2040) with Project Conditions

For each scenario, traffic operations at study intersections are evaluated for the a.m. and p.m. peak hours. Table 17.B summarizes the a.m. and p.m. peak hours and daily project trip generation and reveals that the project is expected to generate 564 vehicle trips, with 39 trips occurring in the a.m. peak hour and 48 trips occurring in the p.m. peak hour.

Table 17.B: Project Trip Generation

Land Uses	Units	A.M. Peak Hour			P.M. Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Multifamily Housing	80 DU							
Trips/Unit ¹		0.11	0.38	0.49	0.38	0.22	0.60	7.05
Trip Generation		9	30	39	30	18	48	564
Total Trip Generation		9	30	39	30	18	48	564

Source: Table 5-A, *Traffic Impact Analysis* (Appendix H); DU = Dwelling Units

¹ Rates derived from the Fitted Curve Equation in the *Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) for Land Use 220 – "Multifamily Housing (Low-Rise)". Setting/Location – "General Urban/Suburban."*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Tables 17.C through Table 17.E summarize the delay and LOS at the study area intersections under “existing without project” and “existing with project” for the 2019 existing conditions, 2022 project completion, and 2022 cumulative scenarios. All study intersections under existing, project completion (2022) conditions, and cumulative (2022) conditions with or without the project are forecast to operate at a satisfactory LOS. Therefore, no mitigation is required.

Table 17.C: Existing Intersection Levels of Service

Intersection	Control	Without Project				With Project				Significant Impact
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		
		Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	
Golden Avenue/La Sierra Academy Driveway-Proposed Driveway	TWSC	17.6	C	11.4	B	20.4	C	12.1	B	No
Golden Avenue/Existing Driveway	OWSC	8.4	A	11.9	B	8.4	A	11.9	B	No
Golden Avenue-Riverwalk Parkway/Pierce Street	Signal	35.0	C	36.9	D	35.3	D	37.1	D	No
Residential Project Driveway/Pierce Street	OWSC ¹	—	—	—	—	13.2	B	12.5	B	No

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

AWSC = All-Way Stop Control

TWSC = Two-Way Stop Control

OWSC = One-Way Stop Control

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

LOS = Level of Service

¹ This intersection operates at OWSC intersection under with project conditions.

Table 17.D: Project Completion (2022) Intersection Levels of Service

Intersection	Control	Without Project				With Project				Significant Impact
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		
		Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	
Golden Avenue/La Sierra Academy Driveway-Proposed Driveway	TWSC	18.7	C	11.7	B	22.0	C	12.4	B	No
Golden Avenue/Existing Driveway	OWSC	8.5	A	12.2	B	8.5	A	12.2	B	No
Golden Avenue-Riverwalk Parkway/Pierce Street	Signal	36.2	D	37.3	D	36.5	D	37.6	D	No
Residential Project Driveway/Pierce Street	OWSC ¹	—	—	—	—	13.6	B	12.9	B	No

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

AWSC = All-Way Stop Control

TWSC = Two-Way Stop Control

OWSC = One-Way Stop Control

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

LOS = Level of Service

¹ This intersection operates at OWSC intersection under with Project conditions.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 17.E: Cumulative (2022) Intersection Levels of Service

Intersection	Control	Without Project				With Project				Significant Impact
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		
		Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	
Golden Avenue/La Sierra Academy Driveway-Proposed Driveway	TWSC	18.8	C	11.8	B	22.1	C	12.5	B	No
Golden Avenue/Existing Driveway	OWSC	8.5	A	12.3	B	8.5	A	12.3	B	No
Golden Avenue-Riverwalk Parkway/Pierce Street	Signal	36.2	D	37.7	D	36.6	D	38.0	D	No
Residential Project Driveway/Pierce Street	OWSC ¹	—	—	—	—	13.7	B	13.0	B	No

Source: Table 7-E, *Traffic Impact Analysis* (Appendix H)

AWSC = All-Way Stop Control

TWSC = Two-Way Stop Control

OWSC = One-Way Stop Control

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

LOS = Level of Service

¹ Intersection operates at OWSC intersection under with Project conditions.

Table 17.F summarizes the delay and LOS at the study area intersections under “buildout without project” and “buildout with project” for the 2040 conditions.

Table 17.F: Buildout (2040) Intersection Levels of Service

Intersection	Control	Without Project				With Project				Significant Impact
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		
		Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	
Golden Avenue/La Sierra Academy Driveway-Proposed Driveway	TWSC	23.1	C	13.2	B	28.4	D	14.3	B	No
Golden Avenue/Existing Driveway	OWSC	8.8	A	14.0	B	8.9	A	14.0	B	No
Golden Avenue-Riverwalk Parkway/Pierce Street	Signal	49.5	D	60.0	E*	51.0	D	62.0	E*	No
Residential Project Driveway/Pierce Street	OWSC ¹	—	—	—	—	19.3	C	17.1	C	No

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

AWSC = All-Way Stop Control

TWSC = Two-Way Stop Control

OWSC = One-Way Stop Control

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

LOS = Level of Service

* Unsatisfactory LOS

¹ Intersection operates at OWSC intersection under with Project conditions.

