

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT

PLANNING DIVISION

DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 3

1. Project Number: PR-2021-000770

2. Project Title: Orangecrest Community Church

3. Hearing Date: TBD

4. Lead Agency: City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street, 3rd Floor

Riverside, CA 92522

5. Contact Person: Danielle Harper-Scott, Assistant Planner

Phone Number: (951) 826-5371

6. Project Location: 5695 Glenhaven Avenue, City of Riverside, CA 92506

The Project address is 5695 Glenhaven Avenue, Riverside, CA 92506. The Assessor's Parcel Number (APN) is: 222-250-006. The Project site is at the northwest corner of Glenhaven Avenue and Alessandro Boulevard and is located west of State Route 91 (SR-91) and generally along the western portion of the City; refer to **Exhibit 1**, *Regional Vicinity*. The site is located within the Riverside East, California USGS 7.5-minute Topographic Quadrangle Map,

Township 2 South, Range 5 West, Section 36.

The Project site is surrounded by single-family residential to the north, south, east, and west; refer to **Exhibit 2**, *Local Vicinity*. Surrounding roadways that provide access to the site include Glenhaven Avenue and Alessandro

Boulevard.

7. Project Applicant/Project Sponsor's Name and Address:

Orangecrest Community Church

Contact: Jon McWhorter

P.O. Box 2799 Riverside, CA 92516 (951) 215-0563

8. General Plan Designation: LDR - Low Density Residential

9. Zoning: R-1-13000 - Single Family Residential

10. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

Physical Setting

The Project site is 5.27 acres in size and abuts Alessandro Boulevard which is located to the south, Glenhaven Avenue which is located to the east, a natural slope which is located to the west, and single-family residential development which is located to the north, south, and east. The Project site's former use was a swim and tennis club. The pool was previously filled in. Two existing buildings that remain onsite from previous use were used for locker rooms, a snack bar, a pro shop, and as an activity room. The Project site also includes a parking lot area, as well ruderal/weedy vegetation, non-native plants, grasses, shrubs, and trees scattered throughout the Project site and along the roadway frontages. There are three power poles along the existing 20' foot-wide public utilities easement, a control building, and a transformer pad with manhole.

Conservation

The Project site is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). According to the Western Riverside County Regional Conservation Authority (RCA) MSHCP map, the Project site is located within the Burrowing Owl (*Athene cunicularia*) survey area. However, the site is not in a criteria Cell group, not in an amphibian survey area, not in a mammal survey area, and not in a narrow endemic plant survey area. The Project has been designed to avoid grading or encroachment within the existing natural drainage area along the site's western perimeter.

Demolition

The existing tennis courts and other associated structures will be removed, not including the two existing buildings which are generally located on the eastern part of the site. These two buildings were formerly used as locker rooms, snack bar, pro shop, and as an activity room. These two buildings are single story structures of masonry block construction and are assumed to be supported on shallow foundations with a concrete slab-on-grade floor which will be renovated in place. The Project will require approximately 6,123 Cubic Yards (CY) of (cut) and 2,644 CY (fill) for a net 3,480 CY of soil export.

Construction

Project construction would occur in four phases, as shown below:

Phase 1: Includes the renovation in place of the existing buildings (Buildings A and B). Building

A will be utilized as accessory office/meeting space and Building B would be utilized

as religious meeting hall.

Phase 2: Includes the construction of Building C. Building C will be the main worship building.

Phase 3: Includes the construction of Building D Additionally, existing Buildings A and B will be

expanded. The expansion is identified in the site plan as (A1 and B1) Other construction activities include landscape, hardscape, and other associated amenities. Building D will be utilized as a religious nursery/daycare building (will not operate midweek); Building A1 will be utilized as a café; and Building B1 entail the expansion of

the existing children's ministry building.

Phase 4: Includes the construction of Building E which will serve as the youth ministry building.

The total construction timing for all 4 phases is anticipated to take approximately 2.5 years (29 months).

A breakdown of the proposed buildings is provided below in **Table 1**, *Proposed Project Structures and Other Components*.

¹ RCA. 2020. MHSCP Information Map. Available at http://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=a73e69d2a64d41c29ebd3acd67467abd. Accessed on August 19, 2020.

Table 1: Proposed Project Structures and Other Components

Building	Purpose	Building Height	Building Area (SF)
	Existing		
"Building A"	Locker Room	15'-6"	2,488.89
"Building B"	Snack Bar	20'-6"	1,583.09
	Existing	Building SF Total	4,071.98
	Phase 1		
Building A	Renovate in Place Administration Building	15'-6"	N/A
Renovate in Place Building B Children's ministry building/Religious Meeting Hall		20'-6"	N/A
	Phases 2 and	3	
Building C	Worship Building	32'-6" with 40'-0" Tower	8,394.46
Building D	Religious Nursery/Daycare Building	20'-0"	3,687.83
Building A1	Expansion – Admin/Café	15'-6"	729.79
Building B1	Building B1 Expansion - Children's Ministry Building/Religious Meeting Hall		1,587.38
	Phase 4		
Building E	Youth Ministry Building	16'-0"	1,473.81
	Total (Existing + Propo	sed) Building SF	19,945.25

Church classrooms and building design features would include high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting throughout common areas, and landscape design. The Project would be constructed in four phases.

The Project includes 264 surface parking spaces which will be provided for visitors along the northern, southern, and western portions of the site. The Project would include two access driveways along Glenhaven Avenue. As shown in **Exhibit 3a-3d**, *Site Plan*, the proposed structures would be generally located in the eastern portion of the Project site. The proposed Project includes 26,162 SF of parking lot landscaping, 24,021 SF of setback landscape area, and 37,187 SF of additional landscape area (including the 3 retention/infiltration basins), totaling 87,370 SF of onsite landscape (38% of the Project site).

An event lawn with a 250-person capacity is proposed on the southwest corner of the site. Additionally, two bio basins are provided along Alessandro Boulevard and one on the northeast corner of the Project site. Street trees are proposed along the Alessandro Boulevard right-of-way (ROW) (Cascabella thevetia) and along the Glenhaven Avenue ROW (Pistacia atlantica Red Push). The existing 31 palms and 24 other trees are anticipated to remain at entries and street perimeter where possible. Note that the existing pepper trees along the existing southern and southwestern perimeter would be removed. Additionally, the Project anticipates providing 78 new trees; that is, 10 more trees than required by the City; refer to Exhibit 4, Landscape Plan.

The total duration of construction activities associated with the Project is estimated to be approximately 2.5 years (29 months). Construction is expected to begin in the third quarter (Q3) of 2021 and end during the last quarter (Q4) of 2023. Construction activities would include site preparation, approximately 6,123 Cubic Yards (CY) of (cut) and 2,644 CY (fill) for a net 3,479 CY of soil export. Project construction will

² CDPC. June 5, 2020. Conceptual Landscape Site Plan.

include buildings, paving, and architectural coating. Construction would occur primarily on the eastern portion of the site approximately 110 feet from the nearest sensitive receptors to the north and approximately 150 feet from the nearest sensitive receptors to the east. However, although construction activities would occur throughout the Project site, construction activities would avoid areas directly adjacent to sensitive receptors. Sensitive receptors identified within a one-mile radius of the project site include: single-family residential dwellings and neighborhoods, Church on The Hill, Alcott Elementary, Riverside Poly High School, and Andulka Park.

Operations

The Project anticipates retaining six full-time employees and seven part-time employees. The administration/office operating hours would be Mon-Fri from 8am-5pm. Initially, 2 worship services will be held for Sunday morning service activities which will be held from 9am to 11:30am. Eventually, primary worship services will occur up to 3 times on Sunday mornings from approximately 9am to 1pm. Midweek gatherings and events are anticipated to occur as follows:

- Small gatherings (i.e. 5-20 people) most weeknights (M-F), approximately 7pm to 9pm.
- Occasionally, the property will be utilized for monthly special events of larger gatherings (larger than 20 people) on a Friday or Saturday evening, approximately from 6pm to 9pm.

Additionally, youth and children's ministries would have a weekly gathering (i.e., Wednesday) from approximately 6:30pm to 8:30pm.

All activities would comply with the City's municipal code including limitations on noise, lighting and parking. The Project and associated activities are those associated with a place of worship and does not include formal "school classrooms" or similar weekday daily school uses that would generate weekday traffic.

Access

Regional access is provided via SR-91 via the Central Avenue and Arlington Avenue ramps, approximately 1.5-miles to the west of the site. Site access is from Glenhaven Avenue via two driveways. The intersection of Glenhaven Avenue and Alessandro Boulevard is signal controlled with a dedicated southbound left-turn lane and right-turn lane.

The proposed Project evaluates the following development applications:

Conditional Use Permit (CUP) No. DP-2021-00027: To permit an assembly of people – non entertainment (church) as reflected in the Site Plan (Exhibit 3).

Design Review (DR) No. DP-2021-00029: Review of site design and building elevations.

Variance (VR) No. DP-2021-00580: To allow a reduced landscape setback.

Grading Variance (GE) No. DP-2021-00580: To allow a retaining wall, open to public, view higher than 3-feet.

The purpose of this Initial Study is to evaluate the potential environmental effects associated with construction and occupancy of the planned development Project and to provide mitigation where necessary to avoid, minimize, or lessen environmental effects.

11. Surrounding land uses and setting: Briefly describe the project's surroundings:

Table 2: Existing Land Uses and Zoning Designations

Table 2. Existing Land Oses and Zonning Designations							
	Existing Land Use	General Plan Designation	Zoning Designation				
Project Site	Former swim and tennis club	LDR - Low Density Residential	R-1-13000 Single Family Residential				
North	Residential	LDR - Low Density Residential	R-1-13000 Single Family Residential				

	Existing Land Use	General Plan Designation	Zoning Designation			
East	Residential	LDR - Low Density Residential	R-1-13000 Single Family Residential P Park			
South	Residential, Swanson Park	LDR - Low Density Residential , (P) Public Park	R-1-13000 Single Family Residential			
West Residential		LDR - Low Density Residential	R-1-13000 Single Family Residential			
Source: https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/ResZoneFinal.pdf						

- 12. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement.):
 - Permit for Water Quality Management Plan
- 13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On July 23, 2020, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52. The City requested a consultation from the following tribes which have previously requested consultation: Rincon Band of Luiseño Indians, Agua Caliente Band of Cahuilla Indians; and Soboba Band of Luiseño Indians.

Consultation with the Rincon Band of Luiseño Indians concluded that the standard conditions included in Section 5, Cultural Resources are adequate and accepted by Rincon Band of Luiseño Indians, if Band of Cahuilla Indians; and Soboba Band of Luiseño Indians also accept them.

