5.	CULTURAL RESOURCES.			
Would	the project:			
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?		\boxtimes	
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to \S 15064.5 of the CEQA Guidelines?			

5(a & b). Response: (Source: Title 20 of the Riverside Municipal Code, GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, AB 52 Consultation and site specific Cultural Resources Assessment prepared by BCR Consulting LLC. In February 19, 2021, provided as Appendix B – Cultural Resources Assessment)

Less than Significant Impact. The proposed Project involves the rehabilitation of the existing two buildings and the construction of three additional buildings. The pedestrian cultural resources survey was intended to locate and document previously recorded or new cultural resources, including archaeological sites, features, isolates, and historic-period buildings, that exceed 45 years in age within defined Project boundaries.

Methodology

Research. A preliminary records search was conducted by BCR Consulting staff using results from previously completed cultural resources reports in the surrounding area, review of the National Register of Historic Places (NRHP), California State Historical Landmarks, California Points of Historical Interest, Riverside County Historical Landmarks, Landmarks of the City of Riverside, and Historic Districts of Riverside. In addition, the Built Environment Resource Directory (BERD) was reviewed for Riverside County. Additional land use history research was performed through the City of Riverside, the Riverside Public Library, the Riverside County Assessor and Recorder, General Land Office records of the Bureau of Land Management, and the County of Riverside Robert J. Fitch Archives.

Field Survey. An intensive-level cultural resources field survey of the project site was conducted on August 20 and 26, 2020. The survey was conducted by walking parallel transects spaced approximately 10-15 meters apart across the project site. The historic-period Riverside Swim and Tennis Club was recorded on DPR 523 forms. Context views and detail photographs were taken of the historic-period resource and at various points within the project boundaries (see Appendix B). Cultural resources were recorded per the California OHP Instructions for Recording Historical Resources in the field using:

- Detailed note taking for entry on DPR forms (Appendix A to the Cultural Resources Assessment)
- Hand-held Garmin Global Positioning systems for mapping purposes

No additional cultural resources were identified within the Project site boundaries. The Project site exhibited approximately 50 percent surface visibility on the western undeveloped portion of the Project site, and approximately five percent within the developed portion.

Records Search. Research completed through the EIC indicates that 18 previous cultural resource studies have taken place resulting in the identification of 6 cultural resources within 1.0 mile of the Project site. The Project site has not been subject to previous cultural resources assessment and no cultural resources have been previously identified within its boundaries. The records search results are summarized in **Table 9**, *Cultural Resources Within One Mile of the Project Site*.

Table 9: Cultural Resources Within One-Mile of the Project Site

USGS 7.5 Min Quadrangle	Cultural Resources Within One Mile of the Project Site
Riverside East,	P-33-4768: Historic Water Conveyance System
California (1980)	P-33-13927: Prehistoric Bedrock Milling Site
	P-33-20333: Historic Trash Scatter; Historic Dam
	P-33-23874: Prehistoric Bedrock Milling Site
	P-33-23957: Prehistoric Bedrock Milling Site
	P-33-23986: Historic Single-Family Property
Source: BCR Consulting, LLC.	February 19, 2021. Cultural Resources Assessment. Appendix B.

Field Survey. During the field survey, BCR Consulting personnel identified the historic-period Riverside Swim and Tennis Club. This cultural resource occupies the eastern two thirds of the property. The western third of the Project site is not developed. The Riverside Swim and Tennis Club is described below and has been documented using California DPR 523 forms. No additional cultural resources were identified within the Project site boundaries. The Project site exhibited approximately 50 percent surface visibility on the western undeveloped portion of the Project site, and approximately five percent within the developed portion. Vegetation included white sage, date palm trees and a variety of non-native shrubs, trees, and seasonal grasses.

Riverside Swim and Tennis Club. The property was formerly used as a swim and tennis club. Two historic-age buildings, two demolished pools, and eight tennis courts remain on the Project site. The pool deck and tennis courts are enclosed by cement block walls and chain-link fencing. In the center of the pool deck is a large pool that has been demolished and filled with dirt. A smaller pool (also filled with dirt) is located about 30 feet southwest of the large pool. Building A is located south of the large pool, while Building B is located on the east side of the pool deck. Both buildings are rectangular in plan and share architectural features typical of the mid-century modern style. Building A, formerly used for office space and dressing rooms for the Riverside Swim and Tennis Club, has a flat roof with exposed structural beams.

It is constructed of square concrete masonry units with decorative concrete masonry unit screen walls along the street facade. At the northeast corner of the building, an extension of the roof overhang shelters a built-in L-shaped desk. Building B, formerly used for snack and recreational space for the Club, also features concrete masonry walls and a flat roof with exposed structural members and deep overhang. All windows and doors have been boarded up. The buildings are in fair condition. In the center of the facility, between the pool deck and tennis courts, there is a vacant garden area. The area is filled with dirt, but some of the wood used to line planters is still visible. Eight tennis courts are situated to the west and north of the pool deck. They are partitioned by tall chain-link fences and connected by a concrete walkway. The courts show significant neglect, as the concrete is cracked and overgrown with weeds. South of the enclosed pool deck and tennis courts is a large asphalt-paved parking lot. The parking lot is in poor condition, with large cracks and potholes forming in the asphalt. A small ancillary structure, featuring a flat roof and concrete veneer cladding, is situated in the south corner of the parking lot.

Sacred Land File Search and Tribal Scoping. The NAHC replied on August 19, 2020. Results of Sacred Land File Search did not indicate the presence of Native American cultural resources and recommended that the below groups/individuals be contacted. BCR Consulting sent notifications to tribes on October 16, 2020. The Tribes contacted are provided in Table C of the Cultural Report and additionally, correspondence is summarized below and available responses are attached in their entirety as Appendix C of the Cultural Report provided in this Initial Study as Appendix B). These are up to date as of October 22, 2020.

Significance Evaluations. The California Environmental Quality Act (CEQA) calls for the evaluation and recordation of historic and archaeological resources. The criteria for determining the significance of impacts to cultural resources are based on §15064.5 of the CEQA Guidelines and Guidelines for the Nomination of Properties to the CRHR. Properties eligible for listing in the CRHR and subject to review under CEQA are those meeting the criteria for listing in the CRHR, or designation under a local ordinance. The City of Riverside Community Development Department Consultant Requirements for Cultural Resources Survey, Studies and Reports Information Sheet also indicates that evaluation for local designation eligibility should be performed per City of Riverside Municipal Code Title 20 (Cultural Resources Ordinance), County Landmark, etc. Since there is no federal review of this Project, NRHP eligibility evaluation is not required.

As part of the goals and policies of the Historic Preservation Element of the General Plan, Riverside maintains an active and systematic program to survey cultural resources citywide. Surveys are completed for a variety of reasons. Surveys reveal what properties are architecturally and historically significant and what properties are eligible for designation. They also facilitate environmental review processes, promote heritage tourism initiatives, and serve as the basis for establishing historic districts and developing design guidelines.

Significance Criteria

Because this work was completed pursuant to CEQA, the resource identified within the Project site boundaries requires evaluation for the California Register. The City of Riverside Community Development Department Consultant Requirements for Cultural Resources Survey, Studies and Reports Information Sheet also indicates that evaluation for local designation eligibility should be performed per City of Riverside Municipal Code Title 20 (Cultural Resources Ordinance), County Landmark, etc. Since there is no federal review of this Project, National Register of Historic Places eligibility evaluation is not required.

California Register of Historical Resources. The CRHR criteria are based on NRHP criteria. For a property to be eligible for inclusion on the CRHR, one or more of the following criteria must be met:

- 1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
- 2. It is associated with the lives of persons important to local, California, or U.S. history;
- 3. It embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of a master, possesses high artistic values; and/or
- 4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years will require evaluation. The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

The Project site revealed that although the Swim and Tennis Club is of historical age, no structure was found to be specifically associated with events significant to local, state, or national history (Criterion 1). With regard to Criterion 2, substantial research has failed to connect the subject property with the lives of persons important in California's past. It is therefore not eligible for the CRHR under Criterion 2. Under Criterion 3, the buildings lack architectural distinction and do not display significant elements of the era during which they were constructed. They do not significantly represent the work of an important creative individual or possess high artistic values. Therefore, the subject property is not eligible under Criterion 3. Under Criterion 4, the subject property has not and is not likely to yield information important in prehistory or history and are therefore not eligible for listing under Criterion 4. The subject property and its historic-age buildings are therefore recommended *not* eligible under any of the four criteria for listing on the CRHR, and as such are not recommended historical resources under CEQA. See the Cultural Resources Assessment provided in Appendix B of this Initial Study, for detailed discussion of the CRHR evaluation.

Local Designation Eligibility. A review of the City Historic Resources Inventory, Existing and Potential Historic District and Neighborhood Conservation Areas, and Landmarks of the City of Riverside were all completed for the Project site. Chapter 20.50.010 of the City municipal code defines a City Landmark as:

Any improvement or natural feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

- 1. Research has not indicated that the subject property and its constituent historic-age buildings and features exemplify or reflect special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
- 2. Research failed to associate the subject property with any persons or events significant in local, state or national history;

- 3. Research and analysis has shown that the subject property and its constituent historic-age buildings and features do not embody distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
- 4. The project site and its buildings and features do not represent the work of a notable builder, designer, or architect, or important creative individual;
- 5. The project site and its buildings and features do not embody elements that possess high artistic values or represent a significant structural or architectural achievement or innovation;
- 6. Research has failed to show that the subject property reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;
- 7. Since research and analysis has demonstrated that the project site does not possess distinguishing characteristics, it is not one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or
- 8. The project site has been subject to severe disturbances associated with previous mining activities and the development of the Riverside Swim and Tennis Club. It has not and is not likely to yield information important in history or prehistory.

Additionally, according to Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity of the General Plan, the Project site is not located in an archaeological sensitivity area and is identified as being located in a medium prehistoric cultural sensitivity zone. Based on this and on the Cultural Resources Assessment findings, it is concluded that the Project site does not qualify as a City Landmark. A review of the City Historic Resources Inventory, Existing and Potential Historic District and Neighborhood Conservation Areas, and Landmarks of the City of Riverside failed to indicate that the Project site had been locally designated. It is therefore recommended not eligible for Local Designation.

As a result, BCR Consulting recommends a finding of no impacts to historical resources under CEQA for the current Project. BCR Consulting also recommends that no additional cultural resources work, or monitoring is necessary during proposed activities associated with the development of the Project site. However, if previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.

Thus, implementation of Conditions of Approval (COA) CUL-1 through CUL-4 would reduce potential impacts to cultural resources directly, indirectly and cumulatively as a result of the Project to a **less than significant** level.

Conditions of Approval

- COA CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.
- COA CUL-2: On call Project Archaeologist: Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.
- **COA CUL-3:** Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

- 1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
- Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and
- 3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
 - Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
 - b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
 - c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and
 - d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

COA CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

training shall be included in the Phase IV Monitoring Report.		
c. Disturb any human remains, including those interred outside of format cemeteries?		

5c. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, and the AB 52 Consultation)

Less than Significant Impact. The proposed Project is not located within a High or Medium Archeological Sensitivity Zone. In regard to Prehistoric Cultural Resources Sensitivity Zone, the Project is located in a Medium Sensitivity Zone. Where construction is proposed in undeveloped areas, disturbance on vacant lands could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries. Consistent with State laws protecting these remains, sites containing human remains must be identified and treated in a sensitive manner. In the event that Native American human remains are inadvertently

discovered during Project related construction activities, there would be significant adverse impacts to Native American resources, but implementation of COAs CUL - 1 through CUL - 4 will, however, reduce impacts to human remains, including those interred outside of formal cemeteries to a less than significant level.					
6. ENERGY Would the project:					
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?					
6a. Response: (Source: City of Riverside, California, Five Year Integrated Resource Plan 2018)					
Less than Significant Impact. The proposed Project includes construction and operation of a community church on a site previously used as a swim and tennis club. The proposed Project would require the use of electricity, natural gas, and use of transportation fuel during the construction phase. The demand for these resources would be supplied from existing services within the proposed Project area. The overall construction activities would require minimal consumption of these resources as these activities would be temporary and conclude once the proposed Project construction is complete.					
The Project would be required to comply with the 2019 California Green Building Standards Code. The Project also would be required to comply with the building energy efficiency standards of California Code of Regulations Title 24, Part 6 in effect at the time of Project approval. Compliance with these standards would reduce energy consumption associated with Project operations. The emissions estimates for energy use provided in the CalEEMod output sheets in Appendix A of the Initial Study take into account these mandatory compliance measures.					
Overall, Project construction and operations would not consume energy resources in a manner considered wasteful, inefficient, or unnecessary. Project impacts related to energy consumption would be considered less than significant .					
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?					
6b. Response: (Source: City of Riverside, California, Five Year Integrated Resource Plan 2018)					
Less than Significant Impact. The City of Riverside Public Utilities 2018 Integrated Resource Plan provides an impact analysis of Riverside's acquisition of new power resources, specifically towards meeting the state of California's aggressive carbon reduction goals, continuing to provide the highest quality electric services at the lowest possible rates, while adhering to a diverse set of state and regional legislative/regulatory mandates. The Project will comply with Title 24, Green Building Code, for all Project energy efficiency requirements. A less than significant impact would occur.					
7. GEOLOGY AND SOILS Would the project:					
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.					
7i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Investigation, prepared by Southern California Geotechnical (SCG), dated January 13, 2021; see Appendix D)					
Less than Significant Impact. Southern California is a seismically active region containing many earthquake faults. According to Figure PS-1, <i>Regional Fault Zones</i> , of the General Plan 2025, and the Geotechnical Investigation, there are no Alquist-Priolo zones or fault lines that traverse the City. The closest faults to the Project site are the Elsinore and San Jacinto Faults which are located approximately 15.0 miles south and 18.0 miles northeast, respectively, from the					

