Appendix J1

Martha McLean Anza Narrows Park Traffic Assessment

RICK
ENGINEERING COMPANY
Traffic Division

March 3, 2023

Ms. Alisa Sramala
City of Riverside
Parks, Recreation and Community Services Department
6927 Magnolia Avenue
Riverside, California 92506

SUBJECT: RIVERSIDE GATEWAY PARKS MARTHA MCLEAN-ANZA NARROWS PARK TRAFFIC ASSESSMENT, RIVERSIDE, CA
(RICK ENGINEERING COMPANY JOB NUMBER 19405-AT)

Dear Ms. Sramala:

The following traffic assessment evaluates the anticipated trip generation, site access, internal circulation and parking of the proposed improvements and amenities within the existing Martha McLean-Anza Narrows Park within the Riverside Gateway parks system in the City of Riverside, California. In addition, level of service (LOS) and vehicle miles traveled (VMT) screening evaluations and an active transportation and public transit evaluation are included in this traffic assessment. The existing park is bounded by Jurupa Avenue to the south, the Santa Ana River to the north and east, and Union Pacific Railroad lines to the west. This study was prepared in accordance with the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020) and discussion with City of Riverside Public Works staff. **Attachment A** contains the City of Riverside's Traffic Analysis Scoping Form, which was reviewed and accepted by City of Riverside Traffic Engineering staff. **Exhibit 1** shows a map of the regional project vicinity.

Project Description

Martha McLean-Anza Narrows Park is an existing 39.5-acre developed park with picnic areas and an 18-hole disc golf course. The Santa Ana River Trail extends through the park near the eastern boundary. A total of 167 parking stalls are currently provided at Martha McLean-Anza Narrows Park, and the proposed project would provide a net increase of 17 additional parking stalls.

The project proposes to develop approximately 3.3 acres of programmable park amenities within the existing park, which include the following:

- Two community meadows/gathering spaces
- Band shell
- Water play arroyo and nature play area
- Realignment of the drive aisle and parking area at the northwest corner of the park, which would remove nine (9) parking stalls
- Proposed new 26-stall parking lot at southeast corner of park

Exhibit 2 shows the project site plan.

Existing Transportation Conditions

The following is a description of the existing roadways in the vicinity of Martha McLean-Anza Narrows Park:

Jurupa Avenue is currently built as a four-lane divided roadway within the project vicinity. Jurupa Avenue is oriented in a general east-west direction and extends from Pachappa Drive near SR-91 to Tyler Street. Jurupa Avenue runs for a total distance of approximately 5.5 miles.

Jurupa Avenue is classified in the City of Riverside's *General Plan Circulation and Community Mobility Element* (February 2018) as a four-lane, 88-foot Arterial in the immediate vicinity of the project site. Jurupa Avenue has a pavement width of approximately 76 feet along the existing park frontage. A raised median with intermittent turn lanes is currently provided west of the existing park access, and a two-way left-turn lane is currently provided east of the existing park access. On-street parking is prohibited on Jurupa Avenue in the vicinity of the existing park.

Class II bike lanes are provided on Jurupa Avenue in each direction of travel for a majority of the roadway length. Several sections of the roadway also provide a two-foot buffer for bicyclists on both sides of the roadway. The posted speed limit on Jurupa Avenue is 45 MPH in the vicinity of the existing park.

Project Trip Generation

Based on input from City of Riverside staff, the trip generation for the proposed project was calculated using custom trip rates that were developed from vehicular traffic counts that were collected at the three (3) driveways serving Ryan Bonaminio Park located at 5000 Tequesquite Avenue in the City of Riverside. The traffic counts at the park driveways were collected on Thursday, September 15, 2022 and on Saturday, September 17, 2022 over a 24-hour period on each day.

Based on the acreage of the existing Ryan Bonaminio Park (43.65 acres) and the number of daily and AM/PM peak hour trips on each day, daily and AM/PM peak hour trip generation rates were calculated for a "local Riverside park" on a typical weekday and a typical Saturday. These customized local park trip rates were applied to the programmable acreage of the proposed developed park areas, which are shown below in **Table 1**.

Table 1
Local Riverside Park Trip Rates from Driveway Counts

Unit	Daily Trip Rate (per unit)	AM Peak Hour			PM Peak Hour		
		Trip Rate (per unit)	Inbound (%)	Outbound (% AM)	Trip Rate (per unit)	Inbound (% PM)	Outbound (% PM)
Weekday Trip Rates							
acres	41.28	3.09	50%	50%	3.83	54%	46%
Saturday Trip Rates							
acres	39.27	4.22	49%	51%	N/A	N/A	N/A

Source: Vehicular traffic counts were collected at Ryan Bonaminio Park driveways by Veracity Traffic Group on Thursday, September 15, 2022 and on Saturday, September 17, 2022.

N/A = Not applicable, as the highest peak hour on a Saturday occurs during the morning hours.

Based on direction from City of Riverside staff, the trip generation rates for a developed Regional/County Park from the San Diego Association of Governments (SANDAG) *Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (April 2002) were used to calculate the trip generation of the existing developed park.

Table 2 shows the trip generation calculations for the proposed project using the custom trip rates shown above in Table 1 and the SANDAG Regional/County Park trip rates as described above. **Attachment B** contains the Ryan Bonaminio Park driveway counts and the SANDAG trip generation rates.

Table 2 shows that the proposed programmable project area and remaining existing developed Martha McLean-Anza Narrows Park would generate a combined total of 860 trips per day on a typical weekday, and a combined total of 853 trips per day on a typical Saturday. The proposed programmable project area and remaining existing developed park would generate a combined total of 39 trips during the weekday AM peak hour (20 inbound/19 outbound), 71 trips during the weekday PM peak hour (36 inbound/35 outbound), and 92 trips during the highest Saturday peak hour (46 inbound/46 outbound).

Table 2 also shows that development of the proposed programmable project area would result in a net increase of 70 trips per day on a typical weekday and a net increase of 63 trips per day on a typical Saturday. The proposed programmable project area would generate a net increase of 7 trips during the weekday AM peak hour (4 inbound/3 outbound), a net increase of 8 trips during the weekday PM peak hour (4 inbound/4 outbound), and a net increase of 7 trips during the highest Saturday peak hour (4 inbound/3 outbound).

The project's trip distribution was estimated based on the surrounding land uses and the existing roadway network. **Exhibit 3** illustrates the trip distribution of the proposed Martha McLean-Anza Narrows Park project.

Project Access, Circulation and Parking

Vehicular access to the existing Martha McLean-Anza Narrows Park is currently taken from Jurupa Avenue just east of the Union Pacific Railroad overpass. An internal road currently meanders through the park and provides access to several parking areas. The existing park access intersection on Jurupa Avenue is one-way stop-controlled and full access is currently provided.

A total of 167 parking spaces are currently provided in Martha McLean-Anza Narrows Park. The proposed realignment of the drive aisle and parking in the northwest corner of the park would result in the removal of nine (9) parking spaces, and a proposed new parking lot in the southeast corner of the park would provide 26 additional parking spaces. The proposed project would provide a net increase of 17 parking stalls, which would provide a total of 184 parking spaces for the entire park.

A minimum of 18 parking spaces are required for the 3.3-acre project programmable area and a minimum of 36 parking spaces are required for the remaining 36.2-acre park use based on the following parking requirements for park uses per Chapter 17.188 of the Riverside County Municipal Code:

- 1 space per 8,000 sq. ft. of active recreational area within a park or playground
- 1 space per acre of passive recreational area within a park or playground

Chapter 17.188 of the Riverside County Municipal Code was utilized to determine the parking requirements of the proposed park because Chapter 19.580 (Parking and Loading) of the City of Riverside Municipal Code does not provide off-street parking requirements for park uses.

TABLE 2
PROPOSED PROJECT TRIP GENERATION

Trip Generation Rates												
Land Use	Unit	Weekday Trips							Weekend (Saturday) Trips			
		Daily Trip Rate (per unit)	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trip Rate (per unit)	Highest Peak Hour (9:15 AM - 10:15 AM)		
			Trip Rate (per unit)	In (% AM)	Out (% AM)	Trip Rate (per unit)	In (% PM)	Out (% PM)		Trip Rate (per unit)	In (% AM)	Out (% AM)
Developed Regional/County Park (SANDAG)	acres	20	4%	50%	50%	8%	50%	50%	5	11%	49%	51%
Local City of Riverside Park (Driveway Counts): Proposed Developed Park Amenities	acres	41.28	3.09	50%	50%	3.83	54%	46%	39.27	4.22	49%	51%

Forecast Project Generated Trips													
Land Use	Size	Unit	Weekday Trips							Weekend (Saturday) Trips			
			Daily Trips	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trips	Highest Peak Hour (9:15 AM - 10:15 AM)		
				Total	In	Out	Total	In	Out		Total	In	Out
Existing Park Trip Generation[1]													
Existing Developed Park	39.5	acres	790	32	16	16	63	32	31	790	85	42	43
Proposed Project Trip Generation[2]													
Developed Park Renovations/ Amenities	3.3	acres	136	10	5	5	13	7	6	129	14	7	7
Total Park Trips (Remaining Undeveloped Acreage Plus Programmable Developed Acreage)[3]													
Existing Developed Park	36.2	acres	724	29	15	14	58	29	29	724	78	39	39
Developed Park Renovations/ Amenities	3.3	acres	136	10	5	5	13	7	6	129	14	7	7
Total Park Trips			**860**	**39**	**20**	**19**	**71**	**36**	**35**	**853**	**92**	**46**	**46**
Net Change in Trips (Total - Existing Trips)													
Net Project Trips			**70**	**7**	**4**	**3**	**8**	**4**	**4**	**63**	**7**	**4**	**3**

Source: Traffic counts conducted by Veracity Traffic Group at Ryan Bonaminio Park driveways on Thursday, September 15, 2022 and on Saturday, September 17, 2022. San Diego Association of Governments (SANDAG) *Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (April 2002).

[1]Existing trip generation is calculated based on total existing park acreage.

[2]Proposed project trip generation is calculated based on programmable acreage to be developed.

[3]The total park trips include the existing park acreage plus the programmable acreage of the area to be developed.

Pedestrian, Bicycle and Transit Facilities Evaluation

Pedestrian access to the existing Martha McLean-Anza Narrows Park is currently provided from the existing sidewalk along the north side of Jurupa Avenue. Existing paved paths meander from Jurupa Avenue through Martha McLean-Anza Narrows Park to provide pedestrian access to the amenities that are currently provided in the park. All of the existing pedestrian paths will remain in place with the proposed project, and the project will provide new pedestrian paths to access the proposed water play arroyo/nature play area, community meadows, and access to the Santa Ana River Trail and river in the northwest corner of the park. The proposed pedestrian and trail improvements are consistent with the *City of Riverside PACT Trails Master Plan* (August 17, 2021), and development of the proposed project would not conflict with the existing or future pedestrian or trail network in the immediate vicinity of the project site.

Bicycle access to Martha McLean-Anza Narrows Park is currently provided from the existing Class II bike lanes along Jurupa Avenue and the existing Santa Ana River Trail, which is built as a Class I bike path that passes through the park along the eastern boundary. The Santa Ana River Trail is approximately 10 feet in width and is divided by a dashed line to separate the direction of travel. An existing park service road just north of the main park entrance provides bicyclists a direct connection to the Santa Ana River Trail from Jurupa Avenue. The proposed 26-stall parking lot at the southeast corner of the park is intended to function as a trailhead staging area for the Santa Ana River Trail. Development of the proposed project would not conflict with the existing or future bicycle network in the immediate vicinity of the project site.

There are currently no bus transit stops within ¼ mile of the existing Martha McLean-Anza Narrows Park. The Riverside Metrolink Rail Line runs adjacent to the western boundary of the park, but the nearest rail station is several miles away. No additional future transit facilities near the project site are planned per the City of Riverside's *General Plan Circulation and Community Mobility Element* (February 2018). Development of the proposed project would not conflict with any existing or future planned transit facilities.

Level of Service (LOS) Analysis Screening Assessment

The Level of Service Screening Assessment was conducted per the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020). Per these guidelines, there are various conditions that can exempt a project from a Level of Service (LOS) analysis. Of the conditions listed in the guidelines, the following are the most relevant to the project:

- *Projects that generate less than 100 peak hour trips, as projects that generate 100 or less trips typically do not affect LOS significantly once distributed to the local network*
- *Local serving churches, lodges, community centers, neighborhood parks and community parks*

As previously shown in Table 2, the proposed project is estimated to generate a net increase of 7 trips during the weekday AM peak hour, a net increase of 8 trips during the weekday PM peak hour, and a net increase of 7 trips during the highest Saturday peak hour. The calculated project traffic falls below the "100 peak hour trips" threshold and is anticipated to have a minimal impact on the local roadway network. Additionally, the proposed land use is a park that will be serving the nearby communities. This characteristic further indicates that most of the project traffic will be local. Based on these criteria, the project is determined to be exempt from an LOS analysis.

Vehicle Miles Traveled (VMT) Analysis Screening Assessment

As required by CEQA, a Vehicles Miles Traveled (VMT) analysis screening assessment was conducted for the proposed project. This VMT analysis screening assessment was conducted in accordance with the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020), which includes the following screening criteria for projects:

- *Projects located in a Transit Priority Area (TPA)*
- *Projects located in a low VMT-generating area (15% or more below City average VMT)*
- *Local-serving land use types*
- *Affordable housing projects*
- *Projects generating less than 110 daily vehicle trips*

The Western Riverside Council of Governments (WRCOG) VMT tool, which utilizes the Riverside County Transportation Model (RIVCOM), shows that the VMT per service population within the Travel Analysis Zone (TAZ) in which the project site is located (TAZ 1937) is below the screening threshold for a low VMT-generating area (15% or more below the City of Riverside average VMT per service population). Therefore, the proposed project is screened out from further VMT analysis due to the site's location in a low VMT-generating area, and is presumed to have a less than significant transportation impact. **Attachment C** contains WRCOG VMT tool outputs for the TAZ in which the project site is located (TAZ 1937), which show that the VMT per service population in the project site TAZ is below the City's screening threshold for a low VMT-generating area.

In addition, the City of Riverside's VMT screening criteria lists local parks as a land use type that is presumed to have a less than significant impact and is screened out from further VMT analysis. The proposed project is a local-serving park use and therefore is screened out from further VMT analysis and is presumed to have a less than significant transportation impact.

In addition, the project is estimated to generate fewer than 110 trips per day as previously shown in Table 2. Vehicular trips generated by the proposed project would not exceed the City's screening threshold of 110 trips per day for Small Projects, and therefore the project is screened out from further VMT analysis and is presumed to have a less than significant transportation impact.

Conclusions/Recommendations

The findings of this traffic assessment showed that the proposed project is anticipated to generate a net increase of 70 trips per day on a typical weekday and a net increase of 63 trips per day on a typical Saturday. The proposed programmable project area would generate a net increase of 7 trips during the weekday AM peak hour (4 inbound/3 outbound), a net increase of 8 trips during the weekday PM peak hour (4 inbound/4 outbound), and a net increase of 7 trips during the highest Saturday peak hour (4 inbound/3 outbound). It is anticipated that the project-generated traffic would have minimal impacts on intersections and roadways in the vicinity of the project.

A total of 167 parking spaces are currently provided in Martha McLean-Anza Narrows Park. The proposed project would provide a net increase of 17 parking stalls, which would provide a total of 184 parking spaces for the entire park. A minimum of 18 parking spaces are required for the 3.3-acre project programmable area and a minimum of 36 parking spaces are required for the remaining 36.2-acre park use (minimum of 54 parking spaces required for entire park). Therefore, sufficient parking would be provided for the proposed project.

The proposed pedestrian and trail improvements within Martha McLean-Anza Narrows Park are consistent with the *City of Riverside PACT Trails Master Plan* (August 17, 2021). Development of the proposed project would not conflict with the existing or future pedestrian, bicycle and transit network in the immediate vicinity of the park.

Should you have any questions, please contact either David Mizell or me at (619) 291-0707.

Sincerely,

RICK ENGINEERING COMPANY

Brian Stephenson, P.E., T.E., P.T.O.E.
Associate Principal

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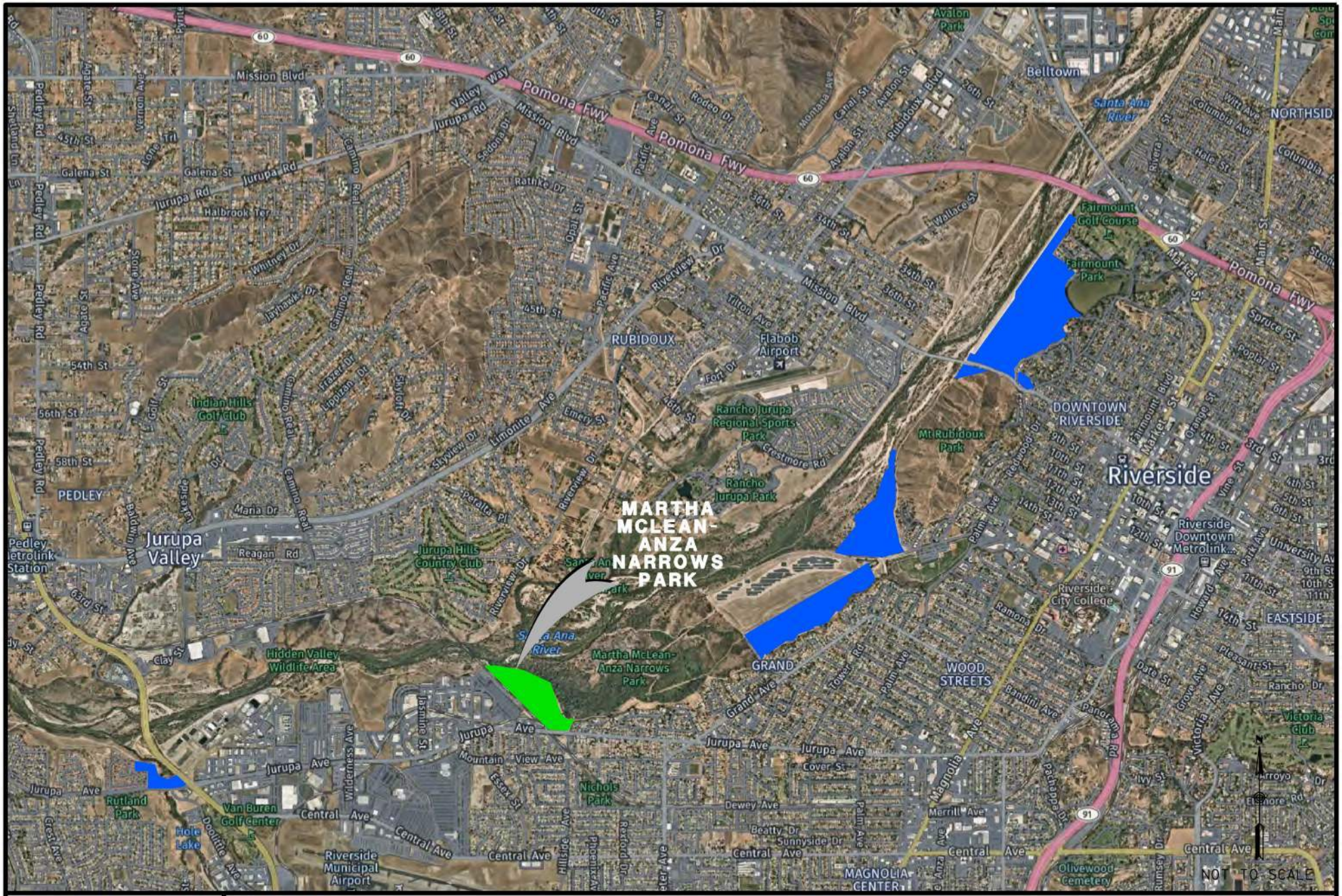
Attachments



RICK ENGINEERING COMPANY

EXHIBIT 1

PROJECT VICINITY MAP

MARTHA MCLEAN - ANZA NARROWS PARK TRAFFIC ASSESSMENT

LEGEND

- =RIVERSIDE GATEWAY PARK SYSTEM
- =MARTHA MCLEAN - ANZA NARROWS PARK

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MARTHA MCLEAN ANZA NARROWS PARK: MASTERPLAN

RICK ENGINEERING COMPANY

EXHIBIT 2

PROJECT SITE PLAN

MARTHA MCLEAN - ANZA NARROWS PARK TRAFFIC ASSESSMENT

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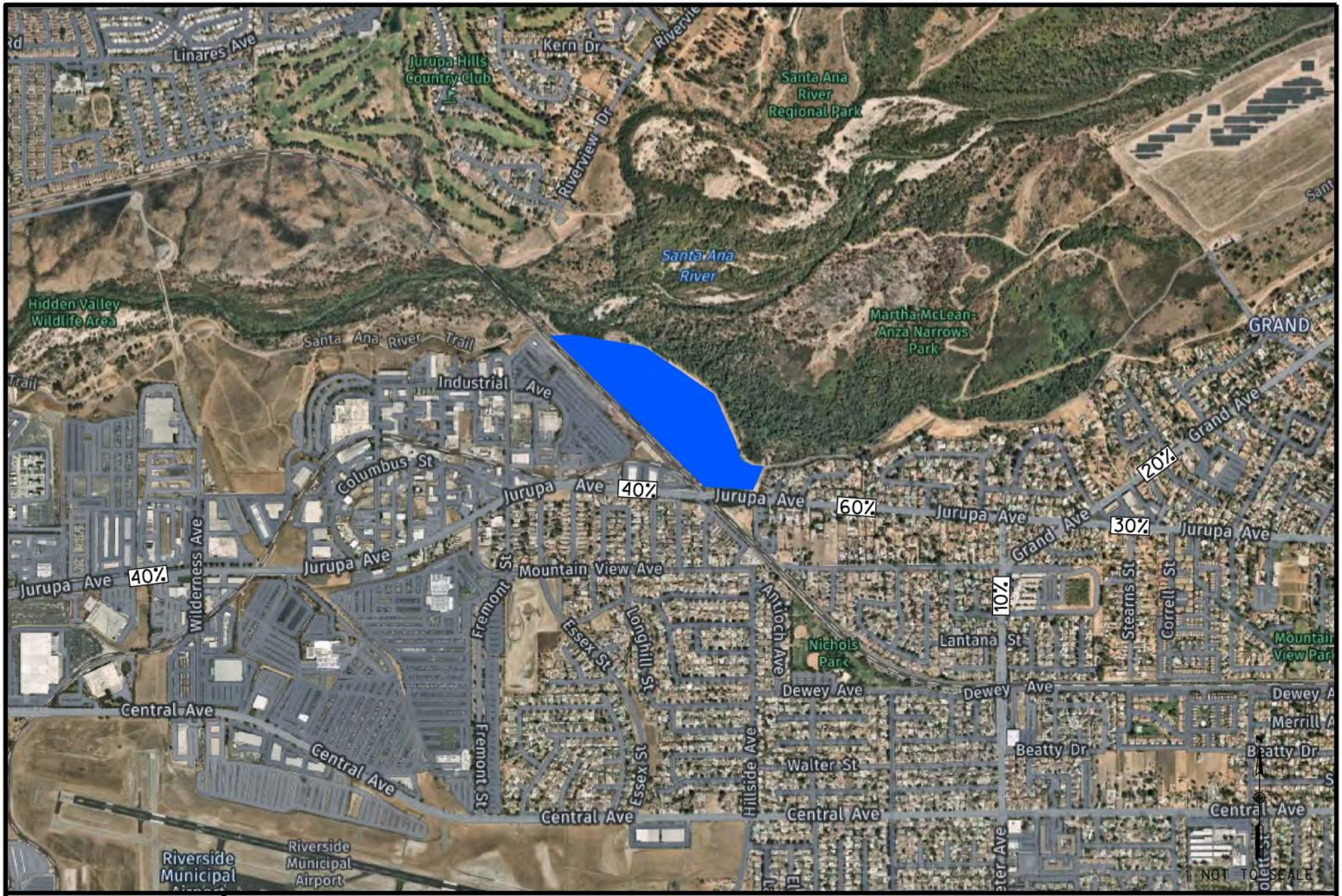

RICK ENGINEERING COMPANY

EXHIBIT 3

PROJECT TRIP DISTRIBUTION

MARTHA MCLEAN - ANZA NARROWS PARK TRAFFIC ASSESSMENT

LEGEND

XX% = DISTRIBUTION PERCENTAGE

= PROJECT SITE

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ATTACHMENT A

APPROVED
Vital Patel
03/02/2023

CITY OF RIVERSIDE
City of Arts & Innovation

Public Works Department

Traffic Analysis Scoping Form

This scoping form shall be submitted to the City of Riverside Traffic Engineering Division

Project Identification:

Case Number:	Not Available
Related Cases:	
SP No.	
EIR No.	
GPA No.	
CZ No.	
Project Name:	Riverside Gateway: Martha McLean Anza Narrows Park
Project Address:	5759 Jurupa Street
Project Opening Year:	Not Available
Project Description:	Existing 39.5 acre developed park with picnic areas and 18-hole disc golf course; project consists of realigning parking areas, providing two community meadows, a band shell and water play/nature play areas.

	Consultant:	Developer:
Name:	Rick Engineering Company	City of Riverside
Address:	5620 Friars Road	Parks & Recreation Dept.
	San Diego, CA 92110	6927 Magnolia Avenue
Telephone:	619-291-0707	Riverside, CA 92506
Fax/Email:	dmizell@rickengineering.com	

Scoping & Study Fees:

Fees to be made payable to "City of Riverside" and delivered to Land Development. City Hall 3rd Floor, 3900 Main Street, Riverside, CA 92522

1) Scoping Agreement Fee (For all projects not screened from analysis): **$271.00**

2) TIA Review (For projects with both LOS & VMT analysis of any scale, or standalone LOS analyses with over 100 vehicle trips per hour): **$2671.02**

3) TIA Review (For standalone VMT analysis, or standalone LOS analyses with under 100 vehicle trips per hour): **$1288.20**

CITY OF RIVERSIDE
City of Arts & Innovation

Public Works Department

Trip Generation Information:

Trip Generation Data Source: Existing Park: SANDAG (Developed Park)
Proposed Amenities: Custom rates developed from driveway counts

Current General Plan Land Use: Major Open Space/Parks

Proposed General Plan Land Use: Major Open Space/Parks

Current Zoning: PF

Proposed Zoning: PF

Total Park Trips

(See attached table)

	Existing Trip Generation			Proposed Trip Generation (Net Change in Trips)		
	In	Out	Total	In	Out	Total
AM Trips	16	16	32	20 (4)	19 (3)	39 (7)
PM Trips	32	31	63	36 (4)	35 (4)	71 (8)

Trip Internalization: ☐ Yes ☒ No (_____% Trip Discount)

Pass-By Allowance: ☐ Yes ☒ No (_____% Trip Discount)

Potential Screening Checks

Is your project screened from specific analyses in accordance with City Guidelines?