- 14. Other Environmental Reviews Incorporated by Reference in this Review:
 - a. Riverside General Plan 2025 (GP)
 - b. GP 2025 Final Program Environmental Impact Report (FPEIR)
 - c. Technical Studies:
 - i) Air Quality Assessment Memorandum (Kimley-Horn, October 22, 2020)
 - ii) Greenhouse Gas Assessment Memorandum (Kimley-Horn, October 22, 2020)
 - iii) Noise Memorandum (Kimley-Horn, October 22, 2020)
 - iv) Focused Traffic Impact Analysis & Parking Analysis (Kimley-Horn, November 2020)
 - v) Biological Resources Assessment/Jurisdictional Delineation & Consistency Analysis (Jericho Systems, October 1, 2020)
 - vi) Preliminary Cultural Resources Report (BCR Consulting LLC, October 22, 2020)
 - vii) Geotechnical Report (SoCalGeo, TBD)
 - viii) Phase I Environmental Site Assessment (FirstCarbon Solutions, June 11, 2015)
 - ix) Water Quality Management Plan (KWC Engineers, June 1, 2020)

15. Acronyms

AICUZ - Air Installation Compatible Use Zone Study

AQMP - Air Quality Management Plan AUSD - Alvord Unified School District

CEQA - California Environmental Quality Act

CMP - Congestion Management Plan
EIR - Environmental Impact Report
EMWD - Eastern Municipal Water District
EOP - Emergency Operations Plan

FEMA - Federal Emergency Management Agency

FPEIR - GP 2025 Final Programmatic Environmental Impact Report

GIS - Geographic Information System

GHG - Greenhouse Gas GP 2025 - General Plan 2025

IS - Initial Study

LHMP - Local Hazard Mitigation Plan

MARB/MIP - March Air Reserve Base/March Inland Port

MJPA-JLUS - March Joint Powers Authority - Joint Land Use Study

MSHCP - Multiple-Species Habitat Conservation Plan

MVUSD - Moreno Valley Unified School District
NCCP - Natural Communities Conservation Plan

OEM - Office of Emergency Services

OPR - Office of Planning & Research, State
PEIR - Program Environmental Impact Report

PW - Public Works, Riverside

RCALUC - Riverside County Airport Land Use Commission
RCALUCP - Riverside County Airport Land Use Compatibility Plan

RCP - Regional Comprehensive Plan

RCTC - Riverside County Transportation Commission

RMC - Riverside Municipal Code
RPD - Riverside Police Department
RPU - Riverside Public Utilities

RTIP - Regional Transportation Improvement Plan

RTP - Regional Transportation Plan RUSD - Riverside Unified School District

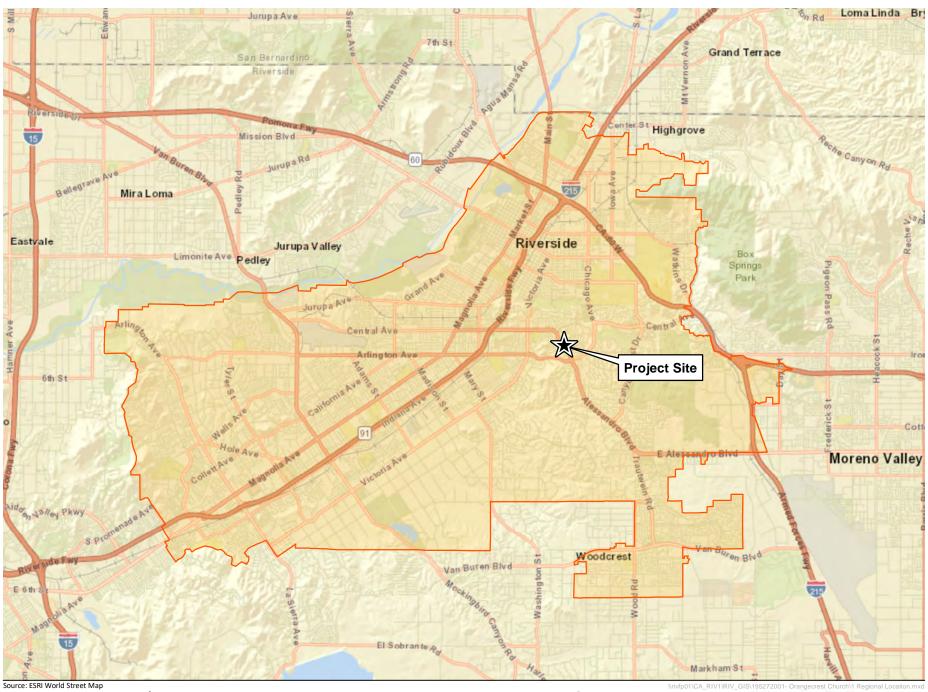
SCAG - Southern California Association of Governments SCAQMD - South Coast Air Quality Management District

SCH - State Clearinghouse

SKR-HCP - Stephens' Kangaroo Rat - Habitat Conservation Plan

SWPPP - Storm Water Pollution Prevention Plan

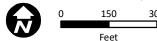
USGS - United States Geological Survey
WMWD - Western Municipal Water District
WQMP - Water Quality Management Plan





Source: ESRI World Imagery **EXHIBIT 2:** Local Vicinity

Orangecrest Community Church





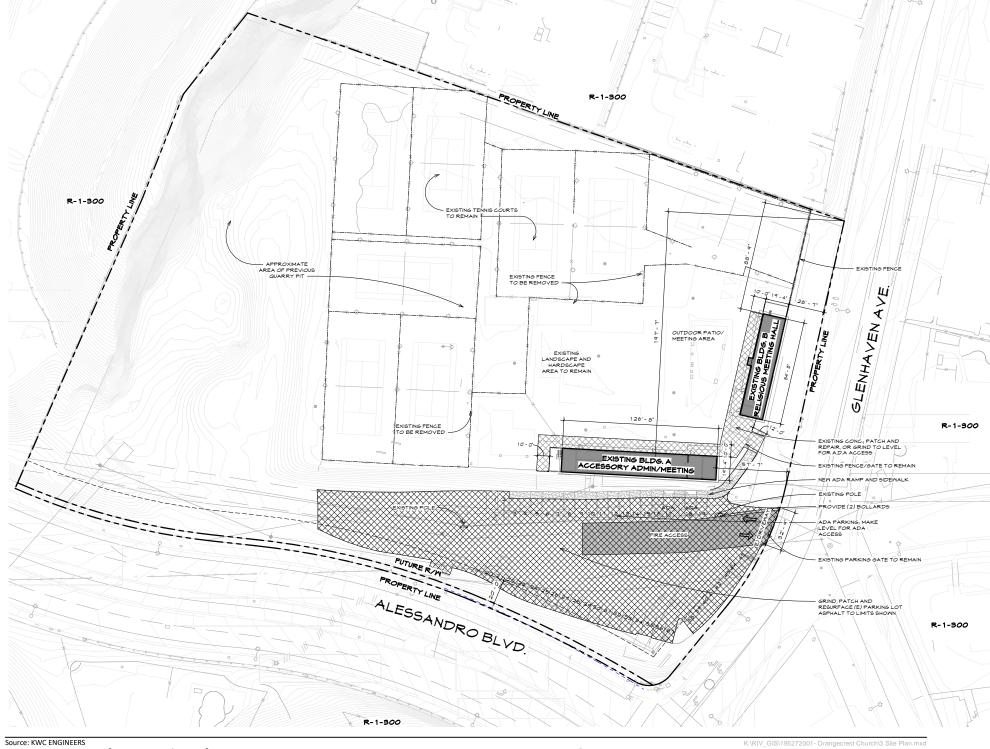
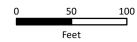
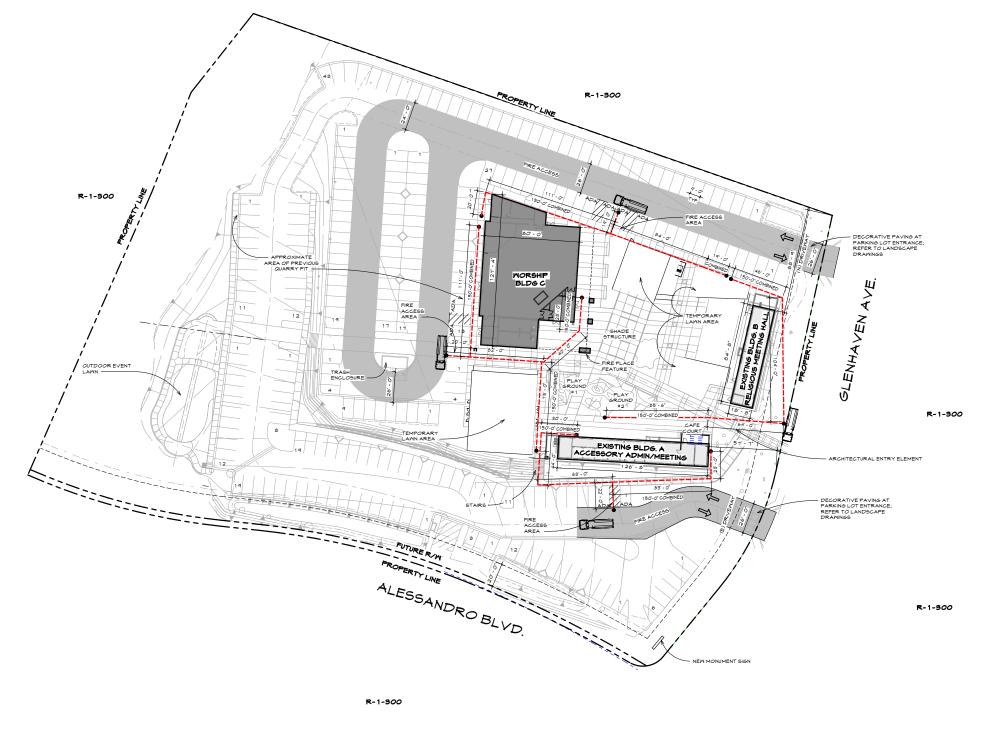