Project site. Furthermore, no evidence of faulting was discovered during the geotech possibility of significant fault rupture on the site is considered to be low. Lastly, any the Project will be subject to seismic design criteria in accordance with the latest Cal will reduce potential impacts to less than significant directly, indirectly and cumulative.	struc [.]	tures develo	ped as a p	art of	
ii. Strong seismic ground shaking?					
7ii. Response: (Source: General Plan 2025 FPEIR Appendix E – Geotechnical International California Geotechnical, dated January 13, 2021, provided as Appendix)	vestig	ation, prepa	ared by Sou	thern	
Less than Significant Impact. The San Jacinto Fault Zone located in the northeastern Fault Zone, located in the southern portion of the City's Sphere of Influence, have the large earthquakes that would cause intense ground shaking. As previously noted, the regional seismicity. Ground shaking originating from earthquakes along active faults is lower horizontal accelerations due to smaller anticipated earthquakes and/or great Project would be required to be in conformance with the most recently published applicable standards. The CBC design standards correspond to the level of seism intended primarily to protect public safety and secondly to minimize property damengineering practices and design criteria established in the latest CBC, would redushaking to a less than significant level.	he pot ne Proj in the ater di d CBC, mic ris nage.	tential to ca ject site is in region is ex istances to , City regula sk in each Conformand	use moder of an area of pected to in other faults tions, and ocation and the with star	ate to f high nduce s. The other d are ndard	
iii. Seismic-related ground failure, including liquefaction?					
Tiii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Investigation, prepared by Southern California Geotechnical, dated January 13, 2021, provided as Appendix?) Less than Significant Impact. Liquefaction is the loss of the strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include ground water table elevation, soil type and grain size characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean (d50) grain size in the range of 0.075 to 0.2 mm. Clayey (cohesive) soils or soils which possess clay particles (d<0.005mm) in excess of 20 percent are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table. According to the General Plan 2025 Liquefaction Zones Map – Figure PS-2, and the Geotechnical Investigation results indicate that the Project site is located within a mapped zone of moderate liquefaction susceptibility. However, the subsurface conditions encountered at the boring and test pit locations consist of artificial fill materials underlain by very dense bedrock. Also, no water was encountered within the depths explored by the borings and test pits. Based on these conditions, no design considerations related to liquefaction are considered warranted for the project. Additionally, with compliance to the latest applicable CBC, a less than significant impact would occur.					
iv. Landslides?					
7iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underla Geotechnical Investigation, prepared by Southern California Geotechnical, de Subdivision Code, Title 17 – Grading Code, Storm Water Pollution Prevention	lated J	lanuary 13,			
Less than Significant Impact. The Project site has two slopes, within the tennis of However, geological features typically associated with landslides, such as hillsides or developed portion of the site. Additionally, the City of Riverside General Plan's Pulprincipal areas of steep slopes; such as the Box Springs Mountains, Alessandro Heig facing slopes of the Norco Hills. The Project site is located outside of an area of stee location precludes impacts associated with landslides, and less than significant impacts.	r riverl Iblic S ghts, F ep slo	banks, are r afety Eleme Hawarden H pes. Therefo	not located ent identifications the ills and the	in the es the east-	

b. Result in substantial soil erosion or the loss of topsoil?				
7b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Un Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – G Environmental Site Assessment prepared by Terracon on June 11, 2019	Grading C			
Less than Significant Impact. According to the Soil Survey of Project area, o 2.2 acres) buren fine sandy loam, 8 to 15 percent slopes, eroded and 37.5% (all sandy loam, shallow, 15 to 50 percent slopes, eroded. The USDA's Soil Survey Project site area is 62.5 percent slight and 37.5 percent moderate. A rating of "sunder ordinary climatic conditions; "moderate" indicates that some erosion is like may be needed. Refer to Exhibit 7, Preliminary Grading Plan.	pproxima of Soil Er slight" ind	itely 1.4 acres rosion Hazard dicates that e	s) fallbrook is s states tha rosion is un	rocky It the likely
The State of California is authorized to administer various aspects of the Na System (NPDES). Construction activities covered under the State's Constructivegetation, grading, excavation, or any other activity that causes the disturbant activities would be required to implement Best Management Practices (BMPs) from potentially polluting surface waters from soil erosion. Additionally, the Prapplicable provisions of State Law, including §15.04.210 of the CBC, Appendix includes the following provisions:	on Gene nce of or to preve roject wo	ral Permit inc ne acre or mo ent construction uld be subjec	clude removere. Construction of the Protection to the Protection of the Protection o	al of ction oject with
 Section J112.1 General. "All parties performing grading operations, Building Official, shall have verification of land use entitlement and shall as directed by the Building Official and incorporated into the Grading Development Department, to avoid earth or other materials from the prestreets or properties, by the action of storm waters or wind, by spillage causes." 	l take rea: Policy pr remises t	sonable preveromulgated by peing deposited	entive meas the Commed onto adja	ures, unity acent
 Section J112.2 Removal of Materials Within 24 Hours. "Earth or oth adjacent streets or properties shall be completely removed by the perm event within 24 hours after receipt of written notice from the Building of designees, to remove the earth or materials, or within such addition notice." 	nittee as s Official, o	soon as practi or NPDES Coo	cable, but in rdinator, or	n any their
 Section J112.3 Noncompliance. "In the event that any party performir requirements of this Section, the Building Official shall have the authorit to remove the earth or other materials. All charges incurred for the ser the City by the permittee prior to acceptance of the grading." 	ty to enga	ge the service	s of a contr	actor
Additionally, most of the artificial fill soils possess appreciable silt content the significant moisture infiltration or disturbance by construction traffic. In addition, of the on-site soils will also be susceptible to erosion. As such, the Project site sponding of surface water and to prevent water from running into excavations. If the site grading will occur during a period of wet weather, allowances should be madering the on-site soils or import of a drier, less moisture-sensitive fill material policies, BMPs, NPDES permits, State Law, and the Regional Water Quality General Permit, which requires the implementation of a variety of BMPs on conthis would minimize potential erosion from the site over the short- and long-termitation.	, based or should, the const de for cost. With according Control instruction	n their granula nerefore, be g cruction sched sts and delays dherence to t Board (RWQC n and operation	ar content, s raded to pre lule dictates associated he above-si (B) Constru on of the Pro	some event s that I with tated ction oject,
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
Landslides				

As previously discussed, the Project site does not contain features typically associated with landslides. Additionally, the Project site is not located in areas of steep slopes included within the City of Riverside's General Plan 2025; refer to Exhibit 7.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water; typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. As failure tends to propagate as block failures, it is difficult to analyze and estimate where the first tension crack will form. However, the Project's geotechnical reports states that the potential for lateral spreading affecting the site is low.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth's surface owing to subsurface movement of earth materials. Subsidence is most often attributed to human activity, mainly from the removal of subsurface water. More than 80 percent of the identified subsidence throughout the United States is a result of exploitation of groundwater, with the increasing development of land and water resources threatening to exacerbate existing land subsidence problems and initiate new ones (U.S. Geological Survey). Other principal causes of subsidence are aquifer system compaction, drainage of organic soils, underground mining, hydrocompaction, natural compaction, sinkholes, and thawing permafrost.

Compaction of soils in some aquifer systems can accompany excessive groundwater pumping and is the single largest cause of subsidence. Excessive pumping of such aquifer systems has resulted in permanent subsidence and related ground failures. In some systems, when large amounts of water are pumped, the subsoil compacts, thereby reducing in size and number the open pore spaces in the soil the previously held water. This can result in a permanent reduction in the total storage capacity of the aquifer system.

According to the City of Riverside General Plan, the Project site is located within the recharge area of the Riverside South Water Basin. Therefore, the Project site is not located within a groundwater basin; land subsidence would also not be considered a substantial issue in the Project area. According to findings in the Geotechnical Investigation, the actual amount of subsidence is expected to be variable and will be dependent on the type of machinery used, repetitions of use, and dynamic effects, all of which are difficult to assess precisely. Therefore, impacts associated with subsidence are anticipated to be less than significant.

Liquefaction

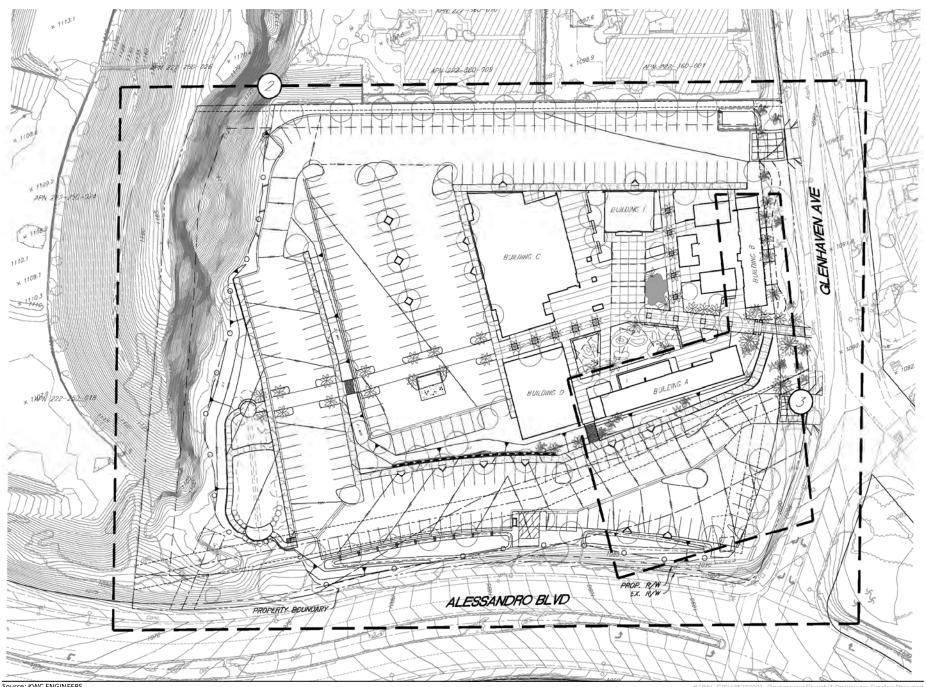
As previously discussed in Response 7iii, above, according to the City of Riverside General Plan's Public Safety Element, Figure PS-2, Liquefaction Zones, the Project site is not considered to be susceptible to liquefaction (Southern California Geotechnical, 2021). Therefore, impacts from liquefaction are considered less than significant.

Collapse

According to the site history, mining of granitic bedrock materials was performed at the site. Prior to 1948, the mining activities had ceased and the excavations were backfilled. According to the Geotechnical Investigation, the recommended remedial grading will remove the existing fill soils from the new building areas as well as a portion of the variable strength compressible alluvium and replace these materials as compacted structural fill. The native soils that will remain in place below the recommended depth of over excavation possess more favorable consolidation and collapse characteristics and will not be subject to significant load increases from the foundations of the new structures. Provided that the recommended remedial grading is completed, the post-construction settlements of the proposed structures are expected to be within tolerable limits. The proposed Project would not be located on an unstable or potentially unstable geologic unit or soils that would potentially result in landslide, lateral spreading, subsidence, or liquefaction. Impacts regarding collapse would be **less than significant**.

structı potent	red that the recommended remedial grading is completed, the post-colures are expected to be within tolerable limits. The proposed Project with ially unstable geologic unit or soils that would potentially result in land action. Impacts regarding collapse would be less than significant.	ould not b	e located or	an unsta	ble or
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				

7d. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 - Soils, Figure 5.6-4 - Soils, Table 5.6-B - Soil Types, Figure 5.6-5 - Soils with High Shrink-Swell Potential, Appendix E - Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code) Less than Significant Impact. Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. According to the Geotechnical Investigation findings, SCG previously performed a geotechnical feasibility study at the Project site. Additionally, as part of the proposed Project's geotechnical investigation, SCG drilled a total of six boring to depth of 7 to 35 feet below the previously existing site grades; refer to Exhibit 8, Boring and Trenching and Location Plan. In addition, SCG excavated a total of three trenches to depth of 13 to 17 feet below previously existing site grades. SCG concluded that the Project site is underlain by artificial fill soils used to backfill excavations made for former minim operations on the site. The fill soils consist of fine to coarse sand, silty sands, and occasional fine sandy silts with varying coarse sand and varying gravel content. Laboratory testing indicates that these materials have very low expansion potentials (EI = 0). Additionally, the near surface bedrock materials are composed of granite and do not possess appreciable plasticity. Due to the existing undocumented fill, the removal of undocumented fill soils would occur. Additionally, the over excavation would be extend to a depth of at least 5 feet below the proposed foundation bearing grade, due to the differing support characteristics of the very dense bedrock materials and compacted fill soils. The Geotechnical study concluded that the implementation of the proposed Project is feasible with compliance with the grading guide specifications provided in Appendix D of the Geotechnical study. Compliance with the recommendation of the Geotechncial report and applicable provision of the City's Subdivision Code Title 18 and the California Building Code with regard to soil hazards related to the expansive soils will be reduced to a less than significant impact level for this Project, directly, indirectly and cumulatively. Have soils incapable of adequately supporting the use of septic tanks Xor alternative waste water disposal systems where sewers are not available for the disposal of waste water? 7e. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 - Soils, Table 5.6-B - Soil Types) No Impact. The proposed project will be served by sewer infrastructure. Therefore, the Project will have no impact. Directly or indirectly destroy a unique paleontological resource or site \boxtimes or unique geologic feature? 7f. Response: (Source: General Plan 2025 Policy HP-1.3, BCR Consulting Draft Cultural Resources Assessment dated October 22, 2020) Less than Significant Impact. The Project is located on a previously developed and fully improved site within an urbanized area. Although the Project site has been previously graded, ground disturbance/construction activities from the new development, could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines §15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact. The Cultural Resources Assessment prepared by BCR Consulting on February 19, 2021 and consultation with the Western Science Center (WSC) have determined that the proposed Project is not located in a site known for containing the presence of fossil material and it is unlikely to be paleontologically sensitive, but caution during development should be observed in the southwest Project area. Additionally, the Project is consistent with General Plan Policy HP-1.3 including compliance with the Federal Native American Graves Protection and Repatriation Act. With compliance to COAs CUL-1 through CUL-4, the Project will have a less than significant impact directly or indirectly to a unique paleontological resource or site or unique geologic feature.



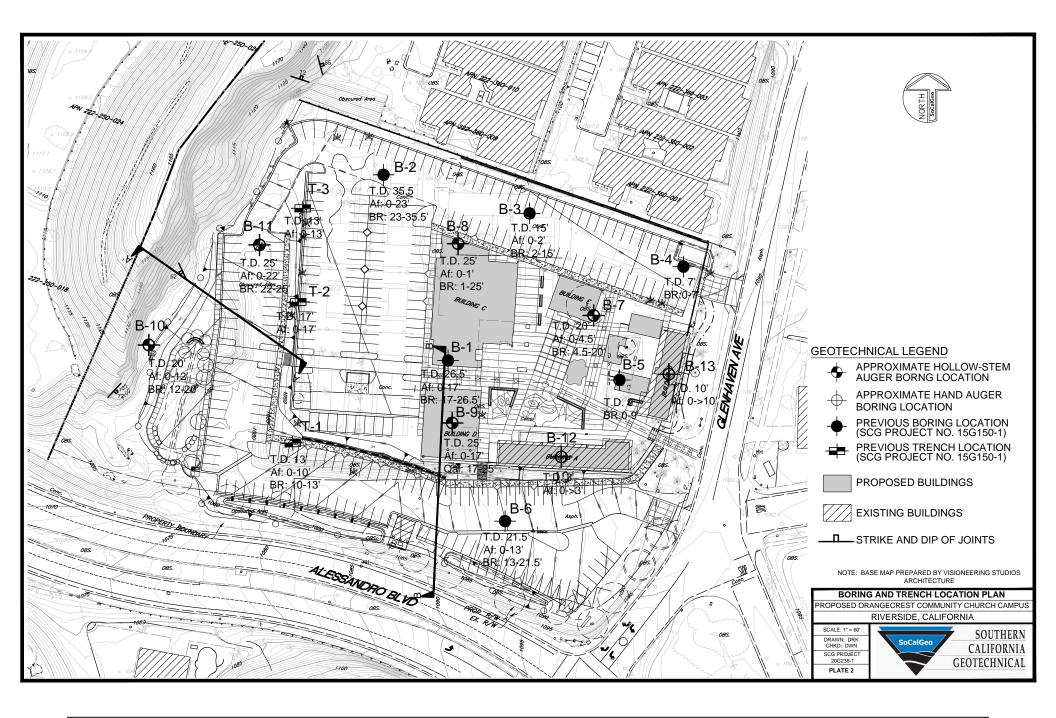
Source: KWC ENGINEERS **EXHIBIT 7:** Preliminary Grading Plan

Orangecrest Community Church

PR-2021-000770 (CUP, DR, GE), Exhibit 10 -Draft Initial Study and Mitigated Negative Declaration



Feet



Source: Visioneering Studios Architecture

Kimley»Horn

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

8a. Response: (Source: GHG Analysis prepared by Kimley-Horn, October 2020)

Less than Significant Impact Addressing greenhouse gas (GHG) emissions generation impacts requires an agency to determine what constitutes a significant impact. The CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions (14 CRC §15064.4(a)).