Is the project screened from LOS assessment? ☒ Yes ☐ No

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5366| **RiversideCA.gov**

LOS screening justification (see Page 6 of the guidelines): Project would generate fewer than 100 peak hour trips and would be a local serving neighborhood or community park.

Is the project screened from VMT assessment? [X] Yes [ ] No

VMT screening justification (see Pages 23-25 of the guidelines): Project would be screened out from VMT analysis based on the following three (3) criteria: 1) Project is located in a low-VMT generating area (>15% below City average VMT per service population); 2) Project would be a local-serving park/public facility; and 3) Project would generate less than 110 ADT.

Level of Service Scoping

- Proposed Trip Distribution (Attach Graphic for Detailed Distribution):

North	South	East	West
20 %	10 %	30 %	40 %

- Attach list of Approved and Pending Projects that need to be considered (provided by the lead agency and adjacent agencies)
- Attach list of study intersections/roadway segments
- Attach legible site plan
- Note other specific items to be addressed:
  - Site access
  - On-site circulation
  - Parking
  - Consistency with Plans supporting Bikes/Peds/Transit
  - Other _____
- Date of Traffic Counts Ryan Bonaminio Park 9/15/22 and 9/17/22
- Attach proposed analysis scenarios (years plus proposed forecasting approach)
- Attach proposed phasing approach (if the project is phased)

VMT Scoping

For projects that are not screened, identify the following:

- Travel Demand Forecasting Model _____
- Attach WRCOG Screening VMT Assessment output or describe why it is not appropriate for use
- Attach proposed Model Land Use Inputs and Assumed Conversion Factors (attach)

Specific Issues to be addressed in the Study (in addition to the standard analysis described in the Guidelines) (To be filled out by the Public Works Traffic Engineering Division)

_____

_____

Table A

Riverside Gateway Parks Trip Generation: Martha McLean Anza Narrows Park

Trip Generation Rates												
Land Use	Unit	Weekday Trips							Weekend (Saturday) Trips			
		Daily Trip Rate (per unit)	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trip Rate (per unit)	Highest Peak Hour (9:15 AM - 10:15 AM)		
			Trip Rate (per unit)	In (% AM)	Out (% AM)	Trip Rate (per unit)	In (% PM)	Out (% PM)		Trip Rate (per unit)	In (% AM)	Out (% AM)
Developed Regional/County Park (SANDAG)	acres	20	4%	50%	50%	8%	50%	50%	20	11%	49%	51%
Local City of Riverside Park (Driveway Counts): Proposed Developed Park Amenities	acres	41.28	3.09	50%	50%	3.83	54%	46%	39.27	4.22	49%	51%

Forecast Project Generated Trips													
Land Use	Size	Unit	Weekday Trips							Weekend (Saturday) Trips			
			Daily Trips	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trips	Highest Peak Hour (9:15 AM - 10:15 AM)		
				Total	In	Out	Total	In	Out		Total	In	Out
Existing Park Trip Generation[1]													
Existing Developed Park	39.5	acres	790	32	16	16	63	32	31	790	85	42	43
Proposed Project Trip Generation[2]													
Developed Park Renovations/ Amenities	3.3	acres	136	10	5	5	13	7	6	129	14	7	7
Total Park Trips (Remaining Undeveloped Acreage Plus Programmable Developed Acreage)[3]													
Existing Developed Park	36.2	acres	724	29	15	14	58	29	29	724	78	39	39
Developed Park Renovations/ Amenities	3.3	acres	136	10	5	5	13	7	6	129	14	7	7
Total Park Trips			**860**	**39**	**20**	**19**	**71**	**36**	**35**	**853**	**92**	**46**	**46**
Net Change in Trips (Total - Existing Trips)													
Net Project Trips			**70**	**7**	**4**	**3**	**8**	**4**	**4**	**63**	**7**	**4**	**3**

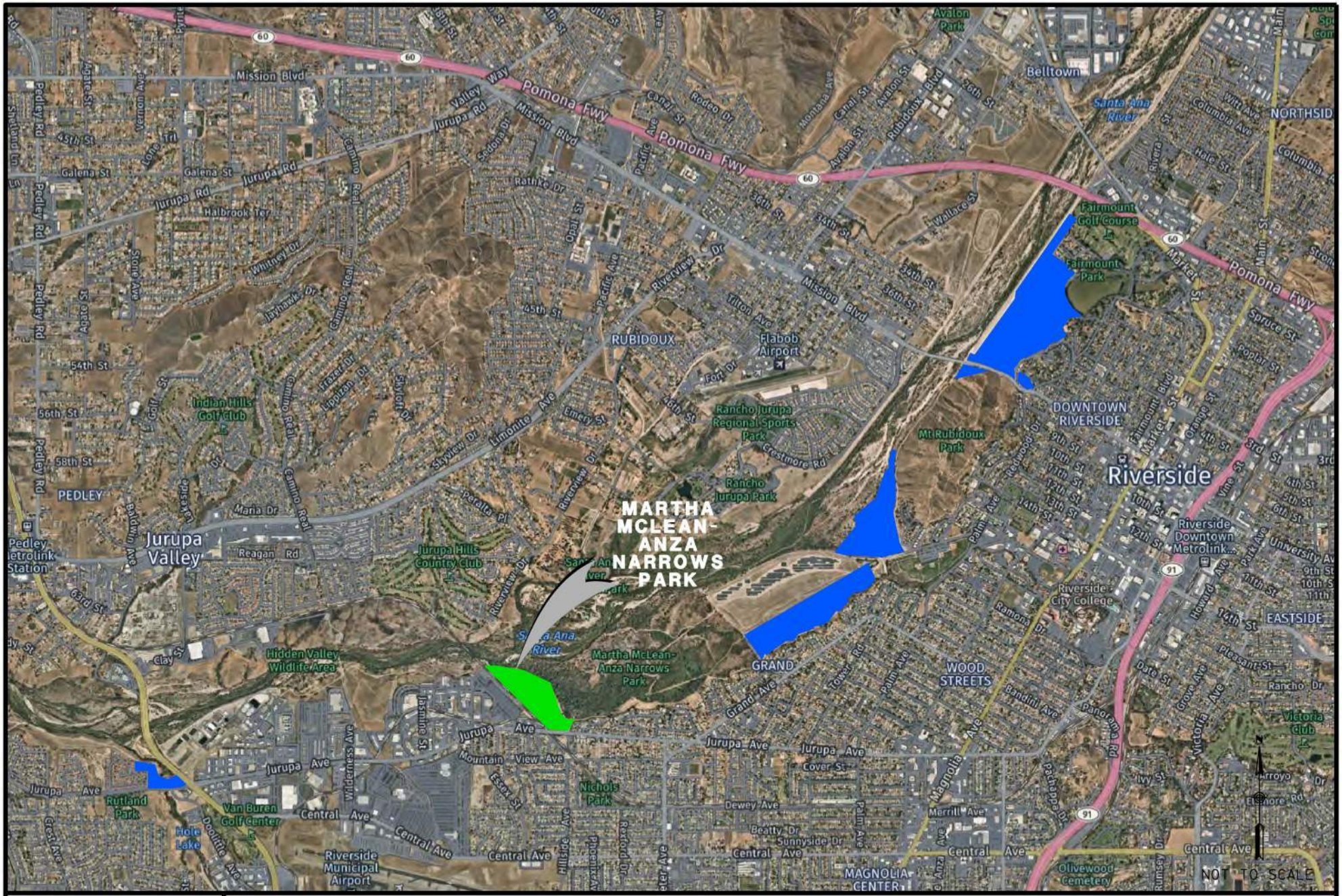
Source: Traffic counts conducted by Veracity Traffic Group at Ryan Bonaminio Park driveways on Thursday, September 15, 2022 and on Saturday, September 17, 2022.

San Diego Association of Governments (SANDAG) Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).

[1]Existing trip generation is calculated based on total existing park acreage.

[2]Proposed project trip generation is calculated based on programmable acreage to be developed.

[3]The total park trips include the existing park acreage plus the programmable acreage of the area to be developed.



RICK ENGINEERING COMPANY

EXHIBIT 1

PROJECT VICINITY MAP

MARTHA MCLEAN - ANZA NARROWS PARK TRAFFIC ASSESSMENT

LEGEND

- =RIVERSIDE GATEWAY PARK SYSTEM
- =MARTHA MCLEAN - ANZA NARROWS PARK

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MARTHA MCLEAN ANZA NARROWS PARK: MASTERPLAN

RICK ENGINEERING COMPANY

EXHIBIT 2

PROJECT SITE PLAN

MARTHA MCLEAN - ANZA NARROWS PARK TRAFFIC ASSESSMENT

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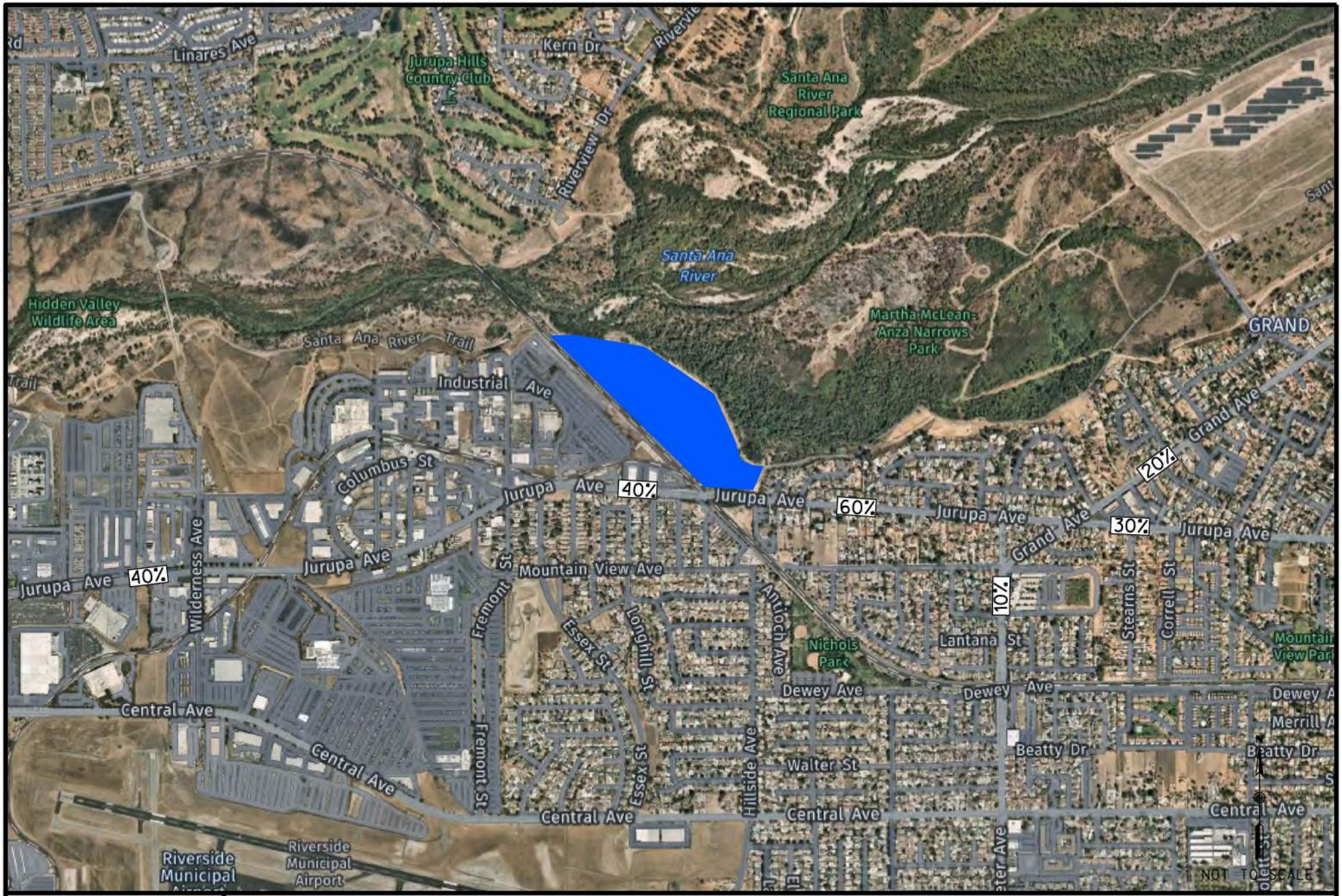


RICK ENGINEERING COMPANY

EXHIBIT 3

PROJECT TRIP DISTRIBUTION

MARTHA MCLEAN - ANZA NARROWS PARK TRAFFIC ASSESSMENT

LEGEND

XX% = DISTRIBUTION PERCENTAGE

= PROJECT SITE

C:\RICK\Projects\C19000\19405_River-side_GatewayPark\19405-AT_Traffic\Traffic\Exhibits\19405_Basefile.dgn
C:\RICK\Projects\C19000\19405_River-side_GatewayPark\19405-AT_Traffic\Traffic\Exhibits\PDFs\SD CorpStds 2005.dscript

01-FEB-2023 17:13

ATTACHMENT B

Thursday, September 15, 2022 Counts

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Thursday, September 15, 2022 City: Riverside Project #: 22-1548-001

Location: Ryan Bonamino Park Western Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	0		3				
00:15	0		0					12:15	1		1				
00:30	0		1					12:30	1		0				
00:45	0	0	0	1			1	12:45	0	2	4	8			10
01:00	0		0					13:00	1		2				
01:15	0		0					13:15	1		1				
01:30	1		0					13:30	2		1				
01:45	0	1	0	0			1	13:45	3	7	5	9			16
02:00	0		0					14:00	1		2				
02:15	0		0					14:15	2		2				
02:30	0		0					14:30	1		3				
02:45	0	0	0	0				14:45	1	5	0	7			12
03:00	0		0					15:00	1		1				
03:15	1		1					15:15	1		2				
03:30	0		0					15:30	0		2				
03:45	0	1	0	1			2	15:45	1	3	3	8			11
04:00	0		0					16:00	1		1				
04:15	0		0					16:15	0		1				
04:30	0		0					16:30	0		1				
04:45	0	0	0	0				16:45	0	1	1	4			5
05:00	0		0					17:00	4		4				
05:15	0		1					17:15	2		4				
05:30	1		0					17:30	1		3				
05:45	0	1	1	2			3	17:45	3	10	8	19			29
06:00	0		1					18:00	5		3				
06:15	0		3					18:15	3		4				
06:30	1		4					18:30	4		7				
06:45	0	1	5	13			14	18:45	2	14	5	19			33
07:00	1		3					19:00	4		6				
07:15	3		5					19:15	6		6				
07:30	1		3					19:30	5		5				
07:45	2	7	5	16			23	19:45	4	19	3	20			39
08:00	3		1					20:00	4		6				
08:15	1		3					20:15	3		1				
08:30	3		2					20:30	1		2				
08:45	3	10	1	7			17	20:45	3	11	4	13			24
09:00	1		2					21:00	1		3				
09:15	1		3					21:15	0		2				
09:30	1		1					21:30	2		1				
09:45	3	6	3	9			15	21:45	1	4	1	7			11
10:00	1		1					22:00	1		1				
10:15	1		1					22:15	1		0				
10:30	1		2					22:30	1		1				
10:45	1	4	4	8			12	22:45	0	3	0	2			5
11:00	1		1					23:00	0		0				
11:15	2		1					23:15	0		0				
11:30	2		1					23:30	1		0				
11:45	0	5	2	5			10	23:45	1	2	0	0			2
Total Vol.		36		62			**98**			81		116			**197**

GPS Coordinates: 33.976215, -117.395528

Daily Totals

NB	SB	EB	WB	Combined
117	178			**295**

	AM			PM		
Split %	36.7%	63.3%	**33.2%**	41.1%	58.9%	**66.8%**
Peak Hour	08:00	06:30	**07:00**	19:00	18:30	**18:30**
Volume	10	17	**23**	19	24	**40**
P.H.F.	0.83	0.85	**0.72**	0.79	0.86	**0.83**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Thursday, September 15, 2022 City: Riverside Project #: 22-1548-002

Location: Ryan Bonamino Park Middle Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		1					12:00	4		3				
00:15	0		0					12:15	2		3				
00:30	0		0					12:30	1		3				
00:45	0	0	1	2			2	12:45	5	12	3	12			24
01:00	0		0					13:00	5		7				
01:15	0		0					13:15	1		6				
01:30	0		0					13:30	2		4				
01:45	0	0	0	0				13:45	5	13	2	19			32
02:00	0		0					14:00	1		7				
02:15	1		0					14:15	2		5				
02:30	1		0					14:30	4		2				
02:45	0	2	0	0			2	14:45	2	9	4	18			27
03:00	0		1					15:00	4		1				
03:15	0		0					15:15	1		4				
03:30	0		0					15:30	5		1				
03:45	0	0	0	1			1	15:45	4	14	2	8			22
04:00	0		0					16:00	3		3				
04:15	0		0					16:15	3		2				
04:30	0		1					16:30	9		1				
04:45	0	0	1	2			2	16:45	4	19	3	9			28
05:00	1		0					17:00	5		4				
05:15	1		1					17:15	9		12				
05:30	2		0					17:30	2		5				
05:45	1	5	0	1			6	17:45	15	31	13	34			65
06:00	0		1					18:00	18		12				
06:15	2		2					18:15	9		7				
06:30	3		1					18:30	17		13				
06:45	3	8	2	6			14	18:45	11	55	8	40			95
07:00	5		3					19:00	11		12				
07:15	1		4					19:15	14		18				
07:30	2		2					19:30	7		12				
07:45	4	12	5	14			26	19:45	3	35	16	58			93
08:00	6		2					20:00	4		15				
08:15	7		5					20:15	3		5				
08:30	6		5					20:30	5		11				
08:45	6	25	9	21			46	20:45	2	14	8	39			53
09:00	11		7					21:00	1		4				
09:15	2		7					21:15	2		2				
09:30	3		13					21:30	0		3				
09:45	6	22	10	37			59	21:45	0	3	2	11			14
10:00	6		8					22:00	2		1				
10:15	4		6					22:15	1		0				
10:30	5		6					22:30	0		1				
10:45	5	20	12	32			52	22:45	2	5	2	4			9
11:00	3		5					23:00	1		0				
11:15	3		5					23:15	0		0				
11:30	4		11					23:30	0		0				
11:45	5	15	6	27			42	23:45	0	1	1	1			2
Total Vol.		109		143			**252**			211		253			**464**

GPS Coordinates: 33.976515, -117.394337

Daily Totals

NB	SB	EB	WB	Combined
320	396			**716**

	AM			PM		
Split %	43.3%	56.7%	**35.2%**	45.5%	54.5%	**64.8%**
Peak Hour	08:15	09:15	**09:00**	17:45	19:15	**17:45**
Volume	30	38	**59**	59	61	**104**
P.H.F.	0.68	0.73	**0.82**	0.82	0.85	**0.87**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Thursday, September 15, 2022 City: Riverside Project #: 22-1548-003

Location: Ryan Bonamino Park Eastern Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	1		0					12:00	6		2				
00:15	0		0					12:15	4		4				
00:30	0		0					12:30	5		2				
00:45	0	1	0	0			1	12:45	7	22	2	10			32
01:00	0		0					13:00	5		1				
01:15	0		1					13:15	5		1				
01:30	0		0					13:30	6		3				
01:45	0	0	0	1			1	13:45	4	20	2	7			27
02:00	0		0					14:00	8		2				
02:15	0		0					14:15	4		1				
02:30	1		0					14:30	3		2				
02:45	0	1	0	0			1	14:45	4	19	0	5			24
03:00	0		0					15:00	3		1				
03:15	1		0					15:15	4		2				
03:30	0		0					15:30	4		0				
03:45	0	1	0	0			1	15:45	4	15	0	3			18
04:00	0		0					16:00	5		3				
04:15	0		0					16:15	6		5				
04:30	1		1					16:30	2		3				
04:45	1	2	0	1			3	16:45	7	20	6	17			37
05:00	1		3					17:00	4		5				
05:15	2		2					17:15	7		8				
05:30	4		2					17:30	12		10				
05:45	4	11	4	11			22	17:45	13	36	14	37			73
06:00	4		4					18:00	7		13				
06:15	8		5					18:15	9		16				
06:30	4		5					18:30	9		7				
06:45	10	26	4	18			44	18:45	8	33	12	48			81
07:00	6		3					19:00	7		13				
07:15	6		4					19:15	10		9				
07:30	5		4					19:30	15		8				
07:45	10	27	7	18			45	19:45	11	43	8	38			81
08:00	8		7					20:00	12		3				
08:15	10		12					20:15	9		4				
08:30	6		13					20:30	8		2				
08:45	9	33	7	39			72	20:45	4	33	1	10			43
09:00	13		6					21:00	5		2				
09:15	10		3					21:15	4		3				
09:30	11		6					21:30	8		2				
09:45	14	48	5	20			68	21:45	2	19	0	7			26
10:00	10		4					22:00	1		0				
10:15	8		3					22:15	2		1				
10:30	5		5					22:30	1		0				
10:45	10	33	3	15			48	22:45	1	5	2	3			8
11:00	1		2					23:00	1		1				
11:15	5		4					23:15	1		1				
11:30	8		2					23:30	0		1				
11:45	5	19	3	11			30	23:45	0	2	0	3			5
Total Vol.		202		134			**336**			267		188			**455**

GPS Coordinates: 33.976813, -117.393149

Daily Totals

NB	SB	EB	WB	Combined
469	322			**791**

	AM			PM		
Split %	60.1%	39.9%	**42.5%**	58.7%	41.3%	**57.5%**
Peak Hour	09:00	07:45	**08:15**	19:15	17:30	**17:30**
Volume	48	39	**76**	48	53	**94**
P.H.F.	0.86	0.75	**0.86**	0.80	0.83	**0.87**

Saturday, September 17, 2022 Counts

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Saturday, September 17, 2022 City: Riverside Project #: 22-1548-001

Location: Ryan Bonamino Park Western Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	3		3				
00:15	0		0					12:15	3		2				
00:30	0		0					12:30	0		1				
00:45	0	0	1	1			1	12:45	1	7	3	9			16
01:00	0		0					13:00	1		2				
01:15	0		0					13:15	3		2				
01:30	0		0					13:30	0		0				
01:45	0	0	0	0				13:45	0	4	0	4			8
02:00	0		0					14:00	1		0				
02:15	0		0					14:15	0		1				
02:30	0		0					14:30	0		2				
02:45	1	1	0	0			1	14:45	0	1	3	6			7
03:00	0		0					15:00	1		1				
03:15	0		0					15:15	3		1				
03:30	0		0					15:30	0		1				
03:45	0	0	0	0				15:45	2	6	0	3			9
04:00	0		0					16:00	0		2				
04:15	1		0					16:15	0		1				
04:30	0		1					16:30	1		2				
04:45	0	1	0	1			2	16:45	0	1	0	5			6
05:00	0		0					17:00	4		0				
05:15	0		1					17:15	0		0				
05:30	0		0					17:30	1		4				
05:45	1	1	1	2			3	17:45	0	5	1	5			10
06:00	0		0					18:00	0		3				
06:15	0		3					18:15	1		2				
06:30	2		0					18:30	2		4				
06:45	1	3	2	5			8	18:45	2	5	7	16			21
07:00	0		3					19:00	5		5				
07:15	2		4					19:15	6		2				
07:30	1		6					19:30	0		2				
07:45	4	7	5	18			25	19:45	2	13	1	10			23
08:00	3		6					20:00	4		1				
08:15	3		6					20:15	0		1				
08:30	5		7					20:30	2		0				
08:45	3	14	4	23			37	20:45	0	6	0	2			8
09:00	7		2					21:00	2		2				
09:15	3		5					21:15	1		2				
09:30	5		4					21:30	1		0				
09:45	4	19	2	13			32	21:45	0	4	0	4			8
10:00	6		5					22:00	2		1				
10:15	3		2					22:15	0		2				
10:30	4		6					22:30	1		2				
10:45	4	17	1	14			31	22:45	1	4	0	5			9
11:00	3		4					23:00	3		2				
11:15	2		1					23:15	0		1				
11:30	4		3					23:30	2		1				
11:45	4	13	0	8			21	23:45	0	5	0	4			9
Total Vol.		76		85			**161**			61		73			**134**

GPS Coordinates: 33.976215, -117.395528

Daily Totals

NB	SB	EB	WB	Combined
137	158			**295**

	AM			PM		
Split %	47.2%	52.8%	**54.6%**	45.5%	54.5%	**45.4%**
Peak Hour	09:00	07:45	**07:45**	18:30	18:15	**18:30**
Volume	19	24	**39**	15	18	**33**
P.H.F.	0.68	0.86	**0.81**	0.63	0.64	**0.83**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Saturday, September 17, 2022 City: Riverside Project #: 22-1548-002

Location: Ryan Bonamino Park Middle Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	2		7				
00:15	0		0					12:15	3		5				
00:30	0		0					12:30	1		7				
00:45	0	0	0	0				12:45	1	7	5	24			31
01:00	0		0					13:00	1		8				
01:15	1		0					13:15	1		4				
01:30	0		0					13:30	4		3				
01:45	0	1	0	0			1	13:45	2	8	5	20			28
02:00	0		0					14:00	3		2				
02:15	2		0					14:15	0		5				
02:30	0		1					14:30	0		5				
02:45	0	2	0	1			3	14:45	4	7	6	18			25
03:00	0		0					15:00	1		7				
03:15	0		0					15:15	4		2				
03:30	0		0					15:30	4		2				
03:45	0	0	2	2			2	15:45	3	12	1	12			24
04:00	0		0					16:00	3		5				
04:15	0		0					16:15	4		6				
04:30	0		0					16:30	6		6				
04:45	1	1	1	1			2	16:45	2	15	5	22			37
05:00	0		0					17:00	4		3				
05:15	0		1					17:15	6		3				
05:30	0		1					17:30	2		4				
05:45	3	3	1	3			6	17:45	7	19	5	15			34
06:00	3		1					18:00	11		6				
06:15	11		4					18:15	3		9				
06:30	7		1					18:30	4		11				
06:45	14	35	4	10			45	18:45	6	24	4	30			54
07:00	6		1					19:00	5		8				
07:15	9		5					19:15	7		6				
07:30	8		7					19:30	7		8				
07:45	9	32	6	19			51	19:45	3	22	7	29			51
08:00	11		6					20:00	6		5				
08:15	7		10					20:15	1		4				
08:30	12		5					20:30	3		4				
08:45	4	34	14	35			69	20:45	6	16	2	15			31
09:00	9		5					21:00	2		2				
09:15	9		9					21:15	3		3				
09:30	7		13					21:30	3		1				
09:45	3	28	5	32			60	21:45	2	10	0	6			16
10:00	11		12					22:00	0		1				
10:15	13		7					22:15	1		0				
10:30	7		9					22:30	2		0				
10:45	8	39	10	38			77	22:45	0	3	0	1			4
11:00	4		6					23:00	0		1				
11:15	2		10					23:15	1		0				
11:30	2		3					23:30	2		1				
11:45	3	11	14	33			44	23:45	1	4	0	2			6
Total Vol.		186		174			**360**			147		194			**341**