EXHIBIT 3a: Phase 1 Site Plan Orangecrest Community Church





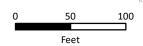




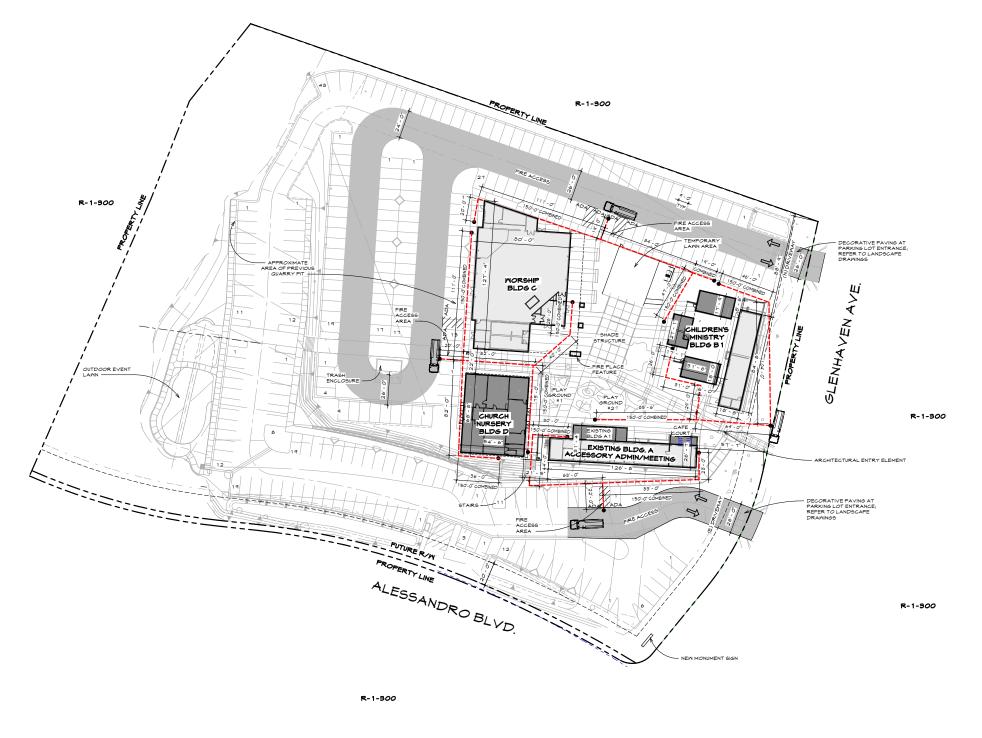
Source: KWC ENGINEERS

EXHIBIT 3b: Phase 2 Site PlanOrangecrest Community Church





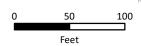




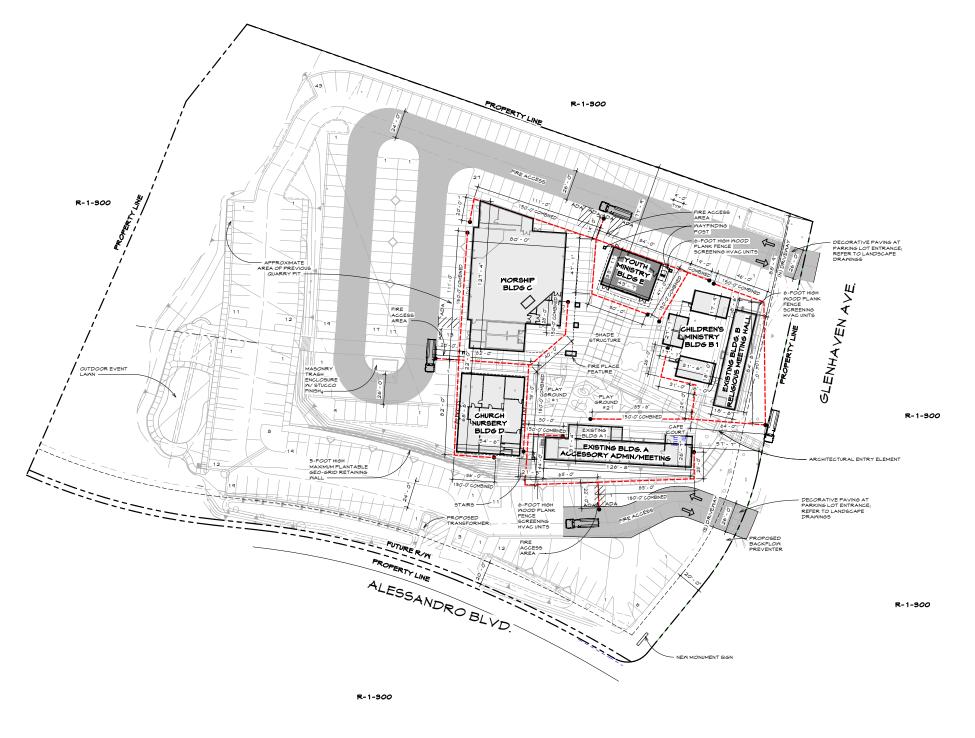
Source: KWC ENGINEERS

EXHIBIT 3c: Phase 3 Site PlanOrangecrest Community Church





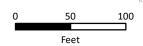




Source: KWC ENGINEERS

EXHIBIT 3d: Full Buildout Site PlanOrangecrest Community Church





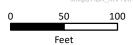




Source: Conceptual Design & Planning Company **EXHIBIT 4:** Landscape Plan

Orangecrest Community Church







ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. Aesthetics Agriculture & Forestry Resources Air Quality **Biological Resources** Cultural Resources Energy Geology & Soils Greenhouse Gas Emissions Hazards & Hazardous Materials Hydrology & Water Quality Land Use & Planning Mineral Resources Population & Housing Public Services Noise Recreation Transportation Tribal Cultural Resources Utilities & Service Systems Wildfire Mandatory Findings of Significance **DETERMINATION:** (To be completed by the Lead Agency) On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that: The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have X been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. The City of Riverside finds that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. Signature Date For City of Riverside Printed Name & Title Danielle Harper-Scott/Assistant Planner

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

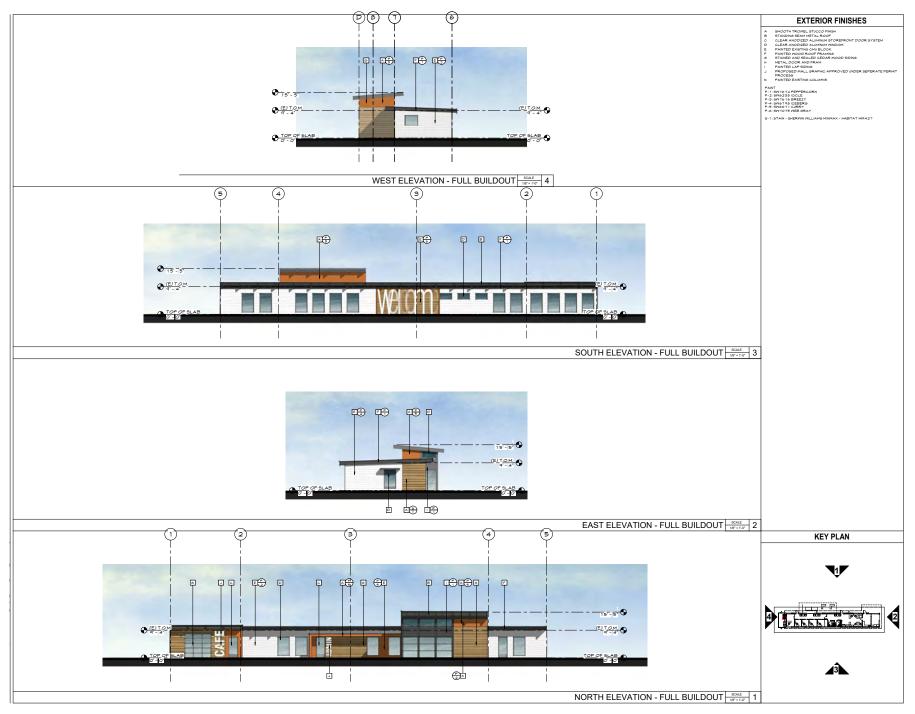
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact		Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project	t:			
a. Have a substantial adverse effect on a scenic vista?			\boxtimes	
1a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-Table 5.1-B – Scenic Parkways)				
Less than Significant Impact. According to page 5.1-2 of the General Plan 20 surround the City provide scenic vistas to residents of the City where they can exterrain. Vista points can be found throughout the City, both as viewed from wilderness areas toward Riverside. The most notable scenic vistas in the City miles southwest), Sycamore Canyon Wilderness Park (2.0 miles east), and Bomiles east). The peaks of Box Springs Mountain (4.45 miles northwest), Mt. Ri Mountain (8.5 miles southwest), and the La Sierra/Norco Hills (8.6 miles southwest) and the region.	xperience I urban are y include tl ox Springs ubidoux (3.	ong distance as toward th he La Sierra/ Mountain Re .2 miles nortl	views of ne hills and Norco Hills gional Par nwest), Arli	atural I from s (8.6 k (4.0 ington
According to Figure LU-3 of the General Plan, there are no scenic vistas in the Additionally, on Figure CCM-4 and in Table 5.1-A of the General Plan and FPl Boulevard and Arlington Avenue are designated as a scenic boulevard. No allessandro Boulevard or Arlington Avenue cross the Project site, nor are these The Project site is located approximately 0.3 miles north of the Alessandro Boulevard or Arlington Avenue cross the Project site, nor are these The Project site is located approximately 0.3 miles north of the Alessandro Boulevard or Arlington Avenue cross the Project site, nor are these The Project site is located approximately 0.3 miles north of the Alessandro Boulevard or Arlington Would alter the Project site by replacing implementation of the Project will not impair any views of the distant natural variation and a developed urban area. Additionally, the proposed buildings would have the for approximately 11' feet high with canopy, Building B is 20' 6" with canopy, Building the buildings and at 40' at the tower, Building D is 20' feet high, and Buildin 5k, Color Elevations and Renderings.	EIR, accord scenic bout se sections oulevard/A the existin vistas since ollowing ma Iding C is ti	dingly, portionallevard designates visible from the critical representation and the critical representations of the Project seaximum heignates at 3	ns of Aless nated port the Project ue interse with new site is loca nts: Buildir 32' 6" at the	andro ion of et site. ection. ones, ted in ng A is ne top
Finally, the proposed Project would not be located in an area designated as at the view of a scenic vista from an adjacent facility or residents in the vicinity significant impact.				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			\boxtimes	
1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-4 City's Urban Forest Tree Policy Manual)				
Less than Significant Impact. The Caltrans California Scenic Highways does within the City that could be affected by the Project. The nearest State Designa 330, located in the City of San Bernardino approximately 17 miles north. The roadways as Scenic Boulevards and Parkways in order to protect scenic resort of Riverside. The proposed Project is located along Alessandro Boulevard whi within the Circulation and Community Mobility Element of the General Plan 20 As shown of Figure CCM-4, Alessandro Boulevard is designated as a Scenic Bountil it intersects with Arlington Avenue, at which point Arlington Avenue became traversing SR-91.	ted Scenic General P urces and o ch is desig 25. Also re ulevard fro	Highways are lan 2025 de enhance the gnated as a Sefer to Respo	e SR-30 ar signates so visual cha cenic Boul nse 1(a), a n part of th	nd SR- everal racter levard above. ne City

	ES (AND SUPPORTING	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
INFO	RMATION SOURCES):	ппрасс	Mitigation Incorporated	Impact	
north of	th the Project site is located along Alessandro Boulevard, the Project fithe Alessandro Boulevard/Arlington Avenue intersection. As such, no pee Scenic Boulevards nor would they be affected by the proposed Projes intended to minimize aesthetic impacts and impacts on visual resources.	ortion of thect. The follo	ated approxir e Project site	would be v	visible
•	Policy OS-2.2: Limit the extent and intensity of uses and developm terrain, scenic vistas, arroyos and other critical environmental areas.		as of unstab	le terrain,	steep
•	Policy OS-2.3: Control the grading of land, pursuant to the City's Graerosion, land-sliding, and other forms of land failure, as well as to limit of excessive modification of natural landforms.				
•	Policy OS-2.4: Recognize the value of ridgelines, hillsides, and ar resources and strengthen their role as features, which define the neighborhoods.				
general constru possible many of Forestry	pject will comply with these policies. The Project will implement design character of the existing community in terms of design, colors, and materials, the existing 31 palms and 24 other trees are anticipated to remain the public right-of-way are anticipated to find the existing trees as possible. If any trees need to be removed, the Project Manual. Finally, there are no significant natural scenic resources not contain rock outcroppings or historic buildings. Impacts would be	essing. Addi ain at entrie be removed oject would es on the si	tionally, as pa as and street d. The intent comply with te as it is fully	art of the P perimeter v is to prese the City's I	roject where rve as Urban
	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
	Response: (Source: General Plan 2025, General Plan 2025 FPEIR, Guidelines)	Zoning Cod	le, Citywide I	Design and	d Sign
and will Project noted in General permitte applical policies	an Significant Impact. The proposed Project is required to implement to be subject to Design Review consistent with established Citywide Dewould be located in an urbanized portion of the City with residential nature Table 2, all parcels surrounding the Project site, including the Project standard use designation and R-1-13000 Single Family Residential zed under this land use and zoning designation. As such, the proposible zoning or other regulations governing scenic quality. With compliant and the Citywide Design and Sign Guidelines, and due to all these son the visual character and quality of the area are less than significant	sign and Si uses on al ite, have a coning. The sed Project nce to the (factors, di	gn Guideline I sides of the LDR - Low De proposed use t would not of General Plan	s. The properts of the Project sinsity Reside is conditionally conflict with 2025 goals.	posed te. As lential onally th the ls and
	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				
	Response: (Source: General Plan 2025, General Plan 2025 FPEIR Figu Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and			ar Lighting	Area,
function	an Significant Impact. The proposed Project will not introduce new ning as a swim and tennis club provided lighting throughout the site. T tures with new lighting fixtures consistent with Chapter 19.556, while y associated with residential developments. The anticipated lighting/	he propose ch should b	d Project will be more ene	replace ex rgy-efficier	disting at and

ISSUES (AND SUPPORTING	Potentially Significant		Less Than Significant	
INFORMATION SOURCES):	Impact	With Mitigation	Impact	
		Incorporated		

which exists in the surrounding area and would not be considered significant. The exterior light sources would be shielded to minimize off-site glare and would not direct light skyward and would be directed away from adjacent properties and public rights-of-ways. Lights anticipated to be mounted on buildings would utilize down-lights with a maximum lumens per fully shielded luminaire of 3,000 lumens. All mounted exterior night and security luminaires will be mounted at a maximum height of 25' feet. A lighting plan will be prepared for Phase 1 of the proposed Project, in accordance with lighting zone 3. Additionally, light poles would not exceed 20 feet in height including the height of any concrete or other base material.