The South Coast Air Quality Management District (SCAQMD) formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD is proposing a screening threshold of 10,000 metric tons of CO2 equivalent (MTCO2e) per year for industrial projects and 3,000 MTCO2e for non-industrial projects. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact. Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO2e per service population per year or 3.0 MTCO2e per service population per year for projects opening after 2020. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

As the Project involves the construction of a church, the 3,000 MTC02e per year non-industrial screening threshold has been selected as the significance threshold, as it is most applicable to the proposed Project.

Short-Term Construction GHG Emissions

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the Project is depicted in the **Table 10**, *Construction GHG Emissions*, below.

Table 10: Construction GHG Emissions

Category	CO2e Emissions, metric tons/year			
Total Construction Emissions	596.3			
Emissions amortized over 30 years 19.88				
Source: CalEEMod version 2016.3.2. Refer to Appendix A, of the Initial Study for model outputs.				

As shown, the Project would result in the generation of approximately 596.3 MTCO₂e over the course of construction. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions. The amortized Project construction emissions would be 19.88 MTCO₂e per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational GHG Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Table 11: Operational GHG Emissions

Emissions Source	CO2e Emissions, metric tons/year			
Area	< 0.01			
Energy	156.43			
Mobile	173.67			
Waste	57.16			
Water	28.21			
Amortized Construction Emissions	19.88			
Total Annual Project GHG Emissions	435.35			
Threshold	3,000			
Exceeds Threshold?	No			
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.				

Total GHG emissions associated with the Project are summarized in **Table 11**, *Operational GHG Emissions*, above. Although the majority of vehicle trips will be generated on Sunday, the church will occasionally be open throughout the week for church-related functions and ministries, therefore, to be conservative, the maximum number of Sunday trips have been applied to everyday of the week. As shown, Project operations would generate approximately 435.35 MTCO₂e annually from operations of the Project-related GHG emissions. Therefore, the proposed Project's total GHG emissions would not exceed the threshold of 3,000 MT CO₂e/year and thus would result in a **less than significant impact**.

impact	t.	would res	out in a less	ulali sigii	illoant
b.	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?				
8b.	Response: (Source: Kimley-Horn, October 2020)				
depleti SCAQN Buildin SCAQN emissi reducii emissi with au	nan Significant Impact. The SCAQMD supports State, federal, and internating gases through its Global Warming Policy and rules, and the proposed Project would comply with thing Code provisions designed to reduce GHG emissions. In addition, the MD applicable rules and regulations during construction of the operations would not exceed the 3,000 MTCO ₂ e threshold, and therefore it woung GHG emission to 1990 levels by the year 2020 as stated in AB 32 ons below 1990 levels by 2050 as stated in Executive Order S-3-05. The applicable plan, policy or regulation related to the reduction in the count impact will occur directly, indirectly and cumulatively in this regard.	posed Proposed proposed nal phase Id not inte and an & herefore, 1	oject would of the project would on the project would be a suffered with the project with t	comply with colicies and comply with above, For State's good could not comply with a color with	th the I State with all Project oals of GHG conflict
9.	HAZARDS & HAZARDOUS MATERIALS.				
Would	the project:				
a.	Create a significant hazard to the public or the environment through			\boxtimes	

9a. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan, Department of Toxic Substances Control (DTSC) EnviroStor), Terracon, June 2015, Phase I Environmental Site Assessment (ESA).

Less than Significant Impact

Short-Term Construction

Both the U. S. Environmental Protection Agency (U.S. EPA) and the U.S. Department of Transportation (DOT) regulate the transport of hazardous waste and material, including transport via highway. The U.S. EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act. The DOT regulates the transportation of hazardous materials through enforcement of the Hazardous Materials Transportation Act. This act includes requirements for container design and labeling, as well as for driver training. The established regulations are intended to track and manage the safe interstate transportation of hazardous materials and waste. Additionally, State and local agencies enforce the application of these acts and coordinate safety and mitigation responses in the case that accidents involving hazardous materials occur.

Project construction activities may include refueling and minor maintenance of construction equipment on-site, which could lead to minor fuel and oil spills. The use and handling of hazardous materials during construction would occur in accordance with applicable federal, State, and local laws, including California Division of Occupational Safety and Health (Cal/OSHA) requirements. However, all construction activities would be subject to the NPDES permit process that requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP), which would be reviewed and approved by the Santa Ana RWQCB, and the latest industry BMPs. Additionally, the Project site is not included on the list of hazardous waste sites (Cortese List) compiled by the Department of Toxic Substances Control (DTSC) pursuant to Government Code §65962.5, and therefore is not anticipated to release hazardous materials due to ground-disturbing activities.

According to the ESA findings, the site was developed by 1961 and the surrounding residential properties were developed in the mid-1960's. Because of the age of the Project site buildings, there is a possibility that potentially hazardous buildings materials such as asbestos-containing materials (ACM), lead-based paint (LBP), or polychlorinated biphenyls (PCBs) may be encountered during demolition of these structures. However, the proposed Project will not demolish the existing buildings. These will be renovated in place. ACMs are natural fibers used in the manufacturing of many building materials; however, they were mostly banned (in building materials) in the 1970s. Lead-based paint is considered a potential health risk and was frequently used in homes before the 1970s. PCBs were banned for commercial use in 1979, and are typically associated with materials such as fluorescent lights, electrical transformers, and power lines.

Electrical Transformers/PCBs

During the site visit, one pole-mounted transformer, owned and serviced by the City of Riverside, was observed on the south portion of the site; however, no information with regard to PCB content of the transformer fluids was observed. Transformers contain mineral oil which may contain minor amounts of PCB and could be considered "PCB contaminated" (PCB content of 50 -500 ppm). The City of Riverside maintains responsibility for the transformers, and if the transformers were "PCB contaminated," the utility company is not required to replace the transformer fluids until a release is identified. However, no evidence of current or prior release was observed in the vicinity of the electrical equipment during the site reconnaissance. Based on site observations, the pole-mounted transformer does not constitute a Recognized Environmental Concern (REC).

Releases or Potential Releases

Trash and debris were observed throughout the northern and western portions of the site during the site reconnaissance. Based on visual observation (only of surface materials), approximately two cubic yards of debris, which consisted of concrete rubble, polyvinyl chloride (PVC) piping, wood, and gardening pots were observed. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance. The debris materials did not appear to be hazardous in nature. Based on site observations, the two cubic yards of trash and debris does not constitute a REC.

Other Notable Site Features

Evidence of two historical swimming pools was observed on the central east and southern portion of the site. The two pools were observed to be filled with soil. The pools were demolished in 2011 and back filled with soils from the western portion of the site and off-site soils. Source of the off-site soils is unknown. Staining and /or odors were not observed within the pool area. Three approximately six-inch circular patches were observed in the vicinity of the historical pool on the central-eastern portion of the site. It is unknown the nature of the circular patches. Based on the location of the circular patches and proximity to the former swimming pool, *indication of RECs was not identified*.

The existing structures within the Project site could contain hazardous materials. According to the ESA, the presence of undocumented fill was observed on the northern, central, southern, and western portions of the site to a depth of as much as 23 feet below grade surface (bgs). The fill was detected at the greatest depths on the southern and western portions of the site. In addition, a total of six soil borings at depths ranging from one to 23 feet bgs and, a total of three test pits at depths ranging from seven to 35 feet bgs were observed in prior reports in June 2004. Trace concrete fragments, asphaltic concrete fragments, and wood chips were observed in soil borings located on the central and northern portion of the site. Some odorous iron oxide staining were observed at depths ranging from one to 21 feet bgs in the soil borings located on the eastern portion of the site. Debris included concrete, brick, wood, asphalt, and rebar were observed in test pits located on the west portion of the site.

If ACM or LBP is present on-site, removal of these materials from the Project site would be conducted by contractors licensed and permitted to handle these materials in accordance with all applicable federal, state, and local regulations. Therefore, short-term construction impacts associated with the handling of hazardous materials would be **less than significant**.

Long-Term Operational Impacts

Refer to the Project Description for facility operations. Operations will include a youth ministry. Operations would be supported by six full-time employees and seven part-time employees. Project operations could result in the use, storage, and disposal of hazardous materials. These can include, but are not limited to paint solvents, pesticides and fertilizers, and maintenance supplies and equipment (e.g., drain cleaners, floor stripping products, paints, oils, fuels). The DTSC does not identify the Project site as a hazardous site. The nearest recorded hazardous occurrence is at the California School for the Deaf located at 3044 Horace Street. This site is located approximately 0.9-mile northwest of the site and has been designated as a "No Further Action" site. With oversight by the appropriate Federal, State, and local agencies, and compliance by the new development with applicable regulations related to the handling, storage and disposal of hazardous materials will cause the Project to have a less than significant impact directly, indirectly and cumulatively.

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

9b. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan and Terracon, June 2015, Phase I Environmental Site Assessment.)

Less than Significant Impact with Mitigation Incorporated. As identified in Threshold 9(a), above, handling, storing, or dispensing activities associated with hazardous or potentially materials would comply with all applicable federal, state, and local agencies and regulations. Adherence with the applicable policies and programs of these agencies will ensure that any interaction with hazardous materials would occur in the safest possible manner, reducing the opportunity for the accidental release of hazardous materials into the environment. Any handling of hazardous materials will be limited in both quantities and concentrations. As mandated by the U.S. Occupational Safety and Health Administration (OSHA), all hazardous materials stored on-site will be accompanied by a Material Safety Data Sheet, which, in the case of accidental release, will inform on-site personnel as to the necessary remediation procedures. Because the existing structures will not be demolished, but rather renovated in place, the possibility for ACM and LMP is minimal. Therefore, the Project would have a less than significant impact.

C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?						
9c.	Response: (Source: General Plan 2025 Public Safety and Education E CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Bo Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Fig Boundaries, California Health and Safety Code, Title 49 of the Code of Code)	undaries, ure 5.13-	Table 5.13-D -4 – Other	RUSD Sc School D	hools, istrict		
materi one-qu located historid propos than si	No Impact. The proposed church Project does not anticipate emitting hazardous emission or handling of any hazardous materials, substances or waste, aside from those identified in Threshold 9(a), above. No schools are located within one-quarter mile of the Project site. The closest school to the Project site is Immanuel Lutheran Elementary School ocated 0.25-mile northwest at 5455 Alessandro Boulevard. Considering that the existing use of the site which has not historically handled hazardous materials, that the site is not in a hazardous list site, as noted below, and because the proposed Project is not a use that will handle hazardous materials, it is anticipated that the Project will have a less han significant impact regarding emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly or cumulatively.						
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?						
9d.	Response: (Source: General Plan 2025 Figure PS-5 – Hazardous Wast CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI In Database Listed Sites)						
Project	pact. A review of hazardous materials site lists compiled pursuant to Gove site is not included on any such lists. Therefore, the Project would have to the public or environment directly, indirectly or cumulatively.						
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?						
9e.	Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zo March Air Reserve Base/March Inland Port Comprehensive Land Use PI FPEIR Figure 5.7-2.)						
to the miles r located Base is Environ risk lev Land U	pact. The Project site is not located within a public or private use airport laboroject site are the Riverside Municipal Airport and Flabob Airport, located project site are the Riverside Municipal Airport and Flabob Airport, located porthwest, respectively. The airports are more than two miles from the Fold within the March Air Reserve Base/March Inland Port Comprehensives a military airport located approximately 5 miles from the site. The Project as Area" of the Airport's Land Use Compatibility Plan. This designation are (RCALUC 2014). Thus, impacts associated with this airport would be use Compatibility Zones and Influence Areas of the Public Safety Element, Riverside Municipal Airport and Flabob Airport.	d approxir Project site Land Use ct is locate indicates unlikely. As	mately 5.0 mile. However, the Plan. The Made within Zone low noise imparted on Fig	les west ar he Project arch Air Re e E "Other A pacts, and ure PS-6, A	nd 4.0 site is eserve Airport a low Airport		
Project	se the Project is not located within two miles or an airport and because site, the Project would not create a safety hazard to the people residing would occur.						
f.	Impair implementation of or physically interfere with an adopted			\boxtimes			

9f. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 - Hazards and Hazardous Materials, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM's Strategic Plan, General Plan 2025 Figure PS 8.1 – Evacuation Routes) Less than Significant Impact. The Project will be served by existing, fully improved streets, Alessandro Boulevard and Glenhaven Avenue, as well as a network of local streets. Figure 8.1 of the General Plan designates specific arterial streets, bridges, freeways, and streets as evacuation routes; this includes Alessandro Boulevard which is an arterial. The proposed Project would ensure that the minimum right-of-way widths on City streets would be maintained, which would continue to ensure that Alessandro Boulevard is accessible to the general public, emergency personnel, and residents. Individual Project review by the City including the Riverside Fire Department (RFD) would also be required. The Project would not interfere with the City's Emergency Operations Plan (EOP) because it does not contain any features that would prohibit the execution of such plans. The Project would provide access via Glenhaven Avenue and would contain adequate access and circulation for emergency equipment on-site. Evaluation and approval of the proposed site plan by the RFD would be required to ensure adequacy of emergency access. Thus, impacts to an emergency response plan would be less than significant. Expose people or structures, either directly or indirectly, to a significant \boxtimes risk of loss, injury or death involving wildland fires? 9g. Response: (Source: General Plan 2025 Figure PS-7 - Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002. Riverside Operational Area - Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM's Strategic Plan, CalFire FHSZ Viewer at https://egis.fire.ca.gov/FHSZ/) No Impact. The proposed Project is located in an urbanized area where no wildlands exist within the property. According to CalFire, the Project site is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ; therefore, no impact regarding wildland fires either directly, indirectly or cumulatively from this Project will occur. HYDROLOGY AND WATER QUALITY. 10. Would the project: a. Violate any water quality standards or waste discharge requirements \boxtimes or otherwise substantially degrade surface or ground water quality? 10a.Response: (Source: GP 2025 FPEIR Table 5.8-A - Beneficial Uses Receiving Water, 2015 Urban Water Management Plan, Water Quality Management Plan prepared by KWC Engineers dated June 1, 2020 and provided as Appendix G) **Short-Term Construction Impacts** Less than Significant Impact. The State of California is authorized to administer various aspects of the NPDES Construction General Permit. The Construction General Permit requires developments of one-acre or more to reduce or eliminate non-stormwater discharges into stormwater systems, and to develop and implement a SWPPP. Since the Project site is more than one acre (5.27 acres) in area, a SWPPP will be required. The Project will implement a SWPPP to comply with the Construction General Permit requirements. Appropriate structural and non-structural BMPs will also be required to be implemented during Project construction. Some of the BMPs the Project shall be required to implement include the following: On-site Storm Drain Inlet Control. Employ measures to maintain and periodically repaint or replace inlet markings. Landscape/Outdoor Pesticide Use Control. Employ features to maintain landscape pesticide use to a minimum or no use level. Sidewalks and Parking Lot Maintenance. Employ measures to sweep sidewalks and parking lots regularly to prevent accumulation of litter and debris.

 Other Reasonable BMPs. The Project must also implement other applicable BMPs as needed to keep pollutants away from stormwater. The Project must also identify additional applicable measures taken during the storm season and when storms are anticipated.

These BMPs have demonstrated through years of field testing and field use to reduce construction runoff impacts to less than significant levels. Based on the various regulatory requirements, potential short-term construction impacts would be considered **less than significant**.