GPS Coordinates: 33.976515, -117.394337

Daily Totals

NB	SB	EB	WB	Combined
333	368			**701**

	AM			PM		
Split %	51.7%	48.3%	**51.4%**	43.1%	56.9%	**48.6%**
Peak Hour	07:45	08:45	**10:00**	17:15	18:15	**17:45**
Volume	39	41	**77**	26	32	**56**
P.H.F.	0.81	0.73	**0.84**	0.59	0.73	**0.82**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Saturday, September 17, 2022 City: Riverside Project #: 22-1548-003

Location: Ryan Bonamino Park Eastern Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	9		3				
00:15	0		0					12:15	7		3				
00:30	0		1					12:30	7		4				
00:45	0	0	0	1			1	12:45	6	29	4	14			43
01:00	1		0					13:00	9		1				
01:15	0		0					13:15	4		5				
01:30	0		0					13:30	6		1				
01:45	0	1	0	0			1	13:45	5	24	5	12			36
02:00	1		0					14:00	7		2				
02:15	0		0					14:15	2		2				
02:30	0		0					14:30	6		3				
02:45	0	1	0	0			1	14:45	4	19	1	8			27
03:00	0		0					15:00	9		1				
03:15	0		0					15:15	6		1				
03:30	0		0					15:30	6		5				
03:45	0	0	0	0				15:45	6	27	3	10			37
04:00	0		0					16:00	5		4				
04:15	1		0					16:15	4		4				
04:30	0		1					16:30	5		4				
04:45	1	2	1	2			4	16:45	6	20	4	16			36
05:00	0		2					17:00	4		5				
05:15	2		1					17:15	3		4				
05:30	4		4					17:30	0		4				
05:45	4	10	5	12			22	17:45	1	8	6	19			27
06:00	3		6					18:00	3		6				
06:15	2		8					18:15	3		6				
06:30	4		6					18:30	2		5				
06:45	5	14	6	26			40	18:45	4	12	3	20			32
07:00	6		6					19:00	11		5				
07:15	9		6					19:15	3		9				
07:30	8		11					19:30	6		4				
07:45	7	30	12	35			65	19:45	7	27	2	20			47
08:00	11		8					20:00	3		2				
08:15	9		8					20:15	1		2				
08:30	10		7					20:30	2		4				
08:45	9	39	8	31			70	20:45	1	7	1	9			16
09:00	11		9					21:00	0		2				
09:15	11		10					21:15	0		1				
09:30	11		9					21:30	0		3				
09:45	10	43	8	36			79	21:45	0	0	0	6			6
10:00	13		9					22:00	2		1				
10:15	9		6					22:15	1		2				
10:30	7		7					22:30	0		1				
10:45	9	38	7	29			67	22:45	1	4	0	4			8
11:00	10		4					23:00	0		1				
11:15	7		3					23:15	1		1				
11:30	13		3					23:30	0		0				
11:45	7	37	3	13			50	23:45	0	1	0	2			3
Total Vol.		215		185			**400**			178		140			**318**

GPS Coordinates: 33.976813, -117.393149

Daily Totals

NB	SB	EB	WB	Combined
393	325			**718**

	AM			PM		
Split %	53.8%	46.3%	**55.7%**	56.0%	44.0%	**44.3%**
Peak Hour	09:15	07:30	**09:15**	12:00	17:45	**19:00**
Volume	45	39	**81**	29	23	**47**
P.H.F.	0.87	0.81	**0.92**	0.81	0.96	**0.73**

SANDAG Trip Generation Rates

(NOT SO)

BRIEF GUIDE OF VEHICULAR TRAFFIC GENERATION RATES FOR THE SAN DIEGO REGION

APRIL 2002

SANDAG
401 B Street, Suite 800
San Diego, California 92101
(619) 699-1900 • Fax (619) 699-1950

NOTE: This listing only represents a ***guide*** of average, or estimated, traffic generation "driveway" rates and some very general trip data for land uses (emphasis on acreage and building square footage) in the San Diego region. These rates (both local and national) are subject to change as future documentation becomes available, or as regional sources are updated. For more specific information regarding traffic data and trip rates, please refer to the San Diego Traffic Generators manual. ***Always check with local jurisdictions for their preferred or applicable rates.***

LAND USE	TRIP CATEGORIES [PRIMARY:DIVERTED:PASS-BY][P]	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio) Between 6:00-9:30 A.M.	Between 3:00-6:30 P.M.	TRIP LENGTH (Miles)[L]
AGRICULTURE (Open Space)	[80:18:2]	2/acre**			10.8
AIRPORT	[78:20:2]				12.5
Commercial		60/acre, 100/flight, 70/1000 sq. ft.* **	5% (6:4)	6% (5:5)	
General Aviation		6/acre, 2/flight, 6/based aircraft* **	9% (7:3)	15% (5:5)	
Heliports		100/acre**			
AUTOMOBILE[S]					
Car Wash					
Automatic		900/site, 600/acre**	4% (5:5)	9% (5:5)	
Self-serve		100/wash stall**	4% (5:5)	8% (5:5)	
Gasoline	[21:51:28]				2.8
with/Food Mart		160/vehicle fueling space**	7% (5:5)	8% (5:5)	
with/Food Mart & Car Wash		155/vehicle fueling space**	8% (5:5)	9% (5:5)	
Older Service Station Design		150/vehicle fueling space, 900/station**	7% (5:5)	9% (5:5)	
Sales (Dealer & Repair)		50/1000 sq. ft., 300/acre, 60/service stall* **	5% (7:3)	8% (4:6)	
Auto Repair Center		20/1000 sq. ft., 400/acre, 20/service stall*	8% (7:3)	11% (4:6)	
Auto Parts Sales		60/1000 sq. ft. **	4%	10%	
Quick Lube		40/service stall**	7% (6:4)	10% (5:5)	
Tire Store		25/1000 sq. ft., 30/service stall**	7% (6:4)	11% (5:5)	
CEMETERY		5/acre*			
CHURCH (or Synagogue)	[64:25:11]	9/1000 sq. ft., 30/acre** (quadruple rates for Sunday, or days of assembly)	5% (6:4)	8% (5:5)	5.1
COMMERCIAL/RETAIL[S]					
Super Regional Shopping Center (More than 80 acres, more than 800,000 sq. ft., w/usually 3+ major stores)		35/1000 sq. ft.,[C] 400/acre*	4% (7:3)	10% (5:5)	
Regional Shopping Center (40-80acres, 400,000-800,000 sq. ft., w/usually 2+ major stores)	[54:35:11]	50/1000 sq. ft.,[C] 500/acre*	4% (7:3)	9% (5:5)	5.2
Community Shopping Center (15-40 acres, 125,000-400,000 sq. ft., w/usually 1 major store, detached restaurant(s), grocery and drugstore)	[47:31:22]	80/1000 sq. ft., 700/acre* **	4% (6:4)	10% (5:5)	3.6
Neighborhood Shopping Center (Less than 15 acres, less than 125,000 sq. ft., w/usually grocery & drugstore, cleaners, beauty & barber shop, & fast food services)		120/1000 sq. ft., 1200/acre* **	4% (6:4)	10% (5:5)	
Commercial Shops	[45:40:15]				
Specialty Retail/Strip Commercial		40/1000 sq. ft., 400/acre*	3% (6:4)	9% (5:5)	4.3
Electronics Superstore		50/1000 sq. ft**		10% (5:5)	
Factory Outlet		40/1000 sq. ft.**	3% (7:3)	9% (5:5)	
Supermarket		150/1000 sq. ft., 2000/acre* **	4% (7:3)	10% (5:5)	
Drugstore		90/1000 sq. ft.**	4% (6:4)	10% (5:5)	
Convenience Market (15-16 hours)		500/1000 sq. ft.**	8% (5:5)	8% (5:5)	
Convenience Market (24 hours)		700/1000 sq. ft.**	9% (5:5)	7% (5:5)	
Convenience Market (w/gasoline pumps)		850/1000 sq. ft., 550/vehicle fueling space**	6% (5:5)	7% (5:5)	
Discount Club		60/1000 sq. ft., 600/acre* **	1% (7:3)	9% (5:5)	
Discount Store		60/1000 sq. ft., 600/acre**	3% (6:4)	8% (5:5)	
Furniture Store		6/1000 sq. ft., 100/acre**	4% (7:3)	9% (5:5)	
Lumber Store		30/1000 sq. ft., 150/acre**	7% (6:4)	9% (5:5)	
Home Improvement Superstore		40/1000 sq. ft.**	5% (6:4)	8% (5:5)	
Hardware/Paint Store		60/1000 sq. ft., 600/acre**	2% (6:4)	9% (5:5)	
Garden Nursery		40/1000 sq. ft., 90/acre**	3% (6:4)	10% (5:5)	
Mixed Use: Commercial (w/supermarket)/Residential		{110/1000 sq. ft., 2000/acre* (commercial only) {5/dwelling unit, 200/acre* (residential only)	3% (6:4) 9% (3:7)	9% (5:5) 13% (6:4)	
EDUCATION					
University (4 years)	[91:9:0]	2.4/student, 100 acre*	10% (8:2)	9% (3:7)	8.9
Junior College (2 years)	[92:7:1]	1.2/student, 24/1000 sq. ft., 120/acre* **	12% (8:2)	9% (6:4)	9.0
High School	[75:19:6]	1.3/student, 15/1000 sq. ft., 60/acre* **	20% (7:3)	10% (4:6)	4.8
Middle/Junior High	[63:25:12]	1.4/student, 12/1000 sq. ft. 50/acre**	30% (6:4)	9% (4:6)	5.0
Elementary	[57:25:10]	1.6/student, 14/1000 sq. ft., 90/acre* **	32% (6:4)	9% (4:6)	3.4
Day Care	[28:58:14]	5/child, 80/1000 sq. ft.**	17% (5:5)	18% (5:5)	3.7
FINANCIAL[S]	[35:42:23]				3.4
Bank (Walk-In only)		150/1000 sq. ft., 1000/acre* **	4% (7:3)	8% (4:6)	
with Drive-Through		200/1000 sq. ft., 1500/acre*	5% (6:4)	10% (5:5)	
Drive-Through only		250 (125 one-way)/lane*	3% (5:5)	13% (5:5)	
Savings & Loan		60/1000 sq. ft., 600/acre**	2%	9%	
Drive-Through only		100 (50 one-way)/lane**	4%	15%	
HOSPITAL	[73:25:2]				8.3
General		20/bed, 25/1000 sq. ft., 250/acre*	8% (7:3)	10% (4:6)	
Convalescent/Nursing		3/bed**	7% (6:4)	7% (4:6)	
INDUSTRIAL					
Industrial/Business Park (commercial included)	[79:19:2]	16/1000 sq. ft., 200/acre* **	12% (8:2)	12% (2:8)	9.0
Industrial Park (no commercial)		8/1000 sq. ft., 90/acre**	11% (9:1)	12% (2:8)	
Industrial Plant (multiple shifts)	[92:5:3]	10/1000 sq. ft., 120/acre*	14% (8:2)	15% (3:7)	11.7
Manufacturing/Assembly		4/1000 sq. ft., 50/acre**	19% (9:1)	20% (2:8)	
Warehousing		5/1000 sq. ft., 60/acre**	13% (7:3)	15% (4:6)	
Storage		2/1000 sq. ft., 0.2/vault, 30/acre*	6% (5:5)	9% (5:5)	
Science Research & Development		8/1000 sq. ft., 80/acre*	16% (9:1)	14% (1:9)	
Landfill & Recycling Center		6/acre	11% (5:5)	10% (4:6)	

(OVER)

LAND USE	TRIP CATEGORIES [PRIMARY:DIVERTED:PASS-BY][P]	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio) Between 6:00-9:30 A.M.		Between 3:00-6:30 P.M.		TRIP LENGTH (Miles)[L]
LIBRARY	[44:44:12]	50/1000 sq. ft., 400/acre**	2%	(7:3)	10%	(5:5)	3.9
LODGING	[58:38:4]						7.6
Hotel (w/convention facilities/restaurant)		10/occupied room, 300/acre	6%	(6:4)	8%	(6:4)	
Motel		9/occupied room, 200/acre*	8%	(4:6)	9%	(6:4)	
Resort Hotel		8/occupied room, 100/acre*	5%	(6:4)	7%	(4:6)	
Business Hotel		7/occupied room**	8%	(4:6)	9%	(6:4)	
MILITARY	[82:16:2]	2.5/military & civilian personnel*	9%	(9:1)	10%	(2:8)	11.2
OFFICE							
Standard Commercial Office (less than 100,000 sq. ft.)	[77:19:4]	20/1000 sq. ft.,[O] 300/acre*	14%	(9:1)	13%	(2:8)	8.8
Large (High-Rise) Commercial Office (more than 100,000 sq. ft., 6+ stories)	[82:15:3]	17/1000 sq. ft.,[O] 600/acre*	13%	(9:1)	14%	(2:8)	10.0
Office Park (400,000+ sq. ft.)		12/1000 sq.ft., 200/acre* **	13%	(9:1)	13%	(2:8)	
Single Tenant Office		14/1000 sq. ft., 180/acre*	15%	(9:1)	15%	(2:8)	8.8
Corporate Headquarters		7/1000 sq. ft., 110/acre*	17%	(9:1)	16%	(1:9)	
Government (Civic Center)	[50:34:16]	30/1000 sq. ft.**	9%	(9:1)	12%	(3:7)	6.0
Post Office							
Central/Walk-In Only		90/1000 sq. ft.**	5%		7%		
Community (not including mail drop lane)		200/1000 sq. ft., 1300/acre*	6%	(6:4)	9%	(5:5)	
Community (w/mail drop lane)		300/1000 sq. ft., 2000/acre*	7%	(5:5)	10%	(5:5)	
Mail Drop Lane only		1500 (750 one-way)/lane*	7%	(5:5)	12%	(5:5)	
Department of Motor Vehicles		180/1000 sq. ft., 900/acre**	6%	(6:4)	10%	(4:6)	
Medical-Dental	[60:30:10]	50/1000 sq. ft., 500/acre*	6%	(8:2)	11%	(3:7)	6.4
PARKS	[66:28:6]		4%		8%		5.4
City (developed w/meeting rooms and sports facilities)		50/acre*	13%	(5:5)	9%	(5:5)	
Regional (developed)		20/acre*					
Neighborhood/County (undeveloped)		5/acre (add for specific sport uses), 6/picnic site* **					
State (average 1000 acres)		1/acre, 10/picnic site**					
Amusement (Theme)		80/acre, 130/acre (summer only)**			6%	(6:4)	
San Diego Zoo		115/acre*					
Sea World		80/acre*					
RECREATION							
Beach, Ocean or Bay	[52:39:9]	600/1000 ft. shoreline, 60/acre*					6.3
Beach, Lake (fresh water)		50/1000 ft. shoreline, 5/acre*					
Bowling Center		30/1000 sq. ft., 300/acre, 30/lane **	7%	(7:3)	11%	(4:6)	
Campground		4/campsite**	4%		8%		
Golf Course		7/acre, 40/hole, 700/course* **	7%	(8:2)	9%	(3:7)	
Driving Range only		70/acre, 14/tee box*	3%	(7:3)	9%	(5:5)	
Marinas		4/berth, 20/acre* **	3%	(3:7)	7%	(6:4)	
Multi-purpose (miniature golf, video arcade, batting cage, etc.)		90/acre	2%		6%		
Racquetball/Health Club		30/1000 sq. ft., 300/acre, 40/court*	4%	(6:4)	9%	(6:4)	
Tennis Courts		16/acre, 30/court**	5%		11%	(5:5)	
Sports Facilities							
Outdoor Stadium		50/acre, 0.2/seat*					
Indoor Arena		30/acre, 0.1/seat*					
Racetrack		40/acre, 0.6 seat*					
Theaters (multiplex w/matinee)	[66:17:17]	80/1000 sq. ft., 1.8/seat, 360/screen*	1/3%		8%	(6:4)	6.1
RESIDENTIAL	[86:11:3]						7.9
Estate, Urban or Rural (average 1-2 DU/acre)		12/dwelling unit*[R]	8%	(3:7)	10%	(7:3)	
Single Family Detached (average 3-6 DU/acre)		10/dwelling unit*[R]	8%	(3:7)	10%	(7:3)	
Condominium (or any multi-family 6-20 DU/acre)		8/dwelling unit*[R]	8%	(2:8)	10%	(7:3)	
Apartment (or any multi-family units more than 20 DU/acre)		6/dwelling unit*[R]	8%	(2:8)	9%	(7:3)	
Military Housing (off-base, multi-family)							
(less than 6 DU/acre)		8/dwelling unit	7%	(3:7)	9%	(6:4)	
(6-20 DU/acre)		6/dwelling unit	7%	(3:7)	9%	(6:4)	
Mobile Home							
Family		5/dwelling unit, 40/acre*	8%	(3:7)	11%	(6:4)	
Adults Only		3/dwelling unit, 20/acre*	9%	(3:7)	10%	(6:4)	
Retirement Community		4/dwelling unit**	5%	(4:6)	7%	(6:4)	
Congregate Care Facility		2.5/dwelling unit**	4%	(6:4)	8%	(5:5)	
RESTAURANT[S]	[51:37:12]						4.7
Quality		100/1000 sq. ft., 3/seat, 500/acre* **	1%	(6:4)	8%	(7:3)	
Sit-down, high turnover		160/1000 sq. ft., 6/seat, 1000/acre* **	8%	(5:5)	8%	(6:4)	
Fast Food (w/drive-through)		650/1000 sq. ft., 20/seat, 3000/acre* **	7%	(5:5)	7%	(5:5)	
Fast Food (without drive-through)		700/1000 sq. ft.**	5%	(6:4)	7%	(5:5)	
Delicatessen (7am-4pm)		150/1000 sq. ft., 11/seat*	9%	(6:4)	3%	(3:7)	
TRANSPORTATION							
Bus Depot		25/1000 sq. ft.**					
Truck Terminal		10/1000 sq. ft., 7/bay, 80/acre**	9%	(4:6)	8%	(5:5)	
Waterport/Marine Terminal		170/berth, 12/acre**					
Transit Station (Light Rail w/parking)		300/acre, $2^{1/2}$/parking space (4/occupied)**	14%	(7:3)	15%	(3:7)	
Park & Ride Lots		400/acre (600/paved acre), 5/parking space (8/occupied)* **	14%	(7:3)	15%	(3:7)	

* Primary source: *San Diego Traffic Generators.*

* Other sources: *ITE Trip Generation Report [6th Edition]*, Trip Generation Rates (other agencies and publications), various SANDAG & CALTRANS studies, reports and estimates.

[P] Trip category percentage ratios are daily from local household surveys, often cannot be applied to very specific land uses, and do not include non-resident drivers (draft SANDAG *Analysis of Trip Diversion*, revised November, 1990):
PRIMARY - one trip directly between origin and primary destination.
DIVERTED - linked trip (having one or more stops along the way to a primary destination) whose distance compared to direct distance ≥ 1 mile.
PASS-BY - undiverted or diverted < 1 mile.

[L] Trip lengths are average weighted for all trips to and from general land use site. (All trips system-wide average length = 6.9 miles)

[C] Fitted curve equation: $Ln(T) = 0.502\ Ln(x) + 6.945$

[O] Fitted curve equation: $Ln(T) = 0.756\ Ln(x) + 3.950$

T = total trips, x = 1,000 sq. ft.

[R] Fitted curve equation: $t = -2.169\ Ln(d) + 12.85$ t = trips/DU, d = density (DU/acre), DU = dwelling unit

[S] Suggested PASS-BY [undiverted or diverted < 1 mile] percentages for trip rate reductions only during P.M. peak period (based on combination of local data/review and Other sources**):

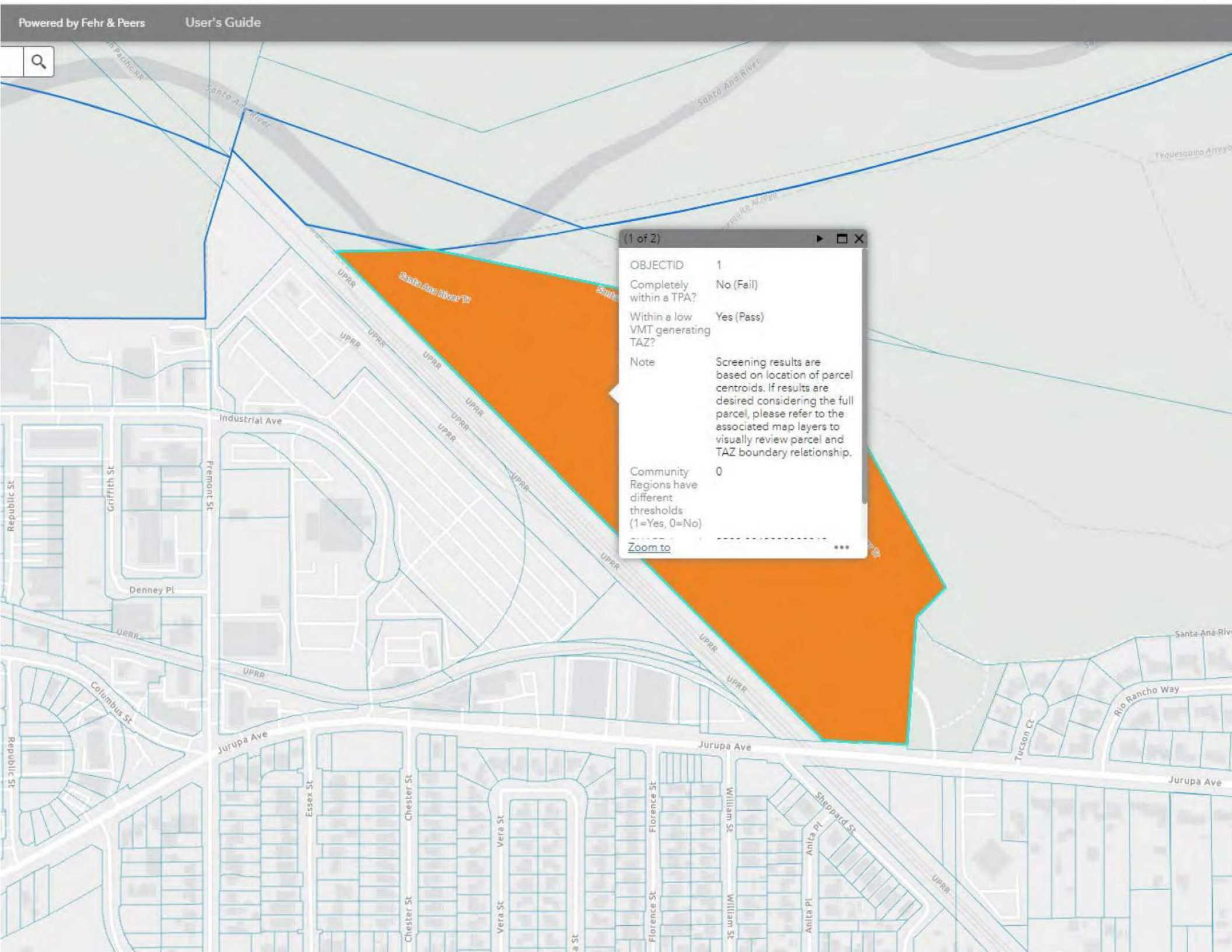
COMMERCIAL/RETAIL	
Regional Shopping Center	20%
Community " "	30%
Neighborhood " "	40%
Specialty Retail/Strip Commercial (other)	10%
Supermarket	40%
Convenience Market	50%
Discount Club/Store	30%
FINANCIAL	
Bank	25%
AUTOMOBILE	
Gasoline Station	50%
RESTAURANT	
Quality	10%
Sit-down high turnover	20%
Fast Food	40%

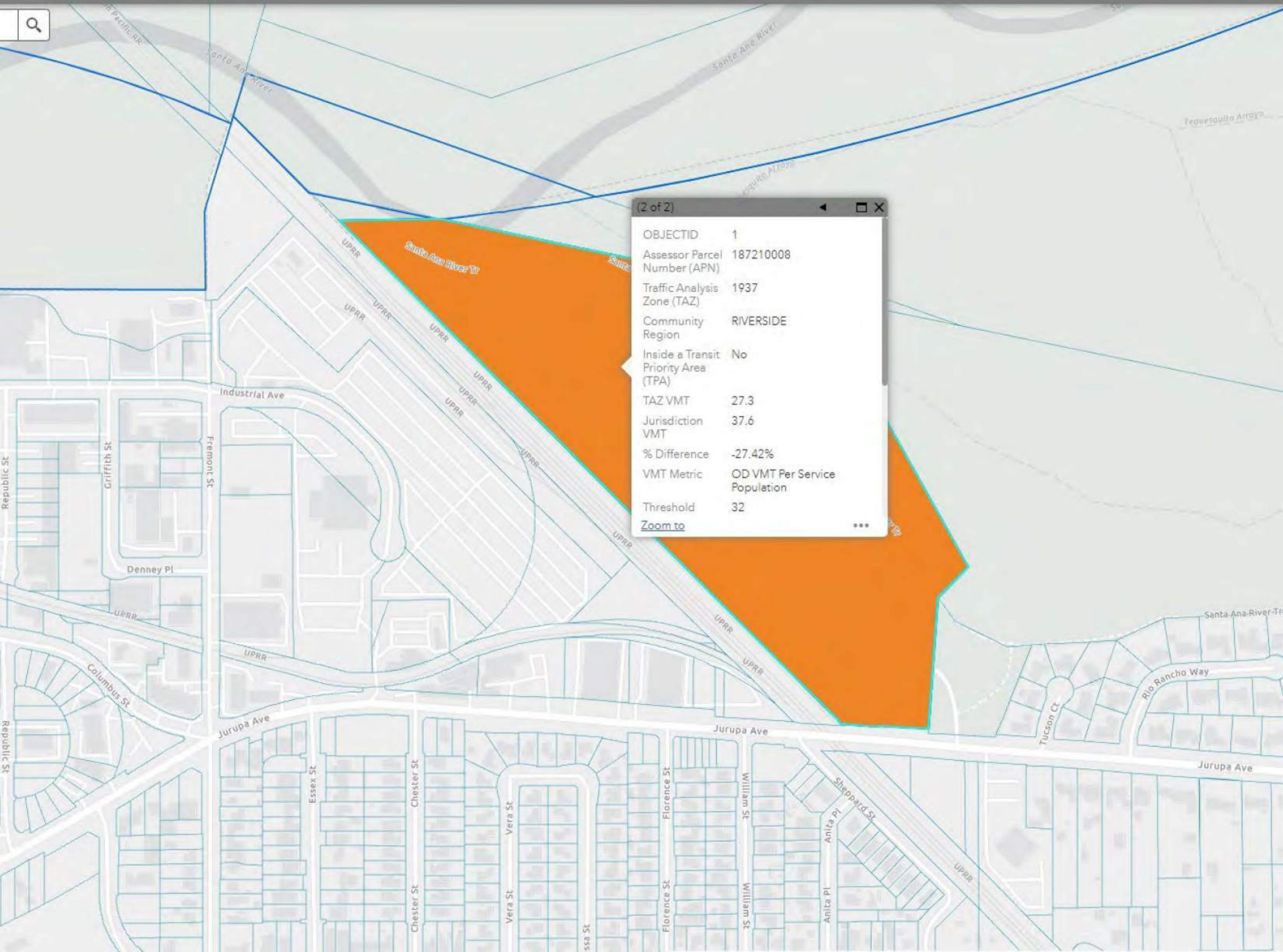
[T] Trip Reductions - In order to help promote regional "smart growth" policies, and acknowledge San Diego's expanding mass transit system, consider vehicle trip rate reductions (with proper documentation and necessary adjustments for peak periods). The following are some examples:

[1] A 5% daily trip reduction for land uses with transit access or near transit stations accessible within 1/4 mile.