Table 17.F shows the intersection of Golden Avenue-Riverwalk Parkway/Pierce Street is forecast to operate at an unsatisfactory LOS E under future build-out year (2040) without and with project conditions during the P.M. peak hour. All other study intersections are forecast to operate at a satisfactory LOS. The addition of the project trips under this condition does not cause the above identified intersection to degrade from acceptable to unacceptable LOS. The “with project” delay at

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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this intersection is 1.5 and 1.1 seconds during the A.M. and P.M. peak hours, respectively; which does not exceed the City's delay threshold of 2.0 seconds. As such, impacts would be **less than significant** and no mitigation would be necessary.

A queuing analysis was performed for the westbound left turn for the intersection of Golden Avenue-Riverwalk Parkway/Pierce Street. The westbound left-turn queues are projected to exceed the existing available turn-pocket storage lengths under all analysis scenarios. It is recommended that the existing storage be extended by an additional 90 feet to accommodate the projected queues. Based on a survey of existing conditions at this location, there is available room to extend the left-turn pocket an additional 90 feet by cutting into the existing raised median. As per discussions with City staff, the project would be conditioned to implement median improvements and traffic signal improvements in order to allow left-turn ingress movements into the project as well as accommodate the forecast queues. This includes additional signal loop detectors along the extended left-turn pocket and a signal loop detector in front of the project driveway.

Overall, implementation of the project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be **less than significant** and no mitigation is required.

b. Would the project conflict or be inconsistent with <i>CEQA Guidelines</i> Section 15064.3, subdivision (b)?	☐	☐	☐	☒
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17b. Response: (Source:)

No Impact. The City of Riverside has not adopted a Vehicle Miles Traveled (VMT) threshold for new development as the requirements of *CEQA Guidelines* Section 15064.3(b) do not require jurisdictions to do so until after July 1, 2020. Until mandated to analyze traffic impacts using VMT, new development would not conflict or be inconsistent with *CEQA Guidelines* Section 15064.3(b). As such, **no impact** would occur with implementation of the proposed project. No mitigation is required.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
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17c. Response: (Source: *Project Site Plans and Building Elevations, Riverside County Airport Land Use Compatibility Plan Policy Document, Map RI-1*)

No Impact. The proposed project will include the development of buildings as tall as 35 feet on site, which is five feet shorter than the maximum allowable building height related to the zoning designation development standards of the site. Riverside Municipal Airport is approximately 3.3 miles northeast of the site and the proposed project is not located in the boundary of the airport's land use compatibility plan. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not include features that would change air traffic patterns that would result in substantial safety risks. **No impacts** directly, indirectly, or cumulatively would occur with project implementation. No mitigation is required.

d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
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17d. Response: (Source: *Project Plan Set, City of Riverside Zoning Code, General Plan 2025*)

No Impact. The design of the proposed project does not include any geometric design features or incompatible uses that could substantially increase hazards. The project will be consolidated into two parcels through a Lot Line Adjustment: Parcel A will retain the existing building, develop two new storage buildings, and improve surface parking; Parcel B will include demolition of the existing five single-family residential rental units, and development of an 80-unit, seven-building multifamily residential community. The design of the project, through review of the Project Plan Set, does not include abnormal development that would increase hazards related to traffic. The internal circulation of the site will be consistent with similar developments in the City and will allow parking and access for residents. Building setbacks will be consistent with the development standards of the R-3-1500 zoning designation and would not block line of sight views for vehicles exiting the site onto Pierce Street and Golden Avenue. The uses on the site are compatible with the uses that are allowable under the O - Office and HDR - High

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Density Residential General Plan 2025 land use designations as well as the O - Office and R-3-1500 - Multi-Family Residential zoning designations. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not substantially increase hazards due to a geometric design feature or incompatible use. **No impacts** directly, indirectly, or cumulatively would occur with implementation of the project and no mitigation is required.

e. Result in inadequate emergency access?	☐	☐	☒	☐
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17e.Response: (Source: Project Plan Set – Project Site Plan; 2016 California Fire Code Sections 503.1.1, 503.2.1, 506.1, and 503.6; General Plan 2025; City of Riverside Fire Department)