Long-Term Operation Impacts

Less than Significant Impact. The water quality management plan (WQMP) is a post-construction management program that ensures the ongoing protection of the watershed basin by requiring structural and programmatic controls. The WQMP identifies structural controls (including a contained, on-site wastewater treatment plant) and programmatic controls to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during long-term operation. In order to minimize pollutants of concern in stormwater discharges from the Project site, site design BMPs and source control BMPs will be included as part of the Project, according to the WQMP, recommendations are noted below in **Table 12**, *Permanent and Operational Source Control BMP Measures*.

Table 12: Permanent and Operational Source Control BMP Measures

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs	Responsible Party(s)
On-site Storm Drain Inlets	Mark all inlets with the words "Only Rain Down the Storm Drain" or similar. Catch Basin Markers shall be per local agency requirements.	Maintain and periodically repaint or replace inlet markings. Provide Stormwater pollution prevention information to new site owners, lessees, or operators. See applicable operational BMPs in Fact Sheet SC-44, "Drainage System Maintenance," in the CASQA Stormwater Quality Handbooks at www.cabmphandbooks.com Include the following in lease agreements: "Tenant shall not allow anyone to discharge anything to storm drains or to store or deposit materials so as to create a potential discharge to storm drains."	Owner
Landscape/Outdoor Pesticide Use	 Final landscape plans will accomplish all of the following: Preserve existing native trees, shrubs, and ground cover to the maximum extent possible. Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to stormwater pollution. 	Maintain landscaping using minimum or no pesticides. See applicable operational BMPs in "What you should know for Landscape and Gardening" at http://rcflood.org/stormwater Provide IPM information to new owners, lessees and operators.	Owner

	Where landscaped areas are used to retain or detain stormwater, specify plants that are tolerant of saturated soil conditions.		
	Consider using pest-resistant plants, especially adjacent to hardscape.		
	To insure successful establishment, select plants appropriate to site oils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.		
Pools, spas, ponds, decorative fountains, and other water features.		See applicable operational BMPs in "Guidelines for Maintaining Your Swimming Pool, Jacuzzi and Garden Fountain" at http://rcflood.org/stormwater/	Owner
Plazas, sidewalks, and parking lots.		Sweep plazas, sidewalks, and parking lots regularly to prevent accumulation of litter and debris. Collect debris from pressure washing to prevent entry into the storm drain system. Collect wash water containing any cleaning agent or degreaser and discharge to the sanitary sewer not to a storm drain.	Owner

The inclusion of BMPs as well as the provision of other post-construction stormwater BMPs would mitigate the impacts associated with stormwater runoff to levels deemed acceptable by both Santa Ana RWQCB and the City of Riverside. Therefore, potential impacts would be **less than significant.**

b.	Substantially decrease groundwater supplies or interfere substantially	/ n	\square	
	with groundwater recharge such that the project may impede			
	sustainable groundwater management of the basin?			

10b.Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, RPU Urban Water Management Plan, 2015 Urban Water Management Plan)

Groundwater Supplies

Less than Significant Impact. According to the Riverside Public Utilities (RPU) Service's 2015 Urban Water Management Plan (UWMP), the City of Riverside depends on groundwater from the Bunker Hill Basin, Rialto-Colton Basin, Riverside Basin, and Arlington Basin. The UWMP contains existing and projected water supplies and demands for the City of Riverside during normal and dry-year scenarios. **Table 13**, *Projected Multiple-Dry Year Supplies and Demands* (afy), provides projected multiple-dry year supplies and demands, which represent water supplies and demands during extended periods of drought conditions when supplies would be reduced.

Table 13: Projected Multiple-Dry Year Supplies and Demands (afy)

	raisie mai i ejectea marapie mij real eapplies and menanas (all)						
Year	Totals	2020	2025	2030	2035	2040	
	Supply Totals	102,364	107,364	110,164	110,164	110,164	
First Year	Demand Totals	95,221	96,534	99,015	101,589	104,257	
	Difference	7,143	10,830	11,149	8,575	5,907	
	Supply Totals	102,364	107,364	110,164	110,164	110,164	
Second Year	Demand Totals	95,221	96,534	99,015	101,589	104,257	
	Difference	7,143	10,830	11,149	8,575	5,907	

Third Year	Supply Totals	102,364	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	104,257
	Difference	7,143	10,830	11,149	8,575	5,907

Source: City of Riverside RPU. 2015. Urban Water Management Plan. Table 8-4. DWR Table 7-4R. Multiple Dry Years Supply and Demand Comparison. June 2016. https://www.riversideca.gov/utilities/pdf/2016/RPU_2015_UWMP_June_Draft.pdf. Accessed November 6, 2020.

According to Table 13, the City anticipates having sufficient water source for multiple-dry years. Additionally, Table PF-2 RPU Projected Water Demands, of the Public Facilities and Infrastructure Element, has projected water demand through year 2030 by water use sector. Since the proposed project is not one of the major sectors noted in Table PF-2, it is assumed that it forms part of the "Other" sector which is estimated a water demand of 499 acre-feet per year (afy). Because the General Plan elements and UWMP are updated periodically and feed off each other, it is presumed that the project site's water demand is account for in RPU's project water demand. The proposed project is anticipated to require considerably less water than if the former use was operational which, for a facility of that type (swim and tennis club), water use would be substantial.

Therefore, as shown in Table 13, the Project's water usage would represent only a nominal percentage of projected surplus (projected supply minus project demand) for the multiple dry year scenarios (conservative). Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

Less than Significant Impact. The Project site is currently gently sloping, and runoff onsite drains as sheet flow towards the southwest direction. The site elevation ranges from 890 to 1,265 feet throughout the site. The Project site does not contain any discernable streams, rivers, but does contain a natural drainage feature on the south portion of the site along Alessandro Boulevard. The proposed improvements will not significantly alter the existing drainage pattern of the site.

The proposed Project includes three bio-retention basins. The runoff from the proposed site will be collected by gutters, swales, and an on-site storm drain system. Most of the runoff from drive aisle and parking lot areas will be collected and diverted into the bio-retention basins that will treat stormwater. Outflow from the basins will ultimately discharge into the existing Master Planned 48-inch storm drain line "F" (Victoria Avenue Storm Drain) in Alessandro Boulevard.

The Project site will implement BMPs to reduce the accumulation of litter and debris, to minimize the use of pesticides, and to collect and dispose of any wash-water to the sanitary sewer. In addition, the imposition of BMPs would ensure that federal and state water quality standards will not be violated and are considered less than significant without mitigation. Because the Project would continue to recharge groundwater basins and because the City has plenty or water resources and the Project is not anticipated to limit recharge, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Additionally, the inclusion of the BMPs will maintain impacts to the existing drainage pattern of the site or area to a level of less than significant.

C.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		
	i. Result in substantial erosion or siltation on-or-off-site?		

10i Response: (Source: Preliminary grading plan)					
Less than Significant Impact. The Project site is currently gently sloping, and runoff on-site drains as sheet flow towards the southwest direction. The site elevation ranges from 890 to 1,265 above mean sea level (AMSL) throughout the site. The Project site does not contain any discernable streams, rivers, or other drainage features aside from the southern drainage. The proposed improvements will not significantly alter the drainage pattern of the existing site as an infiltration basin will be placed to continue to capture water; refer to Exhibit 9, Preliminary WQMP Exhibit.					
Additionally, the Project will implement BMPs to reduce the accumulation of litter and debris, to minimize the use of pesticides, and to collect and dispose of any washwater to the sanitary sewer. In addition, the imposition of BMPs ensure that federal and state water quality standards will not be violated and are considered less than significant without mitigation. The inclusion of the aforementioned BMPs will maintain impacts to the existing drainage pattern of the site or area to a level of less than significant .					
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?					
10ii. Response: (Source: Preliminary grading plan, FEMA Flood Map Service, Map 06065C0728G (08/28/2008) Preliminary WQMP, prepared by KWC Engineers on June 1, 2020.)					
Less than Significant Impact. According to the above reference FEMA Flood Map, the Project site is designated as a Zone X (unshaded) which FEMA defines as an area of minimal flood hazard, usually depicted as above the 500-yea flood level. Zone X is the area determined to be outside the 500-year flood and protected by levee from 100- yea flood.					
According to the WQMP, in preparation of the WQMP, the existing drainage patterns of the site were identified and preserved. The Project would maintain the existing drainage pattern which drains southwesterly to a sump. The proposed runoffs from the Delineate Drainage Management Areas (DMAs) A (located in the Project courtyard area) and C (located along the parking area to the west of Building B) will be collected by gutters, swales and on-site storm drain system then conveyed to two proposed water quality basins along Alessandro Boulevard; refer to Exhibit 8. The north part of the site will drain into the smaller basin at the northeast corner of the site, along Glenhaven Avenue. The outflows from the basins will ultimately discharge into an existing Master Planned 48-inch storm drain line "F" (Victoria Storm Drain) in Alessandro Boulevard.					
Consequently, implementation of the proposed Project is not expected to increase surface runoff in a manner that would cause flooding. Moreover, according to the WQMP, the existing impervious area of 138,042-square feet would remain the same with Project implementation. Additionally, the three infiltration basins will retain and infiltrate on-site water limiting run-off.					
Therefore, the proposed Project would not cause flooding, and would have a less than significant impact.					
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or					
10iii. Response: (Source: Preliminary grading plan)					
Less than Significant Impact. As noted in Threshold 10(c)(ii) above, the Project will fully mitigate stormwater runoff such hat runoff water will not exceed that of existing conditions and is not otherwise anticipated to exceed the capacity of downstream drainage facilities through the implementation of BMPs. As discussed in Threshold 10(a) and 10(c)(ii) above, the proposed onsite retention basins, infiltration and operational BMPs will reduce impacts to less than significant for stormwater runoff and City Municipal Code requirements.					

iv. Impede or redirect flood flows?			\boxtimes			
10iv. Response: (Source: FEMA Flood Zone Map)						
Less than Significant Impact. The proposed Project site is not located within a flood hazard area. The storm water drainage system will be installed concurrently with the construction of this Project and will be adequately sized to accommodate the drainage created by this Project. On-site storm water and non-stormwater runoff will be treated with onsite BMPs and then discharged to the existing drainage courses within the site where they extend off-site, retaining the overall drainage pattern of the site. As outlined in Threshold 10(c)(i) above, the drainage feature that crosses the southwest corner of the site and continues off-site in a northwest direction will not be impacted, but preserved in place, with implementation of the proposed Project. Therefore, the proposed Project will not impede or redirect flood flows and there will be a less than significant impact directly, indirectly or cumulatively.						
v. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				\boxtimes		
10v. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and W	/ater Quali	ty)				
No Impact. Tsunamis are large waves that occur in coastal areas. With the Project's inland location and lack of nearby water body, the Project is not anticipated to be susceptible to seiche, tsunami, or mudflow. Additionally, according to the City of Riverside General Plan's Public Safety Element, the Project site is not within the flood hazard area. Furthermore, as previously discussed, the Project site is located within Zone X which identifies areas outside the 0.2 percent annual chance floodplain. According to FEMA's National Flood Insurance Program, Zone X is an area of minimal flood hazard, and is an area determined to be outside the 500-year flood and protected by levee from the 100-year flood. Therefore, impacts associated with flooding, including flooding as a result of the failure of a levee or dam, seiche, tsunami, or mudflow would not occur.						
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			\boxtimes			
10e.Response: (Source:)						
Less than Significant Impact. Refer to Threshold 10(b) above.						







11. LAND USE AND PLANNING:					
Would the project:					
a. Physically divide an established community?				\boxtimes	
11a.Response: (Source: General Plan 2025 Land Use and Urban Des GIS/CADME map layers)	sign Elemer	nt, Proj	iect site plan,	City of Riv	erside
Less than Significant Impact. The Project site is currently developed with a parking lot along the site frontage. The proposed Project has a Gel Residential and a Zoning of R-1-13000 Single Family Residential which a Use Permit (CUP). As such, the proposed Project is consistent with the dadequate access, circulation and connectivity consistent with the Gen requirements of the Zoning and Subdivision Codes. Additionally, implement run-down condition which would improve the overall character consistent with Policy LU-85.2 in the Land Use and Urban Design Elem Project impacts related to the community are less than significant.	neral Plan allows the evelopmer neral Plan entation of r of the ar	desigoropos It of the 2025, the Presea. As	nation of LD sed Project wi se surroundin and in compoject would in s such, the P	R - Low D th a Condi g area pro pliance with prove the roject wou	ensity itional viding th the site's ald be
b. Cause a significant environmental impact due to a conflict wit land use plan, policy, or regulation adopted for the purpose of avoor mitigating an environmental effect?				\boxtimes	
11b. Response: (Source: General Plan 2025, General Plan 2025 Fig – Neighborhoods and Neighborhood Plans, Table LU-5 – Zoning Zoning Code)					
Less than Significant Impact. The City of Riverside General Plan's La designated the Project site as LDR - Low Density Residential and zo Residential. The Project would require a CUP to allow the development of the Project would not conflict with the adopted General Plan and Zoning historical significance and no historical resources are anticipated to be in be less than significant.	oned the s f a place of g. Additiona	ite as worsh lly, the	R-1-1-1300 nip. With appr e existing buil	O Single I oval of the dings are	amily CUP, not of
12. MINERAL RESOURCES. Would the project:					
a. Result in the loss of availability of a known mineral resource that be of value to the region and the residents of the state?	would [\boxtimes	
12a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral of the GP 2025 FPEIR, Southern California Geotechnical Inc – G				neral Reso	urces
Less than Significant Impact. The Project site is not identified by the City of site. However, the Project site is identified by the City of Riverside General Resource Zone (MRZ-3). The MRZ-3 classification indicates that the occurrences of undermined resource significance. According to the City Elements, the Project site contains limestone mineral resources. The Project area that has minimal accessibility for mining. The geological study project although the site was utilized for approximately 20 years for mining granithen been developed with a swim and tennis club around 1966. Current or in the vicinity. Therefore, the impacts to known mineral resources accumulatively. b. Result in the loss of availability of a locally-important mineral resources are recovery site delineated on a local general plan, specific plan or	eral Plan's e area co ity's Gener Project site repared by itic bedrock tly, there is re less tha	Mine ntains al Pla is loca SoCal mate ano a	ral Resource known or i n Open Space ated within and Geo (2015) orial, the Projective mining of	Map as Manferred made/Conserval existing determined ct site has occurring of	ineral ineral vation urban d that since on site
land use plan?	N December	, <u>,,,</u>			
12b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral No Impact. Refer to Threshold 12(b) above. The Project site does not Project vicinity. No impact would occur.			ive mining si	te, nor doe	es the

13.	NOISE.		
Would	the project result in:		
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		

13a. Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, Noise Study, prepared by Kimley-Horn and Associates, dated November 2020 and provided as Appendix F, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. Table 7-2. Page 179)

Less Than Significant Impact. The Project has the potential to expose persons to or generation of noise levels in excess of standards established in the General Plan 2025 and/or the Noise Code (Title 7). Construction would only occur during the permitted hours of 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays, no construction would occur on Sundays or Federal holidays. As such, construction noise is exempt from General Noise Regulations as described in §7.35.020-Exemptions in the City of Riverside Municipal Code. However, to be conservative this analysis used the Federal Transit Administration (FTA)'s threshold of 80 dBA (8-hour Leq) for residential uses and 85 dBA (8-hour Leq) for non-residential uses to evaluate construction noise impacts.