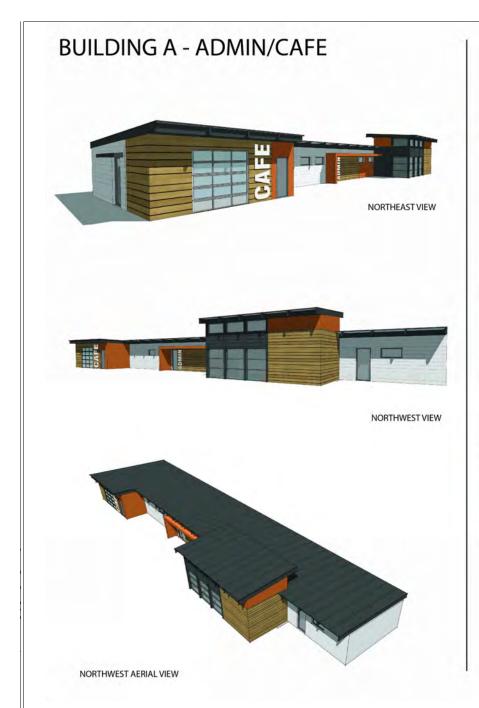
Moreover, the site is not within the Mount Palomar Lighting Area. The Mount Palomar Nighttime Lighting Policy Area covers the southeastern portion of the City. This Policy Area represents a radius of 45 miles from the observatory and restricts nighttime lighting hours, types, and techniques of lighting. A portion of the City and the Riverside City Sphere of Influence are within "Zone B" of County Ordinance 655. The Ordinance requires the use of low-pressure sodium fixtures, limits hours of use, prohibits certain types of lights, and requires hooded fixtures which the Project would provide as part of the development of the site. Additionally, the Project site is located 50 miles northeast from the observatory. Therefore, impacts are **less than significant.**



Source: Visioneering Studios Architecture **EXHIBIT 5a:** Building "A" Elevations

Orangecrest Community Church













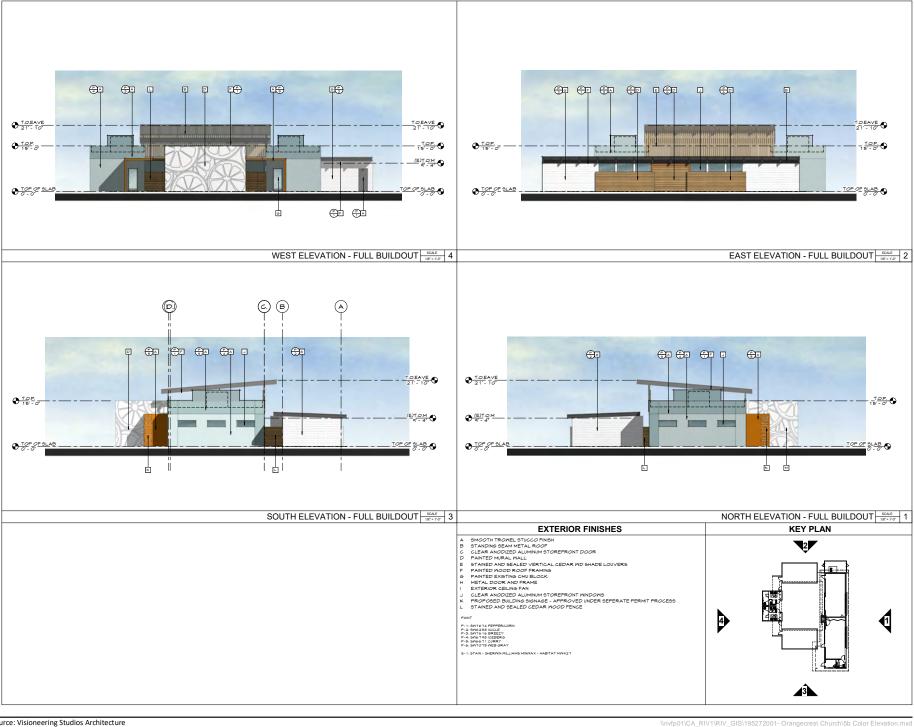




Source: Visioneering Studios Architecture **EXHIBIT 5b:** Building "A" Rendering

Orangecrest Community Church





Source: Visioneering Studios Architecture

EXHIBIT 5c: Building "B" Color Elevations Orangecrest Community Church



BUILDING B - CHILDREN'S NORTHWEST VIEW SOUTHWEST VIEW SOUTHEAST VIEW









ARCHITECTURAL STYLE & CHARACTER



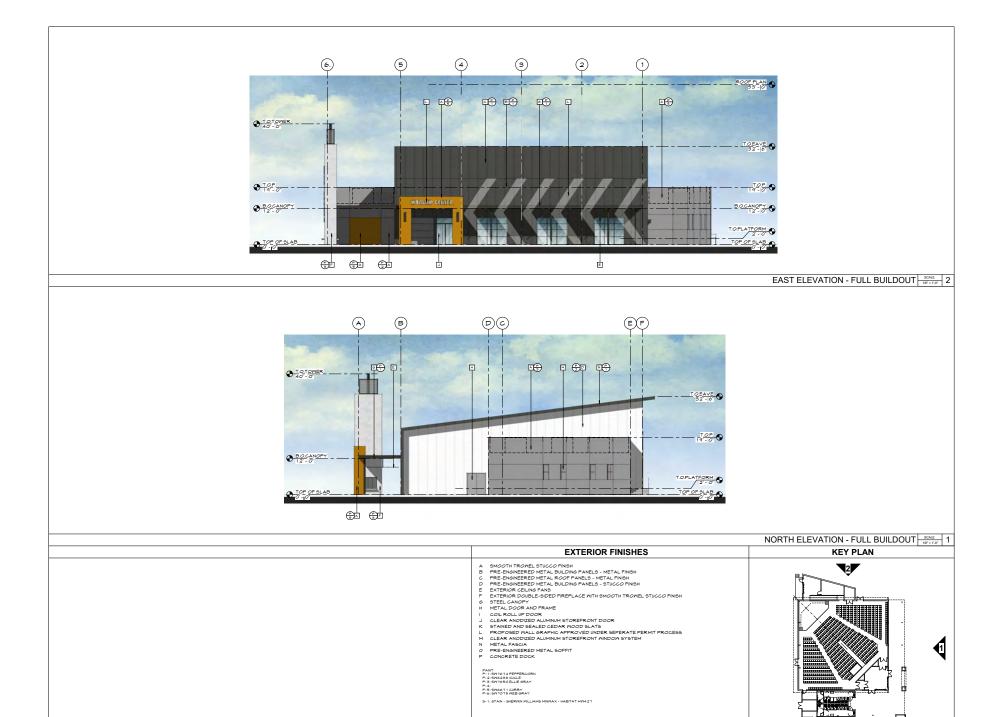


MATERIALS

Source: Visioneering Studios Architecture **EXHIBIT 5d:** Building "B" Rendering

Orangecrest Community Church



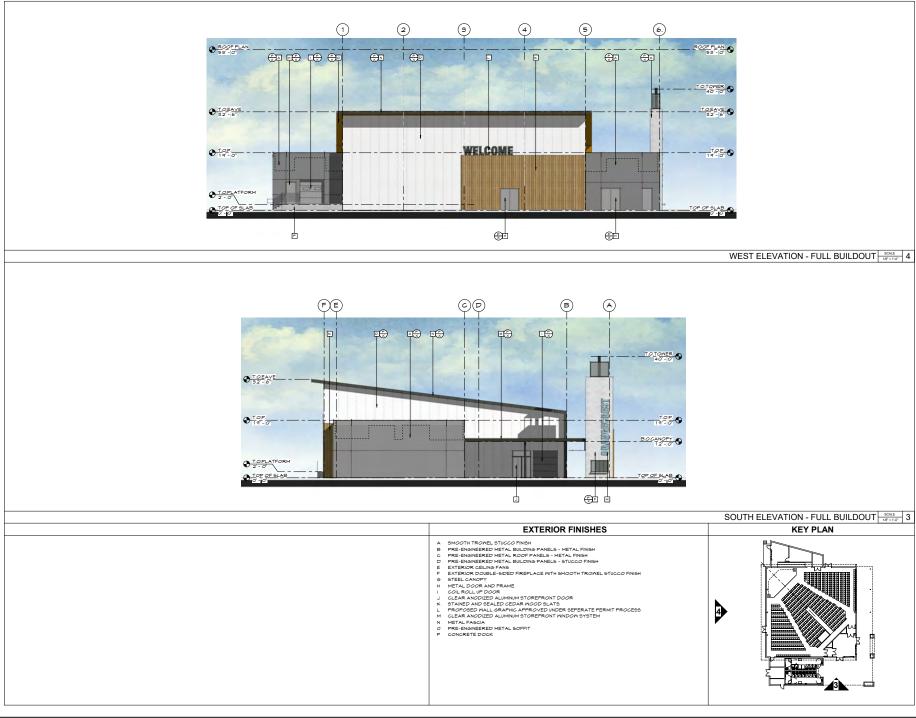


Source: Visioneering Studios Architecture **EXHIBIT 5e:** Building "C" Color Elevations

Orangecrest Community Church

Kimley » Horn

\\rivfp01\CA_RIV1\RIV_GIS\195272001- Orangecrest Church\5c Color Elevation.mxd



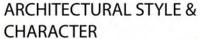
Source: Visioneering Studios Architecture **EXHIBIT 5f:** Building "C" Color Elevations (Continued)

Orangecrest Community Church

Kimley » Horn















MATERIALS

Source: Visioneering Studios Architecture **EXHIBIT 5g:** Building "C" Rendering

Orangecrest Community Church



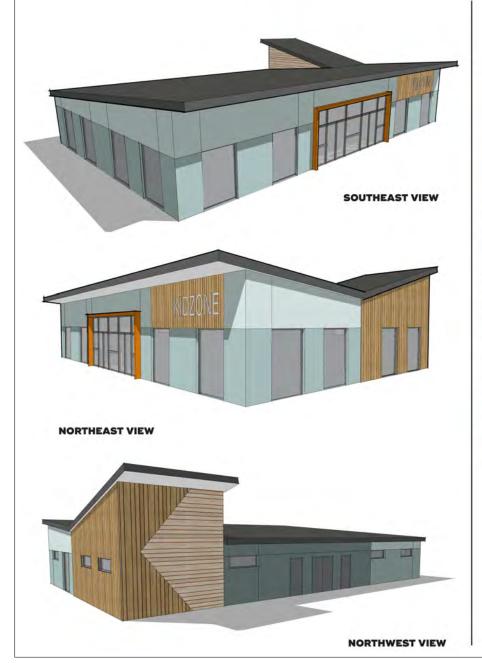


Source: Visioneering Studios Architecture **EXHIBIT 5h:** Building "D" Color Elevations

Orangecrest Community Church

Kimley » Horn

BUILDING D - NURSERY/PRESCHOOL







VOOD ACCENTS



ARCHITECTURAL STYLE & CHARACTER

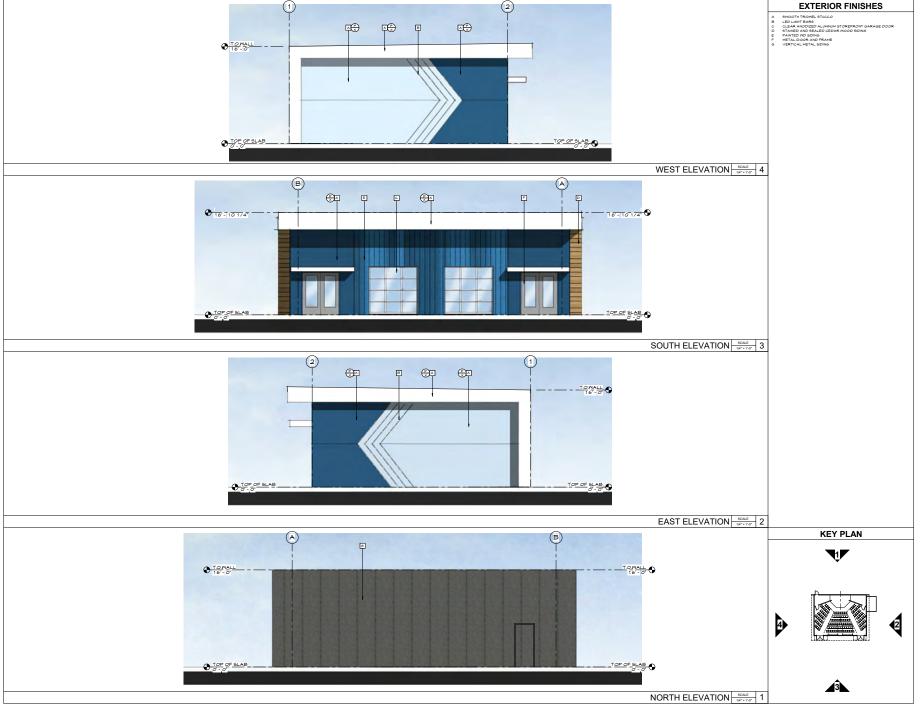




Source: Visioneering Studios Architecture **EXHIBIT 5 i:** Building "D" Rendering