Less Than Significant Impact. The proposed project will comply with the 2016 California Fire Code Section 503-Fire Apparatus Access Roads. Sections 503.1.1 Buildings and Facilities; 503.2.1 Dimensions; 506.1 Key Boxes; and, 503.6 Security Gates of the 2016 California Fire Code Section will all be followed in development of the proposed Project. During construction, the project site will remain accessible for emergency vehicles through the existing driveways along Pierce Street and Golden Avenue. The Project Site Plan indicates that access to the project site, once operational, will be provided by a main driveway/entrance off Pierce Street and two driveways along Golden Avenue. The two driveways along Golden Avenue will provide access to Parcel A and will be designed with a width of 24 feet, 11 inches and 23 feet, 10½ inches, respectively, in compliance with 2016 California Fire Code requirements. An exit driveway, permitting a right turn only will be provided on Pierce Street for visitors leaving Parcel A. This exit driveway will be designed with a 24-foot width, which is also consistent with requirements as set forth in the 2016 California Fire Code. Main access to Parcel B will be provided by a 54-foot wide (curb-to-curb width) entrance/exit driveway along Pierce Street. This driveway will lead to the internal circulation system of Parcel B but will require access through a gate. A Knox box will be located at this gate to allow quick access to the site by emergency service personnel. The internal circulation system will be shaped as an oval around the center of the site (where the community center building, tot lot, BBQ area, field, swimming pool, and pool building will be sited) with 20-foot wide travel lanes. In order to reduce the need for emergency service apparatus turn around on the internal circulation system, a 20-foot wide EVA-only driveway will provided on the northeast side of the site, allowing access to and from Hollyhock Lane. Prior to project approval, the Riverside City Fire Department will review the Final Site Plan to ensure adequate emergency access to the site is provided. If additional features are required, the project will need to incorporate these as conditions of approval.

Based on the design of the project as shown on the Project Site Plan, compliance with the applicable 2016 California Fire Code, and review and approval by the Riverside Fire Department, the proposed project will provide adequate emergency access. Direct, indirect, and cumulative project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** and no mitigation is required.

18. 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), or	☐	☒	☐	☐
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18a.Response: (Source: AB 52 Consultation)

Less Than Significant With Mitigation Incorporated. The term “California Native American tribe” is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the Native American Heritage Commission (NAHC).”

Chapter 905, Statutes of 2004 (i.e., Senate Bill 18) of the California Government Code, requires a City to consult with California Native American tribes for the purpose of preserving specified places, features, and objects described in Sections 5097.9 and 5097.995 of the Public Resources Code that are located within the city or county’s jurisdiction prior to the adoption

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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or amendment of a General Plan. Senate Bill (SB) 18 requires the Lead Agency (i.e., City of Riverside) to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for consultation.

Chapter 532, Statutes of 2014 (i.e., Assembly Bill 52), requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "sites, 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." Assembly Bill (AB) 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

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]).

"Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

Per SB 18 (specifically California Government Code 65352.4), "consultation" means the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party's sovereignty. Consultation shall also recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance. The City engaged the NAHC for a contact list of tribes pursuant to California Government Code 65352.3 during October 2019.

Per AB 52 (specifically California Public Resources Code 21080.3.1), Native American consultation is required upon request by interested California Native American tribes that have previously requested that the City provide them with notice of such projects. The City mailed notices of the proposed project to interested Native American tribes during October 2019. Two tribes, the Soboba Band of Luiseño Indians (Soboba) and the Rincon Band of Luiseño Indians (Rincon), responded with requests to consult with the City for the proposed project, and the following mitigation measures reflect the outcome of the consultation efforts.

Mitigation Measure TCR-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 consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting 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. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribes, to provide tribal monitoring for ground-disturbing activities.

Mitigation Measure TCR-2: 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 trenching and disturbance of native soil, in an effort to identify any unknown archaeological resources. The project archaeologist, in consultation with consulting tribes, the developer/applicant, 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:

1. Project grading and development scheduling;

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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	2. 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, or culturally affiliated tribes designated by the consulting tribes, during 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 coordination with all project archaeologists; 3. The protocols and stipulations that the developer/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 resources evaluation; 4. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and 5. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure TCR-4. Mitigation Measure TCR-3: 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. Consulting Tribes Notified: Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall establish monitoring agreements with the consulting tribes, and provide the City evidence thereof. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. 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. 3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human 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 a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- 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 consulting tribes.

Mitigation Measure TCR-4: 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.

Adherence to **Mitigation Measures TCR-1 through TCR-4** will ensure potential impacts to Tribal Cultural Resources are appropriately reduced to **less than significant with mitigation incorporated**.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
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18b. Response: (Source: AB 52 Consultation)

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."

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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CEQA Guidelines do not preclude identification of historical resources as defined in Public Resources Code Sections 5020.1(j) or 5024.1. Pursuant to *State CEQA Guidelines* Section 15064.5[c][4], if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study, but they need not be considered further in the CEQA process.

The City engaged Native American tribes listed on the NAHC contact list pursuant to SB 18 (California Government Code 65352.3). Additionally, the City mailed notices of the proposed project to interested Native American tribes pursuant to AB 52 (California Public Resources Code 21080.3.1). The Soboba and Rincon requested consultation. With implementation of **Mitigation Measures TCR-1 through TCR-4**, the project archaeologist, applicant, the City, and consulting Tribes shall confer regarding the appropriate disposition of any unanticipated Tribal Cultural Resources encountered during ground-disturbing activities. Therefore, the proposed project would have a **less than significant impact with mitigation incorporated** on Tribal Cultural Resources.