Following FTA's methodology for quantitative construction noise assessments, Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) was used to predict construction noise at the nearest sensitive receptors (i.e., residential uses to the north). **Table 14: Project Construction Noise Levels** shows the estimated exterior construction noise levels at the nearest sensitive receptors. Following FTA methodology, when calculating construction noise, all equipment is assumed to operate at the center of the project because equipment would operate throughout the project site and not at a fixed location for extended periods of time. Therefore, the distance used in the RCNM model was 200 feet for the nearest residential property.

Table 14: Project Construction Noise Levels

Construction Phase	Modeled Exterior Construction Level at Nearest Sensitive Receptor (dBA Leq)	Noise Threshold (dBA Leq)	Exceed Threshold?					
Demolition	74.4	80.0	No					
Site Preparation	75.6	80.0	No					
Grading	75.2	80.0	No					
Construction/Paving/Painting	77.0	80.0	No					
Source: Refer to Appendix A of the Noise Report, provided as Appendix F of the Initial Study, for construction noise modeling assumptions and results.								

As indicated in **Table 14**, project construction noise would not exceed the FTA noise threshold for residential uses. In addition, although construction noise levels may exceed the existing ambient levels in the area, construction would be temporary and would not result in a permanent increase in ambient noise levels in the area. Project construction would also be limited to daytime hours between 7:00 a.m. and 7:00 p.m. during weekdays, 8:00 a.m. and 5:00 p.m. on Saturdays (and prohibited on Sundays and federal holidays) in compliance with Riverside City Code Section 7.35.020(G). Therefore, construction noise impacts would be less than significant.

Operational noise would not result in any significant impacts. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a 3-dBA increase³. According to the Master Plan of Roadways (Figure CCM-4) of the Circulation Element, Alessandro Boulevard is a four-lane arterial roadway and Glenhaven Avenue is a 2-lane roadway. Since the Project would only generate a maximum of 138 daily trips, the increase is not enough to double existing traffic and traffic noise is not anticipated to increase ambient levels.

³ According to the California Department of Transportation, *Technical Noise Supplement to Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e. 3 dBA) noise increase.

Therefore, impacts are considered less t	han significant regarding the exposure	of persons to or the generation	of noise
levels in excess of established City stand			
b. Generation of excessive ground levels?	borne vibration or groundborne noise		
	nsit Administration - Transit Noise an Source Levels For Construction Equipn		Manual,
Less than Significant Impact. Construct groundborne noise and vibration that co (FTA) has published standard vibration architectural damage criterion for conticonstruction vibration impacts include construction vibration rises significantly adamage can be cosmetic or structural. cosmetic damage (e.g., plaster cracks) at the soil composition and underground buildings respond similarly to vibration constructed with reinforced concrete with is considered safe and would not result in the soil composition and underground buildings respond similarly to vibration constructed with reinforced concrete with its considered safe and would not result in the soil considered safe and would not result in the soil considered safe and at 110 feet (to some soil construction and the soil considered safe and at 110 feet (to soil construction and the soil considered safe and at 110 feet (to soil construction and the soil construction are soil construction.	ould affect occupants of neighboring upon velocities for construction equipment of nuous vibrations (i.e., 0.2 in/sec) appears that are not particularly buildings that are not particularly belongial layer between vibration segmentated by construction equipment no plaster, the FTA guidelines show the nearest receptor). In the distance to the nearest receptor).	ses. The Federal Transit Adminment operations. In general, pears to be conservative. The nage. Human annoyance occur on for extended periods of time. Full of the can vary substantially dependence and receiver. In addition the for example, for a building that a vibration level of up to 0.2 bration levels for typical consumptions.	istration the FTA types of irs when Building ence any nding on a, not all g that is 20 in/sec
below, at 110 feet the vibration velocitie below the FTA's 0.20 PPV threshold. It is	s from construction equipment would s also acknowledged that construction	not exceed 0.0228 in/sec PPV, n activities would occur throug	which is hout the
Project site and would not be concentrate			
impacts associated with the proposed Pr	roject would be less than significant d	rectly, indirectly and cumulative	ely.
	-		ely.
	Typical Construction Equipment Vibrat Peak Particle Velocity	ion Levels Peak Particle Velocity	ely.
Table 15: 1	Typical Construction Equipment Vibrat	ion Levels	ely.
Table 15: Equipment Large Bulldozer Loaded Trucks	Typical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082	ely.
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors	Typical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003	Peak Particle Velocity at 110 Feet (in/sec) ¹ 0.0096 0.0082 0.0003	ely.
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210	Peak Particle Velocity at 110 Feet (in/sec) ¹ 0.0096 0.0082 0.0003 0.0228	ely.
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035	Peak Particle Velocity at 110 Feet (in/sec) ¹ 0.0096 0.0082 0.0003	ely.
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = P where: PPV _{equip} = the peak particle	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transiquipment to the receiver	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038	
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = F where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the ee	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transiquipment to the receiver	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038	
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = F where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the ee Source: Federal Transit Administration, Transit Noise C. For a project located within the V	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transiquipment to the receiver	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038	
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = F where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the ee Source: Federal Transit Administration, Transit Noise C. For a project located within the V land use plan or, where such a p miles of a public airport or public	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transi equipment to the receiver eand Vibration Impact Assessment Manual, 2018. icinity of a private airstrip or an airport olan has not been adopted, within two the use airport, would the project expose	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038	Impact
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = F where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the ee Source: Federal Transit Administration, Transit Noise C. For a project located within the V land use plan or, where such a p miles of a public airport or public	Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transiquipment to the receiver e and Vibration Impact Assessment Manual, 2018.	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038	Impact
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = P where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the ee Source: Federal Transit Administration, Transit Noise c. For a project located within the v land use plan or, where such a p miles of a public airport or public people residing or working in levels?	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transi equipment to the receiver eand Vibration Impact Assessment Manual, 2018. icinity of a private airstrip or an airport olan has not been adopted, within two the use airport, would the project expose	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038 stance Administration, Transit Noise and Vibration I	Impact
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = P where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the expectation of the expectation of the expectation of the project located within the valuad use plan or, where such a particle people residing or working in levels? 13c. Response: (Source: General Plate - March ARB Noise Contour)	Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PPV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transiquipment to the receiver e and Vibration Impact Assessment Manual, 2018. icinity of a private airstrip or an airport of an has not been adopted, within two the use airport, would the project expose the project area to excessive noise an 2025 Figure N-8 – Riverside and Figure 25 Peak Particles and Figure 2025 Figure N-8 – Riverside and Figure 2025 Figu	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038 stance Administration, Transit Noise and Vibration I	Impact
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPV _{equip} = PV where: PPV _{equip} = the peak particle PPV _{ref} = the reference vibrat Assessment Manual, 2018. D = the distance from the expounce: Federal Transit Administration, Transit Noise c. For a project located within the valuad use plan or, where such a particle people residing or working in levels? 13c. Response: (Source: General Plater March ARB Noise Contour) No Impact. Although the Project site is Interest and Impact.	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PPV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transi quipment to the receiver e and Vibration Impact Assessment Manual, 2018. Icinity of a private airstrip or an airport of an has not been adopted, within two the use airport, would the project expose the project area to excessive noise In 2025 Figure N-8 – Riverside and Flace and Control of the March Air Reserve Exposed	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038 stance Administration, Transit Noise and Vibration I	Impact gure N-9 ehensive
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPVequip = PVequip = the peak particle PPVref = the reference vibrat Assessment Manual, 2018. D = the distance from the experiment of the experiment of the experiment of the peak particle proving a project located within the valuad use plan or, where such a particle people residing or working in levels? 13c. Response: (Source: General Plater March ARB Noise Contour) No Impact. Although the Project site is lead Use Plan, the proposed Project is not small the proposed in the project is not such as particle proving the project is not s	Power to the receiver and Vibration Equipment Vibration Equipment Vibration Equipment Vibration Power in the Power in the project expose the project area to excessive noise and Vibration the March Air Reserve For the Cocated within two miles of a public vibration Impact Assessment Manual Power in the project area to excessive noise the project area to excessive noise in 2025 Figure N-8 – Riverside and Floocated within the March Air Reserve For the project within two miles of a public project and public in the march Air Reserve For the project within two miles of a public project and public in the march Air Reserve For the project within two miles of a public project and project and public in the march Air Reserve For the project within two miles of a public project and project within two miles of a public project and project within two miles of a public project and project within two miles of a public project and project within two miles of a public project and project within the March Air Reserve For the project within two miles of a public project within the March Air Reserve For the project within two miles of a public project within the March Air Reserve For the project within two miles of a public project within the March Air Reserve For the p	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038 stance Administration, Transit Noise and Vibration II	Impact gure N-9 ehensive I as such
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹ Calculated using the following formula: PPVequip = Perform the end of the performance of a public airport or public people residing or working in levels? 13c. Response: (Source: General Plater March ARB Noise Contour) No Impact. Although the Project site is It Land Use Plan, the proposed Project is new will have no impact on people residing or cumulatively. In addition, per the GP	Fypical Construction Equipment Vibrat Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transit quipment to the receiver e and Vibration Impact Assessment Manual, 2018. Icinity of a private airstrip or an airport plan has not been adopted, within two is use airport, would the project expose the project area to excessive noise In 2025 Figure N-8 – Riverside and Flootated within the March Air Reserve E ot located within two miles of a public r working in the Project area to excess 2025 Program FPEIR, there are no private in the project area to program of the project area of the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR, there are no private in the project area to excess 2025 Program FPEIR.	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038 stance Administration, Transit Noise and Vibration In the Vibration In th	Impact Gure N-9 ehensive I as such ndirectly at would
Equipment Large Bulldozer Loaded Trucks Small Bulldozer/Tractors Vibratory Roller Jackhammer ¹Calculated using the following formula: PPVequip = Perference vibrated Assessment Manual, 2018. D = the distance from the experience vibrated Assessment Manual, 2018. D = the distance from the experience vibrated Assessment Manual, 2018. D = the distance from the experience vibrated Assessment Manual, 2018. C. For a project located within the valend use plan or, where such a perience vibrated and use plan or, where such a perience vibrated and use plan or working in levels? 13c. Response: (Source: General Plane - March ARB Noise Contour) No Impact. Although the Project site is lead Use Plan, the proposed Project is no will have no impact on people residing or working or working in levels?	Peak Particle Velocity at 25 Feet (in/sec) 0.089 0.076 0.003 0.210 0.035 PV _{ref} x (25/D) ^{1.5} velocity in in/sec of the equipment adjusted for the dision level in in/sec from Table 7-4 of the Federal Transiquipment to the receiver et and Vibration Impact Assessment Manual, 2018. icinity of a private airstrip or an airport plan has not been adopted, within two et use airport, would the project expose the project area to excessive noise an 2025 Figure N-8 – Riverside and Floot located within two miles of a public reworking in the Project area to excess 2025 Program FPEIR, there are no project typose ecity to excessive noise levels. Beca	Peak Particle Velocity at 110 Feet (in/sec)¹ 0.0096 0.0082 0.0003 0.0228 0.0038 stance Administration, Transit Noise and Vibration In the Vibration In th	gure N-9 ehensive I as such ndirectly at would t located

or working in the City to excessive noise levels related to a private airstrip and would have no impact directly, indirect or cumulatively.
14. POPULATION AND HOUSING.
Would the project:
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
14a.Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCA Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections 2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housin Projections 2025, Capital Improvement Program and SCAG's RCP and RTP)
Less than Significant Impact. Temporary labor force would be required to construct the proposed Project. The short term nature of this temporary construction workforce would not induce substantial population growth. The Project is religious gathering place that is anticipated to serve the existing community. The Project anticipates retaining six furtime employees and seven part-time employees. The facility would operate with hours typical of places of worship, with the primary activity occurring each Sunday for worship services. Occasional midweek gatherings and events would occur, including occasional evening events for the congregation and guests. Church classrooms are to be used when church is in service ("youth and children's ministries") and for occasional use throughout the week for church-related functions and ministries. The Project is not proposing housing. As such, the Project would not result in new impact beyond those previously evaluated in the GP 2025 FPEIR; therefore, the impacts will be less than significant both directly and indirectly.
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
14b. Response: (Source: CADME Land Use 2003 Layer, photos from site visit, Google imaging)
No Impact. The Project site does not contain any housing and no housing or people would be displaced. Therefore there will be no impact on existing housing either directly, indirectly or cumulatively.
15. PUBLIC SERVICES.
Would the project result in substantial adverse physical impacts associated with the provision of new or physical altered governmental facilities, need for new or physically altered governmental facilities, the construction of whic could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
a. Fire protection?
15a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)
Less than Significant Impact. Refer to Response 9(g), Hazards and Hazardous Materials. The Project is a church facili providing local services to the immediate community by providing a religious gathering space with other associate amenities. As shown on Figure PS-7 – Fire Hazard Areas, of the General Plan 2025, the Project is not located within Very High, High, or Moderate Fire Severity Zone nor is it located adjacent to wildland areas.
Adequate fire facilities and services are provided by Fire Station #3 located 6395 Riverside Avenue, Fire Station # located at 6674 Alessandro Boulevard, and Fire Station #14 located at 725 Central Avenue. All three-fire station at located within a 2.0-mile radius. The RFD's Operations Division responds to more than 25,000 calls annually. The average on-site response to fire calls is five minutes and 30 seconds. Delivering and maintaining such a high level of service in the future as the City grows is a major concern to the RFD. The City's Fire Department's goal is to maintain 5-minute response time for the first arriving units, 90 percent of the time for all Emergency Medical Services (EMS and fire related incidents. As of 2013, the Fire Department arrives within seven minutes of dispatch over 70 percent

of the time. The first arriving unit is capable of advancing the first line for fire basic life support for medical incidents. Additionally, the City's Fire Department and staffed such that an effective response force of four units with twelve persareas of the City within a maximum of ten minutes (total response time).	t policy sta	ates that uni	ts will be lo	cated
Because of the nature of the existing site, compared to the proposed Project, it could generate more calls or need for fire protection services than what is cu should be noted that the proposed Project would not be located within a VHFS be constructed pursuant to the latest California Fire Code as adopted and amer with implementation of General Plan 2025 policies, compliance with existing Department practices, there will be less than significant impacts on the demar either directly, indirectly or cumulatively.	rrently pro Z. Addition nded by the codes and	vided to the ally, the prope City of River standards,	site. Howe posed Proje rside. In add and throug	ever, it ect will dition, gh Fire
b. Police protection?				
15b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood	Policing Ce	enters)		
Less than Significant Impact. Adequate police facilities and services are provided (RPD) which operates from three major facilities. The RPD currently employ personnel. As part of the Riverside Renaissance Initiative, a new Public Safety and Data Center and a Neighborhood Policing Center are proposed. Additional the City. Incoming calls requesting police services are assigned by urgency threatening nature, such as a robbery in process or an accident involving bodil within 7 minutes to Priority 1 calls. Officers will respond to less-urgent Priority of calls are not life threatening and include such incidents as burglary, petty the According to Figure PS-8 of the General Plan, the Orange Station, located approximately 2.5 miles northwest of the Project site. Additionally, it is not are population growth. The proposed Project is not expected to substantially increaservices as the proposed Project is not inducive to criminal activities. With the impact fees, which include a fee for police service impacts to offset potential with implementation of General Plan 2025 policies, compliance with existing than significant impacts on the demand for additional police facilities of cumulatively.	s 394 swey Administration of the control of the con	orn officers a ration buildir silities are loo L calls are ty lice officers a thin 12 minu fting, etc. 2 Orange So that the Project demand for possible of the requires associated wing standards, to	and 236 c ng, 911 Dis cated throu ypically of strive to res ites. These treet, is lo ect would of police proto red develop ith develop there will b	sivilian spatch aghout a life-spond types ocated create ection pment, we less
c. Schools?				
15c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5 Generation for RUSD)	5.13-D – R	USD, Table 5		tudent
Less than Significant Impact. The Project site is located in the Riverside Unified schools including 30 elementary, 1 special education pre-school, 6 middle schools and 1 adult alternative education school, and high science are Alcott Elementary and Riverside Poly High School, which are located 0	nools, 5 co hools. The	mprehensive closest scho	e high scho	ools, 2
The Project is non-residential and would not create or induce unplanned implementation of General Plan 2025 policies, compliance with existing cod impact fees used to offset the impact of new development, there will be less to school facilities or services either directly, indirectly or cumulatively.	es and sta	andards, and	through	RUSD
d. Parks?				
15d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Sp. Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table	5.14-A -	Park and Re	ecreation F	acility