Orangecrest Community Church





Source: Visioneering Studios Architecture **EXHIBIT 5j:** Building "E" Color Elevations

Orangecrest Community Church



BUILDING E - YOUTH











ARCHITECTURAL STYLE & CHARACTER





Source: Visioneering Studios Architecture **EXHIBIT 5k:** Building "E" Rendering

Orangecrest Community Church



2. AGRICULTURE AND FORESTRY RESOURCES:				
In determining whether impacts to agricultural resources are significant environ to the California Agricultural Land Evaluation and Site Assessment Model (19 Conservation as an optional model to use in assessing impacts on agriculture impacts to forest resources, including timberland, are significant environment information compiled by the California Department of Forestry and Fire Prote forest land, including the Forest and Range Assessment Project and the Forest carbon measurement methodology provided in the Forest Protocols a Board. Would the project:	997) prepare and farmle ntal effects ection regarest Legacy	red by the Ca and. In dete s, lead agenc rding the stat Assessment	alifornia De rmining wh ies may re te's invento project; an	ept. of nether efer to ory of nd the
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?				
2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural S	uitability)			
No Impact. The Project is located in an urbanized area of the City in a resign formerly used as a swim and tennis club. Additionally, the site is identified a Figure OS-2, and therefore does not support agricultural resources or operation or operations, including farmlands within proximity of the Project site. The directly, indirectly or cumulatively on agricultural uses.	as urban/b ons. There	ouilt-up land, are no agricu	as identificultural reso	ed on ources
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Ac Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title		s, General Pla	an 2025 Fl	PEIR -
No Impact. The site is within a built environment and no Williamson Act contract of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR rewithin an area that is affected by a Williamson Act Preserve or under a William will not conflict with existing zoning for agricultural uses or any applicable Vimpacts will occur from this Project directly, indirectly or cumulatively.	veals that t nson Act Co	the Project si ontract. The p	te is not looroposed P	cated roject
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))?				
2c. Response: (Source: General Plan 2025 Zoning Map for the City of Rive	erside)			
No Impact. Refer to Response 2a and 2b, above. The Project site and surror Single Family Residential. The Project site is located in an urbanized area and or timberland production. No additional changes would occur from Project impin the rezoning of forest land or timberland. Therefore, no impacts will occur cumulatively.	undings are I is not zon Diementatio	ed for forestl on that would	and, timbe trigger or	erland result
d. Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
2d. Response: (Source: General Plan 2025 Zoning Map for the City of Riverse)	erside)			
No Impact. As stated in 2c above, the Project site is currently zoned R-1-13d urbanized area and is surrounded by existing development. Neither the s forestland, timberland or timberland production. Therefore, no impacts will oc	ite nor its			

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non- agricultural use or conversion of forest land to non-forest use?				\boxtimes
2e. Response: (Source: General Plan - Figure OS-2 - Agricultural Sui	itability, Fi	gure OS-3 –	Williamso	n Act
Preserves) No Impact. The Project is located in an urbanized area of the City in an existing the site is identified as urban/built out land and therefore does not support a Project will not result in the conversion of designated farmland to non-agric agricultural resources or operations, including farmlands within proximity of the no forest land that can support 10-percent native tree cover. Therefore, no imp indirectly or cumulatively to the conversion of farmland, to non-agricultural uses	gricultural cultural us le subject s pacts will oc	resources or es. In addition site. The City occur from this	operations on, there a of Riversid Project dir	s. The re no e has
3. AIR QUALITY				
Where available, the significance criteria established by the applicable air qua control district may be relied upon to make the following determinations. Wou			t or air pol	lution
 a. Conflict with or obstruct implementation of the applicable air quality plan? 			\boxtimes	
3a. Response: (Source: South Coast Air Quality Management District's 201	.6 Air Quali	ty Manageme	ent Plan (A	QMP);
see Appendix A)				
Less than Significant Impact. The City is located within the South Coast Air E Quality Management District (SCAQMD) prepares the Air Quality Management sets forth a comprehensive program that will lead the Basin into compliance standards. The AQMP's control measures and related emission reduction projections for a future development scenario derived from land use, popul defined in consultation with local governments. Accordingly, if a project demon plans and/or population projections, then the AQMP would have taken into according to the proposed Project includes construction and operation of a community churand tennis club. The site's General Plan designation is low density residential Residential, requiring a CUP to develop the site as a place of worship. Although General Plan 2025 land uses which were incorporated in the AQMP, the Project seventeen single-family units (the maximum number permitted under R-1-130 FPEIR determined that implementation of the General Plan 2025 would ge attainment of the standards of the AQMP. Because the proposed Project would approved under the 2016 AQMP, the Project would not conflict or obstruct implementation plans.	t Plan (AQN ce with all estimates lation, and instrates count such arch on a sill and is zor lugh this usect would good for a senerally me generate I lementatio	MP) for the B federal and are based of employment ompliance with uses when it it is previously ned R-1-1300 se is not congenerate less 5.27-acre site et attainment ess emission of the AQMI	asin. The Astate air qupon emist character h local landwas develoused as a 20 Single Fusistent with emissions e). The GP at forecasts s than what p. Therefore	AQMP juality sions ristics d use oped. swim family the the than 2025 s and at was e, the
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?				
3b. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD (South Coast Air Quality Management District's 2016 Air Quality I 2016.3.2, EMFAC 2017, and Air Quality Analysis prepared by Kimley-H	Manageme	ent Plan, Ca		
Less than Significant Impact. Per the GP 2025 FPEIR, AQMP thresholds indice the General Plan are projected to result in significant levels of NO $_{\rm x}$ and ROG, I and CO. The portion of the Basin within which the City is located is designate PM10 and PM2.5 under State standards, and as a non-attainment area for ozo standards.	ooth ozone ed as a no	precursors, n-attainment	and PM10, area for o	PM _{2.5} zone,

The Project's short-term construction and long-term operational emissions were evaluated using the CalEEMod version 2016.3.2 computer program (refer to Appendix A – AQ/GHG Analysis to the Initial Study). Project construction will be subject to SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), and Rule 1113 for architectural coatings. Maximum daily emissions from Project construction are summarized below and compared to the SCAQMD's daily regional thresholds. The maximum emissions from Project operation are summarized in the subsequent tables and compared to the SCAOMD daily regional thresholds.

Table 3: Short-Term Construction Emissions

A attivity (Maximum Pounds Per Day							
Activity	ROG	NOx	со	SO ₂	PM10	PM2.5		
Construction Year 2021 (Including Phases 1 - 4)	5.58	40.55	38.48	0.08	9.28	5.80		
SCAQMD Threshold	75	100	550	150	150	55		
Exceed SCAQMD Threshold?	No	No	No	No	No	No		

ROG = reactive organic gases, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns in diameter or less

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs of the Initial Study.

Table 4: Long-Term Operational Emissions

Table 4. Long-Term Operational Emissions									
0	Maximum Pounds Per Day								
Source	ROG	NOx	co	SO ₂	PM10	PM _{2.5}			
Area Source Emissions	0.47	< 0.01	0.01	0.00	< 0.01	< 0.01			
Energy Emissions	0.02	0.15	0.13	< 0.01	0.01	0.01			
Mobile Emissions	0.37	1.20	3.30	0.01	0.91	0.26			
Total Emissions	0.86	1.35	3.44	0.01	0.92	0.27			
SCAQMD Threshold	55	55	550	150	55	150			
Exceeds Threshold?	No	No	No	No	No	No			

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

ROG = reactive organic gases, NOX = nitrogen oxides, CO = carbon monoxide, SO2 = sulfur dioxide, PM10 = particulate matter 10 microns in diameter or less, PM2.5 = particulate matter 2.5 microns in diameter or less

The above Tables 3 and 4 compare the Project emissions (construction and operational) to the SCAQMD daily thresholds and shows that established thresholds would not be exceeded. Because the proposed Project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the Project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. 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**.

c.	Expose sensitive receptors to substantial pollutant concentrations?		\boxtimes	

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 version 2016.3.2 EMFAC 2017 Model and Air Quality Analysis prepared by Kimley-Horn, October 2020)

Less than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: criteria pollutants; CO hotspots; and toxic air contaminants (TACs, specifically diesel particulate matter [DPM]) from on-site construction.

Localized Significance Thresholds

The Localized Significance Threshold (LST) Methodology provides a look-up table for construction and operational emissions based on the emission rate, location, and distance from receptors, and provides a methodology for air

dispersion modeling to evaluate whether construction or operation could cause an exceedance of an ambient air quality standard. An LST analysis was performed for this Project to show that NOx, CO, PM10, PM2.5 emissions would not contribute to or cause an exceedance of California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). For determining localized air quality impacts from small projects in a defined geographic source receptor area (SRA), the LST methodology provides mass emission rate lookup tables for 1-acre, 2-acre, and 5-acre parcels by SRA.

The appropriate SRA for the City of Riverside is Metropolitan Riverside County (SRA 23). LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. Project construction is anticipated to disturb a maximum of 3.5 acres in a single day based on estimated amount of construction equipment that may be needed and the SCAQMD guidance document Fact Sheet for Applying CalEEMod to LTS (SCAQMD 2017). As the LST mass look-up tables provide thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the stricter threshold for 2 acres was used for construction analysis. For operational LSTs, although the Project site is slightly larger than five acres, the LST lookup tables can be used to show that even if the daily emissions from all Project operations were emitted on a five-acre site, the impacts would be less than significant

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the multi-family residences located 110 feet (34 meters) north of the Project. LST thresholds are provided in the mass look-up tables for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at a distance of 34 meters have been interpolated and utilized in this analysis. The **Table 5**, *Localized Significance of Construction Emissions* and **Table 6**, *Localized Significance of Operational Emissions*, below present the results of localized emissions during construction and operation, emissions of these pollutants would not result in significant concentrations of pollutants at nearby sensitive receptors.

Table 5: Localized Significance of Construction Emissions

Construction Asticity	Maximum Pounds Per Day								
Construction Activity	N	NOx		СО		PM10		PM2.5	
Demolition	31	31.44		21.57		1.99		51	
Site Preparation	40.50		21	.15	9.09		5.75		
Grading	24.74		15.86		3.72		2.38		
Construction ¹	17.43		16.58		0.96		0.90		
Paving ¹	12.92	31.88	14.65	33.05	0.68	1.73	0.62	1.61	
Architectural Coating ¹	1.53		1.82	1	0.09		0.09		
SCAQMD Localized Screening Threshold (adjusted for 2 acres at 34 meters)	272		884		19		6	6	
Exceed SCAQMD Threshold?	N	lo	No		No		No		

^{1:} The building construction, paving, and architectural coating sub-phases are combined because they would potentially occur at the same time. Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Table 6: Localized Significance of Operational Emissions

Construction Activity	Maximum Pounds Per Day			
Construction Activity	NOx	co	PM10	PM2.5
On-Site and Mobile Source Emissions	1.35	3.44	0.92	0.27
SCAQMD Localized Screening Threshold (adjusted for 5 acres at 34 meters)	272	884	5	2
Exceed SCAQMD Threshold?	No	No	No	No

Note: 5-acre area, 34 meters to sensitive receptor, and conservatively includes 100% of mobile source emissions Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

As shown in Tables 5 and 6, above, the Project's construction and operational emissions would not exceed SCAQMD LSTs. Therefore, the Project would not result in significant localized construction or operational emissions.