19. UTILITIES AND SYSTEM SERVICES

Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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19a. Response: (Source: *General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR)*, *Table PF-2 – RPU Projected Water Demand*, *Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR)*, *RPU, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025*, *Table 5.16-I - Current and Projected Water Use WMWD*, *Table 5.16-J - General Plan Projected Water Demand for WMWD Including Water Reliability 2025*, *Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area & Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD*, *Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR*)

Less Than Significant Impact. The Project Set Plans prepared by the applicant indicates that the Riverside Public Utilities provides water, sewer and electrical service to the project site. Telephone and cable service is provided by AT&T and Charter Spectrum, respectively. Southern California Gas provides natural gas service to the project site.

Water: Water lines currently exist in Golden Avenue, Pierce Avenue, Huguley Drive, and Hollyhock Lane. The proposed project will connect to these existing water lines in order to provide both potable water to the project residents and for project landscaping. Water distribution lines would be installed and loop through the project site in order to provide water supply to each of the buildings. Water for landscape irrigation will be separately metered. The necessary on-site water distribution line installation is included as a design feature of the project and would not result in any physical environmental effects beyond what is analyzed in this environmental document. Off-site improvements to water lines located in the surrounding streets will not be required as the piping is correctly sized to continue to provide adequate water delivery to the project site. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not require or result in the relocation or construction of new water infrastructure that would cause significant environmental effects. Impacts will be **less than significant** and no mitigation is required.

Wastewater: The project site is currently served by existing sewer lines in the adjacent roads. Pierce Street has an existing 10-inch and 15-inch sewer line; and, Golden Avenue and Hollyhock Lane both have existing 8-inch sewer lines.

The proposed project would include an internal wastewater distribution system connecting the on-site uses to the existing infrastructure in the surrounding roadways adjacent to the project. From here, wastewater would be conveyed to the Riverside Water Quality Control Plant, which, as of 2005 has a treatment capacity of 40 million gallons per day (mgd). By 2035, the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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plant is anticipated to operate at 40 mgd. A planned expansion of the facility will allow for an ultimate treatment capacity of 52.2 million gallons of wastewater per day.

According to the Riverside 2014 Capital Improvement Program and Rate Development Study, the adjusted daily flow of wastewater per equivalent dwelling unit in the City is 206 gallons per day. The proposed project will include the development of 80 residential units and therefore is estimated to generated 16,480 gallons per day of wastewater that will be conveyed and treated at the Riverside Water Quality Control Plant. Based on the existing daily treatment capacity and inflow of the Riverside Water Quality Control Plan, the project would be able to be adequately served related to wastewater disposal and conveyance. As part of the project design, an internal wastewater distribution system will be developed on site; however, such installation would not result in any physical environmental effects beyond those that are analyzed in this environmental document. As part of the project's conditions of approval, the applicant will be required to provide sewer-loading calculations to the City to ensure the existing piping is correctly sized to continue to provide adequate service to the project site. Any required improvements to the existing piping would occur within City right-of-way or on properties that have already been developed, so no additional physical impacts to the environment are expected. Impacts will be **less than significant** and no mitigation measures are required.

Storm Water: The project site is currently served by existing storm water drain lines in the adjacent roads. Pierce Street has an existing 10-inch and 15-inch storm water drain line; and Golden Avenue and Hollyhock Lane both have existing 8-inch storm water drain lines. On-site storm water drainage infrastructure will be developed as part of the project design in conformance with the Final WQMP Report that will be prepared for the project. The on-site storm water drainage facilities will connect to existing storm water infrastructure in the City's right-of-way. Additionally, bioretention basins will be developed as part of the project design to improve the quality of storm water collected on site and conveyed to off-site infrastructure. Off-site storm water drainage facilities will not need to be upgraded with implementation of the proposed project as existing infrastructure has enough capacity to accommodate development on the project site. Implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review) would not require or result in the relocation or construction of new off-site wastewater infrastructure that would cause significant environmental effects. Impacts will be **less than significant** and no mitigation is required.

Electrical/Gas Utilities: The proposed project will tie into existing electrical and natural gas infrastructure that exists in roads adjacent to the site. Such connections may require trenching on the adjacent roads; however, construction to connect to existing electrical and natural gas infrastructure will be temporary. Implementation of the proposed project would not require the relocation or construction of new electrical/natural gas infrastructure off site that would cause significant environmental effects. Impacts will be **less than significant** and no mitigation is required.

Telecommunications: The proposed project will tie into existing telecommunication infrastructure that exists in roads adjacent to the site. Such connections may require trenching on the adjacent roads; however, construction to connect to existing telecommunication infrastructure will be temporary. Implementation of the proposed project would not require the relocation or construction of new telecommunication infrastructure off site that would cause significant environmental effects. Impacts will be **less than significant** and no mitigation is required.

- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?



19b. Response: (Source: 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, Table 5.16-H – Current and Projected Domestic Water Supply (acre-ft/year) WMWD Table 5.16-I Current and Projected Water Use WMWD, Table 5.16-J – General Plan Projected Water Demand for WMWD Including Water Reliability 2025, RPU Master Plan)

Less Than Significant Impact. The City of Riverside will have sufficient water supplies available to adequately serve the project during normal, dry, and multiple dry years. The proposed project will connect to existing water infrastructure to provide the necessary construction and operational water needs for site occupants. The connection point for water lines will be from

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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infrastructure within existing adjacent roadways (either Pierce Street, Golden Avenue, or Hollyhock Lane). The Riverside Public Utilities (RPU) 2015 Urban Water Management Plan (UWMP) estimates water supply and demand during normal, dry, and multiple-dry years as shown in Table 19.A.

Table 19.A: Riverside Projected Water Supply/Demand (acre-feet/year)

Years	Normal Year		Dry Year		Multiple-Dry Year	
	Supply	Demand	Supply	Demand	Supply	Demand
2020	116,903	95,221	96,288	95,221	102,364	95,221
2025	121,093	96,534	101,288	96,534	107,364	96,534
2030	124,703	99,015	104,088	99,015	110,614	99,015
2035	124,703	101,589	104,088	101,589	110,164	101,589
2040	124,703	104,257	104,088	104,257	110,164	104,247

The RPU's 2015 Urban Water Management Plan prepared by the City of Riverside estimated a daily per capita water demand of 206 gallons (gpcd). Implementation of the proposed project will result in a maximum population of 229 residents (2.8625 persons/household × 80 units), with an estimated water usage of 47,174 gallons per day (0.14 acre-feet/day) or 17,218,510 gallons per year (52.8 acre-feet/year). This represents 0.05 percent of anticipated RPU water supplies in 2020 and represents 0.048 percent of anticipated RPU supplies in 2040 (assuming worst-case multiple dry years). As shown in Table 19.A, sufficient water supplies are available to serve existing and projected future water demand under normal, dry and multiple-dry conditions.

Therefore, the proposed project (including the General Plan Amendment, Zone Change, and Design Review) was found to have a **less than significant impact** on water supplies either directly, indirectly, or cumulatively during normal, dry, and multiple-dry years. No mitigation is required.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
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19c. Response: (Source: 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, Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD, and Wastewater Integrated Master Plan and Certified EIR)

Less Than Significant Impact. Table 3.4 of the Riverside Wastewater Collection and Treatment Facilities Integrated Master Plan projects future flow of 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 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 buildout 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 229 persons, the proposed project would generate approximately 16,480 gallons of wastewater per day or 6,015,200 gallons of wastewater per year. 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 0.04 percent.

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

The project will not exceed RWQCB wastewater treatment requirements of. The project is consistent with the General Plan 2025 Typical Growth Scenario where future wastewater generation was determined to be adequate (see Table 5.16-K of the General Plan 2025 Final PEIR). Further, the current Wastewater Treatment Master Plan anticipates and provides for this type of project. For these reasons, project (including the General Plan Amendment, Zone Change, and Design Review) impacts would be **less than significant** directly, indirectly, or cumulatively. No mitigation is required.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
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19d. Response: (Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)

Less Than Significant Impact. Solid waste generated during construction and operation of the proposed project will be disposed of at the Badlands Landfill, located at 31125 Ironwood Avenue in Moreno Valley. The Badlands Landfill operates Monday through Saturday from 6:00 a.m. to 4:30 p.m. and accepts the following types of waste: agricultural, asbestos, ash, construction/demolition, contaminated soil, dead animals, green materials, industrial waste, inert waste, liquid waste, metals, mixed municipal, sludge (bio solids), tires, and wood waste. Riverside County, in April 2019, circulated a Notice of Intent (NOI) to adopt an IS/MND for the Badlands Landfill Integrated Project; a project to revise the landfill's Solid Waste Facility Permit to expand operations and capacity. The revised permit would increase the permitted disturbance area of the landfill from 278 acres to 811 acres, which includes expanding the disposal footprint from 150 acres to 396 acres, thereby providing an additional 50 years of needed landfill capacity. The permit would increase the maximum permitted daily tonnage by 500 tons per day (tpd), from 4,500 tpd to 5,000 tpd. The maximum design capacity of the landfill will increase from 34.4 million cubic yards to 86 million tons (cubic yards not stated), resulting in a new closure date of 2073.⁸

Construction activities on Parcel B of the site will require the demolition of five single-family residential rental units. The demolition debris will be transported off site and disposed of at Badlands Landfill. The proposed project, once operational is estimated to generate a maximum of 560 pounds (lbs.) per day (0.28 ton per day),⁹ which is well below the maximum permitted daily tonnage accepted by the Badlands Landfill.