[2] Up to 10% daily trip reduction for mixed-use developments where residential and commercial retail are combined (demonstrate mode split of walking trips to replace vehicular trips).

ATTACHMENT C


Powered by Fehr & Peers
User's Guide
(1 of 2)
OBJECTID 1
Completely within a TPA? No (Fail)
Within a low VMT generating TAZ? Yes (Pass)
Note Screening results are based on location of parcel centroids. If results are desired considering the full parcel, please refer to the associated map layers to visually review parcel and TAZ boundary relationship.
Community Regions have different thresholds (1=Yes, 0=No) 0
Zoom to
Santa Ana River W
Industrial Ave
Jurupa Ave
Denney Pl
Columbus St
Griffith St
Fremont St
Republic St
Essex St
Chester St
Vera St
Florence St
William St
Anita Pl
Sheppard St
Tucson Ct
Rio Rancho Way
UPRR


(2 of 2)
OBJECTID 1
Assessor Parcel Number (APN) 187210008
Traffic Analysis Zone (TAZ) 1937
Community Region RIVERSIDE
Inside a Transit Priority Area (TPA) No
TAZ VMT 27.3
Jurisdiction VMT 37.6
% Difference -27.42%
VMT Metric OD VMT Per Service Population
Threshold 32
Zoom to
Santa Ana River Tr
Industrial Ave
Griffith St
Fremont St
Republic St
Denney Pl
Columbus St
Jurupa Ave
Essex St
Chester St
Vera St
Florence St
Williams St
Anita Pl
Sheppard St
Tucson Ct
Rio Rancho Way
Santa Ana River Trail
UPRR

Appendix J2

Jurupa Avenue Trailhead Traffic Assessment

RICK ENGINEERING COMPANY
Traffic Division

April 27, 2023

Ms. Alisa Sramala
City of Riverside
Parks, Recreation and Community Services Department
6927 Magnolia Avenue
Riverside, California 92506

SUBJECT: RIVERSIDE GATEWAY PARKS JURUPA AVENUE TRAILHEAD PARK TRAFFIC ASSESSMENT, RIVERSIDE, CA
(RICK ENGINEERING COMPANY JOB NUMBER 19405-AT)

Dear Ms. Sramala:

The following traffic assessment evaluates the anticipated trip generation, site access, internal circulation and parking of the proposed Jurupa Avenue Trailhead Park within the Riverside Gateway parks system. In addition, level of service (LOS) and vehicle miles traveled (VMT) screening evaluations and an active transportation and public transit evaluation are included in this traffic assessment. The project site is located adjacent to the Santa Ana River Trail along the north side of the Jurupa Avenue approximately 600 feet west of Van Buren Boulevard in the City of Riverside, California. This study was prepared in accordance with the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020) and discussion with City of Riverside Public Works staff. **Attachment A** contains the City of Riverside's Traffic Analysis Scoping Form, which was reviewed and accepted by City of Riverside Traffic Engineering staff. **Exhibit 1** shows a map of the regional project vicinity.

Project Description

The project site currently consists of 7.7 acres of undeveloped open space. The existing Santa Ana River Bike Trail, a Class I bicycle facility, runs through the project site from the northwest corner of the site to the southeast corner and continues east of the site along the north side of Jurupa Avenue. There are currently no existing amenities other than a few undesignated, unpaved trails within the site.

The project proposes to develop approximately 1.5 acres of programmable park amenities, which include the following:

- Community lawn/meadow
- Demonstration garden
- Arroyo plaza/play area
- Music and nature play areas
- Bike hub with restrooms
- Outlook with benches
- Realigned Santa Ana River Trail
- Paved and unpaved (decomposed granite) walking paths

The project site is proposed as a trailhead/staging area for the Santa Ana River Trail. The project would provide a total of 31 parking spaces for both trail and park users. **Exhibit 2** shows the project site plan.

Existing Transportation Conditions

The following is a description of the existing roadways in the vicinity of the project site:

Jurupa Avenue is currently built as a four-lane divided roadway within the project vicinity. Jurupa Avenue is oriented in a general east-west direction and extends from Pachappa Drive near SR-91 to Tyler Street. Jurupa Avenue runs for a total distance of approximately 5.5 miles.

Jurupa Avenue is classified in the City of Riverside's *General Plan Circulation and Community Mobility Element* (February 2018) as a four-lane, 110-foot Arterial in the vicinity of the project site. Jurupa Avenue has a pavement width of approximately 86 feet within the vicinity of the project site. A raised median with intermittent turn lanes is currently provided west of Van Buren Boulevard. On-street parking is prohibited on Jurupa Avenue in the vicinity of the project site.

Class II bike lanes are provided on Jurupa Avenue in each direction of travel for a majority of the roadway length. Several sections of the roadway also provide a two-foot buffer for bicyclists on both sides of the roadway. The Santa Ana River Bike Trail currently runs along the north side of the roadway fronting the project site. The posted speed limit on Jurupa Avenue is 40 MPH in the immediate vicinity of the project site.

Project Trip Generation

Based on input from City of Riverside staff, the trip generation for the proposed project was calculated using custom trip rates that were developed from vehicular traffic counts that were collected at the three (3) driveways serving Ryan Bonaminio Park located at 5000 Tequesquite Avenue in the City of Riverside. The traffic counts at the park driveways were collected on Thursday, September 15, 2022 and on Saturday, September 17, 2022 over a 24-hour period on each day.

Based on the acreage of the existing Ryan Bonaminio Park (43.65 acres) and the number of daily and AM/PM peak hour trips on each day, daily and AM/PM peak hour trip generation rates were calculated for a "local Riverside park" on a typical weekday and a typical Saturday. These customized local park trip rates were applied to the programmable acreage of the proposed developed park areas, which are shown below in **Table 1**.

Table 1
Local Riverside Park Trip Rates from Driveway Counts

Unit	Daily Trip Rate (per unit)	AM Peak Hour			PM Peak Hour		
		Trip Rate (per unit)	Inbound (%AM)	Outbound (% AM)	Trip Rate (per unit)	Inbound (% PM)	Outbound (% PM)
Weekday Trip Rates							
acres	41.28	3.09	50%	50%	3.83	54%	46%
Saturday Trip Rates							
acres	39.27	4.22	49%	51%	N/A	N/A	N/A

Source: Vehicular traffic counts were collected at Ryan Bonaminio Park driveways by Veracity Traffic Group on Thursday, September 15, 2022 and on Saturday, September 17, 2022.

N/A = Not applicable, as the highest peak hour on a Saturday occurs during the morning hours.

Due to the lack of existing park amenities or parking, it was assumed that the existing 7.7 acres of open space on the project site currently do not generate any vehicular trips. Bicyclists along the Santa Ana River Trail currently pass through the project site but do not generate any site-specific trips, and pedestrians from the adjacent neighborhood may also use the Santa Ana River Trail and the existing trails within the project site.

Based on direction from City of Riverside staff, the trip generation rates for an undeveloped Neighborhood/County Park from the San Diego Association of Governments (SANDAG) *Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (April 2002) were used to calculate the trip generation of the remaining park area that would remain undeveloped after development of the project's programmable acreage.

Table 2 shows the trip generation calculations for the proposed project using the custom trip rates shown above in Table 1 and the SANDAG Neighborhood/County Park trip rates as described above. **Attachment B** contains the Ryan Bonaminio Park driveway counts and the SANDAG trip generation rates.

Table 2 shows that the proposed project, including both the programmable developed area and remaining undeveloped area, is estimated to generate a total of 93 trips per day on a typical weekday, with a total of 7 trips during the weekday AM peak hour (3 inbound/4 outbound) and a total of 8 trips during the weekday PM peak hour (4 inbound/4 outbound).

Table 2 also shows that the project is estimated to generate a total of 90 trips per day on a typical Saturday, with a total of 9 trips during the highest Saturday peak hour (4 inbound/5 outbound).

The project's trip distribution was estimated based on the surrounding land uses and the existing roadway network. **Exhibit 3** illustrates the trip distribution of the proposed Jurupa Trailhead project.

Project Access, Circulation and Parking

Vehicular access is proposed to be taken from one driveway on the north side of Jurupa Avenue approximately 320 feet east of Bradford Street. The project driveway would be one-way stop-controlled with right-in/right-out access.

The project would provide a total of 31 parking spaces, which would serve the proposed project site and users of the Santa Ana River Trail. A minimum of four (4) parking spaces are required for the project site, based on the following parking requirements for park uses per Chapter 17.188 of the Riverside County Municipal Code:

- 1 space per 8,000 sq. ft. of active recreational area within a park or playground
- 1 space per acre of passive recreational area within a park or playground

Chapter 17.188 of the Riverside County Municipal Code was utilized to determine the parking requirements of the proposed park because Chapter 19.580 (Parking and Loading) of the City of Riverside Municipal Code does not provide off-street parking requirements for park uses. Parking requirements for park uses in the City of Riverside are determined by the Parks, Recreation and Community Services Department, who have approved using the Riverside County off-street parking requirements for a park use.

The minimum parking requirements are based on the size of the proposed developed amenities within the park, and the additional parking spaces provided for the project would function as a trailhead/staging area for bicyclists and pedestrians using the Santa Ana River Trail.

TABLE 2
PROPOSED PROJECT TRIP GENERATION

Trip Generation Rates												
Land Use	Unit	Weekday Trips							Weekend (Saturday) Trips			
		Daily Trip Rate (per unit)	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trip Rate (per unit)	Highest Peak Hour (9:15 AM - 10:15 AM)		
			Trip Rate (per unit)	In (% AM)	Out (% AM)	Trip Rate (per unit)	In (% PM)	Out (% PM)		Trip Rate (per unit)	In (% AM)	Out (% AM)
Undeveloped Neighborhood/County Park (SANDAG)	acres	5	4%	50%	50%	8%	50%	50%	5	11%	49%	51%
Local City of Riverside Park (Driveway Counts): Proposed Developed Park Amenities	acres	41.28	3.09	50%	50%	3.83	54%	46%	39.27	4.22	49%	51%

Forecast Project Generated Trips													
Land Use	Size	Unit	Weekday Trips							Weekend (Saturday) Trips			
			Daily Trips	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trips	Highest Peak Hour (9:15 AM - 10:15 AM)		
				Total	In	Out	Total	In	Out		Total	In	Out
Existing Park Trip Generation[1]													
Existing Undeveloped Open Space	7.7	acres	0	0	0	0	0	0	0	0	0	0	0
Proposed Project Trip Generation[2]													
Developed Park Facilities/Amenities	1.5	acres	62	5	2	3	6	3	3	59	6	3	3
Total Park Trips (Remaining Undeveloped Acreage Plus Programmable Developed Acreage)[3]													
Existing Undeveloped Park/Open Space	6.2	acres	31	2	1	1	2	1	1	31	3	1	2
Developed Park Facilities/Amenities	1.5	acres	62	5	2	3	6	3	3	59	6	3	3
Total Park Trips			**93**	**7**	**3**	**4**	**8**	**4**	**4**	**90**	**9**	**4**	**5**

Source: Traffic counts conducted by Veracity Traffic Group at Ryan Bonaminio Park driveways on Thursday, September 15, 2022 and on Saturday, September 17, 2022. San Diego Association of Governments (SANDAG) *Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (April 2002).

[1]It was assumed that the existing open space currently does not generate any vehicular trips due to the lack of amenities or access to parking.

[2]Proposed project trip generation is calculated based on programmable acreage to be developed.

[3]The total park trips include the existing park acreage that would remain undeveloped plus the programmable acreage of the area to be developed.

Pedestrian, Bicycle and Transit Facilities Evaluation

Pedestrian access to the existing undeveloped park is currently provided from the existing sidewalk along the north side of Jurupa Avenue. There are currently a few undesignated trails within the existing undeveloped open space within the park.

Pedestrian access to the park is proposed via a proposed paved path extending into the park from the existing sidewalk on the north side of Jurupa Avenue. The Jurupa Trailhead Master Plan and the City of Riverside Parks, Recreation & Community Services Department have expressed the need for a mid-block crosswalk or lighted crosswalk across Jurupa Avenue at the intersection with Bradford Street, which would provide a pedestrian connection to Rutland Park on the south side of Jurupa Avenue. The mid-block crosswalk is currently not a part of the Jurupa Trailhead Master Plan nor is it a City project, and there is currently no funding in place for a mid-block crosswalk across Jurupa Avenue.

The project will construct a portion of the Santa Ana River Greenway, which would consist of a decomposed granite (DG) pedestrian path alongside the Santa Ana River Trail within the proposed developed area of the park. Some of the existing undesignated trails will be closed as they are partially within the biological avoidance area of the park that will be closed to the public. The proposed pedestrian and trail improvements are consistent with the *City of Riverside PACT Trails Master Plan* (August 17, 2021), and development of the proposed project would not conflict with the existing or future pedestrian or trail network in the immediate vicinity of the project site.

Bicycle access to the project site is currently provided from the existing Class II bike lanes along Jurupa Avenue and the existing Santa Ana River Trail, which is built as a Class I bike path that passes through the project site along the southern and western boundaries. The Santa Ana River Trail is approximately 10 feet in width and is divided by a dashed line to separate the direction of travel. The project proposes to realign the trail to meander through the project site and avoid any potential conflict points with vehicles accessing the proposed parking lot on the southwest corner. This will also allow users from the Santa Ana River Trail to access the other amenities proposed in the project, such as the demonstration gardens, play areas and bike hub with restrooms.

The proposed bicycle network improvements are consistent with the City's Master Plan of Trails and Bikeways in the *General Plan Circulation and Community Mobility Element* (February 2018) and the *City of Riverside PACT Active Transportation Plan* (August 17, 2021), and development of the proposed project would not conflict with the existing or future bicycle network in the immediate vicinity of the project site.

There are currently two bus transit stops within ¼ mile of the project site, which are provided on northbound and southbound Van Buren Boulevard near the intersection with Jurupa Avenue. The two bus transit stops serve Riverside Transit Agency Route 21, which runs from the Galleria at Tyler to the Pedley Metrolink Station. No additional future transit facilities near the project site are planned per the City of Riverside's *General Plan Circulation and Community Mobility Element* (February 2018). Development of the proposed project would not conflict with any existing or future planned transit facilities.

Level of Service (LOS) Analysis Screening Assessment

The Level of Service Screening Assessment was conducted per the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020). Per these guidelines, there are various conditions that can exempt a project from a Level of Service (LOS) analysis. Of the conditions listed in the guidelines, the following are the most relevant to the project:

- *Projects that generate less than 100 peak hour trips, as projects that generate 100 or less trips typically do not affect LOS significantly once distributed to the local network*
- *Local serving churches, lodges, community centers, neighborhood parks and community parks*

As previously shown in Table 2, the proposed project is estimated to generate 7 trips during the weekday AM peak hour, 8 trips during the weekday PM peak hour, and 9 trips during the highest Saturday peak hour. The calculated project traffic falls below the "100 peak hour trips" threshold and is anticipated to have a minimal impact on the local roadway network. Additionally, the proposed land use is a park that will be serving the nearby communities. This characteristic further indicates that most of the project traffic will be local. Based on these criteria, the project is determined to be exempt from an LOS analysis.

Vehicle Miles Traveled (VMT) Analysis Screening Assessment

As required by CEQA, a Vehicles Miles Traveled (VMT) analysis screening assessment was conducted for the proposed project. This VMT analysis screening assessment was conducted in accordance with the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020), which includes the following screening criteria for projects:

- *Projects located in a Transit Priority Area (TPA)*
- *Projects located in a low VMT-generating area (15% or more below regional average)*
- *Local-serving land use types*
- *Affordable housing projects*
- *Projects generating less than 110 daily vehicle trips*

The Western Riverside Council of Governments (WRCOG) VMT tool, which utilizes the Riverside County Transportation Model (RIVCOM), shows that the VMT per service population within the Travel Analysis Zone (TAZ) in which the project site is located (TAZ 1944) is below the screening threshold for a low VMT-generating area (15% or more below the regional average VMT per service population). Therefore, the proposed project is screened out from further VMT analysis due to the site's location in a low VMT-generating area and is presumed to have a less than significant transportation impact. **Attachment C** contains WRCOG VMT tool outputs for the TAZ in which the project site is located (TAZ 1944), which show that the VMT per service population in the project site TAZ is below the City's screening threshold for a low VMT-generating area.

In addition, the City of Riverside's VMT screening criteria lists local parks as a land use type that is presumed to have a less than significant impact and is screened out from further VMT analysis. The proposed project is a local-serving park use and therefore is screened out from further VMT analysis and is presumed to have a less than significant transportation impact.

In addition, the project is estimated to generate fewer than 110 trips per day as previously shown in Table 2. Vehicular trips generated by the proposed project would not exceed the City's screening threshold of 110 trips per day for Small Projects, and therefore the project is screened out from further VMT analysis and is presumed to have a less than significant transportation impact.

Conclusions/Recommendations

The findings of this traffic assessment showed that the proposed project is anticipated to generate a total of 93 trips per day on a typical weekday, with a total of 7 trips during the weekday AM peak hour (3 inbound/4 outbound) and a total of 8 trips during the weekday PM peak hour (4 inbound/4 outbound). The findings also show that the project is estimated to generate a total of 90 trips per day on a typical Saturday, with a total of 9 trips during the highest Saturday peak hour (4 inbound/5 outbound). It is anticipated that the project-generated traffic would have minimal impacts on intersections and roadways in the vicinity of the project.

The project would provide a total of 31 parking spaces that would serve both the proposed park users and users of the existing Santa Ana River Trail. A minimum of four (4) parking spaces are required for the Jurupa Avenue Trailhead, based on the size of the proposed developed amenities within the park. Therefore, sufficient parking would be provided for the proposed project.

The proposed pedestrian and trail improvements are consistent with the *City of Riverside PACT Trails Master Plan* (August 17, 2021), and development of the proposed project would not conflict with the existing or future pedestrian network in the immediate vicinity of the project site. The proposed bicycle network improvements are consistent with the City's Master Plan of Trails and Bikeways in the *General Plan Circulation and Community Mobility Element* (February 2018) and the *City of Riverside PACT Active Transportation Plan* (August 17, 2021), and development of the proposed project would not conflict with the existing or future bicycle network in the immediate vicinity of the project site.

It is recommended that the project install proper signage and striping along the proposed Santa Ana River Trail realignment through the project site, and installation of crosswalks will be required across the bike path. In addition, it is recommended that the project provide a pedestrian connection between the public sidewalk along Jurupa Avenue and the DG pedestrian path adjacent to the bike path, which would require a crosswalk across the bike path with signage as part of this pedestrian connection. These improvements, which are not yet included in the Master Plan, are needed to warn bicyclists that they may need to slow down or stop, as there will be pedestrians crossing the bike path from the parking lot to access the various proposed amenities within the park.

Exhibit 4 illustrates the anticipated crossing markings and signage types per the *California Manual on Uniform Traffic Devices* (CA-MUTCD, 2014 Edition, Revision 7, March 10, 2023). As shown, high-visibility ladder-style or continental-style crosswalk markings per CA-MUTCD Figures 3B-19 and 3B-19 (CA) are recommended at the anticipated pedestrian crossing areas along the Santa Ana River Trail within the Jurupa Trailhead Park. Exhibit 3 also shows that the following signage types per the CA-MUTCD are recommended at the anticipated pedestrian crossing areas:

- CA-MUTCD W11-2 (top) with W16-7P (bottom) at crosswalks (both directions)
- CA-MUTCD W11-2 (top) with W16-9P (bottom) approximately 50-100 feet in advance of the crosswalks (both directions); or
- CA-MUTCD R9-6 approximately 20-50 feet in advance of the crosswalks (both directions)

Attachment D contains CA-MUTCD Figures 3B-19 and 3B-19 (CA), which show the recommended high-visibility crosswalk marking types, and CA-MUTCD Figures 9B-2, 9B-3, 9B-7 and 9B-8, which show the recommended pedestrian crossing signage along the Santa Ana River Trail.

The recommended crosswalk marking types would be highly visible to bicyclists approaching the anticipated pedestrian crossing locations, and the recommended signage would provide bicyclists advance warning of the pedestrian crossings as well as indicate the specific pedestrian crossing locations. These recommendations are anticipated to reduce bicycle speeds by warning bicyclists that pedestrians may be crossing ahead.

Should you have any questions, please contact either David Mizell or me at (619) 291-0707.