Carbon Monoxide Hot-Spots

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot-spots." The Project is anticipated to generate a maximum of 138 average daily trips (ADT). An adverse CO concentration ("hot-spot") would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of nine ppm were to occur. At the time of the 1993 Handbook, the Basin was designated nonattainment under the NAAQS and CAAQS for CO. It has long been recognized that CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. However, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated as attainment.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP. As part of the SCAQMD CO hot-spot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The proposed Project considered herein would not produce the volume of traffic required to generate a CO hot-spot in the context of SCAQMD's 2003 CO hot-spot analysis. As the CO hot-spots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hot-spots would not be experienced at any vicinity intersections as a result of 138 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant in this regard.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of nine, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the Project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM of any one receptor is exposed to would be limited. Therefore, considering the relatively short duration of DPM-emitting construction activity at any one location and the highly dispersive properties of DPM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. Carcinogenic health risk occurs from long-term exposure and not necessarily construction activities. For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

polluta	russed, short-term construction and long-term operations would not resunts, CO hot-spots, and TACs (specifically DPM). Therefore, the Project voltal pollutant concentrations and a less than significant impact will occopiect.	vould not e	expose sensit	tive recept	ors to
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				
3d.	Response: (Source: Air Quality Analysis prepared by Kimley-Horn, Octo	ber 20202	2)		
anticipa	eact. The Project would not expose a substantial number of people to ob- ated to be generated by the proposed use. Therefore, no impact to a r, indirectly or cumulatively.				
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 Game or U.S. Fish and Wildlife Service?	1 1			
	Response: (Source: Biological Resources Assessment, Jurisdictional Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared		•	_	

see Appendix B)

Less than Significant Impact with Mitigation Incorporated. Prior to the field investigation reference materials and databases relevant to the Project site were reviewed for the Riverside East and Riverside West 7.5-minute USGS quadrangles. The database search included the Riverside West USGS Quad due to the Project site's proximity (less

- California Natural Diversity Database (CNDDB) Rarefind 5;
- CNDDB Biogeographic Information and Observation System (BIOS);
- U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Web Soil Survey;
- County/City habitat conservation plans and other sensitive resource policies;
- RCA MSHCP Information Map; and

than 3 miles). The sources reviewed included:

Burrowing Owl Burrow Reconnaissance Survey prepared by FirstCarbon Solutions in 2015

A habitat assessment was prepared on August 24, 2020, by Jericho Systems qualified biologist Christian Nordal. Mr. Nordal is a biologist with an M.S. in biology and several years of experience surveying for Burrowing Owl (BUOW) in Southern California. Mr. Nordal conducted the BUOW habitat suitability assessment conducted in accordance with the MSHCP, which follows the 1993 "Burrowing Owl Survey Protocol and Mitigation Guidelines" prepared by the California Burrowing Owl Consortium. Suitable habitat was determined present, and this protocol requires four surveys between March 1 - August 31. The surveys conducted are shown below under **Table 7**, *Weather Data During Survey*.

Table 7: Weather Data During Survey

Data Time of Commit		Of Olaved Occurs Wind (DET)		T (0.5)	Baratatian	
Date	Time of Survey	% Cloud Cover	Wind (BFT)	Temperature (° F)	Precipitation	
08/24/2020	8:00 a.m.	0	0	74	None	
08/26/2020	6:00 p.m.	0	0	100	None	
08/27/2020	8:00 a.m.	0	1	70	None	
08/29/2020	6:00 p.m.	0	1	85	None	

According to the database searches, 60 sensitive species and four sensitive habitats have been documented in the Riverside East and Riverside West USGS 7.5-minute series quadrangles; refer to **Table 8**, Sensitive Species Potential to Occur.

Table 8: Sensitive Species Potential to Occur

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur	
Plants					
Abronia villosa var. aurita	chaparral sand-verbena	None None G5T2? S2 1B.1 BLM: Sensitive USFS: Sensitive	Chaparral, coastal scrub, desert dunes. Sandy areas60-1570 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .	
Ambrosia pumila	San Diego ambrosia	Endangered None G1 S1 1B.1	Chaparral, coastal scrub, valley and foothill grassland. Sandy loam or clay soil; sometimes alkaline. In valleys; persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 3-580 m.	The soils required for this species are not on site. Potential to occur is low.	
Arenaria paludicola	marsh sandwort	Endangered Endangered G1 S1 1B.1	Marshes and swamps. Growing up through dense mats of Typha, Juncus, Scirpus, etc. in freshwater marsh. Sandy soil. 3-170 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .	
Berberis nevinii	Nevin's barberry	Endangered Endangered G1 S1 1B.1	Chaparral, cismontane woodland, coastal scrub, riparian scrub. On steep, N-facing slopes or in low grade sandy washes. 90-1590 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low.	
Calochortus plummerae	Plummer's mariposa-lily	None None G4 S4 4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 60-2500 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate.	
Centromadia pungens ssp. laevis	smooth tarplant	None None G3G4T2 S2 1B.1	Valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland. Alkali meadow, alkali scrub; also in disturbed places. 5-1170 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate.	
Chloropyron maritimum ssp. maritimum	salt marsh bird's-beak	Endangered Endangered G4?T1 S1 1B.2 BLM: Sensitive	Marshes and swamps, coastal dunes. Limited to the higher zones of salt marsh habitat. 0-10 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .	
Chorizanthe parryi var. parryi	Parry's spineflower	None None G3T2 S2 1B.1 BLM: Sensitive USFS: Sensitive	Coastal scrub, chaparral, cismontane woodland, valley and foothill grassland. Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland. Dry, sandy soils. 90-1220 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate.	
Cylindropuntia californica var. californica	snake cholla	None None G3T2 S1 1B.1 BLM: Sensitive	Chaparral, coastal scrub. 15-290 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .	
Deinandra paniculata	paniculate tarplant	None None G4 S4 4.2	Coastal scrub, valley and foothill grassland, vernal pools. Usually in vernally mesic sites. Sometimes in vernal pools or on mima mounds near them. 25-940 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate.	

Scientific Name	Scientific Name Common Name State Listing State Listing Other Listing		Habitats	Potential To Occur
Eriastrum densifolium ssp. sanctorum	Santa Ana River woollystar	Endangered Endangered G4T1 S1 1B.1	Coastal scrub, chaparral. In sandy soils on river floodplains or terraced fluvial deposits. 180-705 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	None None G4T2 S2 1B.1 BLM: Sensitive	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1375 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Lepidium virginicum var. robinsonii	Robinson's pepper-grass	None None G5T3 S3 4.3	Chaparral, coastal scrub. Dry soils, shrubland. 4-1435 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Myosurus minimus ssp. apus	little mousetail	None None G5T2Q S2 3.1	Vernal pools, valley and foothill grassland. Alkaline soils. 20-640 m.	Vernal pools are not on site. Potential to occur is low .
Phacelia stellaris	Brand's star phacelia	None None G1 S1 1B.1	Coastal scrub, coastal dunes. Open areas. 3-370 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Romneya coulteri	Coulter's matilija poppy	None None G4 S4 4.2	Coastal scrub, chaparral. In washes and on slopes; also after burns. 20-1200 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Senecio aphanactis	chaparral ragwort	None None G3 S2 2B.2	Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. 20-1020 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
			Birds	
Accipiter cooperii	Cooper's hawk	None None G5 S4 CDFW: Watch List IUCN: Least Concern	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.	There are ornamental trees in the vicinity that can provide suitable habitat for this species. Potential to occur is moderate.
Agelaius tricolor	tricolored blackbird	None Threatened G2G3 S1S2 BLM: Sensitive CDFW: Species of Special Concern IUCN: Endangered NABCI: Red Watch List USFWS: Birds of Conservation Concern	Highly colonial species, most numerous in Central Valley & vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Aimophila ruficeps canescens	southern California rufous- crowned sparrow	None None G5T3 S3 CDFW: Watch List	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	Steep, rocky cliffside preferred by this species is on site, and some coastal scrub species occur on and near the cliff. Potential to occur is moderate .

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur
Artemisiospiza belli belli	Bell's sage sparrow	None None G5T2T3 S3 CDFW: Watch List USFWS: Birds of Conservation Concern	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range. Nest located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yds apart.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Athene cunicularia	burrowing owl	None None G4 S3 BLM: Sensitive CDFW: Species of Special Concern IUCN: Least Concern USFWS: Birds of Conservation Concern	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Some suitable habitat for this species occurs at the southerr base of the cliff. Potential to occur is moderate .
Buteo swainsoni	Swainson's hawk	None Threatened G5 S3 BLM: Sensitive IUCN: Least Concern USFWS: Birds of Conservation Concern	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, & agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	The project is outside of the species' current known range. Potential to occur is low .
Coccyzus americanus occidentalis	western yellow-billed cuckoo	Threatened Endangered G5T2T3 S1 BLM: Sensitive NABCI: Red Watch List USFS: Sensitive USFWS: Birds of Conservation Concern	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Coturnicops noveboracensis	yellow rail	None None G4 S1S2 CDFW: Species of Special Concern IUCN: Least Concern NABCI: Red Watch List USFS: Sensitive USFWS: Birds of Conservation Concern	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Eremophila alpestris actia	California horned lark	None None G5T4Q S4 CDFW: Watch List IUCN: Least Concern	Coastal regions, chiefly from Sonoma County to San Diego County. Also main part of San Joaquin Valley and east to foothills. Short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Icteria virens	yellow- breasted chat	None None G5 S3	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species Potential to occur is low .

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		CDFW: Species of Special Concern IUCN: Least Concern	Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 ft of ground.	
Lanius Iudovicianus	loggerhead shrike	None None G4 S4 CDFW: Species of Special Concern IUCN: Least Concern USFWS: Birds of Conservation Concern	Broken woodlands, savannah, pinyon- juniper, Joshua tree, and riparian woodlands, desert oases, scrub & washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	Habitat on site is non- expansive/open ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Laterallus jamaicensis coturniculus	California black rail	None Threatened G3G4T1 S1 BLM: Sensitive CDFW: Fully Protected IUCN: Near Threatened NABCI: Red Watch List USFWS: Birds of Conservation Concern	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Polioptila californica californica	coastal California gnatcatcher	Threatened None G4G5T2Q S2 CDFW: Species of Special Concern NABCI: Yellow Watch List	Obligate, permanent resident of coastal sage scrub below 2,500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	Habitat on site is primarily ruderal annual grassland and coastal scrub on site does not contain <i>Artemesia californica</i> , the plant preferred by this species for nesting. The scrub is not suitable for this species. Potential to occur is low .
Setophaga petechia	yellow warbler	None None G5 S3S4 CDFW: Species of Special Concern USFWS: Birds of Conservation Concern	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Spinus lawrencei	Lawrence's goldfinch	None None G3G4 S3S4 IUCN: Least Concern NABCI: Yellow Watch List USFWS: Birds of Conservation Concern	Nests in open oak or other arid woodland and chaparral, near water. Nearby herbaceous habitats used for feeding. Closely associated with oaks.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Vireo bellii pusillus	least Bell's vireo	Endangered Endangered G5T2 S2 IUCN: Near Threatened NABCI: Yellow Watch List	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, <i>Baccharis</i> , mesquite.	ruderal annual grassland and is not suitable for this species.