Per the California Green Building Code, a minimum of 50 percent of debris will be diverted to a material recycling facility thus reducing the input of solid waste to Badlands Landfill emanating from the proposed project. Direct, indirect, and cumulative impacts to landfill capacity will be **less than significant** with implementation of the proposed project (including the General Plan Amendment, Zone Change, and Design Review). No mitigation is required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒
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19e. 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 100 percent of excavated soil and land clearing

⁸ CEQAnet Web Portal, EA No. 2017-03: Badlands Landfill Integrated Project Notice of Completion, <https://ceqanet.opr.ca.gov/2019049142/2> (accessed July 9, 2019).

⁹ Solid Waste Estimate 7 lbs/day per dwelling unit for multi-family residential units × 80 dwelling units = 560 lbs/day.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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debris for all non-residential projects beginning January 1, 2011. The proposed project must comply with the City's waste disposal requirements as well as the California Green Building Code and, as such, would not conflict with any federal, State, or local regulations related to solid waste. Therefore, **no impact** related to solid waste statutes will occur directly, indirectly, or cumulatively with project (including the General Plan Amendment, Zone Change, and Design Review) implementation. No mitigation is required.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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20a. Response: (Source: General Plan 2025; Project Set Plans; Riverside Municipal Code Section 9.20.130 and Section 19.100)

Less Than Significant Impact. The proposed project site is located in an urbanized portion of Riverside within a Local Responsibility Area (LRA), and is categorized as LRA Unzoned, as defined by CalFire and the Fire Hazard Severity Zone Map program. The project site is approximately 1.55 miles from the La Sierra/Norco Hills, which is considered a very high fire hazard zone.

The project site is currently accessed by existing driveways on Pierce Street and Golden Avenue. Implementation of the proposed project would not require construction activities on the off-site roadway system and therefore would not impair the City's adopted emergency response plan or emergency evacuation plan. Design of the project would include the development of an improved driveway on Pierce Street that will lead to an internal circulation system where the residential uses will be developed. An EVA driveway will be provided on Hollyhock Lane so fire apparatus can easily access and depart from the project site. Parcel A of the project site will be accessed via a driveway off Golden Avenue and an exit (right-turn only) will be provided on Pierce Street. If residents needed to evacuate the area, they could use Pierce Avenue to access La Sierra Avenue, which provides access to California State Route 91. California State Route 91 provides regional access to the City of Riverside.

The design of the project will comply with the Riverside Municipal Code Section 19.100 related to the development standards for a multifamily residential use. Prior to the issuance of the final building permit, the City will review site plans for the proposed project to ensure that design features will not substantially impair emergency response or emergency evacuation plans of the City. Direct, indirect and cumulative project impacts (including the General Plan Amendment, Zone Change, and Design Review) will be **less than significant** and no mitigation is required.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
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20b. Response: (Source: CAL FIRE Fire Hazard Severity Zone Map Program)

Less Than Significant Impact. The proposed project site is located in an urbanized portion of Riverside within an LRA, and is categorized as LRA Unzoned, as defined by CAL FIRE and the Fire Hazard Severity Zone Map program. The project site is approximately 1.55 miles from the La Sierra/Norco Hills, which is considered a very high fire hazard zone. The proposed project site is topographically flat and, based on weather conditions, can be exposed to offshore (Santa Ana Winds) or onshore winds, similar to other urbanized portions of Riverside. If wildfires occur nearby, there is potential for smoke to drift into the City and increase pollutant concentrations for the residents at the proposed project site as well as residents in the City. Such conditions will most likely be temporary as fires that produce the smoke is controlled and extinguished. Due to the location of the proposed project site in a heavily urbanized area, the exposure of project occupants to uncontrolled spread of a wildfire is low. The City of Riverside has systems in place to protect residents in the event that wildfires are burning outside of the City limits and spreading towards the City.

Implementation of the proposed project will not exacerbate wildfire risks, exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Direct, indirect, and cumulative project impacts

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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(including the General Plan Amendment, Zone Change, and Design Review) impacts will be **less than significant** with implementation of the proposed project. No mitigation is required.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
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20c. Response: (Riverside Municipal Code Section 19.100; Project Set Plans)

No Impact. The proposed project includes the consolidation of the existing six parcels into two parcels. The Broadcast Center will remain as is on Parcel A; however, two new storage buildings and a surface parking lot will be constructed on Parcel A. The existing five residential rental units on the remainder of the site will be demolished and an 80-unit multifamily residential development in seven buildings will be developed on Parcel B of the site. The project will be served by existing infrastructure (roads, natural gas, sewage, electrical and water utilities) and will directly connect to existing utilities already serving the site. The proposed project would not include the development of infrastructure (roads, fuel breaks, emergency water sources, etc.) that may exacerbate fire risk or cause temporary or ongoing impacts to the environment.