Sincerely,

RICK ENGINEERING COMPANY

Brian Stephenson, P.E., T.E., P.T.O.E.
Associate Principal

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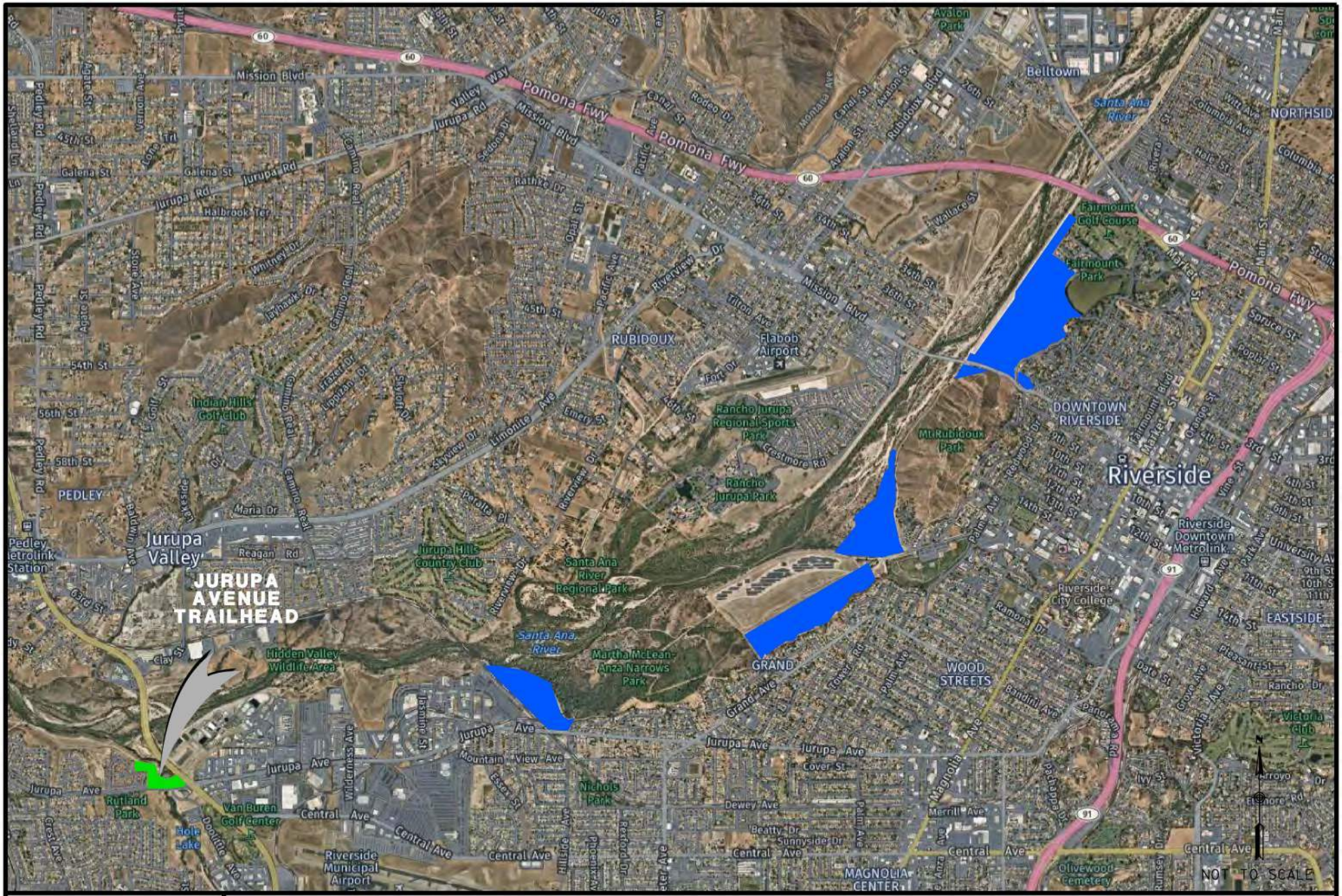
Attachments



RICK ENGINEERING COMPANY

EXHIBIT 1

PROJECT VICINITY MAP

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

LEGEND

- =RIVERSIDE GATEWAY PARK SYSTEM
- =JURUPA AVENUE TRAILHEAD

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SOURCE:STUDIO-MLA

RICK ENGINEERING COMPANY

EXHIBIT 2

CONCEPTUAL MASTER PLAN

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

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RICK ENGINEERING COMPANY

EXHIBIT 3

PROJECT TRIP DISTRIBUTION

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

LEGEND

XX% = DISTRIBUTION PERCENTAGE

= PROJECT SITE

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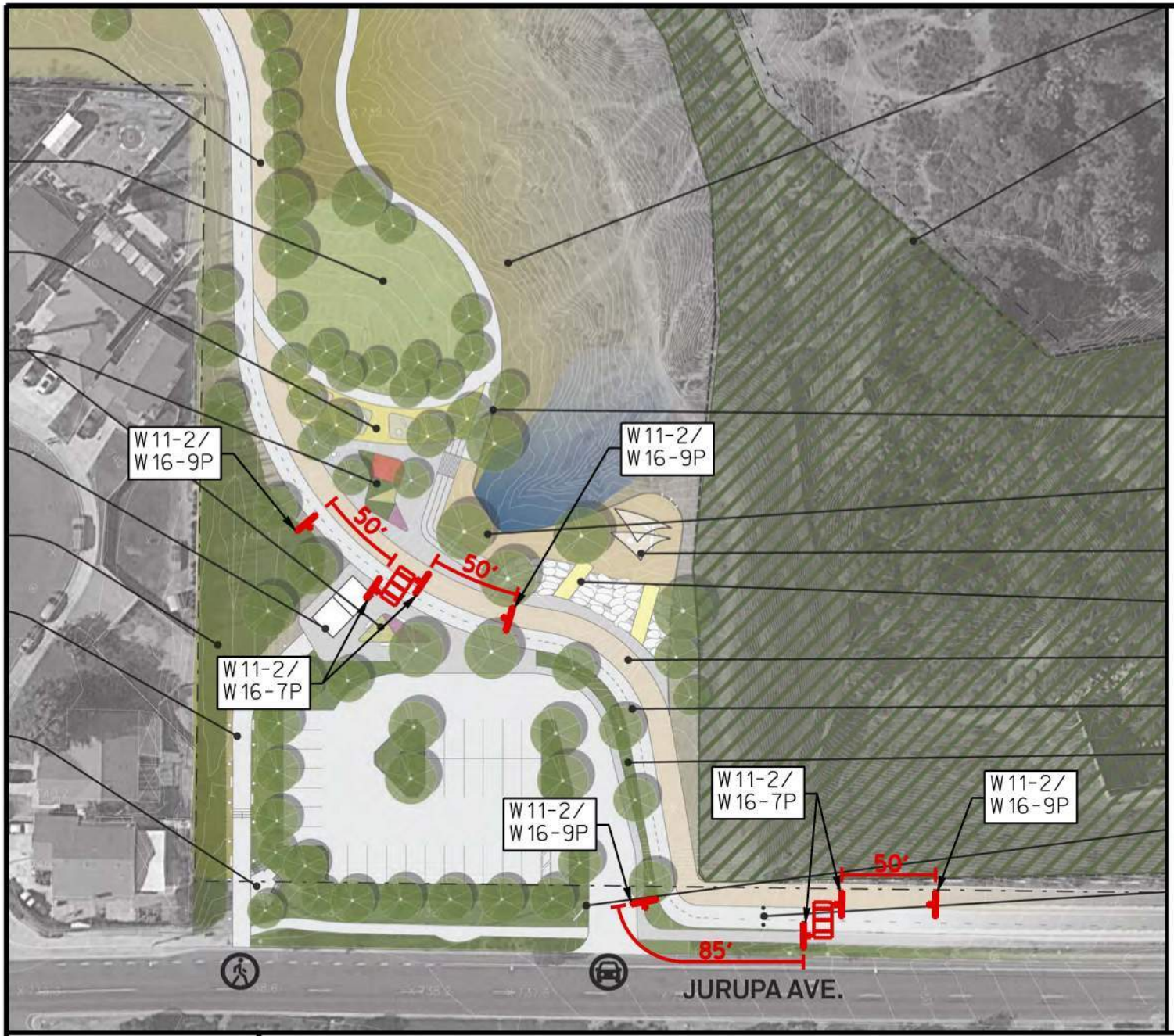

LEGEND

= INSTALL CONTINENTAL CROSSWALK

= INSTALL SIGN

SIGN LEGEND

W11-2

W16-9P

W16-7P

RICK ENGINEERING COMPANY

EXHIBIT 4

RECOMMENDED PEDESTRIAN CROSSING IMPROVEMENTS

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

ILLUSTRATION FOR CONCEPTUAL PURPOSES ONLY

80 60 40 0 40 80

GRAPHIC SCALE 1" = 80'

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ATTACHMENT A

APPROVED
Vital Patel
03/02/2023

CITY OF RIVERSIDE
City of Arts & Innovation

Public Works Department

Traffic Analysis Scoping Form

This scoping form shall be submitted to the City of Riverside Traffic Engineering Division

Project Identification:

Case Number:	Not Available
Related Cases:	
SP No.	
EIR No.	
GPA No.	
CZ No.	
Project Name:	Riverside Gateway: Jurupa Avenue Trailhead
Project Address:	Jurupa Avenue approx. 800' west of Van Buren Boulevard
Project Opening Year:	Not Available
Project Description:	Existing 7.7 acres of undeveloped open space; project consists of providing 1.5 acres of park amenities including bicycle and equestrian facilities, and providing trailhead staging area/parking for Santa Ana River Trail.

	Consultant:	**Developer:**
Name:	Rick Engineering Company	City of Riverside
Address:	5620 Friars Road	Parks & Recreation Dept.
	San Diego, CA 92110	6927 Magnolia Avenue
Telephone:	619-291-0707	Riverside, CA 92506
Fax/Email:	dmizell@rickengineering.com	

Scoping & Study Fees:

Fees to be made payable to "City of Riverside" and delivered to Land Development. City Hall 3rd Floor, 3900 Main Street, Riverside, CA 92522

1) Scoping Agreement Fee (For all projects not screened from analysis): **$271.00**

2) TIA Review (For projects with both LOS & VMT analysis of any scale, or standalone LOS analyses with over 100 vehicle trips per hour): **$2671.02**

3) TIA Review (For standalone VMT analysis, or standalone LOS analyses with under 100 vehicle trips per hour): **$1288.20**

Trip Generation Information:

Trip Generation Data Source: Proposed Amenities: Custom rates developed from driveway counts
Remaining Undeveloped Area: SANDAG (Undeveloped Park)

Current General Plan Land Use: Major Open Space/Parks

Proposed General Plan Land Use: Major Open Space/Parks

Current Zoning: PF

Proposed Zoning: PF

(See attached table)

	Existing Trip Generation			Proposed Trip Generation		
	In	Out	Total	In	Out	Total
AM Trips	0	0	0	3	4	7
PM Trips	0	0	0	4	4	8

Trip Internalization: ☐ Yes ☒ No (_____% Trip Discount)

Pass-By Allowance: ☐ Yes ☒ No (_____% Trip Discount)

Potential Screening Checks

Is your project screened from specific analyses in accordance with City Guidelines?

Is the project screened from LOS assessment? ☒ Yes ☐ No

LOS screening justification (see Page 6 of the guidelines): Project would generate fewer than 100 peak hour trips and would be a local serving neighborhood or community park.

Is the project screened from VMT assessment? [X] Yes [ ] No

VMT screening justification (see Pages 23-25 of the guidelines): Project would be screened out from VMT analysis based on the following three (3) criteria: 1) Project is located in a low-VMT generating area (>15% below regional average); 2) Project would be a local serving park/public facility; and 3) Project would generate less than 110 ADT.

Level of Service Scoping

- Proposed Trip Distribution (Attach Graphic for Detailed Distribution):

North	South	East	West
25%	30%	35%	10%

- Attach list of Approved and Pending Projects that need to be considered (provided by the lead agency and adjacent agencies)
- Attach list of study intersections/roadway segments
- Attach legible site plan
- Note other specific items to be addressed:
  - Site access
  - On-site circulation
  - Parking
  - Consistency with Plans supporting Bikes/Peds/Transit
  - Other _____
- Date of Traffic Counts Ryan Bonaminio Park 9/15/22 and 9/17/22
- Attach proposed analysis scenarios (years plus proposed forecasting approach)
- Attach proposed phasing approach (if the project is phased)

VMT Scoping

For projects that are not screened, identify the following:

- Travel Demand Forecasting Model _____
- Attach WRCOG Screening VMT Assessment output or describe why it is not appropriate for use
- Attach proposed Model Land Use Inputs and Assumed Conversion Factors (attach)

Specific Issues to be addressed in the Study (in addition to the standard analysis described in the Guidelines) (To be filled out by the Public Works Traffic Engineering Division)

_____

_____

Table A

Riverside Gateway Parks Trip Generation: Jurupa Avenue Trailhead

Trip Generation Rates													
Land Use	Unit	Weekday Trips							Weekend (Saturday) Trips				
		Daily Trip Rate (per unit)	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trip Rate (per unit)	Highest Peak Hour (9:15 AM - 10:15 AM)		
			Trip Rate (per unit)	In (% AM)	Out (% AM)	Trip Rate (per unit)	In (% PM)	Out (% PM)		Trip Rate (per unit)	In (% AM)	Out (% AM)
Undeveloped Neighborhood/County Park (SANDAG)	acres	5	4%	50%	50%	8%	50%	50%	5	11%	49%	51%
Local City of Riverside Park (Driveway Counts): Proposed Developed Park Amenities	acres	41.28	3.09	50%	50%	3.83	54%	46%	39.27	4.22	49%	51%

Forecast Project Generated Trips													
Land Use	Size	Unit	Weekday Trips							Weekend (Saturday) Trips			
			Daily Trips	AM Peak Hour (8:00 AM - 9:00 AM)			PM Peak Hour (5:00 PM - 6:00 PM)			Daily Trips	Highest Peak Hour (9:15 AM - 10:15 AM)		
				Total	In	Out	Total	In	Out		Total	In	Out
Existing Park Trip Generation[1]													
Existing Undeveloped Open Space	7.7	acres	0	0	0	0	0	0	0	0	0	0	0
Proposed Project Trip Generation[2]													
Developed Park Facilities/Amenities	1.5	acres	62	5	2	3	6	3	3	59	6	3	3
Total Park Trips (Remaining Undeveloped Acreage Plus Programmable Developed Acreage)[3]													
Existing Undeveloped Park/Open Space	6.2	acres	31	2	1	1	2	1	1	31	3	1	2
Developed Park Facilities/Amenities	1.5	acres	62	5	2	3	6	3	3	59	6	3	3
Total Park Trips			**93**	**7**	**3**	**4**	**8**	**4**	**4**	**90**	**9**	**4**	**5**
Net Change in Trips (Total - Existing Trips)													
Net Project Trips			**93**	**7**	**3**	**4**	**8**	**4**	**4**	**90**	**9**	**4**	**5**

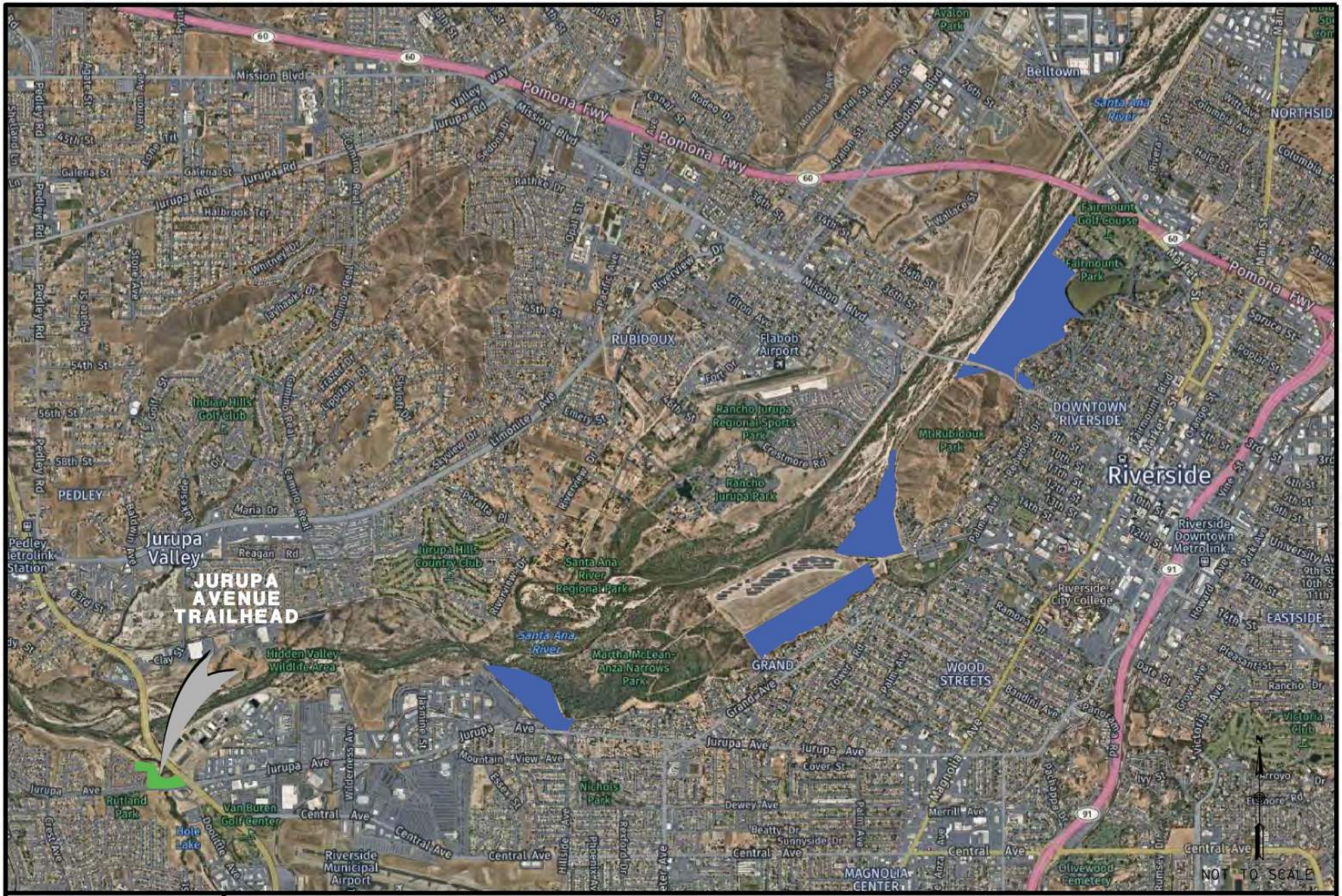
Source: Traffic counts conducted by Veracity Traffic Group at Ryan Bonaminio Park driveways on Thursday, September 15, 2022 and on Saturday, September 17, 2022.

San Diego Association of Governments (SANDAG) Not So Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).

[1]Existing trip generation is calculated based on total existing park acreage.

[2]Proposed project trip generation is calculated based on programmable acreage to be developed.

[3]The total park trips include the existing park acreage that would remain undeveloped plus the programmable acreage of the area to be developed.



RICK ENGINEERING COMPANY

EXHIBIT 1

PROJECT VICINITY MAP

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

LEGEND

- =RIVERSIDE GATEWAY PARK SYSTEM
- =JURUPA AVENUE TRAILHEAD

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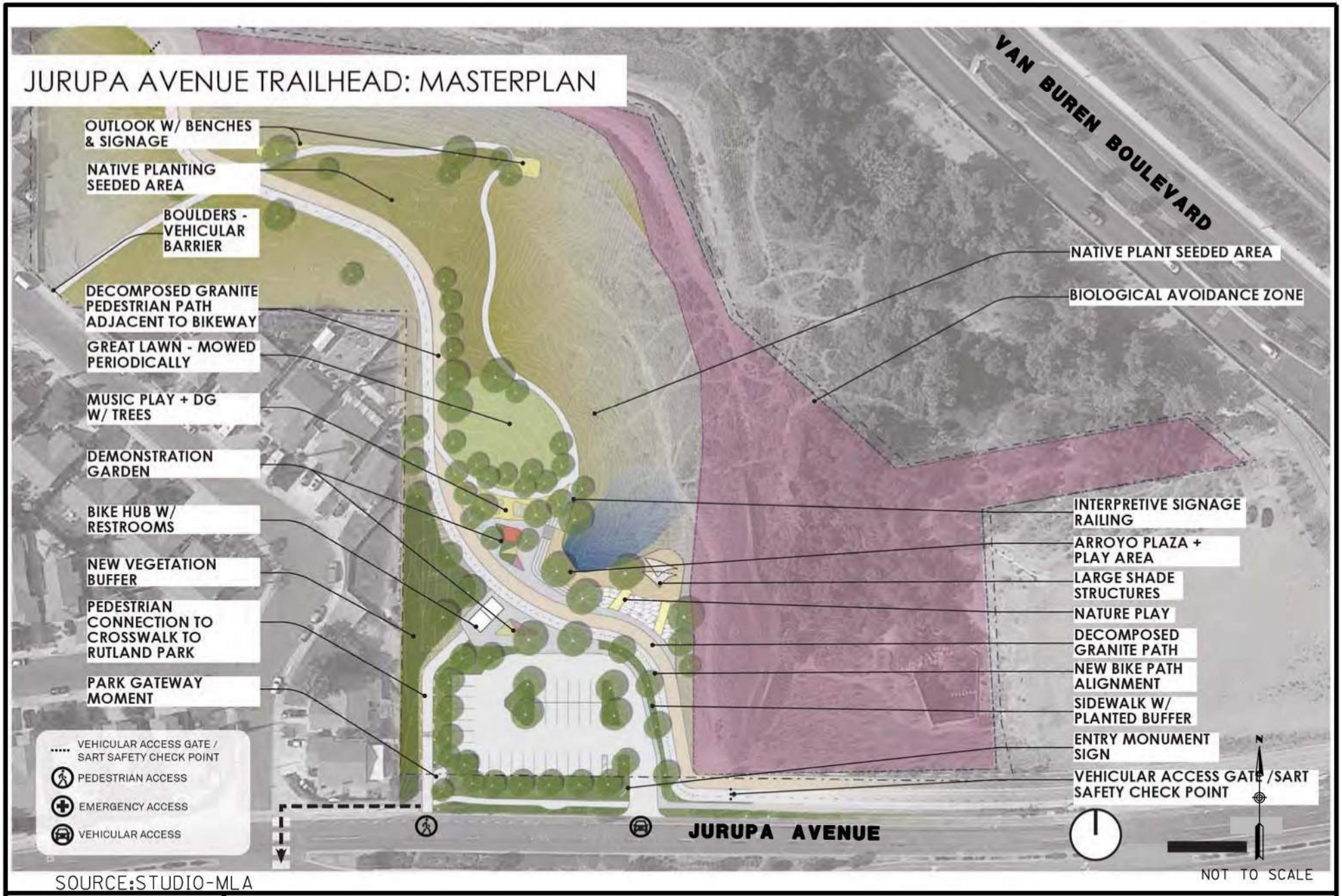

SOURCE:STUDIO-MLA

RICK ENGINEERING COMPANY

EXHIBIT 2

CONCEPTUAL MASTER PLAN

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

RICK ENGINEERING COMPANY

EXHIBIT 3

PROJECT TRIP DISTRIBUTION

JURUPA AVENUE TRAILHEAD TRAFFIC ASSESSMENT

LEGEND

XX% = DISTRIBUTION PERCENTAGE

= PROJECT SITE

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ATTACHMENT B

Thursday, September 15, 2022 Counts

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Thursday, September 15, 2022 City: Riverside Project #: 22-1548-001

Location: Ryan Bonamino Park Western Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	0		3				
00:15	0		0					12:15	1		1				
00:30	0		1					12:30	1		0				
00:45	0	0	0	1			1	12:45	0	2	4	8			10
01:00	0		0					13:00	1		2				
01:15	0		0					13:15	1		1				
01:30	1		0					13:30	2		1				
01:45	0	1	0	0			1	13:45	3	7	5	9			16
02:00	0		0					14:00	1		2				
02:15	0		0					14:15	2		2				
02:30	0		0					14:30	1		3				
02:45	0	0	0	0				14:45	1	5	0	7			12
03:00	0		0					15:00	1		1				
03:15	1		1					15:15	1		2				
03:30	0		0					15:30	0		2				
03:45	0	1	0	1			2	15:45	1	3	3	8			11
04:00	0		0					16:00	1		1				
04:15	0		0					16:15	0		1				
04:30	0		0					16:30	0		1				
04:45	0	0	0	0				16:45	0	1	1	4			5
05:00	0		0					17:00	4		4				
05:15	0		1					17:15	2		4				
05:30	1		0					17:30	1		3				
05:45	0	1	1	2			3	17:45	3	10	8	19			29
06:00	0		1					18:00	5		3				
06:15	0		3					18:15	3		4				
06:30	1		4					18:30	4		7				
06:45	0	1	5	13			14	18:45	2	14	5	19			33
07:00	1		3					19:00	4		6				
07:15	3		5					19:15	6		6				
07:30	1		3					19:30	5		5				
07:45	2	7	5	16			23	19:45	4	19	3	20			39
08:00	3		1					20:00	4		6				
08:15	1		3					20:15	3		1				
08:30	3		2					20:30	1		2				
08:45	3	10	1	7			17	20:45	3	11	4	13			24
09:00	1		2					21:00	1		3				
09:15	1		3					21:15	0		2				
09:30	1		1					21:30	2		1				
09:45	3	6	3	9			15	21:45	1	4	1	7			11
10:00	1		1					22:00	1		1				
10:15	1		1					22:15	1		0				
10:30	1		2					22:30	1		1				
10:45	1	4	4	8			12	22:45	0	3	0	2			5
11:00	1		1					23:00	0		0				
11:15	2		1					23:15	0		0				
11:30	2		1					23:30	1		0				
11:45	0	5	2	5			10	23:45	1	2	0	0			2
Total Vol.		36		62			**98**			81		116			**197**

GPS Coordinates: 33.976215, -117.395528

Daily Totals

NB	SB	EB	WB	Combined
117	178			**295**

	AM			PM		
Split %	36.7%	63.3%	**33.2%**	41.1%	58.9%	**66.8%**
Peak Hour	08:00	06:30	**07:00**	19:00	18:30	**18:30**
Volume	10	17	**23**	19	24	**40**
P.H.F.	0.83	0.85	**0.72**	0.79	0.86	**0.83**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Thursday, September 15, 2022 City: Riverside Project #: 22-1548-002

Location: Ryan Bonamino Park Middle Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		1					12:00	4		3				
00:15	0		0					12:15	2		3				
00:30	0		0					12:30	1		3				
00:45	0	0	1	2			2	12:45	5	12	3	12			24
01:00	0		0					13:00	5		7				
01:15	0		0					13:15	1		6				
01:30	0		0					13:30	2		4				
01:45	0	0	0	0				13:45	5	13	2	19			32
02:00	0		0					14:00	1		7				
02:15	1		0					14:15	2		5				
02:30	1		0					14:30	4		2				
02:45	0	2	0	0			2	14:45	2	9	4	18			27
03:00	0		1					15:00	4		1				
03:15	0		0					15:15	1		4				
03:30	0		0					15:30	5		1				
03:45	0	0	0	1			1	15:45	4	14	2	8			22
04:00	0		0					16:00	3		3				
04:15	0		0					16:15	3		2				
04:30	0		1					16:30	9		1				
04:45	0	0	1	2			2	16:45	4	19	3	9			28
05:00	1		0					17:00	5		4				
05:15	1		1					17:15	9		12				
05:30	2		0					17:30	2		5				
05:45	1	5	0	1			6	17:45	15	31	13	34			65
06:00	0		1					18:00	18		12				
06:15	2		2					18:15	9		7				
06:30	3		1					18:30	17		13				
06:45	3	8	2	6			14	18:45	11	55	8	40			95
07:00	5		3					19:00	11		12				
07:15	1		4					19:15	14		18				
07:30	2		2					19:30	7		12				
07:45	4	12	5	14			26	19:45	3	35	16	58			93
08:00	6		2					20:00	4		15				
08:15	7		5					20:15	3		5				
08:30	6		5					20:30	5		11				
08:45	6	25	9	21			46	20:45	2	14	8	39			53
09:00	11		7					21:00	1		4				
09:15	2		7					21:15	2		2				
09:30	3		13					21:30	0		3				
09:45	6	22	10	37			59	21:45	0	3	2	11			14
10:00	6		8					22:00	2		1				
10:15	4		6					22:15	1		0				
10:30	5		6					22:30	0		1				
10:45	5	20	12	32			52	22:45	2	5	2	4			9
11:00	3		5					23:00	1		0				
11:15	3		5					23:15	0		0				
11:30	4		11					23:30	0		0				
11:45	5	15	6	27			42	23:45	0	1	1	1			2
Total Vol.		109		143			**252**			211		253			**464**

GPS Coordinates: 33.976515, -117.394337

Daily Totals

NB	SB	EB	WB	Combined
320	396			**716**

	AM			PM		
Split %	43.3%	56.7%	**35.2%**	45.5%	54.5%	**64.8%**
Peak Hour	08:15	09:15	**09:00**	17:45	19:15	**17:45**
Volume	30	38	**59**	59	61	**104**
P.H.F.	0.68	0.73	**0.82**	0.82	0.85	**0.87**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Thursday, September 15, 2022 City: Riverside Project #: 22-1548-003