No Impact. The Project is a non-residential use that will not involve the addition population. Additionally, the Project will provide 37,187 SF of additional lands impact on the demand for additional park facilities or services either directly, in	scape area	s. Therefore,	there will	
e. Other public facilities?				\boxtimes
15e. Response: (Source: General Plan 2025 Figure LU-8 – Community Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Riverside Public Library Service Standards)				
No Impact. The Project consists of the development of church. Adequate fire, to serve this Project area. In addition, with implementation of General Plan 2 codes and standards, there will be no impacts on the demand for additional p indirectly or cumulatively.	2025 polic	ies, compliar	nce with ex	isting
16. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
16a. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Space Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeway 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plance	s, Parks M and Recre Community	aster Plan 20 ation Facilitie Centers, Rive	003, FPEIR es Funded	Table in the
No Impact. Refer to Response 15(d) above, and 16(b) below. The Project is conducted 2025 upon the approval of a CUP to allow for the development of a place of work. The Project will not require the development of additional parks as part of the subject to Development Impact Fees (DIF), at the discretion of the City Park Department. Therefore, this Project will have a no impact directly, indirectly or	orship also e Project a ks, Recreat	providing prive pproval. The ion and Com	/ate open s Project cou	pace. uld be
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				
16b. Response:				
No Impact. The Project will not include new recreational facilities or recreational facilities; therefore, there will be no impact directly, indirectly or c			or expansi	on of
17. TRANSPORTATION				
Existing Street System Regional access to the site is provided primarily by State Route 91(SR-91) and be accessed via Alessandro Boulevard.	d Interstate	e 215 (I-215)	, which car	n both
Existing lane configurations and intersection controls at the study intersections Configuration and Traffic Control. A copy of the City of Riverside Circulation Riverside Circulation Plan. The following provides a description of the roadways	Plan is pr	ovided on Ex	chibit 11, (
Alessandro Boulevard – The segment of Alessandro Boulevard adjacent to the a raised center median. On-street parking is not allowed along either side of the 40 miles per hour (mph). Class II Bike lanes are provided on both sides of the the southern boundary of the Project site and would provide vehicle access the driveways are located. Alessandro Boulevard is designated as an Urban Arteria Plan.	ie roadway e roadway. o Glenhav	and the post Alessandro I en Avenue w	ed speed li Boulevard i here two P	imit is forms roject

Glenhaven Avenue – The segment of Glenhaven Avenue adjacent to the Project site is a two-lane undivided roadway trending in a north-south direction. On-street parking is permitted and the posted speed limit is 25 miles per hour.

Analysis Scenario and Methodology

Analysis Scenarios

Due to Project size, the City of Riverside recommends a site access analysis and a queueing assessment for the Project driveways to be evaluated in the morning and evening peak hours for the following conditions:

- Existing Conditions
- Opening Year 2021 Cumulative (Opening Year Plus Cumulative traffic of other known developments) Plus Project

If analysis shows that improvement are required based on deficiency criteria, then Opening Year Cumulative Plus Project Plus improvements scenarios will be analyzed.

Intersection Analysis - HCM Methodology

Peak hour intersection operations at the signalized existing intersection and proposed unsignalized driveways were evaluated using the methods prescribed in the *Highway Capacity Manual 6th Edition* (HCM), consistent with the *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020).

For signalized intersections, the HCM methodology estimates the average delay (in average seconds per vehicle) for each of the movements through the intersection, considering a number of factors, including the number of lanes, volume of traffic, and the signal timing phasing.

For unsignalized intersections, the HCM methodology analysis determines the average total delay for each vehicle making any movement from the stop-controlled minor street, as well as left turns from the major street. Delay values are calculated based on the relationship between traffic on the major street and the availability of acceptable gaps in the traffic stream through which conflicting traffic movements can be made.

The HCM delay forecast translates to a Level of Service (LOS) designation, ranging from LOS A to LOS F. A summary of each LOS and the corresponding delay is provided in **Table 16**, Level of Service Definitions and **Table 17**, Level of Service Criteria.

Table 16: Level of Service Definitions

Level of Service	Description
А	No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily and nearly all drivers find freedom of operation.
В	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.
С	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted but not objectionably so.
D	This level encompasses a zone of increasing restriction, approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.

F

This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Table 17: Level of Service Criteria

Level of Service	Signalized Intersection (Average delay per vehicle, in seconds) ¹ Unsignalized Intersections (Average delay per vehicle, in seconds) ² in seconds) ²			
Α	<u>≤</u> 10	0 - 10		
В	> 10 - 20	> 10 - 15		
С	> 20 - 35	> 15 - 25		
D	> 35 - 55	> 25 - 35		
E	> 55 - 80	> 35 - 50		
F	> 80	> 50		

Source: Highway Capacity Manual (HCM 2010), Exhibit 18-4

Level of Service Standards

The City of Riverside General Plan includes the following policies regarding minimum acceptable LOS:

- a) LOS C is to be maintained at all street intersections
- b) LOS D is to be maintained at intersections of Collector or higher Classification. See General Plan Policy CCM - 2.3

For projects that propose intensities above that contained in the General Plan:

Operational improvements are required when the addition of project related trips causes either peak hour LOS to degrade the acceptable (A through D) to unacceptable levels (E or F) or the peak hour delay to increase as follows:

•	LOS A/B -	By 10 seconds
•	LOS C -	By 8 seconds
•	LOS D -	By 5 seconds
•	LOS E -	By 2 seconds
•	LOS F -	By 1 seconds

Existing Traffic Volumes

Starting March of 2020, the COVID-19 Pandemic has altered trip patterns and traffic levels as a result of the California Governor's Stay at Home Order and school closures. The City of Riverside recommends that any studies conducted during this initial or any subsequent stay at home order may qualify for special accommodations regarding data collection. Historical counts within the Project study area were not available and therefore historical morning and evening peak hour turning movement volumes for the intersection of Overlook Parkway/Canyon Crest Drive and Alessandro Boulevard were obtained from the Meridian South Campus Traffic Impact Analysis collected in August 2019. Peak hour counts for the intersection of Overlook Parkway/Canyon Crest Drive and Alessandro Boulevard and Alessandro Boulevard and Glenhaven Avenue were conducted on October 20, 2020. A COVID-19 factor was applied to the intersection of Alessandro Boulevard and Glenhaven Avenue to properly represent pre-COVID-19 conditions.

Adjusted existing morning and evening peak hour volumes are presented on Exhibit 12, Existing Traffic Volumes. Traffic volumes and COVID-19 factor calculations are provided in Appendix B of the Focused Traffic Impact Study provided as Appendix H to this Initial Study.

² Source: Highway Capacity Manual (HCM 2010), Exhibits 19-1 and 20-2.

Existing Intersection and Roadway Operating Conditions

Intersection LOS analysis was conducted for the morning and evening peak hours using the analysis procedures and assumptions described previously in this report. The results of the intersection analysis for Existing Conditions are shown on **Table 18**, Summary of Intersection Operation Existing Conditions. Copies of Existing Conditions intersection analysis worksheets are provided in Appendix C of the Focused Traffic Study, provided as Appendix H of this Initial Study.

Table 18: Summary of Intersection Operation Existing Conditions

Int.#	Intersection	Traffic	AM Peak Hour		PM Peak Hour	
IIIC.#	intersection	Control	Delay	LOS	Delay	LOS
1	Alessandro Blvd & Glenhaven Ave	S	8.4	А	9.6	А
2	Glenhaven Ave & Driveway 1/ Glenhaven Ct	U	FUTURE INTERSECTION			
3	Glenhaven Ave & Driveway 2	U	FUTURE INTERSECTION			

Notes:

Review of Table 18 indicates that all study intersections are currently operating at an acceptable LOS under Existing Conditions.

Project Traffic

Project Trip Generation

Trip generation estimates for the Orangecrest Church project are based on daily and peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) <u>Trip Generation Manual (10th Edition)</u> and additional sources. The following ITE code was used:

• ITE Land Use 560: Church

Daily, AM peak hour, and PM peak hour trips were estimated for a proposed 19,945 SF church. Trip rates and the estimated Project trip generation are shown on **Table 19**, Summary of Project Trip Generation. The Project is expected to generate 138 daily trips, 7 trips during the AM peak (four inbound and three outbound) and 9 trips during the PM peak (four inbound and five outbound).

Table 19: Summary of Project Trip Generation

				Trip Generation Rates ¹					
Land use	ITE Code Units Daily Trips	А	M Peak Ho	our	PM Peak Hour				
				In	Out	Total	In	Out	Total
Church	560	ksf	6.950	0.198	0.132	0.33	0.221	0.270	0.49
					Tri	p Generation	on Estimate	S ²	
Land use	Quantity	Units	Daily	А	M Peak Ho	our	PM	/I Peak Hour	
				In	Out	Total	In	Out	Total
Church	19,945	ksf	138	4	3	7	4	5	9
	Total Project Trips	3	138	4	3	7	4	5	9
1 Course Institute	of Transportation End	(incore (ITE) Trin Con	eration Manual 10th Edi	tion					

^{*}Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition KSF = Thousand Square Feet

⁻ Bold values indicate intersections operating at an unacceptable LOS

⁻ Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Trip Distribution and Assignment

Project trip distribution assumptions for the Project site were developed taking into account the proposed site use, and routes to and from the freeway system. Trip distribution and assignment for Project trips are shown on **Exhibit 13**, *Project Distribution* (*Refer to Attached Exhibits*). **Exhibit 14**, *Project-Related Traffic Volumes*, shows the total Project trip assignment.

Future Conditions with Project

Project Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Conditions

Project-related traffic was added to the Project Opening Year 2021 Plus Cumulative Project Traffic volumes. Cumulative project information can be found in Appendix D of the TIA which is provided as Appendix H in this Initial Study. Project Opening Year 2021 Plus Cumulative Project Plus Project Traffic at study intersections are shown on **Exhibit 15**, Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Volumes (Refer to Attached Exhibits).

Intersection and Roadway Operating Conditions

Intersection LOS analysis was conducted for the morning and evening peak hours for the Project Opening Year 2021 Plus Cumulative Projects Plus Project Traffic condition. The results are shown on **Table 20**, Summary of Intersection Openation Opening Year 2021 with Cumulative Projects with Project Conditions. Intersection analysis worksheets for this scenario are provided in Appendix C of the TIA provided as Appendix H of this Initial Study.

Table 20: Summary of Intersection Operation Opening Year 2021 with Cumulative Projects with Project Conditions

		AM Pea	ak Hour	PM Peak Hour		
Int. # Intersection		With F	Project	With Project		
		Delay	LOS	Delay	LOS	
1	Alessandro Blvd & Glenhaven Ave	9.2	Α	10.1	В	
2	Glenhaven Ave & Driveway 1/ Glenhaven Ct	10.2	В	8.9	А	
3	Glenhaven Ave & Driveway 2	9.0	Α	8.9	А	

Source: Focused Traffic Study, Kimley-Horn and Associates, November 2020.

Notes: Bold values indicate intersections operating at an unacceptable Level of Service.

Review of Table 20 indicates that all study intersections would operate at an acceptable LOS under Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Conditions.

Church Classroom 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.

⁻ Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Site Access Analysis

Vehicular access for the Project site would be via two full-access driveways on Glenhaven Avenue. **Table 21**, *Opening Year 2021 with Cumulative Project with Project Conditions*, shows the driveway queues for the morning and evening peak hours.

Table 21: Opening Year 2021 with Cumulative Project with Project Conditions

Intersection	Movement	Peak Hour	95th Percentile Queue (ft)	Exceeds Available Storage
Alessandra Daulauard 9 Clanbauan Avanua	Courthbased (loft)	AM	119'	NO
Alessandro Boulevard & Glenhaven Avenue	Southbound (left)	PM	122'	NO
Glenhaven Avenue & Driveway 1	Eastbound	AM	0	NO
•	(right/thru/left)	PM	0	NO
Glenhaven Avenue & Driveway 2	Eastbound	AM	0	NO
diciliaven/wende & bilveway 2	(right/thru/left)	PM	0	NO

Source: Focused Traffic Study, Kimley-Horn and Associates, November 2020.

Notes:

95th Percentile Queues are based on Synchro HCM 6th Edition reports (version 10.0).

As shown on Table 21, the queues do no disrupt the internal circulation on the site. There are no sight distance issues as there are no steep grades or obstructive landscaping along the southbound side of Glenhaven Avenue. Lastly, as shown in the Scoping Agreement in Appendix A of the TIA provided as Appendix H of the Initial Study, the Project is screened from Vehicle Miles Traveled (VMT) assessment as it is a local serving church.

	facilities?	 50510		
a.	Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian		\boxtimes	

17a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, and Project Specific Focused Traffic Impact Study prepared by Kimley-Horn and Associates prepared on November 2020, provided as Appendix H)

Less than Significant Impact. Roadway capacity is adequate to accommodate the projected traffic volumes of the proposed Project. As determined by the City Traffic Engineer and the Focused Traffic Impact Analysis prepared for the proposed Project by Kimley-Horn and provided as Appendix H to this Initial Study. As noted in Table 20, Intersection #1 (Alessandro Blvd & Glenhaven Ave) will operate at LOS A in the AM Peak Hour and LOS B in the PM Peak Hour; Intersection #2 (Glenhaven Ave & Driveway 1/Glenhaven Ct) will operate at LOS B in the AM Peak Hour and LOS A in the PM Peak Hour; and Intersection #3 (Glenhaven Ave & Driveway 2) will operate at LOS A in both the AM and PM Peak Hours, which is better than the required LOS D.