Prior to the issuance of the final building permit, the City will review site plans for the proposed project to ensure that design features will not exacerbate fire risk. The proposed project is not anticipated to install or require the maintenance of infrastructure that will exacerbate fire risk; as such, **no impact**, directly, indirectly, or cumulatively will occur. No mitigation is required.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
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20d. Response: (Source: General Plan 2025, Federal Emergency Management Administration Flood Map Service Center, <https://msc.fema.gov/portal/search#searchresultsanchor>)

No Impact. The proposed project is located on a site that is topographically flat (maximum elevation changes on the site of about 12 feet) and is surrounded by land that is topographically flat. Urban uses surround the proposed project site. The closest elevated terrain are the La Sierra/Norco Hills approximately 1.55 miles from the site; as a result, future residents and the structures on the proposed project site will most likely not be exposed to significant risks from downslope flooding, landslides or drainage changes due to wildland fires. The proposed project site is not located in a flood zone area. The closest Flood Hazard area is Mockingbird Canyon Dam, which is approximately 4.57 miles from the site.

The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **No impact** would occur and no mitigation is required.

21. MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to substantially 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, substantially 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?	☐	☒	☐	☐
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21a. Response: (Source:)

Less Than Significant With Mitigation Incorporated. The proposed project's impacts to biological and cultural resources were analyzed in this Initial Study and all direct and cumulative impacts were determined to have no impact, a less than significant impact, or rendered a less than significant impact with implementation of mitigation. Therefore, impacts to

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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biological and cultural resources would be **less than significant with mitigation incorporated** and no additional mitigation is required.

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)?	☐	☒	☐	☐
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21b. Response: (Source:)

Less Than Significant With Mitigation Incorporated. The proposed project’s potential cumulative impacts to air quality, biological resources, cultural resources, GHGs, hazards and hazardous materials, noise, traffic, and tribal cultural resources were analyzed in this Initial Study. All cumulative impacts related to these resource topics were less than significant or rendered less than significant with mitigation incorporated.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
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21c. Response: (Source:)

Less Than Significant With Mitigation Incorporated. Impacts related to aesthetics, air quality, geology and soils, GHGs, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, traffic, utilities and services, and wildfires that could potentially affect human beings directly or indirectly were analyzed in this Initial Study. All direct and cumulative impacts were less than significant or rendered less than significant with mitigation incorporated.



CITY OF
RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

PLANNING DIVISION

MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program has been prepared for use in implementing mitigation for the:

National Community Renaissance – La Sierra Affordable Housing Development
11291 and 11253 Pierce Street
Parcels 146-141-029, 065, 066, 071, and 072
Planning Cases 19-0553 (General Plan Amendment), 19-0554 (Zone Change), 19-0555 (Design Review)

The program has been prepared in compliance with State law and the Initial Study prepared for the project by the City of Riverside.

CEQA requires adoption of a reporting or monitoring program for those measures placed on a project to mitigate or avoid adverse effects on the environment (Public Resource Code Section 21081.6). The law states that the reporting or monitoring program would be designed to ensure compliance during project implementation.

The monitoring program contains the following elements:

- 1) The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
- 2) A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who would take action, what action would be taken and when, and to whom and when compliance would be reported.
- 3) The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records would be developed and incorporated into the program.

This Mitigation Monitoring and Reporting Program includes mitigation identified in the Initial Study.

**National Community Renaissance – La Sierra Affordable Housing Developing Project
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
					Initials	Date
Cultural Resources Mitigation Measures						
TCR-2	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 trenching and disturbance of native soil, in an effort to identify any unknown archaeological resources. The project archaeologist, in consultation with consulting tribes, the developer/applicant, 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:	Prior to issuance of a grading permit and prior to grading	Preparation of an Archaeological Monitoring Plan	City of Riverside		
	1. Project grading and development scheduling; 2. 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, or culturally affiliated tribes designated by the consulting tribes, during 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 coordination with all project archaeologists; 3. The protocols and stipulations that the developer/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 resources evaluation; 4. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and 5. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure TCR-4.					
TCR-3	In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following	During ground-	Participation of Consulting	City of Riverside		

**National Community Renaissance – La Sierra Affordable Housing Developing Program
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures	Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
				Initials	Date
procedures will be carried out for treatment and disposition of the discoveries: Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall establish monitoring agreements with the consulting tribes, and provide the city evidence thereof. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 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. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human 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: - 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 cataloging and basic recordation have been completed. - 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	disturbing activities	Native American Tribes			