Location: Ryan Bonamino Park Eastern Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	1		0					12:00	6		2				
00:15	0		0					12:15	4		4				
00:30	0		0					12:30	5		2				
00:45	0	1	0	0			1	12:45	7	22	2	10			32
01:00	0		0					13:00	5		1				
01:15	0		1					13:15	5		1				
01:30	0		0					13:30	6		3				
01:45	0	0	0	1			1	13:45	4	20	2	7			27
02:00	0		0					14:00	8		2				
02:15	0		0					14:15	4		1				
02:30	1		0					14:30	3		2				
02:45	0	1	0	0			1	14:45	4	19	0	5			24
03:00	0		0					15:00	3		1				
03:15	1		0					15:15	4		2				
03:30	0		0					15:30	4		0				
03:45	0	1	0	0			1	15:45	4	15	0	3			18
04:00	0		0					16:00	5		3				
04:15	0		0					16:15	6		5				
04:30	1		1					16:30	2		3				
04:45	1	2	0	1			3	16:45	7	20	6	17			37
05:00	1		3					17:00	4		5				
05:15	2		2					17:15	7		8				
05:30	4		2					17:30	12		10				
05:45	4	11	4	11			22	17:45	13	36	14	37			73
06:00	4		4					18:00	7		13				
06:15	8		5					18:15	9		16				
06:30	4		5					18:30	9		7				
06:45	10	26	4	18			44	18:45	8	33	12	48			81
07:00	6		3					19:00	7		13				
07:15	6		4					19:15	10		9				
07:30	5		4					19:30	15		8				
07:45	10	27	7	18			45	19:45	11	43	8	38			81
08:00	8		7					20:00	12		3				
08:15	10		12					20:15	9		4				
08:30	6		13					20:30	8		2				
08:45	9	33	7	39			72	20:45	4	33	1	10			43
09:00	13		6					21:00	5		2				
09:15	10		3					21:15	4		3				
09:30	11		6					21:30	8		2				
09:45	14	48	5	20			68	21:45	2	19	0	7			26
10:00	10		4					22:00	1		0				
10:15	8		3					22:15	2		1				
10:30	5		5					22:30	1		0				
10:45	10	33	3	15			48	22:45	1	5	2	3			8
11:00	1		2					23:00	1		1				
11:15	5		4					23:15	1		1				
11:30	8		2					23:30	0		1				
11:45	5	19	3	11			30	23:45	0	2	0	3			5
Total Vol.		202		134			**336**			267		188			**455**

GPS Coordinates: 33.976813, -117.393149

Daily Totals

NB	SB	EB	WB	Combined
469	322			**791**

	AM			PM		
Split %	60.1%	39.9%	**42.5%**	58.7%	41.3%	**57.5%**
Peak Hour	09:00	07:45	**08:15**	19:15	17:30	**17:30**
Volume	48	39	**76**	48	53	**94**
P.H.F.	0.86	0.75	**0.86**	0.80	0.83	**0.87**

Saturday, September 17, 2022 Counts

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Saturday, September 17, 2022 City: Riverside Project #: 22-1548-001

Location: Ryan Bonamino Park Western Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	3		3				
00:15	0		0					12:15	3		2				
00:30	0		0					12:30	0		1				
00:45	0	0	1	1			1	12:45	1	7	3	9			16
01:00	0		0					13:00	1		2				
01:15	0		0					13:15	3		2				
01:30	0		0					13:30	0		0				
01:45	0	0	0	0				13:45	0	4	0	4			8
02:00	0		0					14:00	1		0				
02:15	0		0					14:15	0		1				
02:30	0		0					14:30	0		2				
02:45	1	1	0	0			1	14:45	0	1	3	6			7
03:00	0		0					15:00	1		1				
03:15	0		0					15:15	3		1				
03:30	0		0					15:30	0		1				
03:45	0	0	0	0				15:45	2	6	0	3			9
04:00	0		0					16:00	0		2				
04:15	1		0					16:15	0		1				
04:30	0		1					16:30	1		2				
04:45	0	1	0	1			2	16:45	0	1	0	5			6
05:00	0		0					17:00	4		0				
05:15	0		1					17:15	0		0				
05:30	0		0					17:30	1		4				
05:45	1	1	1	2			3	17:45	0	5	1	5			10
06:00	0		0					18:00	0		3				
06:15	0		3					18:15	1		2				
06:30	2		0					18:30	2		4				
06:45	1	3	2	5			8	18:45	2	5	7	16			21
07:00	0		3					19:00	5		5				
07:15	2		4					19:15	6		2				
07:30	1		6					19:30	0		2				
07:45	4	7	5	18			25	19:45	2	13	1	10			23
08:00	3		6					20:00	4		1				
08:15	3		6					20:15	0		1				
08:30	5		7					20:30	2		0				
08:45	3	14	4	23			37	20:45	0	6	0	2			8
09:00	7		2					21:00	2		2				
09:15	3		5					21:15	1		2				
09:30	5		4					21:30	1		0				
09:45	4	19	2	13			32	21:45	0	4	0	4			8
10:00	6		5					22:00	2		1				
10:15	3		2					22:15	0		2				
10:30	4		6					22:30	1		2				
10:45	4	17	1	14			31	22:45	1	4	0	5			9
11:00	3		4					23:00	3		2				
11:15	2		1					23:15	0		1				
11:30	4		3					23:30	2		1				
11:45	4	13	0	8			21	23:45	0	5	0	4			9
Total Vol.		76		85			**161**			61		73			**134**

GPS Coordinates: 33.976215, -117.395528

Daily Totals

NB	SB	EB	WB	Combined
137	158			**295**

	AM			PM		
Split %	47.2%	52.8%	**54.6%**	45.5%	54.5%	**45.4%**
Peak Hour	09:00	07:45	**07:45**	18:30	18:15	**18:30**
Volume	19	24	**39**	15	18	**33**
P.H.F.	0.68	0.86	**0.81**	0.63	0.64	**0.83**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Saturday, September 17, 2022 City: Riverside Project #: 22-1548-002

Location: Ryan Bonamino Park Middle Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	2		7				
00:15	0		0					12:15	3		5				
00:30	0		0					12:30	1		7				
00:45	0	0	0	0				12:45	1	7	5	24			31
01:00	0		0					13:00	1		8				
01:15	1		0					13:15	1		4				
01:30	0		0					13:30	4		3				
01:45	0	1	0	0			1	13:45	2	8	5	20			28
02:00	0		0					14:00	3		2				
02:15	2		0					14:15	0		5				
02:30	0		1					14:30	0		5				
02:45	0	2	0	1			3	14:45	4	7	6	18			25
03:00	0		0					15:00	1		7				
03:15	0		0					15:15	4		2				
03:30	0		0					15:30	4		2				
03:45	0	0	2	2			2	15:45	3	12	1	12			24
04:00	0		0					16:00	3		5				
04:15	0		0					16:15	4		6				
04:30	0		0					16:30	6		6				
04:45	1	1	1	1			2	16:45	2	15	5	22			37
05:00	0		0					17:00	4		3				
05:15	0		1					17:15	6		3				
05:30	0		1					17:30	2		4				
05:45	3	3	1	3			6	17:45	7	19	5	15			34
06:00	3		1					18:00	11		6				
06:15	11		4					18:15	3		9				
06:30	7		1					18:30	4		11				
06:45	14	35	4	10			45	18:45	6	24	4	30			54
07:00	6		1					19:00	5		8				
07:15	9		5					19:15	7		6				
07:30	8		7					19:30	7		8				
07:45	9	32	6	19			51	19:45	3	22	7	29			51
08:00	11		6					20:00	6		5				
08:15	7		10					20:15	1		4				
08:30	12		5					20:30	3		4				
08:45	4	34	14	35			69	20:45	6	16	2	15			31
09:00	9		5					21:00	2		2				
09:15	9		9					21:15	3		3				
09:30	7		13					21:30	3		1				
09:45	3	28	5	32			60	21:45	2	10	0	6			16
10:00	11		12					22:00	0		1				
10:15	13		7					22:15	1		0				
10:30	7		9					22:30	2		0				
10:45	8	39	10	38			77	22:45	0	3	0	1			4
11:00	4		6					23:00	0		1				
11:15	2		10					23:15	1		0				
11:30	2		3					23:30	2		1				
11:45	3	11	14	33			44	23:45	1	4	0	2			6
Total Vol.		186		174			**360**			147		194			**341**

GPS Coordinates: 33.976515, -117.394337

Daily Totals

NB	SB	EB	WB	Combined
333	368			**701**

	AM			PM		
Split %	51.7%	48.3%	**51.4%**	43.1%	56.9%	**48.6%**
Peak Hour	07:45	08:45	**10:00**	17:15	18:15	**17:45**
Volume	39	41	**77**	26	32	**56**
P.H.F.	0.81	0.73	**0.84**	0.59	0.73	**0.82**

Prepared by: Field Data Services of Arizona/Veracity Traffic Group (520) 316-6745

Volumes for: Saturday, September 17, 2022 City: Riverside Project #: 22-1548-003

Location: Ryan Bonamino Park Eastern Driveway

AM Period	NB		SB		EB	WB		PM Period	NB		SB		EB	WB	
00:00	0		0					12:00	9		3				
00:15	0		0					12:15	7		3				
00:30	0		1					12:30	7		4				
00:45	0	0	0	1			1	12:45	6	29	4	14			43
01:00	1		0					13:00	9		1				
01:15	0		0					13:15	4		5				
01:30	0		0					13:30	6		1				
01:45	0	1	0	0			1	13:45	5	24	5	12			36
02:00	1		0					14:00	7		2				
02:15	0		0					14:15	2		2				
02:30	0		0					14:30	6		3				
02:45	0	1	0	0			1	14:45	4	19	1	8			27
03:00	0		0					15:00	9		1				
03:15	0		0					15:15	6		1				
03:30	0		0					15:30	6		5				
03:45	0	0	0	0				15:45	6	27	3	10			37
04:00	0		0					16:00	5		4				
04:15	1		0					16:15	4		4				
04:30	0		1					16:30	5		4				
04:45	1	2	1	2			4	16:45	6	20	4	16			36
05:00	0		2					17:00	4		5				
05:15	2		1					17:15	3		4				
05:30	4		4					17:30	0		4				
05:45	4	10	5	12			22	17:45	1	8	6	19			27
06:00	3		6					18:00	3		6				
06:15	2		8					18:15	3		6				
06:30	4		6					18:30	2		5				
06:45	5	14	6	26			40	18:45	4	12	3	20			32
07:00	6		6					19:00	11		5				
07:15	9		6					19:15	3		9				
07:30	8		11					19:30	6		4				
07:45	7	30	12	35			65	19:45	7	27	2	20			47
08:00	11		8					20:00	3		2				
08:15	9		8					20:15	1		2				
08:30	10		7					20:30	2		4				
08:45	9	39	8	31			70	20:45	1	7	1	9			16
09:00	11		9					21:00	0		2				
09:15	11		10					21:15	0		1				
09:30	11		9					21:30	0		3				
09:45	10	43	8	36			79	21:45	0	0	0	6			6
10:00	13		9					22:00	2		1				
10:15	9		6					22:15	1		2				
10:30	7		7					22:30	0		1				
10:45	9	38	7	29			67	22:45	1	4	0	4			8
11:00	10		4					23:00	0		1				
11:15	7		3					23:15	1		1				
11:30	13		3					23:30	0		0				
11:45	7	37	3	13			50	23:45	0	1	0	2			3
Total Vol.		215		185			**400**			178		140			**318**

GPS Coordinates: 33.976813, -117.393149

Daily Totals

NB	SB	EB	WB	Combined
393	325			**718**

	AM			PM		
Split %	53.8%	46.3%	**55.7%**	56.0%	44.0%	**44.3%**
Peak Hour	09:15	07:30	**09:15**	12:00	17:45	**19:00**
Volume	45	39	**81**	29	23	**47**
P.H.F.	0.87	0.81	**0.92**	0.81	0.96	**0.73**

SANDAG Trip Generation Rates

(NOT SO)

BRIEF GUIDE OF VEHICULAR TRAFFIC GENERATION RATES FOR THE SAN DIEGO REGION

APRIL 2002

SANDAG
401 B Street, Suite 800
San Diego, California 92101
(619) 699-1900 • Fax (619) 699-1950

NOTE: This listing only represents a ***guide*** of average, or estimated, traffic generation "driveway" rates and some very general trip data for land uses (emphasis on acreage and building square footage) in the San Diego region. These rates (both local and national) are subject to change as future documentation becomes available, or as regional sources are updated. For more specific information regarding traffic data and trip rates, please refer to the San Diego Traffic Generators manual. ***Always check with local jurisdictions for their preferred or applicable rates.***

LAND USE	TRIP CATEGORIES [PRIMARY:DIVERTED:PASS-BY][P]	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio) Between 6:00-9:30 A.M.		Between 3:00-6:30 P.M.		TRIP LENGTH (Miles)[L]
AGRICULTURE (Open Space)	[80:18:2]	2/acre**					10.8
AIRPORT	[78:20:2]						12.5
Commercial		60/acre, 100/flight, 70/1000 sq. ft.* **	5%	(6:4)	6%	(5:5)	
General Aviation		6/acre, 2/flight, 6/based aircraft* **	9%	(7:3)	15%	(5:5)	
Heliports		100/acre**					
AUTOMOBILE[S]							
Car Wash							
Automatic		900/site, 600/acre**	4%	(5:5)	9%	(5:5)	
Self-serve		100/wash stall**	4%	(5:5)	8%	(5:5)	
Gasoline	[21:51:28]						2.8
with/Food Mart		160/vehicle fueling space**	7%	(5:5)	8%	(5:5)	
with/Food Mart & Car Wash		155/vehicle fueling space**	8%	(5:5)	9%	(5:5)	
Older Service Station Design		150/vehicle fueling space, 900/station**	7%	(5:5)	9%	(5:5)	
Sales (Dealer & Repair)		50/1000 sq. ft., 300/acre, 60/service stall* **	5%	(7:3)	8%	(4:6)	
Auto Repair Center		20/1000 sq. ft., 400/acre, 20/service stall*	8%	(7:3)	11%	(4:6)	
Auto Parts Sales		60/1000 sq. ft. **	4%		10%		
Quick Lube		40/service stall**	7%	(6:4)	10%	(5:5)	
Tire Store		25/1000 sq. ft., 30/service stall**	7%	(6:4)	11%	(5:5)	
CEMETERY		5/acre*					
CHURCH (or Synagogue)	[64:25:11]	9/1000 sq. ft., 30/acre** (quadruple rates for Sunday, or days of assembly)	5%	(6:4)	8%	(5:5)	5.1
COMMERCIAL/RETAIL[S]							
Super Regional Shopping Center (More than 80 acres, more than 800,000 sq. ft., w/usually 3+ major stores)		35/1000 sq. ft.,[C] 400/acre*	4%	(7:3)	10%	(5:5)	
Regional Shopping Center (40-80acres, 400,000-800,000 sq. ft., w/usually 2+ major stores)	[54:35:11]	50/1000 sq. ft.,[C] 500/acre*	4%	(7:3)	9%	(5:5)	5.2
Community Shopping Center (15-40 acres, 125,000-400,000 sq. ft., w/usually 1 major store, detached restaurant(s), grocery and drugstore)	[47:31:22]	80/1000 sq. ft., 700/acre* **	4%	(6:4)	10%	(5:5)	3.6
Neighborhood Shopping Center (Less than 15 acres, less than 125,000 sq. ft., w/usually grocery & drugstore, cleaners, beauty & barber shop, & fast food services)		120/1000 sq. ft., 1200/acre* **	4%	(6:4)	10%	(5:5)	
Commercial Shops	[45:40:15]						
Specialty Retail/Strip Commercial		40/1000 sq. ft., 400/acre*	3%	(6:4)	9%	(5:5)	4.3
Electronics Superstore		50/1000 sq. ft**			10%	(5:5)	
Factory Outlet		40/1000 sq. ft.**	3%	(7:3)	9%	(5:5)	
Supermarket		150/1000 sq. ft., 2000/acre* **	4%	(7:3)	10%	(5:5)	
Drugstore		90/1000 sq. ft.**	4%	(6:4)	10%	(5:5)	
Convenience Market (15-16 hours)		500/1000 sq. ft.**	8%	(5:5)	8%	(5:5)	
Convenience Market (24 hours)		700/1000 sq. ft.**	9%	(5:5)	7%	(5:5)	
Convenience Market (w/gasoline pumps)		850/1000 sq. ft., 550/vehicle fueling space**	6%	(5:5)	7%	(5:5)	
Discount Club		60/1000 sq. ft., 600/acre* **	1%	(7:3)	9%	(5.5)	
Discount Store		60/1000 sq. ft., 600/acre**	3%	(6:4)	8%	(5:5)	
Furniture Store		6/1000 sq. ft., 100/acre**	4%	(7:3)	9%	(5:5)	
Lumber Store		30/1000 sq. ft., 150/acre**	7%	(6:4)	9%	(5:5)	
Home Improvement Superstore		40/1000 sq. ft.**	5%	(6:4)	8%	(5:5)	
Hardware/Paint Store		60/1000 sq. ft., 600/acre**	2%	(6:4)	9%	(5:5)	
Garden Nursery		40/1000 sq. ft., 90/acre**	3%	(6:4)	10%	(5:5)	
Mixed Use: Commercial (w/supermarket)/Residential		110/1000 sq. ft., 2000/acre* (commercial only) 5/dwelling unit, 200/acre* (residential only)	3% 9%	(6:4) (3:7)	9% 13%	(5:5) (6:4)	
EDUCATION							
University (4 years)	[91:9:0]	2.4/student, 100 acre*	10%	(8:2)	9%	(3:7)	8.9
Junior College (2 years)	[92:7:1]	1.2/student, 24/1000 sq. ft., 120/acre* **	12%	(8:2)	9%	(6:4)	9.0
High School	[75:19:6]	1.3/student, 15/1000 sq. ft., 60/acre* **	20%	(7:3)	10%	(4:6)	4.8
Middle/Junior High	[63:25:12]	1.4/student, 12/1000 sq. ft. 50/acre**	30%	(6:4)	9%	(4:6)	5.0
Elementary	[57:25:10]	1.6/student, 14/1000 sq. ft., 90/acre* **	32%	(6:4)	9%	(4:6)	3.4
Day Care	[28:58:14]	5/child, 80/1000 sq. ft.**	17%	(5:5)	18%	(5:5)	3.7
FINANCIAL[S]	[35:42:23]						3.4
Bank (Walk-In only)		150/1000 sq. ft., 1000/acre* **	4%	(7:3)	8%	(4:6)	
with Drive-Through		200/1000 sq. ft., 1500/acre*	5%	(6:4)	10%	(5:5)	
Drive-Through only		250 (125 one-way)/lane*	3%	(5:5)	13%	(5:5)	
Savings & Loan		60/1000 sq. ft., 600/acre**	2%		9%		
Drive-Through only		100 (50 one-way)/lane**	4%		15%		
HOSPITAL	[73:25:2]						8.3
General		20/bed, 25/1000 sq. ft., 250/acre*	8%	(7:3)	10%	(4:6)	
Convalescent/Nursing		3/bed**	7%	(6:4)	7%	(4:6)	
INDUSTRIAL							
Industrial/Business Park (commercial included)	[79:19:2]	16/1000 sq. ft., 200/acre* **	12%	(8:2)	12%	(2:8)	9.0
Industrial Park (no commercial)		8/1000 sq. ft., 90/acre**	11%	(9:1)	12%	(2:8)	
Industrial Plant (multiple shifts)	[92:5:3]	10/1000 sq. ft., 120/acre*	14%	(8:2)	15%	(3:7)	11.7
Manufacturing/Assembly		4/1000 sq. ft., 50/acre**	19%	(9:1)	20%	(2:8)	
Warehousing		5/1000 sq. ft., 60/acre**	13%	(7:3)	15%	(4:6)	
Storage		2/1000 sq. ft., 0.2/vault, 30/acre*	6%	(5:5)	9%	(5:5)	
Science Research & Development		8/1000 sq. ft., 80/acre*	16%	(9:1)	14%	(1:9)	
Landfill & Recycling Center		6/acre	11%	(5:5)	10%	(4:6)	

(OVER)

LAND USE	TRIP CATEGORIES [PRIMARY:DIVERTED:PASS-BY][P]	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio) Between 6:00-9:30 A.M.		Between 3:00-6:30 P.M.		TRIP LENGTH (Miles)[L]
LIBRARY	[44:44:12]	50/1000 sq. ft., 400/acre**	2%	(7:3)	10%	(5:5)	3.9
LODGING	[58:38:4]						7.6
Hotel (w/convention facilities/restaurant)		10/occupied room, 300/acre	6%	(6:4)	8%	(6:4)	
Motel		9/occupied room, 200/acre*	8%	(4:6)	9%	(6:4)	
Resort Hotel		8/occupied room, 100/acre*	5%	(6:4)	7%	(4:6)	
Business Hotel		7/occupied room**	8%	(4:6)	9%	(6:4)	
MILITARY	[82:16:2]	2.5/military & civilian personnel*	9%	(9:1)	10%	(2:8)	11.2
OFFICE							
Standard Commercial Office (less than 100,000 sq. ft.)	[77:19:4]	20/1000 sq. ft.,[O] 300/acre*	14%	(9:1)	13%	(2:8)	8.8
Large (High-Rise) Commercial Office (more than 100,000 sq. ft., 6+ stories)	[82:15:3]	17/1000 sq. ft.,[O] 600/acre*	13%	(9:1)	14%	(2:8)	10.0
Office Park (400,000+ sq. ft.)		12/1000 sq.ft., 200/acre* **	13%	(9:1)	13%	(2:8)	
Single Tenant Office		14/1000 sq. ft., 180/acre*	15%	(9:1)	15%	(2:8)	8.8
Corporate Headquarters		7/1000 sq. ft., 110/acre*	17%	(9:1)	16%	(1:9)	
Government (Civic Center)	[50:34:16]	30/1000 sq. ft.**	9%	(9:1)	12%	(3:7)	6.0
Post Office							
Central/Walk-In Only		90/1000 sq. ft.**	5%		7%		
Community (not including mail drop lane)		200/1000 sq. ft., 1300/acre*	6%	(6:4)	9%	(5:5)	
Community (w/mail drop lane)		300/1000 sq. ft., 2000/acre*	7%	(5:5)	10%	(5:5)	
Mail Drop Lane only		1500 (750 one-way)/lane*	7%	(5:5)	12%	(5:5)	
Department of Motor Vehicles		180/1000 sq. ft., 900/acre**	6%	(6:4)	10%	(4:6)	
Medical-Dental	[60:30:10]	50/1000 sq. ft., 500/acre*	6%	(8:2)	11%	(3:7)	6.4
PARKS	[66:28:6]		4%		8%		5.4
City (developed w/meeting rooms and sports facilities)		50/acre*	13%	(5:5)	9%	(5:5)	
Regional (developed)		20/acre*					
Neighborhood/County (undeveloped)		5/acre (add for specific sport uses), 6/picnic site* **					
State (average 1000 acres)		1/acre, 10/picnic site**					
Amusement (Theme)		80/acre, 130/acre (summer only)**			6%	(6:4)	
San Diego Zoo		115/acre*					
Sea World		80/acre*					
RECREATION							
Beach, Ocean or Bay	[52:39:9]	600/1000 ft. shoreline, 60/acre*					6.3
Beach, Lake (fresh water)		50/1000 ft. shoreline, 5/acre*					
Bowling Center		30/1000 sq. ft., 300/acre, 30/lane **	7%	(7:3)	11%	(4:6)	
Campground		4/campsite**	4%		8%		
Golf Course		7/acre, 40/hole, 700/course* **	7%	(8:2)	9%	(3:7)	
Driving Range only		70/acre, 14/tee box*	3%	(7:3)	9%	(5:5)	
Marinas		4/berth, 20/acre* **	3%	(3:7)	7%	(6:4)	
Multi-purpose (miniature golf, video arcade, batting cage, etc.)		90/acre	2%		6%		
Racquetball/Health Club		30/1000 sq. ft., 300/acre, 40/court*	4%	(6:4)	9%	(6:4)	
Tennis Courts		16/acre, 30/court**	5%		11%	(5:5)	
Sports Facilities							
Outdoor Stadium		50/acre, 0.2/seat*					
Indoor Arena		30/acre, 0.1/seat*					
Racetrack		40/acre, 0.6 seat*					
Theaters (multiplex w/matinee)	[66:17:17]	80/1000 sq. ft., 1.8/seat, 360/screen*	1/3%		8%	(6:4)	6.1
RESIDENTIAL	[86:11:3]						7.9
Estate, Urban or Rural (average 1-2 DU/acre)		12/dwelling unit *[R]	8%	(3:7)	10%	(7:3)	
Single Family Detached (average 3-6 DU/acre)		10/dwelling unit *[R]	8%	(3:7)	10%	(7:3)	
Condominium (or any multi-family 6-20 DU/acre)		8/dwelling unit *[R]	8%	(2:8)	10%	(7:3)	
Apartment (or any multi-family units more than 20 DU/acre)		6/dwelling unit *[R]	8%	(2:8)	9%	(7:3)	
Military Housing (off-base, multi-family)							
(less than 6 DU/acre)		8/dwelling unit	7%	(3:7)	9%	(6:4)	
(6-20 DU/acre)		6/dwelling unit	7%	(3:7)	9%	(6:4)	
Mobile Home							
Family		5/dwelling unit, 40/acre*	8%	(3:7)	11%	(6:4)	
Adults Only		3/dwelling unit, 20/acre*	9%	(3:7)	10%	(6:4)	
Retirement Community		4/dwelling unit**	5%	(4:6)	7%	(6:4)	
Congregate Care Facility		2.5/dwelling unit**	4%	(6:4)	8%	(5:5)	
RESTAURANT[S]	[51:37:12]						4.7
Quality		100/1000 sq. ft., 3/seat, 500/acre* **	1%	(6:4)	8%	(7:3)	
Sit-down, high turnover		160/1000 sq. ft., 6/seat, 1000/acre* **	8%	(5:5)	8%	(6:4)	
Fast Food (w/drive-through)		650/1000 sq. ft., 20/seat, 3000/acre* **	7%	(5:5)	7%	(5:5)	
Fast Food (without drive-through)		700/1000 sq. ft.**	5%	(6:4)	7%	(5:5)	
Delicatessen (7am-4pm)		150/1000 sq. ft., 11/seat*	9%	(6:4)	3%	(3:7)	
TRANSPORTATION							
Bus Depot		25/1000 sq. ft.**					
Truck Terminal		10/1000 sq. ft., 7/bay, 80/acre**	9%	(4:6)	8%	(5:5)	
Waterport/Marine Terminal		170/berth, 12/acre**					
Transit Station (Light Rail w/parking)		300/acre, $2^{1/2}$/parking space (4/occupied)**	14%	(7:3)	15%	(3:7)	
Park & Ride Lots		400/acre (600/paved acre), 5/parking space (8/occupied)* **	14%	(7:3)	15%	(3:7)	

* Primary source: *San Diego Traffic Generators.*

* Other sources: *ITE Trip Generation Report [6th Edition]*, Trip Generation Rates (other agencies and publications), various SANDAG & CALTRANS studies, reports and estimates.