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur
			Mammals	
Chaetodipus fallax fallax	naetodipus fallax San Diego Sas4 Sas4 Sagebrush, etc. III western San Diego County. Sagebrush, etc. III western San Diego ruderal annua is not suitable		Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .	
Dipodomys merriami parvus	San Bernardino kangaroo rat	Endangered Candidate Endangered G5T1 S1 CDFW: Species of Special Concern	Alluvial scrub vegetation on sandy loam substrates characteristic of alluvial fans and flood plains. Needs early to intermediate seral stages.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Dipodomys stephensi	Stephens' kangaroo rat	Endangered Threatened G2 S2 IUCN: Endangered	Primarily annual & perennial grasslands, but also occurs in coastal scrub & sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil.	Habitat on site is marginally suitable for this species. Potential to occur is moderate
Eumops perotis californicus	western mastiff bat	None None G5T4 S3S4 BLM: Sensitive CDFW: Species of Special Concern WBWG: High Priority	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels.	The cliff face provides suitable roosting habitat for this species. Potential to occur is moderate.
Lasiurus xanthinus	western yellow bat	None None G5 S3 CDFW: Species of Special Concern IUCN: Least Concern WBWG: High Priority	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.	Palm trees suitable for roosting are on site and water sources are available within a mile radius. Potential to occur is moderate.
Lepus californicus bennettii	San Diego black-tailed jackrabbit	None None G5T3T4 S3S4 CDFW: Species of Special Concern	Intermediate canopy stages of shrub habitats & open shrub / herbaceous & tree / herbaceous edges. Coastal sage scrub habitats in Southern California.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Nyctinomops femorosaccus	pocketed free-tailed bat	None None G4 S3 CDFW: Species of Special Concern IUCN: Least Concern WBWG: Medium Priority	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.	The cliff face provides suitable roosting habitat for this species. Potential to occur is moderate.
Onychomys torridus ramona	southern grasshopper mouse	None None G5T3 S3 CDFW: Species of Special Concern	Chenopod scrub Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover. Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Perognathus longimembris brevinasus	Los Angeles pocket mouse	None None G5T1T2	Coastal scrub	Habitat on site is primarily ruderal annual grassland and

		S1S2 CDFW: Species of Special Concern	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin. Open ground with fine, sandy soils. May not dig extensive burrows, hiding under weeds and dead leaves instead.	is not suitable for this species. Potential to occur is low .
Taxidea taxus	American badger	None None G5 S3 CDFW: Species of Special Concern IUCN: Least Concern	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
			Reptiles	
Anniella stebbinsi	Southern California legless lizard	None None G3 S3 CDFW: Species of Special Concern USFS: Sensitive	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.	Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species occur. Potential to occur is moderate .
Arizona elegans occidentalis	California glossy snake	None None G5T2 S2 CDFW: Species of Special Concern	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species occur. Potential to occur is moderate .
Aspidoscelis hyperythra	orange- throated whiptail	None None G5 S2S3 CDFW: Watch List IUCN: Least Concern USFS: Sensitive	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks. Perennial plants necessary for its major food: termites.	Washes are not on site. Potential to occur is low .
Aspidoscelis tigris stejnegeri	coastal whiptail	None None G5T5 S3 CDFW: Species of Special Concern	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Crotalus ruber	red-diamond rattlesnake	None None G4 S3 CDFW: Species of Special Concern USFS: Sensitive	Chaparral, woodland, grassland, & desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.	Habitat on site is primarily ruderal annual grassland. Potential to occur is moderate .
Phrynosoma blainvillii	coast horned lizard	None None G3G4 S3S4 BLM: Sensitive CDFW: Species of Special Concern IUCN: Least Concern	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
			Amphibians	
Spea hammondii	western spadefoot	None None G3 S3	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands.	Habitat on site is primarily ruderal annual grassland with no pooling areas and is not

		BLM: Sensitive CDFW: Species of Special Concern IUCN: Near Threatened	Vernal pools are essential for breeding and egg-laying.	suitable for this species. Potential to occur is low .			
Fish							
Catostomus santaanae	Santa Ana sucker	Threatened None G1 S1 AFS: Threatened IUCN: Vulnerable	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand- rubble-boulder bottoms, cool, clear water, and algae.	Habitat on site is not aquatic. Potential to occur is none.			
Gila orcuttii	arroyo chub	None None G2 S2 AFS: Vulnerable CDFW: Species of Special Concern USFS: Sensitive	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave & San Diego river basins. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.	Habitat on site is not aquatic. Potential to occur is none.			
Oncorhynchus mykiss irideus pop. 10	steelhead - southern California DPS	Endangered None G5T1Q S1 AFS: Endangered	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.	Habitat on site is not aquatic. Potential to occur is none.			
Rhinichthys osculus ssp. 3	Santa Ana speckled dace	None None G5T1 S1 AFS: Threatened CDFW: Species of Special Concern USFS: Sensitive	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20 C. Usually inhabits shallow cobble and gravel riffles.	Habitat on site is not aquatic. Potential to occur is none.			
			Crustaceans				
Streptocephalus woottoni	Riverside fairy shrimp	Endangered None G1G2 S1S2 IUCN: Endangered	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.	There are no vernal pools on site. Potential to occur is low .			
			Insects				
Bombus crotchii	Crotch bumble bee	None Candidate Endangered G3G4 S1S2	Coastal California east to the Sierra- Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	Habitat on site is primarily disturbed and buckwheat is sparse. Potential to occur is low .			
Carolella busckana	Busck's gallmoth	None None G1G3 SH	Coastal dunes, Coastal scrub	Coastal dunes habitat does not occur on site. Potential to occur is low .			
Ceratochrysis Iongimala	Desert cuckoo wasp	None None G1 S1	Desert habitats.	Desert habitat is not on site. Potential to occur is low .			
Euphydryas editha	quino checkerspot	Endangered None G5T1T2	Sunny openings within chaparral & coastal sage shrublands in parts of Riverside & San Diego counties. Hills and mesas near the coast. Need high densities of food plants Plantago	Plantago species required by this species do not occur on site. Potential to occur is low.			
quino	butterfly	S1S2 None	erecta, P. insularis, and Orthocarpus purpurescens.				

		SH	Cleptoparasitic in the nests of perdita bees.	areas. Potential to occur is low.		
	Habitats					
Southern California Arroyo Chub/Santa Ana Sucker Stream	Southern California Arroyo Chub/Santa Ana Sucker Stream	None None GNR SNR	N/A	Habitat is not on site.		
Southern Cottonwood Willow Riparian Forest	Southern Cottonwood Willow Riparian Forest	None None G3 S3.2	N/A	Habitat is not on site.		
Southern Sycamore Alder Riparian Woodland	Southern Sycamore Alder Riparian Woodland	None None G4 S4	N/A	Habitat is not on site.		
Southern Willow Scrub	Southern Willow Scrub	None None G3 S2.1	N/A	Habitat is not on site.		

Coding and Terms

E = Endangered T = Threatened C = Candidate FP = Fully Protected SSC = Species of Special Concern R = Rare

State Species of Special Concern: An administrative designation given to vertebrate species that appear to be vulnerable to extinction because of declining populations, limited acreages, and/or continuing threats. Raptor and owls are protected under section 3502.5 of the California Fish and Game code: "It is unlawful to take, possess or destroy any birds in the orders Falconiformes or Strigiformes or to take, possess or destroy the nest or eggs of any such bird."

State Fully Protected: The classification of Fully Protected was the State's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, mammals, amphibians and reptiles. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

Global Rankings (Species or Natural Community Level):

G1 = Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2 = Imperiled – At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3 = Vulnerable – At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4 = Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5 = Secure - Common; widespread and abundant.

Subspecies Level: Taxa which are subspecies or varieties receive a taxon rank (T-rank) attached to their G-rank. Where the G-rank reflects the condition of the entire species, the T-rank reflects the global situation of just the subspecies. For example: the Point Reyes mountain beaver, *Aplodontia rufa* ssp. *phaea* is ranked G5T2. The G-rank refers to the whole species range, i.e., *Aplodontia rufa*. The T-rank refers only to the global condition of ssp. *phaea*.

State Ranking:

S1 = Critically Imperiled - Critically imperiled in the State because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the State.

S2 = Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the State.

S3 = Vulnerable - Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the State.

S4 = Apparently Secure - Uncommon but not rare in the State; some cause for long-term concern due to declines or other

S5 = Secure – Common, widespread, and abundant in the State.

California Rare Plant Rankings (CNPS List):

1A = Plants presumed extirpated in California and either rare or extinct elsewhere.

1B = Plants rare, threatened, or endangered in California and elsewhere.

- 2A = Plants presumed extirpated in California, but common elsewhere.
- 2B = Plants rare, threatened, or endangered in California, but more common elsewhere.
- 3 = Plants about which more information is needed; a review list.
- 4 = Plants of limited distribution; a watch list.

Threat Ranks:

- .1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
- .2 = Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
- .3 = Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

As noted in Table 8, 60 sensitive species and four habitats have been documented in the *Riverside East* and *Riverside West USGS* 7.5-minute series quadrangles. This list of sensitive species and habitats includes any State and/or federally listed threatened or endangered species, CDFW designated Species of Special Concern (SSC), and otherwise Special Animals. "Special Animals" is a general term that refers to all taxa the CNDDB is interested in tracking, regardless of their legal or protection status. This list is also referred to as the list of "species at risk" or "special status species." The California Department of Fish and Wildlife (CDFW) considers the taxa on this list to be those of greatest conservation need. An analysis of the likelihood of occurrence for all sensitive species documented in the *Riverside East* and *Riverside West* quads on the Project site is provided in Table 8, above. This analysis considers species range as well as documentation within the vicinity of the Project site and includes the habitat requirements for each species and the potential for their occurrence on the site, based on required habitat elements and range relative to the current site conditions. According to the databases, no sensitive habitat, including U.S. Fish and Wildlife Service (USFWS) designated critical habitat, occurs within or adjacent to the Project site.

Plant species and wildlife observed onsite are listed below.

Plant Species

Plant species identified on-site include Peruvian pepper tree (*Schinus mole*), Mexican fan palm (*Washingtonia robusta*), Russian thistle (*Salsola tragus*), oleander (*Nerium oleander*), wild oat (*Avena fatua*), yellow tobacco tree (*Nicotiana glauca*), brittlebush (*Encelia farinosa*), and California buckwheat (*Erioganum fasciculatum*).

Wildlife Species

Wildlife species observed on site include house finch (*Carpodacus mexicanus*), common raven (*Corvus corax*), Anna's hummingbird (*Calypte anna*), and lesser goldfinch (*Spinus psaltria*). California ground squirrel (*Otospermophilus beechevi*) burrows were found at the southern base of the cliff on site.

Species with a Moderate Potential to Occur

- Table 8 summarizes the database search and provides an analysis of the potential for these species to occur.
 Species identified in this section are identified to have a "moderate" potential to occur.
- Plummer's mariposa Lily this species typically is found in coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. The habitat on site is ruderal annual grassland with some remnant coastal scrub species. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Therefore, the project would have a less than significant impact to this species;
- Smooth tarplant this species is typically found in valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland, or alkali meadow, alkali scrub; also, in disturbed places. The habitat on site is ruderal annual grassland with some remnant coastal scrub species. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Additionally, this species would have been blooming during the field surveys and would have been discovered during the site visits. Therefore, the project would have a less than significant impact to this species.

- Parry's spineflower Typically found in coastal scrub, chaparral, cismontane woodland, valley and foothill
 grassland. Habitat on site is ruderal annual grassland with some remnant coastal scrub species. This species
 could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were
 found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also
 did not identify that this parcel required surveys for narrow endemic plant species. Therefore, the project would
 have a less than significant impact to this species.
- Paniculate tarplant This species can be found in coastal scrub, valley and foothill grassland, vernal pools, but usually in vernally mesic sites, and sometimes in vernal pools or on mima mounds near them. The habitat on site is ruderal annual grassland with some remnant coastal scrub species, and there are no vernal pools or vernally mesic sites. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Therefore, the project would have a less than significant impact to this species.
- Cooper's hawk This species prefers woodland, chiefly of open, interrupted or marginal type. Nest sites are mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks. There are trees on site and in the general vicinity that can provide suitable habitat for this species. No nests were observed in the trees on site. Even though the Project may impact the trees on site, the Cooper's hawk will utilize a variety of trees for nesting and roosting, and there are numerous trees in the general Project area. A pre-construction nesting bird survey is recommended. With the nesting survey, there is a less than significant impact.
- Southern California rufous-crowned sparrow A resident in Southern California coastal sage scrub and sparse
 mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches. Steep, rocky
 cliffside preferred by this species is on site, and some coastal scrub species occur on and near the cliff. The
 Project is not anticipated to impact the cliff or hillside that exists on the western portion of the site. Therefore,
 there is a less than significant impact.
- Stephens' kangaroo rat Primarily annual & perennial grasslands, but also occurs in coastal scrub & sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil. Habitat on site is marginally suitable for this species, mostly in the northern area where there is patchy coastal sage scrub species and grassland. However, this area is small, isolated, and does not provide connectivity to other areas that would be suitable for this species. The Riverside MSHCP has a Stephen's kangaroo rat fee structure to off-set development.
- Western mastiff bat Prefers open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels. The cliff face in the western area of the site provides suitable roosting habitat for this species. The Project is not anticipated to disturb the cliff, therefore, there is a less than significant impact.
- Western yellow bat this species is typically found in valley foothill riparian, desert riparian, desert wash, and
 palm oasis habitats. Palm trees suitable for roosting are on site and water sources are available within a one
 mile radius. Roosts in trees, particularly palms. Forages over water and among trees. A pre-construction
 nesting bird survey is recommended. With the implementation of this recommendation, there would be a less
 than significant impact.
- Pocketed free-tailed bat This species prefers a variety of arid areas in Southern California; pine-juniper
 woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc., especially rocky areas with high cliffs.
 The cliff face in the western portion of the site provides suitable roosting habitat for this species. However, the
 Project is not anticipated to impact the cliff area, therefore, there is a less than significant impact.
- Southern California legless lizard Typically occurs in sandy or loose loamy soils under sparse vegetation, and
 typically prefer soils with a high moisture content. Suitable habitat for this species occurs at the base of the
 cliff where less drought-tolerant species occur. The Project is not anticipated to significantly impact the suitable
 habitat area where this species could occur. Therefore, there is a less than significant impact.
- California glossy snake Generally reported from a range of scrub and grassland habitats, often with loose or sandy soils. Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species

occur. The Project is not anticipated to significantly impact the suitable habitat area where this species could occur. Therefore, there is a less than significant impact.