**National Community Renaissance – La Sierra Affordable Housing Developing
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	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 a consensus 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 consulting tribes.						
Hazardous Materials Mitigation Measures							
HAZ-1	Prior to issuance of a demolition permit, a lead-based material (LBM) and asbestos-containing material (ACM) survey shall be completed for renovation or demolition of all structures constructed prior to 1978. If the ACM survey is negative and if the LBM survey reveals lead levels below 0.06 milligram per square centimeter or 600 parts per million pursuant to Code of Federal Regulations Chapter 29, Section 1926.62 and Title 8, California Code of Regulations Section 1532.1, no further survey or remedial work is required. However, if ACM are identified within structures proposed for renovation or demolition, Mitigation Measure HAZ-2 shall apply. Furthermore, if lead levels at or above 0.06 milligram per square centimeter or 600 parts per million are identified, Mitigation Measure HAZ-3 shall apply. This measure shall be implemented to the satisfaction of the City of Riverside Community	Prior to issuance of a demolition permit	Report of findings submitted to City	City of Riverside			

**National Community Renaissance – La Sierra Affordable Housing Developing Program
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	Development Director or designee, and/or Building and Safety Division, or designee.						
HAZ-2	Prior to issuance of a demolition permit for any structure identified to contain asbestos-containing materials (ACM), all ACM shall be abated from the demolition site. An Asbestos Notification shall be prepared and submitted to the South Coast Air Quality Management District (SCAQMD) for approval before any asbestos abatement may commence. An asbestos construction and demolition plan shall be provided to the City of Riverside prior to the issuance of a demolition permit. The contractor shall provide disposal tickets from an SCAQMD-approved disposal facility and air clearances prior to final inspection. This measure shall be implemented to the satisfaction of the City of Riverside Community Development Director or designee, and/or Building and Safety Division, or designee.	Prior to issuance of a demolition permit	Asbestos Notification to SCAQMD; asbestos construction and demolition plan and disposal tickets to City	City of Riverside			
HAZ-3	Prior to the demolition of any structure identified to contain lead-based materials (LBM), all LBM shall be abated from the demolition site. A lead construction and demolition plan shall be provided to the City of Riverside prior to the issuance of a demolition permit. The contractor shall provide disposal tickets from an SCAQMD-approved disposal facility and air clearances prior to final inspection. This measure shall be implemented to the satisfaction of the City of Riverside Community Development Director or designee, and/or Building and Safety Division, or designee.	Prior to issuance of a demolition permit	Asbestos Notification to SCAQMD; lead construction and demolition plan and disposal tickets to City	City of Riverside			
Noise Mitigation Measures							
NOI-1	Prior to the issuance of grading and building permits, the applicant shall submit to the City evidence that the project construction documents include the following restrictions: The construction contractor shall prohibit the use of heavy equipment (e.g., large tracked bulldozers or loaded trucks during) within 15 feet of the residential structures located immediately northeast and east of the project construction boundary. Light construction equipment (e.g., small rubber-tire bulldozer or pick-up trucks) is permitted within 15 feet of the residential structures located immediately northeast and east of the project construction boundary.	Prior to issuance of grading and building permits	Evidence grading and building plans with listed construction restrictions are submitted to City	City of Riverside			

**National Community Renaissance – La Sierra Affordable Housing Developing
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
					Initials	Date
	The construction contractor shall prohibit the use of heavy equipment (e.g., large tracked bulldozers or loaded trucks during) within 145 feet of the broadcast center during its hours of operation. Light construction equipment (e.g., small rubber-tire bulldozer or pick-up trucks) is permitted within 145 feet of the broadcast center during its hours of operation.					
Tribal Cultural Resources Mitigation Measures						
TCR-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 consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting 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. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribes, to provide tribal monitoring for ground-disturbing activities.	Prior to issuance of a grading permit	Engage consulting Native American tribes	City of Riverside		
TCR-2	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 trenching and disturbance of native soil, in an effort to identify any unknown archaeological resources. The project archaeologist, in consultation with consulting tribes, the developer/applicant, 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: 1. Project grading and development scheduling; 2. 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, or culturally affiliated tribes designated by the consulting tribes, during ground-disturbing activities on the	Prior to issuance of a grading permit and prior to grading	Preparation of an Archaeological Monitoring Plan	City of Riverside		

**National Community Renaissance – La Sierra Affordable Housing Developing
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

	Mitigation Measures	Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists; 3. The protocols and stipulations that the developer/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 resources evaluation; 4. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and 5. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure TCR-4.						
TCR-3	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. Consulting Tribes Notified: Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall establish monitoring agreements with the consulting tribes, and provide the city evidence thereof. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. 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 3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human	During ground-disturbing activities	Participation of Consulting Native American Tribes	City of Riverside			

**National Community Renaissance – La Sierra Affordable Housing Developing
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures	Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
				Initials	Date
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 cataloging 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 a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and 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/					

**National Community Renaissance – La Sierra Affordable Housing Developing
Initial Study/Mitigated Negative Declaration: Mitigation Monitoring Reporting Program**

Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.						
TCR-4	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.	Prior to construction	Conduct Worker Environmental Awareness program	City of Riverside			