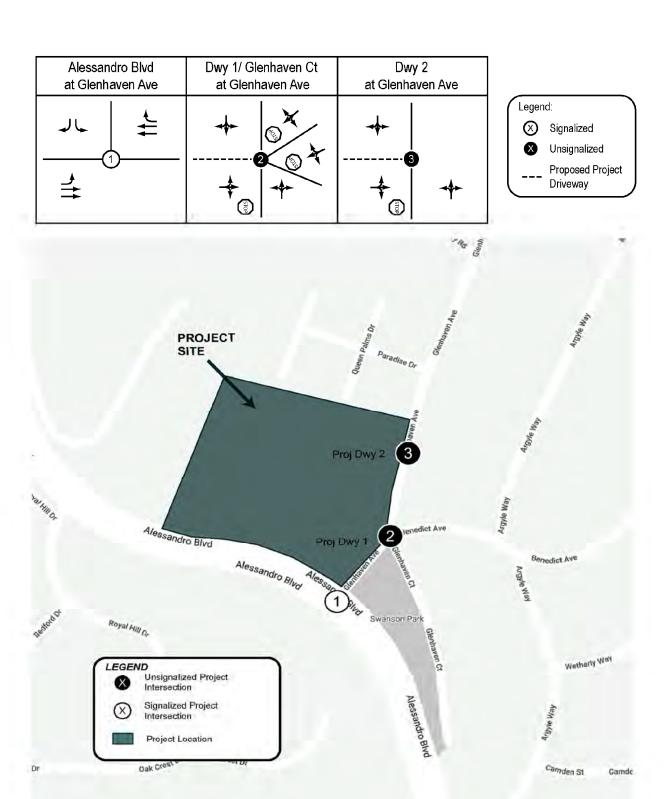
Additionally, the Project is local serving and would not alter any existing bicycle, public transit, or pedestrian facilities, and would not substantially induce the increase use of such infrastructure. Therefore, the increase in traffic in relation to the existing traffic load and capacity of the street system is **less than significant** directly, indirectly or cumulatively.

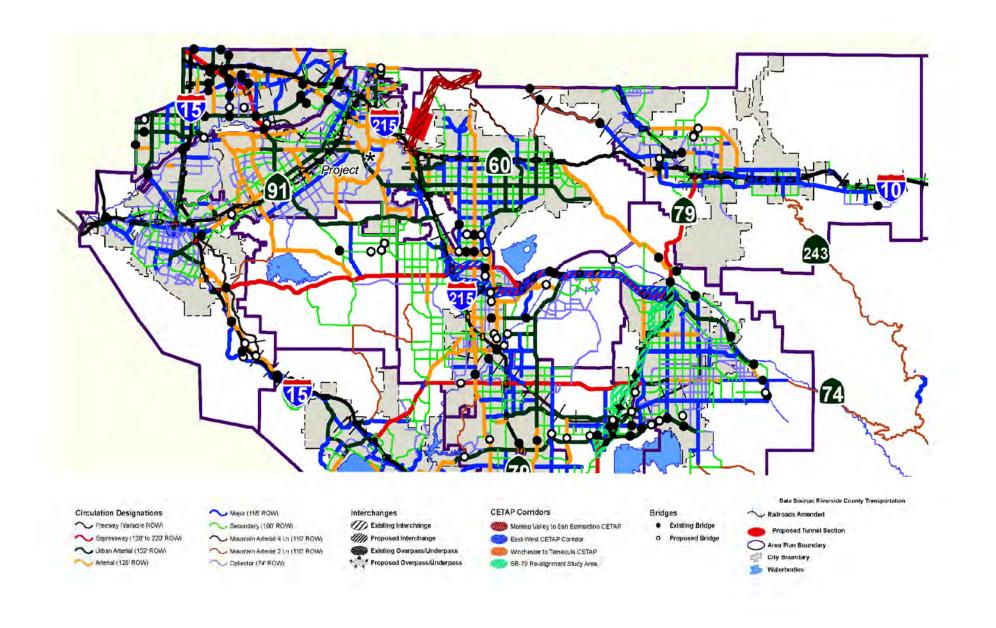
b	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?		\boxtimes	

17b.(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 Figure CCM-5 – Transit Facilities)

Less than Significant Impact. As noted in the Scoping Agreement, provided on Appendix A of the TIA which is available as Appendix H of the Initial Study, the Project is screened from VMT assessment, as it is a local serving church. The

Project would not conflict and would not be inconsistent with CEQA Guidelines §15064.3, subdivision (b). As such, a less than significant impact would occur.									
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				\boxtimes					
17c.Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, Riverside County Airport Land Use Compatibility Plan, 2004. http://www.rcaluc.org/Plans/New-Compatibility-Plan. Accessed November 2020)									
Less than Significant Impact. Refer to Threshold Response 13(c). The project site is not within the Airport Influence Area Boundary as shown in the General Plan Airport Safety Zones Figure and Map R1 and Compatibility Map Riverside Municipal Airport of the Airport Land Use Compatibility Plan. Therefore, the proposed project, which will develop a local serving church, will not create a change in air traffic patterns, and impacts related to safety risks related to a change in air traffic patterns are not anticipated to occur from implementation of the proposed project. As such, a less than significant impact on air traffic patterns would occur from the increase in traffic levels.									
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?									
17d.Response: (Source: Project Site Plans)									
Less than Significant Impact. The proposed Project is compatible with adjacent existing residential uses. It has been designed so as not to cause any incompatible use or any hazards to the surrounding area or general public. Additionally, there are no sight distance issues as there are no steep grades or obstructive landscaping along the southbound side of Glenhaven Avenue. Moreover, the Project will restripe Glenhaven Avenue, half-width from the Project's northern limit to Alessandro Boulevard. Restriping will include the centerline and repainting the left and right turn arrows and making the left-turn pocket 10-feet-wide and the right-turn pocket 12-feet-wide; refer to Exhibit 16, Preliminary Striping Plan. As proposed, this Project will have a less than significant impact on increasing hazards through design or incompatible uses either directly, indirectly or cumulatively.									
e. Result in inadequate emergency access?			\square						
17e.Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code and Focused Traffic Study, prepared by Kimley-Horn and Associated, prepared November 2020)									
Less than Significant Impact. Emergency ingress and egress is available via the two 26-foot-wide driveways located along Glenhaven Avenue. Because the Project provides ample ingress and egress opportunities, these driveways ensure that emergency vehicles have an unobstructed ingress and egress to the Project site. As a standard City practice, if road closures (complete or partial) are necessary, the RPD and RFD would be notified of									
the construction schedule and any required detours would allow emergency vehicles to use alternate routes for emergency response. Additionally, the Project will be developed in compliance with Title 18, Section 18.210.030 and the City's Fire Code Section 503 (California Fire Code 2007).									
The RFD would review the proposed Project and would provide comments regarding fire and emergency access. The proposed Project would comply with the RFD requirements. The impact on emergency access from Project implementation would be less than significant .									

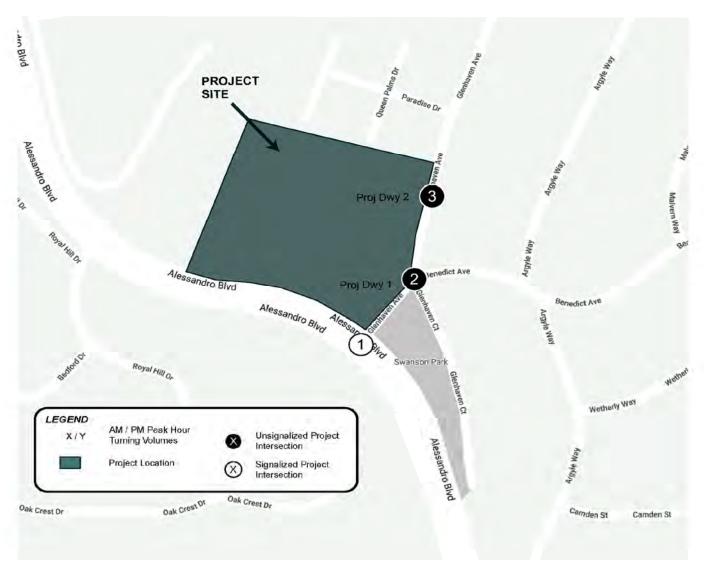




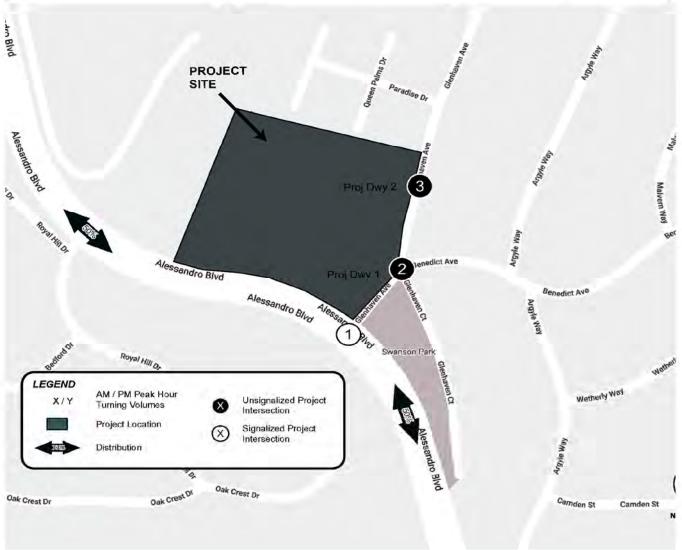
Source: Kimley Horn - TIA for Orangecrest Community Church



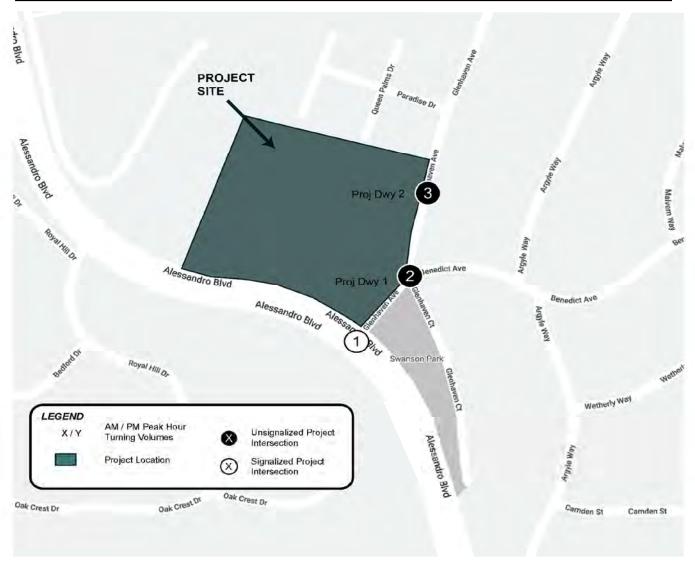
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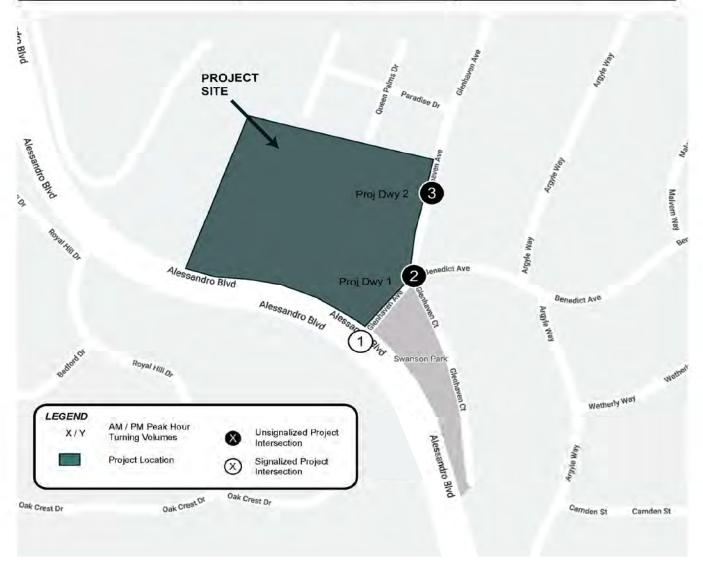
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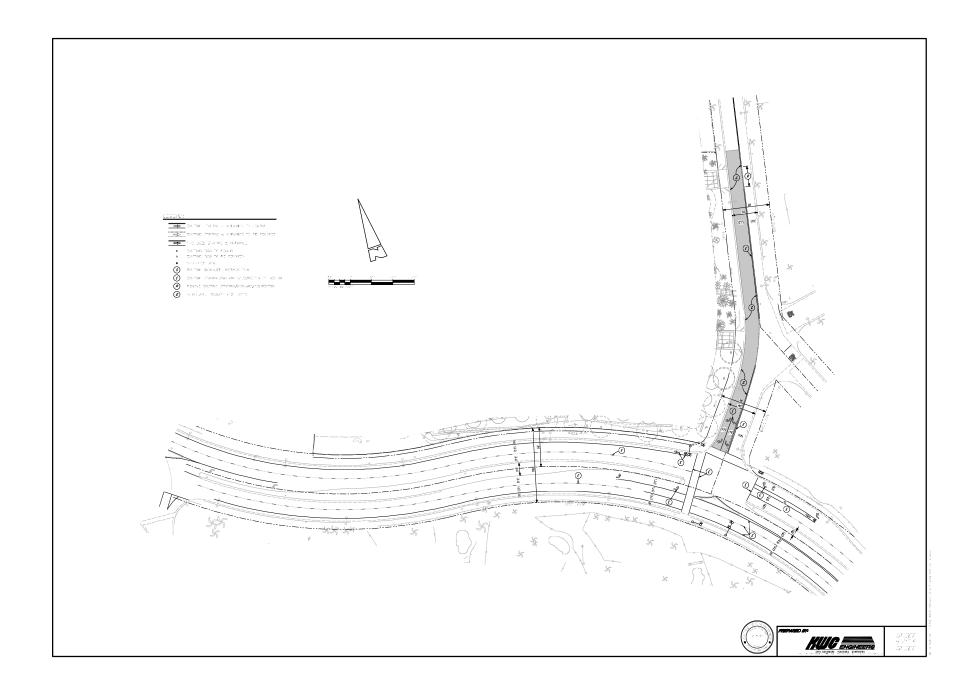


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18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical \boxtimes Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or b. Resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 18a and 18b. Response: (Source: AB52 Consultation) Less than Significant Impact. As of July 2015, California Assembly Bill 52 (AB 52) was enacted and expands CEOA by defining a new resource category. "Tribal Cultural Resources." AB 52 requires Lead Agencies to evaluate a project's

Less than Significant Impact. As of July 2015, California Assembly Bill 52 (AB 52) was enacted and expands CEQA by defining a new resource category, "Tribal Cultural Resources." AB 52 requires Lead Agencies to evaluate a project's potential to impact tribal cultural resources. Such resources include "[s]ites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe and is 1) listed or eligible for listing in the CRHR or included in a local register of historical resources. AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource." As discussed in Threshold 5(a) above, as part of the Cultural Resources Assessment prepared by BCR Consulting in October 22, 2020, archaeologists did not record any cultural resources within the subject property boundaries.

According to AB 52, Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such Project. On July 23, 2020, the City of Riverside provided the required notices to the tribes through certified mail. The following Native American Tribes were notified:

- Morongo Band of Mission Indians;
- San Gabriel Band of Mission Indians;
- Gabrieleno Band of Mission Indians Kizh Nation;
- Pechanga Band of Luiseño Mission Indians;
- Soboba Band of Luiseño Indians;
- Rincon Band of Luiseño Indians;
- Morongo Band of Mission Indians;
- Cahuilla Band of Indians;
- San Manuel Band of Mission Indians: and the
- Agua Caliente Band of Cahuilla Indians.

As a result of AB 52 notices to interested tribes, the following tribes requested consultation with the City:

- Agua Caliente Band of Cahuilla Indians;
- Rincon Band of Luiseño Indians; and
- Soboba Band of Luiseño Indians.
- Agua Caliente Band of Cahuilla Indians officially concluded on May 18, 20201, while Rincon Band of Luiseño
 Indians and Soboba Band of Luiseño Indians officially concluded consultation on June 15, 2021. The
 interested tribes agreed that the City's Standard COAs CUL-1 through CUL-4 were appropriate to mitigate any
 potential impacts to tribal cultural resources. With the acceptance of the standards COAs CUL-1 through CUL-4
 by the interested tribes, AB 52 tribal consultation has officially concluded.