• Red-diamond rattlesnake - Chaparral, woodland, grassland, & desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects. Habitat on site is primarily ruderal annual grassland. The snake may be preyed on by kingsnakes, roadrunners and possibly owls, according to the California's Department of Fish and Wildlife, and it has lost habitat as human developments expand into its range. Nevertheless, it is ranked as a species of "least concern" by the International Union for Conservation of Nature and Natural Resources. However, the species' population trend is down, and it may face long-term threats. In fact, said the San Diego Natural History Museum, it is listed as a "Special Concern species" by both the Federal and California state governments. Due to the urban nature of the area with prey species, as well as the Project site not providing any wildlife corridor function, it is not likely that this species will be present within the Project area. A recommendation for worker awareness training will reduce potential impacts.

Burrowing Owl (BUOW)

Although not a State- or federally-listed as threatened or endangered species, burrowing owl (*Athene cunicularia*) are considered a State and federal SSC and are a migratory bird protected by the international treaty under the Migratory Bird Treaty Act of 1918 (MBTA) and by State law under the California Fish and Game Code (CDFG Code #3513 & #3503.5). Burrowing owl have been documented locally in suitable habitat areas, and as previously noted above, suitable Burrowing owl habitat was determined present on the undeveloped portion of the site on a previous Burrowing Owl Burrow Reconnaissance Survey prepared by FirstCarbon Solutions in 2015.

The nearest documented BUOW occurrence is an extirpated occurrence 2.76 miles southwest of the survey area (CNDDB, 2005). The previous habitat assessment (FirstCarbon Solutions, 2015) found habitat on site to be suitable, and identified in the report that one BUOW was observed perched on a telephone line. Because no information on the BUOW was provided (such as where it flew to, how long it was observed, what it was doing on site, etc.) or submitted to the CNDDB, this occurrence was not used as the nearest recorded occurrence. The only suitable habitat within the Project area occurs within the undeveloped portion of the parcel; **Exhibit 6**, *BUOW Suitable Habitat*. There are ground squirrel burrows along the cliff in this portion that are potentially suitable for BUOW.

The proposed Project would not impact, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. No sensitive or special status plant species are identified to occur on-site. The results of the protocol surveys were that no burrowing owls or recent or historic sign (molted feathers, whitewash, cast pellets or prey remains, or whitewash) were observed during the surveys. However, habitat on site is suitable for BUOW in the undeveloped portion of the parcel. Based on site conditions, the likelihood of burrowing owl is moderate, but based on the Habitat Resources Study, BUOW was determined to be currently absent. To ensure that there are no impacts to burrowing owl, the following Mitigation Measure is recommended:

Mitigation Measures:

BIO-1: General Species Avoidance and Minimization

If construction activity is conducted between September 1st and January 31st, then this mitigation measure is required prior to issuance of a grading permit. Federal Migratory Bird Treaty Act (MBTA) and/or state code protect all native bird species - both common and special status. In most scenarios, MSHCP coverage does not override the nesting bird protections provided by these. Impacts to nesting birds, both direct and indirect, can be minimized or eliminated by conducting work activities outside of the local breeding season. Although nesting can occur in any month in southern California for some species, breeding in the study area, given the habitat, would primarily be expected from about 1 February through 31 August. Work from about 1 September through 31 January would avoid most negative affects to birds and nesting activity. If work must be done during the breeding season, surveys for nesting birds should occur no more than three (3) days prior to all vegetation clearing and ground disturbance. If active nests are found, they should be avoided until young have fledged. While there is no established protocol for nest avoidance, when consulted the CDFW generally recommends avoidance buffers of about 500 feet for raptors and threatened/endangered species and 100 – 300 feet for non-raptors. Adherence to these nesting bird recommendations will also avoid and/or mitigate impacts to special status bird species known from the project site which are not covered by the MSHCP.

BIO-2:	31 August). Regardless of the result of those surveys, because	focused BUOW survey must be conducted during the breeding season (four visits between 1 March - 1 August). Regardless of the result of those surveys, because of the presence of suitable habitat that ould be occupied at any time, a one-day preconstruction survey must also be conducted 30 days or						
With in	nplementation of Mitigation Measures BIO-1, and BIO-2, a less than sign	nificant imp	oact would oc	cur.				
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 Game or U.S. Fish and Wildlife Service?							
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?							

4b and 4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer, Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)

Less than Significant Impact. The City of Riverside is a signatory to the MSHCP. The MSHCP requires that a project comply with the MSHCP policies identified in Section 6 of the MSHCP. A review of the RCA MSHCP Information Map determined that the subject parcel is located within the Riverside Habitat Management Unit and in a designated survey area for BUOW. Consistent with Section 6.3.2 of the MSHCP, a habitat suitability assessment for BUOW was conducted. The initial site assessment determined that potentially suitable habitat for BUOW occurred onsite and as a result, follow-up focused surveys for BUOW were conducted; refer to Response 3(a), above. Focused surveys determined BUOW to be absent from the site.

The Project site is not located within any MSHCP designated criteria cell, cell group, or area identified for conservation. The Project site is not located in an amphibian, criteria area species, mammal, or narrow endemic plant survey area. The Project site was evaluated for wetlands and Riparian/Riverine Venal Pool resources as per MSHCP section 6.1.2, and field surveys determined these resources to be absent from the site. Other wildlife with potential to existing in vernal pools and riparian habitat such as fairy shrimp and riparian birds were reviewed for their potential to exist onsite.

Fairy Shrimp

Fairy shrimp can be found in non-vernal pool features such as stock ponds, ephemeral pools, road ruts, human-made depressions, or other depressions that may pond water. If vernal pools or other suitable fairy shrimp habitats are located within the Project site then fairy shrimp surveys must be conducted pursuant to USFWS Survey Guidelines for the Listed Large Branchiopods (May 31, 2015), which includes six listed fairy shrimp species, including those species covered under the MSHCP Section 6.1.2 which include but are not limited to:

- Riverside fairy shrimp (Streptocephalus woottoni)
- Santa Rosa Plateau fairy Shrimp (*Linderiella santarosae*)
- Vernal Pool fairy shrimp (*Branchinecta lynchi*)

The habitat assessment revealed that no habitat features suitable for fairy shrimp exist on site. Therefore, evaluations for the presence of fairy shrimp were not warranted or required.

Riparian Birds

Riparian birds covered under the MSHCP such as the Least Bell's vireo (*Vireo bellii pusillus*) (LBVI), Southwestern willow flycatcher (*Empidonax trallii extimus*) (SWWF) and Yellow-billed cuckoo (*Coccyzus americanus*) (YBCU) are found only in well-developed riparian habitat. Although Table 8 notes that the site exhibits some riparian habitat, no well-developed riparian habitat exist. The entire site is surrounded by ruderal habitat and low density residential. The habitat on site is not suitable for use by riparian birds, but, as noted in Table 8, there is always a moderate chance that birds could dwell in the future. Therefore, With implementation of Mitigation Measure BIO-1 pre-construction nesting survey, riparian birds would have a **less than significant impact**.

Wetlands No jurisdictional waters occur onsite, and no impact to riparian habitat, sensitive natural communities, federa protected wetlands, marsh, vernal pool, coastal habitat would be impacted with the implementation of the propose Project. Therefore, a less than significant impact would occur.									
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 and Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)									
Less than Significant Impact with Mitigation Incorporated. Refer to Response 4(a). The Project site is not located with any MSHCP Criteria Cells, Cores, or Linkages. The MBTA (16 U.S.C 703-711) provides protection for nesting birds th are both residents and migrants whether or not they are considered sensitive by resource agencies. The MBTA make it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feather or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The direct injuor death of a migratory bird, due to construction activities or other construction-related disturbance that causes ne abandonment, nestling abandonment, or forced fledging would be considered a take under federal law. The USFW in coordination with CDFW administers the MBTA. CDFW's authoritative nexus to MBTA is provided in FGC Sectic 3503.5 which protects all birds of prey and their nests and FGC Section 3800 which protects all non-game birds the occur naturally in the State. Additionally, vegetation suitable for nesting birds does exist within and adjacent to the Project site and most birds are protected by the MBTA. Bird nesting season generally extends from February 1 through September 15 in southern California and specifical April 15 through August 31 for migratory passerine birds. In general, Projects should be constructed outside of the time to avoid impacts to nesting birds. If a Project cannot be constructed outside of nesting season, the Project sishall be surveyed for nesting birds by a qualified avian biologist prior to initiating the construction activities. If active nests are found during the pre-construction nesting bird surveys, a Nesting Bird Plan (NBP) will be prepared an implemented. At a minimum, the NBP will include guidelines for addressing active nests, establishing buffer monitoring, and reporting. The NBP will include a copy of maps showing the location of all nests and an appropria buffer zone around each nest	at es rs ury st s, on at e ly, is te e d s, te all								
to disturbance, and expected types of disturbance. The nests and buffer zones shall be field checked weekly by qualified biological monitor. The approved buffer zone shall be marked in the field, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist has determined the young birds have successful fledged or that the nest has otherwise become inactive. Based on these standards procedures, the Project would have a less than significant impact on the movement of migratory fish and birds.	a ng Ily								
A less than significant impact would occur on migratory birds with implementation of Mitigation Measure BIO-1.									
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?]								
4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHO Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City Riverside Urban Forest Tree Policy Manual, and Biological Resources Assessment, Jurisdictional Delineatic Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericl Systems on October 1, 2020)	of n,								
Less than Significant Impact. Implementation of the proposed Project is subject to all applicable Federal, State, an local policies and regulations related to the protection of biological resources and tree preservation. In addition, the Project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation for and Section 16.40.040 establishing the Threatened and Endangered Species Fees. The Project site contains 31 palms	ne ee								

and 24 other trees which are anticipated to remain at entries and street perimeter where possible. Additionally, the Project anticipates providing 78 new trees; that is, 10 more trees than required by the City. Any planting of a street tree within a City right-of-way will follow the Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. The Project will be in compliance with the Tree Policy Manual when planting a tree within a City right-of-way, and therefore, impacts will be less than significant. Conflict with the provisions of an adopted Habitat Conservation Plan, \boxtimes Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? 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, Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)

Less than Significant Impact. A habitat assessment prepared by a qualified biologist (Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020) was prepared for the Project. The habitat assessment found the proposed Project to be located within River Habitat Management Unit in an area that requires focused BUOW surveys be conducted if suitable habitat is present. The site is not located within any MSHCP designated criteria cell, cell group, or area identified for conservation. Further, the Project site is not located in an amphibian, criteria area species, mammal, or narrow endemic plant survey area and assessment were conducted in accordance with MSHCP.

Therefore, impacts directly, indirectly and cumulatively are **less than significant impacts** to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.



EXHIBIT 6: BOUW Suitable Habitat Orangecrest Community Church