[P] Trip category percentage ratios are daily from local household surveys, often cannot be applied to very specific land uses, and do not include non-resident drivers (draft SANDAG *Analysis of Trip Diversion*, revised November, 1990):
PRIMARY - one trip directly between origin and primary destination.
DIVERTED - linked trip (having one or more stops along the way to a primary destination) whose distance compared to direct distance ≥ 1 mile.
PASS-BY - undiverted or diverted < 1 mile.

[L] Trip lengths are average weighted for all trips to and from general land use site. (All trips system-wide average length = 6.9 miles)

[C] Fitted curve equation: Ln(T) = 0.502 Ln(x) + 6.945
[O] Fitted curve equation: Ln(T) = 0.756 Ln(x) + 3.950
} T = total trips, x = 1,000 sq. ft.

[R] Fitted curve equation: t = -2.169 Ln(d) + 12.85 t = trips/DU, d = density (DU/acre), DU = dwelling unit

[S] Suggested PASS-BY [undiverted or diverted < 1 mile] percentages for trip rate reductions only during P.M. peak period (based on combination of local data/review and Other sources**):

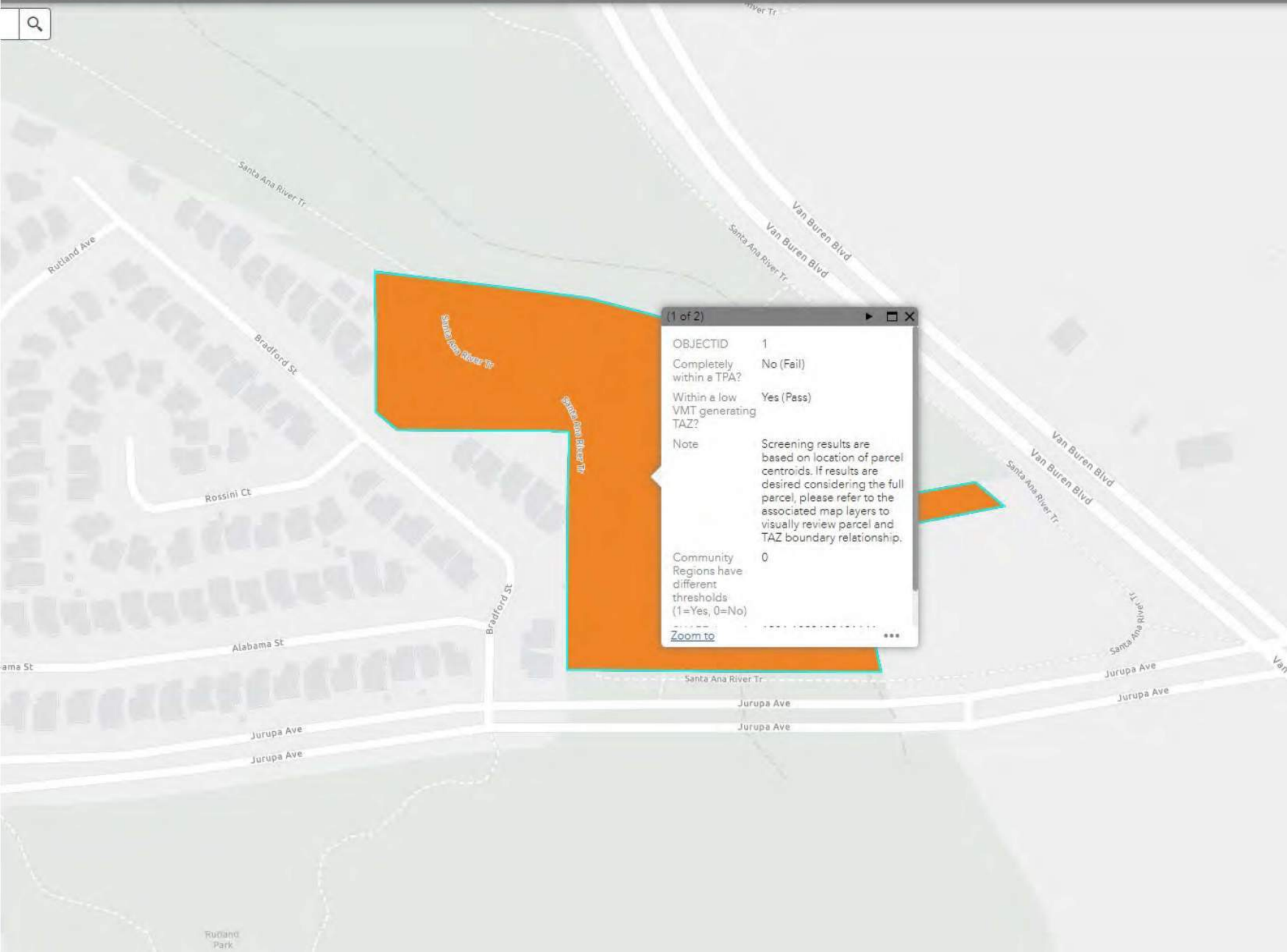
COMMERCIAL/RETAIL	
Regional Shopping Center	20%
Community " "	30%
Neighborhood " "	40%
Specialty Retail/Strip Commercial (other)	10%
Supermarket	40%
Convenience Market	50%
Discount Club/Store	30%
FINANCIAL	
Bank	25%
AUTOMOBILE	
Gasoline Station	50%
RESTAURANT	
Quality	10%
Sit-down high turnover	20%
Fast Food	40%

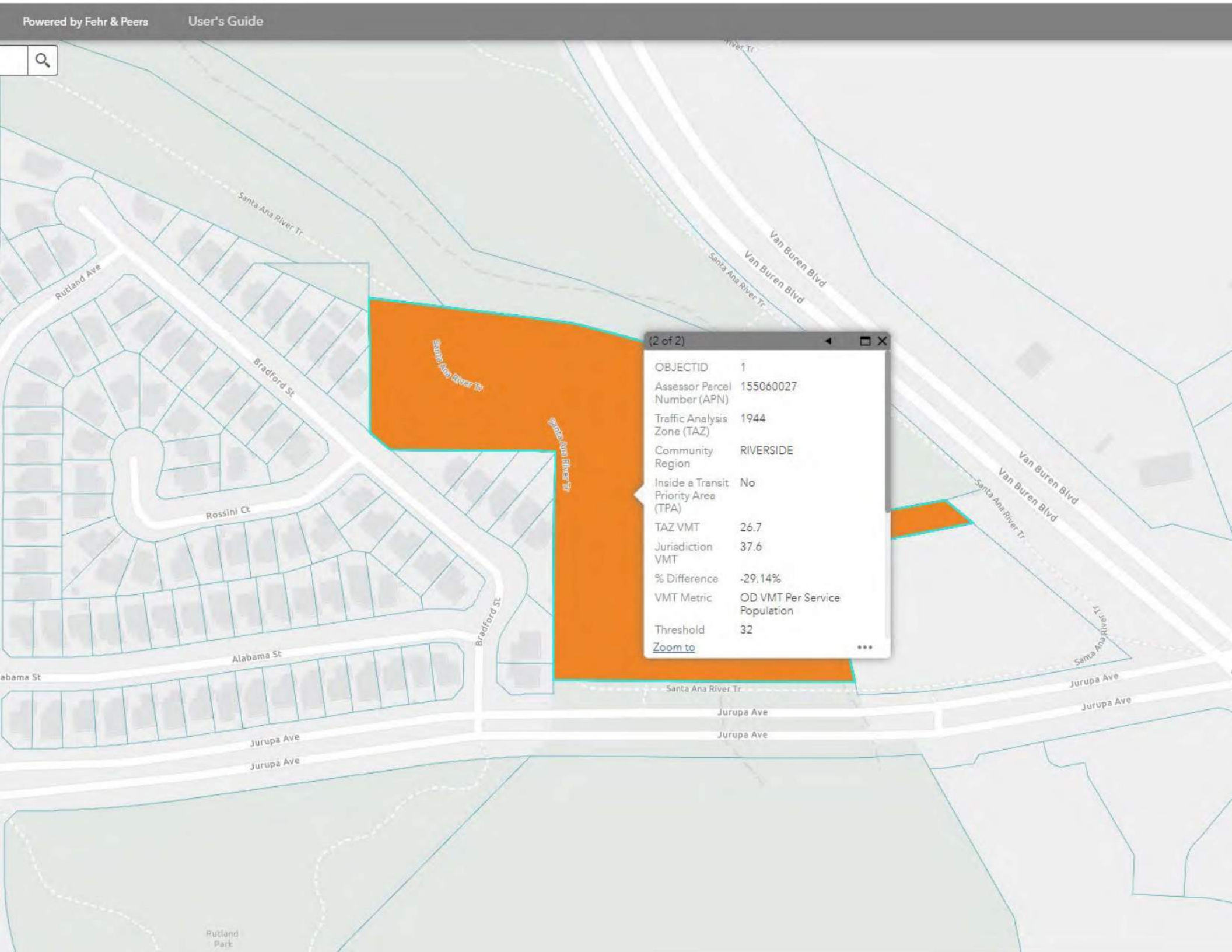
[T] Trip Reductions - In order to help promote regional "smart growth" policies, and acknowledge San Diego's expanding mass transit system, consider vehicle trip rate reductions (with proper documentation and necessary adjustments for peak periods). The following are some examples:

[1] A 5% daily trip reduction for land uses with transit access or near transit stations accessible within 1/4 mile.

[2] Up to 10% daily trip reduction for mixed-use developments where residential and commercial retail are combined (demonstrate mode split of walking trips to replace vehicular trips).

ATTACHMENT C


(1 of 2)
OBJECTID 1
Completely within a TPA? No (Fail)
Within a low VMT generating TAZ? Yes (Pass)
Note Screening results are based on location of parcel centroids. If results are desired considering the full parcel, please refer to the associated map layers to visually review parcel and TAZ boundary relationship.
Community Regions have different thresholds (1=Yes, 0=No) 0
Zoom to
Santa Ana River Tr
Van Buren Blvd
Rutland Ave
Bradford St
Rossini Ct
Alabama St
Jurupa Ave
Rutland Park


Powered by Fehr & Peers
User's Guide
(2 of 2)
OBJECTID 1
Assessor Parcel Number (APN) 155060027
Traffic Analysis Zone (TAZ) 1944
Community Region RIVERSIDE
Inside a Transit Priority Area (TPA) No
TAZ VMT 26.7
Jurisdiction VMT 37.6
% Difference -29.14%
VMT Metric OD VMT Per Service Population
Threshold 32
Zoom to
Santa Ana River Tr
Van Buren Blvd
Rutland Ave
Bradford St
Rossini Ct
Alabama St
Jurupa Ave
Rutland Park

ATTACHMENT D

Figure 3B-17 (CA). Examples of Crosswalk Enhancements at Uncontrolled Multilane Approaches

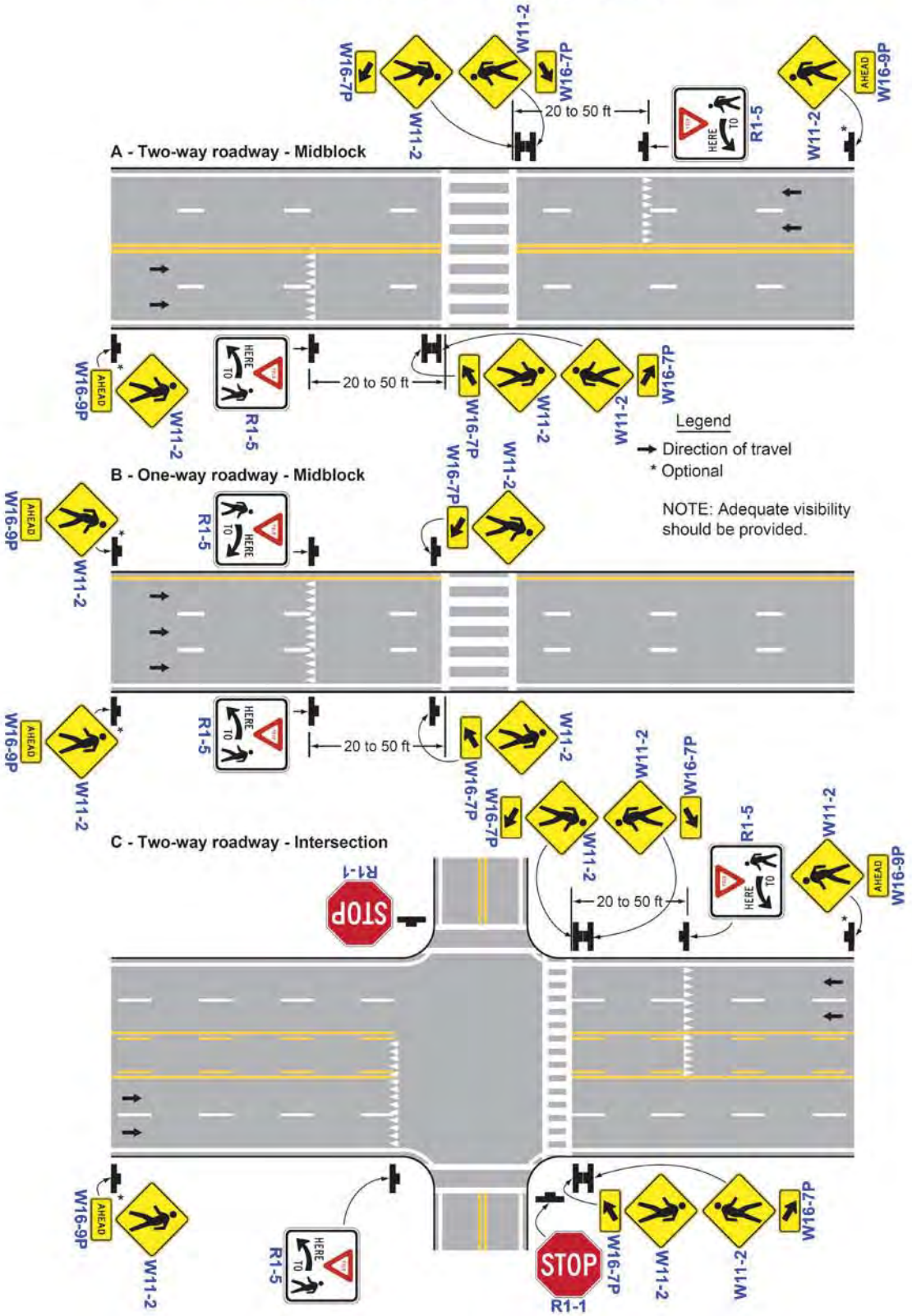


Figure 3B-19. Examples of Crosswalk Markings

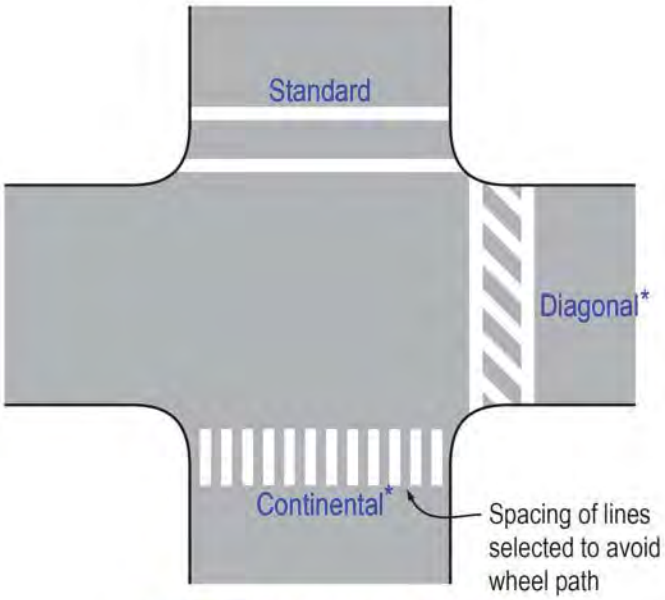


Figure 3B-19 (CA). Examples of Crosswalk Markings

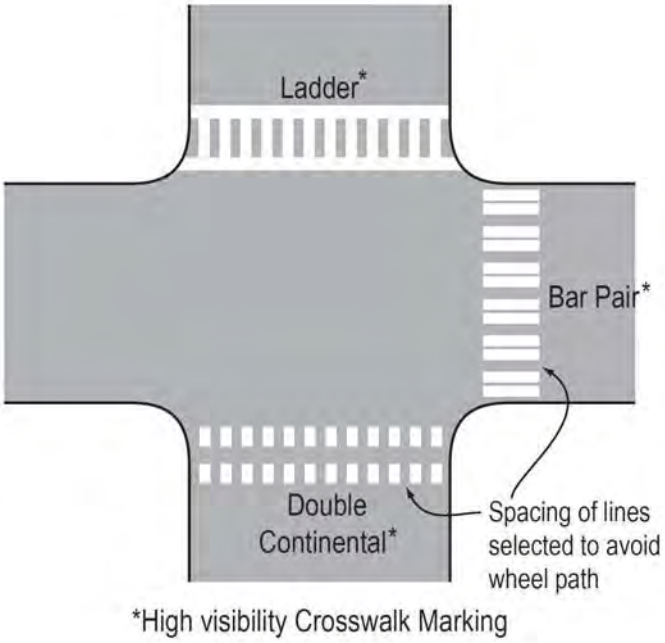
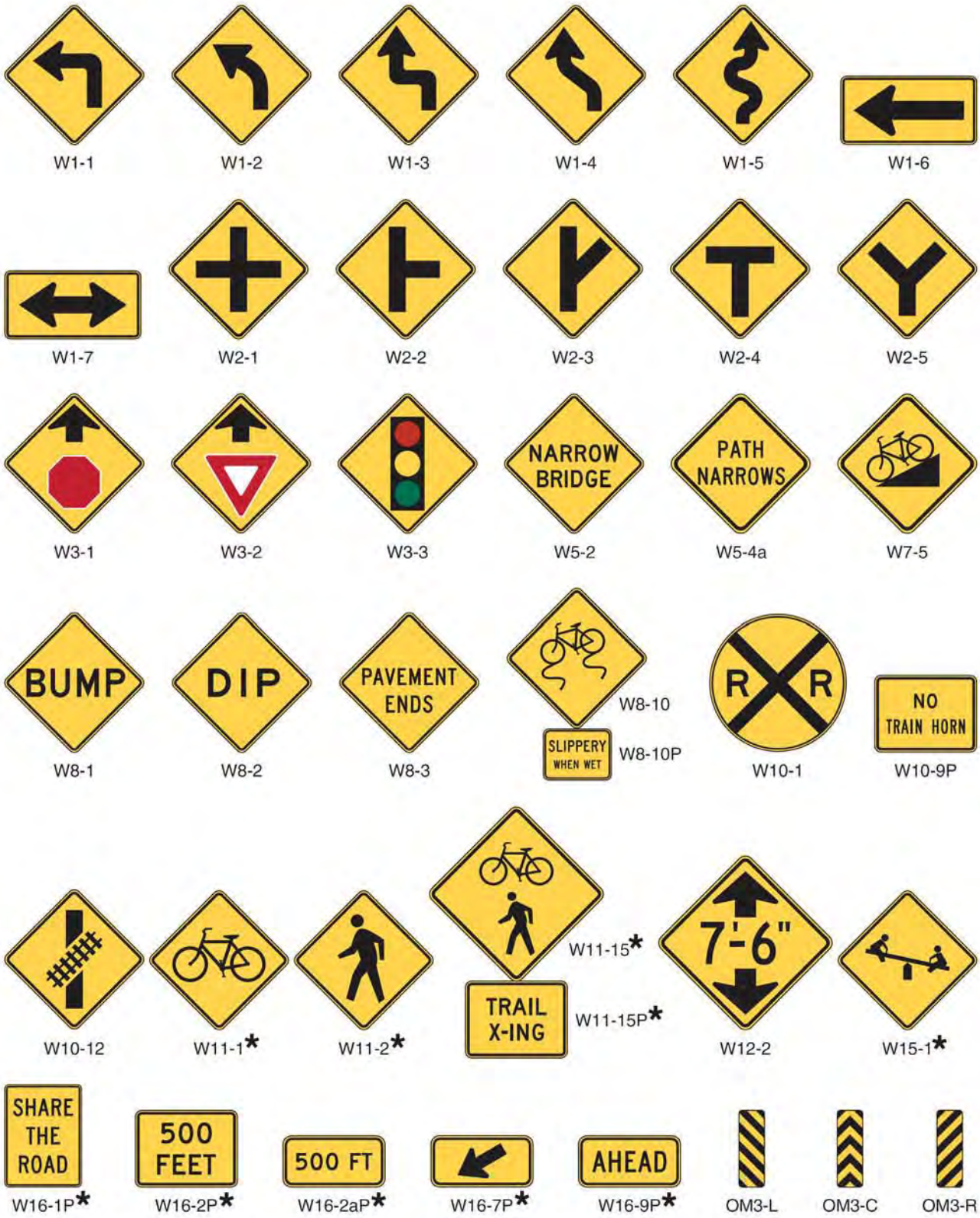


Figure 9B-2. Regulatory Signs and Plaques for Bicycle Facilities

Figure 9B-3. Warning Signs and Plaques and Object Markers for Bicycle Facilities



* A fluorescent yellow-green background color may be used for this sign or plaque. The background color of the plaque should match the color of the warning sign that it supplements.

Figure 9B-7. Examples of Signing and Markings for a Shared-Use Path Crossing

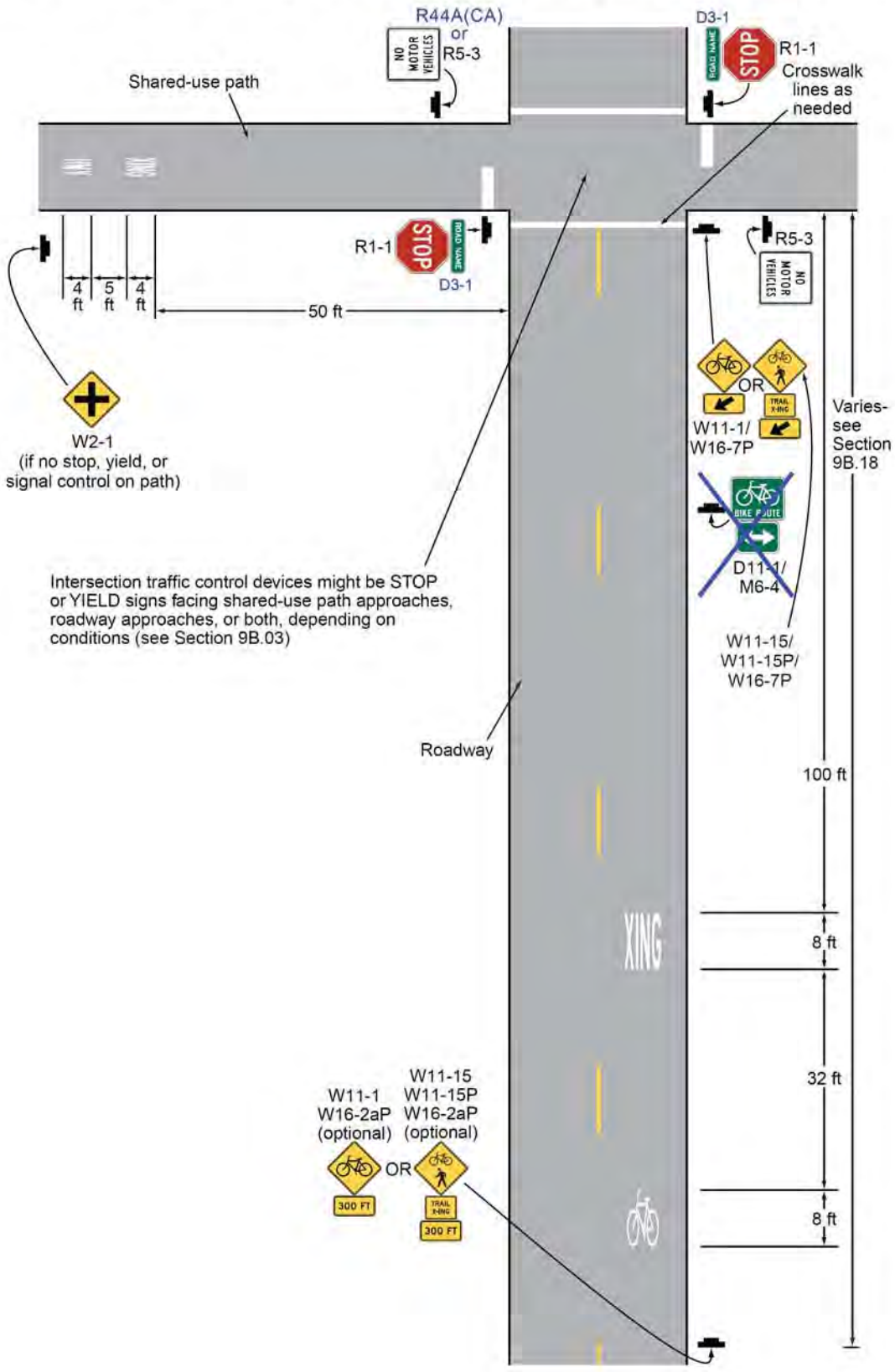
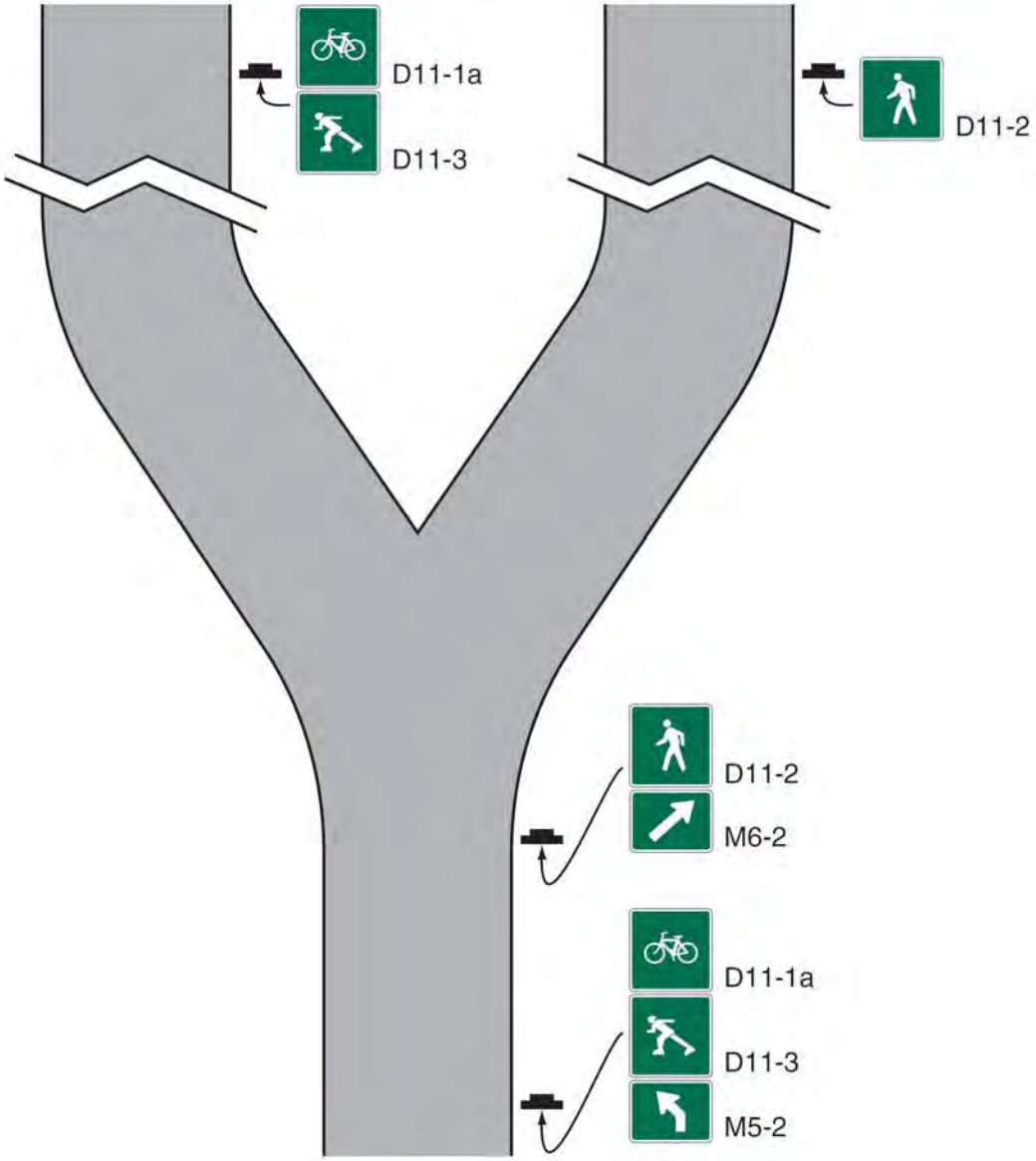