Conditions of Approval

Implementation of COAs CUL-1 through CUL-4.

19. UTILITIES AND SYSTEM SERVICES.										
Would the project:										
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?										
19a. Response: (Source: General Plan 2025 FPEIR – 5.16 Utilities and Service Systems, General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area)										
Less than Significant Impact. The City's Urban Water Management Plan must be updated every five years to include the most recent population trends. The Project site is currently developed with a former swim and tennis club and the site is provided with stormwater drainage, electric power, natural gas, and telecommunication infrastructure. The Project site would continue to be served domestic water by the Riverside Public Utilities (RPU) and sewer services by the City of Riverside Public Works Department. The Project would maintain the two existing buildings and would add three new buildings (Buildings C, D, and E), as noted in Table 1. As shown on Figure 5.16-2, Drainage Facilities and Figure 5.16-4, Water Facilities of the General Plan, water line infrastructure is provided along Alessandro Boulevard and Glenhaven Avenue and drainage infrastructure is provided along Alessandro Boulevard.										
Pursuant to AB 610, the Project does not require a Water Supply Assessment. As noted in Table 5.16-E of the Utilities section of the General Plan 2025 Final PEIR, RPU's 2025 water supply would include up to 32,138 acre-feet of supply from planned sources. These sources include additional groundwater pumping and treatment, additional exchange with the Gage Canal Company, additional potable water made available through increased recycled water use, additional supply made available through the Seven Oaks Dam Conservation storage project and increased imported water from Western Municipal Water District (WMWD).										
As noted above, the proposed Project would continue to be connected to existing potable water supply infrastructure along Alessandro Boulevard and Glenhaven Avenue. The City of Public Works Department provides for the collection, treatment and disposal of nearly all wastewater generated within the City of Riverside, through its Riverside Regional Water Quality Treatment Plan and complies with State and Federal requirements governing the treatment and discharge of wastewater. The proposed Project would continue to be connected to the existing sewer pipeline in Alessandro Boulevard. The proposed Project will continue to receive other utilities, including gas, electric, and telecommunication on Glenhaven Avenue. No relocation or construction of expanded utilities are needed for the Project. Therefore, this Project was found to have a less than significant impact on these utilities either directly, indirectly or cumulatively.										
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?										
19b.Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, RPU Master Plan.))										
Less than Significant Impact. Refer to Response 19(a) above. RPU updated its Urban Water Management Plan in 2005 consisting of water supply and demand to the year 2030. The RPU anticipates that supply will exceed demand by over 16,000 acre-feet per year by year 2030. Additionally, at worst case scenario, RPU may purchase water from WMWD to meet additional water demand not accounted in the Urban Water Management Plan (UWMP).										
According to the RPU UWMP, which is incorporated herein by reference, projected domestic water demand is expected to increase from 77,767 acre-feet per year in 2005 to 99,835 acre-feet per year in 2025 in normal water years. The										

projected water demand (99,835 acre-feet) under the Typical build-out scenario⁴ is below the water supply anticipated to be available to the RPU in that year (112,671 acre-feet). RPU's projected water supplies and demand are presented in **Table 22**, *RPU Projected Domestic Water Supply (ac-ft/yr)* and **Table 23**, *RPU Projected Water Demand*. During single dry year conditions, supply is expected to exceed demand by 9,528 acre-feet, and under multiple dry year conditions supply is expected to exceed demand by 14,786 acre-feet. RPU is able to provide excess supply even in multiple dry years because it relies mainly on groundwater, which has proven to be very reliable even in multiple dry years.

Table 22: RPU Projected Domestic Water Supply (ac-ft/yr)

Water Supply Sources	2010	2015	2020	2025	2030
Existing (as of 2005)					
Total Groundwater	72,033	72,033	72,033	72,033	72,033
Imported Water*	3,800	5,300	6,800	8,300	9,800
Recycled Water**	200	200	200	200	200
Planned					
John W. North Water Treatment Plant (Groundwater)	10,000	10,000	10,000	10,000	10,000
Riverside Groundwater- Downtown Area	-	-	7,000	7,000	7,000
Additional Gage Exchange (groundwater)	5,388	5,388	5,388	5,388	5,388
Recycled water	1,000	3,250	5,500	7,750	10,000
Seven Oaks Dam Conservation Storage	2,000	2,000	2,000	2,000	2,000
Total					
Groundwater	87,421	87,421	94,421	94,421	94,421
Purchased (Imported) water	3,800	5,300	6,800	8,300	9,800
Recycled water	1,200	3,450	5,700	7,950	10,200
Seven Oaks Dam***	2,000	2,000	2,000	2,000	2,000
Total	94,421	98,171	108,921	112,671	116,421

Table 23: RPU Projected Water Demand

Table Zer III o'r Tojecteu Water Belliana											
Water Use Sector	2005	2010	2015	2020	2025	2030					
Residential	44,297	48,019	50,071	51,545	52,538	53,856					
Commercial	12,167	13,188	13,752	14,157	14,430	14,792					
Industrial	11,211	12,152	12,672	13,046	13,297	13,630					
Agriculture	1,244	1,348	1,406	1,447	1,475	1,512					
Other	421	456	476	490	499	512					
Sale to Home Gardens County Water District	540	540	540	540	540	540					
Unaccounted for Water*	7,687	8,327	8,681	8,935	9,106	9,333					
Subtotal Domestic Demand	77,567	84,031	87,598	90,158	91,885	94,174					
Recycled Water	200	1,200	3,450	5,700	7,950	10,200					
Total	77,767	85,231	91,048	95,858	99,835	104,374					

As noted in Table 22 and 23 above, RPU's 2025 water supply would include up to 32,138 acre-feet of supply from planned sources. These sources include additional groundwater pumping and treatment, additional exchange with the Gage Canal Company, additional potable water made available through increased recycled water use, additional supply made available through the Seven Oaks Dam Conservation storage project and increased imported water from WMWD.

RPU anticipates that supply will exceed demand by over 12,000 acre-feet per year in 2025. RPU's 2030 water demand was based on a service area (covering 68.5 square miles within the City limits and 5.6 square miles outside the City limits) with a service area population of 316,000. Development assumed in the UWMP for RPU included the addition

⁴ The Typical build-out scenario is consistent with SCAG population projections for the Planning Area. In addition, RPU commissioned an independent population projection as part of its Urban Water Management Plan process, which is also broadly consistent with the projections on which the Typical scenario is based.

of up to 38,100 new dwelling units and 39.6 million square feet of new non-residential construction over the 20-year horizon of the General Plan within the Planning Area, which encompasses not only Riverside City limits but also the northern and southern Spheres of Influence. Additionally, as noted in **Table 24**, *General Plan Projected Water Demand for RPU Including Water Reliability for 2025*, the RPU anticipates adequate water supplies for year 2025 under multipledry year conditions based on current land use projections.

Table 24: General Plan Projected Water Demand for RPU Including Water Reliability for 2025

	Water	Projected Residential Meters* / Non- Residential usage (acre)			_	Projected Water Demand 2025			Projected Water Supply 2025			
Land Use	Use(AFY) /Meter	Тур	Max	Max/ PRD	Тур	Max	Max/ PRD	Normal	Single Dry Year	Multi Dry Year		
Residential	.8* *	73,645	94,333	112,193	58,916 AFY	75,466 AFY	89,754 AFY	112.67	104.371	104.37		
Commercial	5.0 AFY	446.15	743.6		2,230.75 AFY	3,718 AFY		112,67 1 AFY	AFY	104,37 1 AFY		
Other	.6.4 AFY	251.95	377.93		1,612.48 AFY	2,418.75 AFY						
TOTAL					62,759.2 3 AFY	81,602.75 AFY	89,754 AFY					

The Project will not exceed expected water supplies. Therefore, the Project will have a **less than significant impact** resulting in the insufficient water supplies either directly, indirectly or cumulatively.

C.	Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?		

19c.Response: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Wastewater Integrated Master Plan and Certified EIR)

No Impact. The Project will not exceed wastewater treatment requirements of the Regional Water Quality Control Board. The Project would be consistent with the General Plan 2025 Typical Growth Scenario where future wastewater generation was determined to be adequate. Further, the current Wastewater Treatment Master Plan anticipates and provides for this type of Project which is consistent and permitted in the Project site. Therefore, **no impact** to wastewater treatment directly, indirectly or cumulatively will occur.

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

No Impact. The Project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR). The General Plan notes that the remaining total landfill capacity is of approximately 56.57 million tons over the next 16 years (until Year 2025) assumes that no expansion of existing landfills (or development of new landfills) will occur. Therefore, **no impact** to landfill capacity will occur directly, indirectly or cumulatively.

e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?		\boxtimes

19e. Response: (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)

No Impact. The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The City is currently achieving

a 60 percent diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50 percent of non-hazardous construction and demolition debris for all projects and 100 percent of excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed Project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any Federal, State, or local regulations related to solid waste. Therefore, no impacts related to solid waste statutes will occur directly, indirectly or cumulatively.									
20. WILDFIRE									
If located in or near state responsibility areas or lands classified as very hig project:	h fire haza	rd severity z	ones, woul	d the					
 a. Substantially impair an adopted emergency response plan or emergency evacuation plan? 									
20a. Response: (Source: General Plan 2025 PEIR – Volume 2; 5.7 Hazards 2025; Circulation and Community Design Element)	and Hazar	dous Materia	ls, Genera	l Plan					
Less than Significant Impact. In 2008, CALFIRE produced Fire Hazard Severity Zone maps for the areas of California where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRA). In 2008, the California Building Standards Commission adopted California Building Code Chapter 7A requiring new buildings in Very High Fire Hazard Severity Zones to use ignition-resistant construction methods and materials. The Project would not interfere with the City's Emergency Operations Plan because it does not contain any features that would prohibit the execution of such plans. The Project would provide access via Glenhaven Avenue and would contain adequate access and circulation for emergency equipment on-site. Evaluation and approval of the proposed site plan by the Riverside Fire Department would be required to ensure adequacy of emergency access. Thus, impacts to an emergency response plan would be less than significant.									
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?									
20b.Response: (Source: General Plan 2025 PEIR - Volume 2; 5.7 Hazard Element General Plan 2025; Land Use and Urban Design Element. City				Safety					
Less than Significant Impact. Like most Southern California cities, Riverside faces a diverse array of potential natural hazards. The City's undeveloped hillsides are visually appealing but can provide fuel for a wildfire or mudslides in heavy rains. As noted on Figure 5.7-3A – Fire Responsibility Areas of the General Plan EIR, the City has three divisions for fire responsibility within the Planning Area. The areas surrounding the March Air Reserve Base are under federal responsibility. The area known as Box Springs Mountain Regional Reserve in the northeast corner of the City's Planning Area as well as land in the southern quadrant near Lake Mathews falls under the responsibility of the State of California. The State Responsibility Areas (SRA's) are located within the City's sphere of influence portion of the Planning Area and are currently under the County's jurisdiction. The remaining areas are under local responsibility by either the City of Riverside's Fire Department or the County Fire Department in unincorporated portions of the Planning Area. As shown in Figure 5.7-3A and 5.7-3 – Fire Hazard Areas of the General Plan EIR, the Project site is not located in a moderate or very high fire zone. Because the Project site is not located in an area identified as a fire hazard zone, it is anticipated that the proposed Project would not exacerbate wildfire risks, and thereby would not expose Project occupants to pollutant concentrations from a wildfire. No impact would occur.									
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?									
20c. Response: (Source: General Plan 2025; Land Use and Urban Design Ele City of Riverside Municipal Code, Project Preliminary Site Plan)	ement. City	of Riverside	Municipal	Code,					
No Impact. All proposed Project components would be within the Project site									
with the development of the Project within this footprint area are analyzed thro	սբուսսւ տոչ	aucument. 1	THE FIUJECT	uues					

not propose the construction of roads, fuel breaks, emergency water sources, power lines, or other utilities. The Project does not represent a significant impact relative to fire risk, as discussed in Response 20(a) above. Additionally, City's Fire Department, as part of the City's process, will review all building permit plans for adequate fire suppression, fire access, and emergency evacuation. Adherence to standard City policies reduce the potential to exacerbate fire risk. Therefore, no impact would occur.							
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?							
20d.Response: (Source: Google Aerial Imagery, FEMA 100 Year Flood Zones GIS Mapping, General Plan 2025 PEIR – Volume 5.8-2 Hydrology Water Quality.)							
No Impact. As discussed in Response 7(iv), Geology and Soils, the Project site is not located in a landslide hazard area or a floodplain and no signs of flooding or erosion were visible during the geotechnical study site visit. The Project site is relatively flat and is not located in a landslide-prone zone. Additionally, according to Figure 5.8-2 – Flood Hazard Areas of the General Plan, the Project site is not located within a 100 or 500-Year Flood Zone which indicates that the site has a low potential of flooding. Additionally, the Project will provide three infiltration basin to help capture and infiltrate water at the same rate as existing conditions. Therefore, no impact to people or structures from risk of downslope or downstream flooding, landslides, post-fire instability, or drainage would occur.							
21. MANDATORY FINDINGS OF SIGNIFICANCE							
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?							
21a. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer, MSHCP, General Plan 2025 – Figure OS-7 – MSHCP Cores and Linkage, MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, 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) (Title 20 of the Riverside Municipal Code, GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, AB 52 Consultation and site specific Cultural Resources Assessment prepared by BCR Consulting LLC. In October 2020, provided as Appendix B – Cultural Resources Assessment)							
Less than Significant with Mitigation Incorporated. The proposed project would remodel and expand existing buildings to be used for church operations. As described above, the proposed project would result in several potentially significant project-level impacts including biological resources and cultural resources. The project site does not contain any known historical resources and does not support habitat for any special-status animals or plant communities. Furthermore, the site does not contain riparian habitat. However, development of the proposed project would require ground disturbance, which would have the potential to uncover cultural resources; thus, with implementation of Mitigation Measures BIO-1 and BIO-2 the project would have a less than significant impact on biological resources. In addition, construction of the proposed project could result in the disturbance of nesting birds from ground disturbing activities. Implementations of Conditions of Approval CUL-1 through CUL-4, would reduce impacts to historical and archaeological resources to less than significant.							

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?								
21b.Response: (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)								
Less than significant with mitigation incorporated. The project would contribute minimally to cumulative development impacts within the region, similar to other future developments. The project would create several potentially significant impacts relating to biological and cultural resources, hazards, and noise. However, the Project would adequately mitigate all potential impacts to less than significant levels with implementation of Mitigation Measures, thereby reducing the project's cumulative impacts. Therefore, cumulative impacts would be less than significant.								
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?								
21c. Response: (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)								
Less than significant with mitigation incorporated. The proposed project is not anticipated to result in significant project-level impacts on human beings. Mitigation measures have been identified that would reduce impacts to biological resources to a less than significant impact. Therefore, impacts would be less than significant.								

Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ⁵	Monitoring/Reporting Method
Biological Resources	MM 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.	During Construction Activities.	Qualified Biologist	Evaluation
Biological Resources	MM BIO 2: Burrowing Owl. A focused BUOW survey must be conducted during the breeding season (four visits between 1 March - 31 August). Regardless of the result of those surveys, because of the presence of suitable habitat that could be occupied at any time, a one-day preconstruction survey must also be conducted 30 days or less before groundbreaking.	Prior to project-related disturbance to nestable vegetation	Qualified Avian Biologist	Pre-construction Nesting Survey (NBS)

⁵ All agencies are City of Riverside Departments/Divisions unless otherwise noted.