Figure 9B-8. Example of Mode-Specific Guide Signing on a Shared-Use Path



Appendix K

Response to Comments

Comment Letter 1: Mission Grove Neighborhood Alliance LLC (MGNA) – January 2, 2026

Mission Grove Neighborhood Alliance LLC (MGNA)

DATE: January 2, 2026
TO: City of Riverside Planning Commission / Planning Division /City Clerk
Email: ceqa-prcsd@riversideca.gov; asramala@riversideca.gov; city_clerk@riversideca.gov
FROM: Mission Grove Neighborhood Alliance
PROJECT: Public comment for the Riverside Gateway Park CEQA IS/MND projects – SCH # 2025120424; 2025120370; 2025120520; 2025120369
LOCATION: Riverside, CA
RE: Formal Comments and Technical Inquiry Regarding Environmental Documentation

To: Ms. Sramala, City Clerk

Please accept this letter and the attached technical inquiries as formal comments regarding the environmental review documents for the project referenced. As a concerned stakeholder, a review has been conducted of the provided reports to ensure compliance with the **California Environmental Quality Act (CEQA)** and the **City of Riverside's Parks Master Plan.**

It must be noted, the comment period occurring over from December 3rd to January 2nd included two major holidays yet included a comment period of exactly 30 days. The four projects have significant environmental documentation to review and the City of Riverside provided only the minimum notification and a number of the documents to be reviewed are not available for download easily from the website. The announcement was never referenced on the project website www.riversidegatewayparks.com. We ask for an extended comment period to be able to fully review these documents to provide more thorough comments on the projects.

Riverside's unique geography—situated within the South Coast Air Basin and governed by the Western Riverside County MSHCP—demands a level of scrutiny that appears to be missing from the current documentation. Upon detailed analysis, several "red flags" regarding internal consistency, outdated data, and "Strategic Omissions" have been identified.

The attached document contains over **250 technical questions and comments** that remain unanswered or insufficiently addressed in the current reports. These questions cover multiple critical areas of concern,

Under CEQA, a Lead Agency is required to provide a reasoned response to significant environmental points raised in public comments. We look forward to a comprehensive, data-backed response to each of these inquiries before any further action is taken toward project approval.

Thank you,

Lewis Allen, Chair
Mission Grove Neighborhood Alliance
mgna@missiongrovena.org

The **Riverside Gateway Parks Program** highlights critical tensions between the city's broad strategic goals, as defined in the **2020 Park Master Plan (PMP)**, and this specific, large-scale grant-funded initiative.

Based on our review of the project's Technical Reports and Environmental Documents, the following analysis evaluates how the Gateway project aligns—or misaligns—with the PMP and addresses core concerns regarding scope, sustainability, and equity.

1. Alignment with the 2020 Park Master Plan

- **The Equity Gap (Policy PR-1.2):** We find that the project sites do not reside within the "underserved areas" identified in PMP Exhibit 5.1-1 (primarily Wards 2, 3, and 6). While the City argues that the Class I and II bike/pedestrian spine provides "Equity of Access," this creates a "destination park" requiring a commute rather than resolving local park deficits in high-need neighborhoods.
- **Preservation vs. Paving (Policy LU-1):** The project asserts an 80/20 split, with 80% of the 280 acres dedicated to conservation and restoration (e.g., *Arundo* removal at Camp Evans). However, the 20% developed area introduces high-intensity amenities—such as dual roller rinks, a skate park, and a 208-spot parking lot—that exceed the PMP's original scope for the river bottom.
- **Fiscal Sustainability (The Maintenance "Time Bomb"):** The PMP estimates annual maintenance costs at **$4,000 to $10,000 per acre**. For this 250-acre suite, this represents a **$1,000,000+ annual liability** to the General Fund. We note that while construction is funded by a State Coastal Conservancy grant, there is no identified permanent funding source, such as a Community Facilities District, to prevent the rapid degradation of high-maintenance features like permeable paving and restrooms.

2. Project Scope and Commercialization

- **Hydraulic Impact:** We confirm the project does **not** propose filling the river with water or damming it. It focuses on hydrological restoration (clearing Spring Brook) and managed access through overlooks and trails.
- **Commercial Activity:** The project is not a retail district but does include a **Concession Area Hub** at Tequesquite North for food, beverages, and bike repairs. These "amenity anchors" are intended to generate small-scale revenue and provide "eyes on the park" for safety.
- **Intensity of Use:** This is not merely a trail improvement project. The introduction of archery ranges at Camp Evans, a 16-foot elevation "Grand Stair" at Loring Park, and capacity-heavy roller rinks signifies a shift toward active regional recreation.

3. Operational and Environmental "Red Flags"

Pending any approval, we have identified several critical vulnerabilities:

- **Maintenance Funding Gap:** There is no clear evidence of a Long-Term Operations Endowment. Without one, the project violates the PMP's mandate for "cost-effective" enhancement.
- **Outdated Biological Data:** The reliance on **2016 and 2018 biological survey data** is a significant risk. Because riparian environments are dynamic, using decade-old data to

plan construction in endangered species habitats (e.g., Least Bell's Vireo) creates substantial litigation and delay risks.

- **Hydrological Disconnect:** While the project identifies "mulefat die-off" and refuse clogging Spring Brook, we find that a more detailed **Dredging and Hydromodification Plan** is required to ensure restoration efforts do not result in flood hazards or mosquito-breeding grounds.

4. Alternatives and Maintenance Requirements

- **Formal Alternatives:** The primary alternative considered was the **No Project Alternative**, which would leave the 250 acres in their current underutilized and potentially degrading state.
- **Mitigation Requirements (MMRP):** The project is bound by strict environmental maintenance, including daily dust control (AQ-SC-1), stormwater management (HAZ-BMP-1), and biological performance standards for forest restoration.
- **Infrastructure Strategy:** To reduce wear, the design includes a **12-foot wide decomposed granite walking path** separate from the bike path. Additionally, the **208-spot parking lot** will utilize permeable paving to manage drainage, though this requires specialized vacuum-sweeping maintenance to remain functional.

Summary

While the project successfully "puts the River back in Riverside," it leans heavily into active recreation at the potential expense of fiscal sustainability. **We recommend that the City provide a comprehensive Fiscal Impact Analysis** to prove that this $1M+ annual maintenance burden will not divert resources from the underserved neighborhoods prioritized in the 2020 Park Master Plan. Furthermore, biological surveys must be updated to reflect current site conditions before moving forward.

TECHNICAL COMMENT INDEX:
RIVERSIDE GATEWAY PARKS PROGRAM

Project Sites: Camp Evans, Loring Park, Tequesquite North/South, Martha McLean Anza Narrows

Jurisdiction: City of Riverside, CA

Public Review Period: December 3, 2025 – January 2, 2026

PHASE 1: AUDIT OF DISCREPANCIES

ID	Document Reference	Identified Inconsistency/Fact-Error
F-01	Tequesquite MMRP vs. NOI	The **MMRP** is dated **September 2025**, but the **Notice of Intent** lists a review period closing **January 2, 2026**. This implies the mitigation plan was finalized before public comments was legally closed.
F-02	Camp Evans NOI (p. 1)	The NOI defines the site as **100 acres**, yet technical surveys focus on smaller "disturbed" footprints without reconciling the total 100-acre impact.
F-03	All Project NOIs	The City cites the **"non-existence of hazardous waste sites"** but does not provide or cite the specific Phase I ESA reports for these historical landfill-adjacent zones.
F-04	Cultural Technical Report	**ICF-LE-004 (Spring Brook)** is recommended as "Not a Historical Resource" despite its 1924 association with the founding of Lake Evans and the City's citrus-era hydrology.
F-05	Jurisdictional Delineation	Wetland data forms (e.g., SP ADFR-16) rely on **2016 sampling dates**, which are nearly a decade old and fail to reflect current hydrology after recent record rainfall.

PHASE 2: THE INQUIRY 250 Questions

I. Aesthetics, Light Pollution & Historic Heritage (Questions 1–25)

1. How does the project protect the "Citrus Heritage" aesthetic defined in the Riverside General Plan?
2. What is the specific lumens-per-acre limit for new safety lighting along the Santa Ana River Trail?
3. Does the lighting plan utilize directional shielding to prevent skyglow in the Mount Rubidoux Historic District?
4. Will the "Nature Walk" include physical barriers to prevent light spill into nocturnal riparian habitats?
5. How does the 12' wide decomposed granite path impact the "natural state" preservation efforts of Martha McLean?
6. Is the "Secondary Lookout" at Loring Park designed to be graffiti-resistant without the use of chemical coatings?
7. How will the "Interpretive Native Gardens" be protected from social-trail erosion?
8. Will the "Grand Stairs" at Loring Park include anti-skateboarding hardware to prevent noise and damage?
9. Does the "Botanical Walk" utilize exclusively local-genotype seeds from the Santa Ana River watershed?
10. What is the plan for preserving the "Historic Marker" currently on-site at Martha McLean during grading?
11. How will the "Safety Lighting" be timed to minimize disruption to the circadian rhythms of local riparian wildlife?
12. What specific materials will be used for the "Nature Walk" to ensure they blend with the natural Alluvial Fan Sage Scrub?
13. Is there a visual impact study from the perspective of the historic Indian Hill residential neighborhood?
14. How does the project mitigate the "industrial viewshed" of the adjacent train tracks at Martha McLean?
15. Will the "Entry Plaza" at Loring Park incorporate historic Riverside "Raincross" symbolism as per city branding guidelines?
16. Does the "16 FT height" of the terraced seating at Loring Park obstruct any protected view corridors?
17. How will "specimen tree planting" be used to screen the Tequesquite North parking lot from the Greenway?
18. What is the reflectivity index (Albedo) of the materials chosen for the "Grand Stairs"?
19. How will the project ensure that "safety lighting" does not result in light trespass onto private residential ladera properties?
20. Will the "Shaded Overlook" structures be constructed using non-reflective, earth-toned materials?

21. Does the aesthetic plan for the "Nature Trails" allow for seasonal color changes typical of native Riverside flora?
22. How will the "Fitness Trail" exercise loop be marked to avoid a "high-intensity gym" aesthetic in a natural area?
23. What is the maintenance plan for removing graffiti from native boulders used in the design?
24. Are the "interpretive signs" designed to be weather-resistant without adding "visual clutter" to the river landscape?
25. How does the project reconcile "Safety Lighting" with Riverside's Dark Sky initiatives?

II. Air Quality & Greenhouse Gases (Questions 26–50)

26. How do construction emissions reconcile with **SCAQMD Rule 403** regarding daily watering of "exposed ground"?
27. Why is there no specific quantification of localized PM2.5 impacts for receptors on Indian Hill Road?
28. Does the GHG analysis account for carbon sequestration loss from removing "dense vegetation" at Camp Evans?
29. Will the 208 parking spots at Tequesquite North use "cool pavement" to mitigate the Urban Heat Island effect?
30. How will "track-out" of dust be monitored daily for the duration of the multi-year program?
31. What is the VOC limit for architectural coatings used on the "Concession Area Hub"?
32. Does the project include electrical hookups for food trucks to prevent diesel idling?
33. How will the 7% annual escalation in costs affect the quality of air-filtration systems for park restrooms?
34. What is the cumulative GHG impact of the 250-acre suite when combined with the nearby Tequesquite South expansion?
35. Will Tier 4 Final engines be mandated for all heavy grading equipment to reduce NOx emissions?
36. How will the project mitigate the "dust bowl" effect if grading occurs during Riverside's Santa Ana wind events?
37. Does the air quality model account for the "mobile source emissions" from the 208 new parking spaces?
38. Is there a plan to install EV charging stations in the new Tequesquite parking lot to offset park-visitor GHG?
39. How will the loss of "Riparian, marsh, and grassland" (page 45) be quantified in terms of metric tons of CO2?
40. Does the project follow the 2021 CARB Global Warming Potential (GWP) standards cited in Table VIII-1?
41. How will the project monitor VOC emissions from "colorants" used in the new play court surfaces (AQ-SC-2)?
42. What is the proximity of the nearest "sensitive receptor" (schools/hospitals) to the primary grading sites?
43. Will the project utilize "electric" landscaping equipment for long-term maintenance after construction?

44. How does the project align with Riverside's "Sustainable City" GHG reduction targets?
45. Does the dust control plan include "wind fencing" for the high-wind corridor of the Santa Ana River?
46. What are the specific "odorous" impacts of dredging or clearing the stagnant pond areas at Hidden Valley?
47. How will the City ensure that "haul trucks" are covered as per AQ-SC-1 when leaving the site?
48. Is there a "Green Construction Policy" that favors local Riverside labor to reduce VMT/emissions?
49. How often will the "VOC Specification Submittals" be audited by an independent third party?
50. Does the 3°C global warming projection for 2100 (Part 1, p. 1) change the choice of drought-tolerant species?

III. Biological Resources & MSHCP (Questions 51–75)

51. Given the 2022 survey dates, what is the protocol for "pre-construction surveys" for Burrowing Owls?
52. How does the project comply with MSHCP Section 6.1.2 regarding the Santa Ana River riparian corridor?
53. What specific "performance standards" define the success of the proposed "forest restoration"?
54. How will the "biological avoidance zone" at Hole Lake be physically delineated during construction?
55. Does the plan for "invasive species clearing" include 5-year monitoring for *Arundo donax* re-growth?
56. How will the "Arroyo Chub" be protected from siltation during the "access point" construction at the river?
57. Why was the "Cooper's Hawk" and "Sharp-shinned Hawk" habitat (Part 3, p. 15) not specifically mitigated for nesting loss?
58. Is there a "Wildlife Corridor" analysis to ensure the new fences do not trap large mammals against the river?
59. How will the "Mulefat die-off" (Photo Point PP HV-17) be addressed—is it a water table or pathogen issue?
60. Does the "Native Garden Buffer" include host plants for the endangered Delhi Sands Flower-loving Fly?
61. What is the frequency of "nesting bird surveys" during the February–August breeding window?
62. How will the "Santa Ana River Wooly Star" (surveyed in 2018) be protected from increased public foot traffic?
63. Will the "Equestrian Rest Stop" include facilities to prevent horse waste from contaminating the riparian scrub?
64. Does the "2.5-mile exercise loop" trail infringe on known "Criteria Cells" for the MSHCP?
65. What is the buffer distance between the "Dog Park" (if any) and the Least Bell's Vireo habitat?

66. How will the project handle the removal of non-native *Washingtonia robusta* palms without damaging nearby willows?
67. Does the project include a "Seed Collection Plan" to preserve the genetic integrity of Riverside's local willows?
68. How will "noise" from the roller rinks impact the sonar/foraging of local bat species?
69. Is there a "Restoration Ecologist" on the responsible party list for long-term native plant success?
70. What is the mitigation for the loss of "Alluvial Fan Sage Scrub" at the Tequesquite North site?
71. Will the "Separated Walking Path" use materials that are non-toxic to amphibians crossing from the river?
72. How will the project prevent "human-wildlife conflict" (coyotes/mountain lions) encouraged by new park debris?
73. Is there a plan for "Light Shielding" to prevent disorienting migrating birds along the Santa Ana flyway?
74. How will "trash and food waste" be managed to prevent an increase in "subsidized predators" like ravens/crows?
75. Does the MSHCP "consistency analysis" include the impact of the newly proposed Water Play Area"?

IV. Cultural & Tribal Resources (Questions 76–100)

76. Why was the "Spring Brook" feature (ICF-LE-004) dismissed despite its connection to the 1924 Lake Evans?
77. What is the contingency plan if "buried Native American resources" are found 1 meter below the surface?
78. How can the City conclude "Less Than Significant Impact" while five tribes (Cahuilla, Gabrieleno, etc.) have not concluded consultation?
79. Will a qualified Native American monitor be present for all initial ground-disturbing activities across all 250 acres?
80. Does the report evaluate "Spring Rancheria" (P-33-000678) for cumulative impacts from increased foot traffic?
81. How will the "Ten previously recorded archaeological sites" (Part 8, p. 8) be protected from "looting" once trails are opened?
82. Does the project include "Cultural Sensitivity Training" for all construction contractors?
83. What is the specific protocol for a "Discovery of Human Remains" as per California Health and Safety Code 7050.5?
84. Why was the "Boy Scout Camp Evans" (RGW-ICF-001) found ineligible for the CRHR despite its local social history?
85. How will the "1931 Aerial Photograph" soil intactness (Part 11, p. 99) be preserved during heavy grading?
86. Does the project utilize "Ground Penetrating Radar" (GPR) in areas where buried stone artifacts were previously found?
87. How will the "historic neighborhoods" near Tequesquite be protected from construction-related vibration?

88. Will the "Interpretive Native Gardens" include signage created in collaboration with the local Kizh or Soboba tribes?
89. Is there a plan to protect "Water Conveyance Features" that may still have functional or historic value?
90. What is the "Mitigation Measure" for the two previously recorded isolates (P-33-017330)?
91. How does the project account for "Cumulative Cultural Impacts" in the Santa Ana River bottom?
92. Does the "Native American Coordination" (Appendix B) include a summary of the tribes' specific concerns?
93. How will the City handle "confidentiality" of sensitive tribal site locations during the public review process?
94. Is there a "Curation Agreement" for artifacts recovered during the Monitoring phase?
95. What happens if a "Historical Resource" is discovered that would require project re-design?
96. How will the "Loring Park Building" (P-33-028013) be protected from the "Grand Stair" construction?
97. Does the project include a "Historic American Building Survey" (HABS) for features slated for removal?
98. How will "Tribal Cultural Resources" (TCR) be defined—as per the City or as per the Tribal Governments?
99. Is the "Archaeological Monitoring Research Design" (AMRD) available for public technical review?
100. How does the project reconcile the 1960s activism of Martha McLean with the proposed "modern" improvements?

V. Hydrology & Water Quality (Questions 101–125)

101. Why are **2016 sampling dates** (SP ADFR-16) considered valid for current wetland hydrology determinations?
102. How will the "permeable paving" at Tequesquite North be maintained to prevent clogging from fine Riverside dust?
103. Does the SWPPP include specific erosion controls for "Dello loamy fine sand" (Soil Map Unit name)?
104. How will the project manage stormwater runoff from the new bike path toward the Hidden Valley Wetlands?
105. What is the impact of the "SART Reroute" on existing drainage patterns toward the river?
106. Will the "Water Play Area" at Tequesquite North use recirculated or potable "one-pass" water?
107. How will the project prevent "track-out" of silt from the "Anza Drain" during construction?
108. Does the hydrology analysis account for the "Ordinary High Water Mark" changes after the 2024 floods?
109. How will "Crayfish Burrows" (Indicator C8) be handled if they indicate a high water table during grading?

110. Will the project install "Bioswales" to treat runoff from the new 208-spot parking lot?
111. How will "Salt Crust" (Indicator B11) be managed to prevent soil toxicity for native plants?
112. Does the "Stormdrain Outfall" at Martha McLean require an individual Section 404 permit from the USACE?
113. What is the contingency for "Groundwater Dewatering" if construction hits the water table at 3 feet?
114. How will the project monitor "Total Suspended Solids" (TSS) in the Santa Ana River during river-access grading?
115. Does the "WQMP" (Water Quality Management Plan) include long-term maintenance funding?
116. Is there a risk of "Hydrogen Sulfide Odor" (Indicator C1) during the excavation of the old pond areas?
117. How will "Oxidized Rhizospheres" (Indicator C3) be preserved to maintain soil health?
118. What is the specific "Best Management Practice" (HAZ-BMP-1) for handling hydraulic leaks from heavy equipment?
119. Will the project use "Low Impact Development" (LID) features to capture 100% of on-site runoff?
120. How will the "Nature Walk" depressions handle "standing water" and potential vector (mosquito) issues?
121. Does the hydrology report evaluate the "Riverside-Arlington Groundwater Basin" impacts?
122. How will "Biotic Crust" (Indicator B12) be salvaged or replaced in restored areas?
123. Is the "Aquatic Invertebrate" (Indicator B13) population being monitored as a baseline for river health?
124. What is the specific impact of the "Earthen Berm" on local sheet-flow drainage?
125. How will the City prevent "Trash and Debris" from entering the storm drains during the construction of the "Play Meadows"?

VI. Social, Economic & Infrastructure (Questions 126–150)

126. How will the City manage "frequent conflicts" between cyclists and vehicles at Tequesquite Avenue?
127. Does the 20% Construction Management fee account for the MSHCP-required biological monitor?
128. What is the plan for "emergency access" to the internal Cottonwood Trail for Fire Department vehicles?
129. How will the 13,768 residents within a mile of Martha McLean be protected from construction noise/dust?
130. Does the 208-spot parking lot accommodate the 180-person peak capacity of the dual roller rinks?
131. Will the "Concession Area Hub" create a competitive disadvantage for existing small businesses in Arlanza?
132. Is there a "Security Plan" for the new parks to prevent illegal activity in the unlit trail sections?

133. How will the project manage "Illegal Dumping" at the new trailhead at Gregory and Tequesquite?
134. Does the "Opinion of Probable Cost" account for the 12% Prevailing Wage requirement (Part 3, p. 1)?
135. How will the project ensure "Equitable Access" for residents who do not own vehicles?
136. Will the "Coffee/Beer" concession hub require a separate CEQA review for late-night social impacts?
137. How will the City maintain the "Nature Walk" without increasing the annual parks department budget?
138. Does the "7% Annual Escalation" cover the rising cost of specialized native nursery stock?
139. How will the "Fitness Trail" be made accessible to people with disabilities (ADA compliance)?
140. Is there a "Shuttle" plan for major events at the "Flexible Meadow" or roller rinks?
141. What is the impact of "Park Visitors" on the parking availability in the adjacent residential neighborhoods?
142. How will "Wayfinding" signage address the diverse language needs of the Riverside community?
143. Does the "Emergency Access" plan allow for 24/7 entry for police and medical responders?
144. Will the "Drinking Fountains" be designed to withstand vandalism and freezing temperatures?
145. How will the "Community Feedback" (Part 3, p. 14) be formally integrated into the final design?
146. Is there a "Youth Employment" component for the restoration work at Tequesquite?
147. How will the project prevent "Green Gentrification" in the Arlanza and Downtown neighborhoods?
148. Does the "General Contractor Fee" of 10% include insurance for environmental "incidents"?
149. How will the "Water Play Area" be secured during the off-season to prevent injury?
150. What is the "Lifecycle Cost" analysis for the "Separated Walking Path" vs. the existing bike path?

VII. Noise & Vibration (Questions 151–175)

151. What is the projected decibel increase for residents on Indian Hill Road during rock crushing?
152. How will construction vibration be mitigated for historic resources like P-33-012130?
153. Will the "Skate Park" include acoustic baffles to prevent noise echoing off Mount Rubidoux?
154. Does the noise study account for the "Impulsive Noise" of pickleball play near residential areas?
155. What are the "Construction Hours" for the Martha McLean site, and do they match city noise ordinances?
156. How will the noise from the "132/133 Train Tracks" interfere with the "Nature Walk" experience?

157. Will "Temporary Noise Barriers" be used for the homes adjacent to the Tequesquite North staging area?
158. How will "Vibration Monitoring" be conducted during the installation of the "Grand Stairs"?
159. Does the project evaluate the "Cumulative Noise" of the park vs. the existing "Van Buren Traffic"?
160. Will "Backup Alarms" on equipment be replaced with "white noise" strobes to reduce neighborhood annoyance?
161. How will noise from "Late Night Concessions" be managed after 10:00 PM?
162. Is there a noise buffer between the "Active Facilities" and the "Habitat Conservation Areas"?
163. How will the "90-person capacity" noise from roller rinks be mitigated?
164. What is the dB threshold for "Significance" used in this specific MND?
165. How will the project prevent "Acoustic Reflection" off the Santa Ana River water surface?
166. Will "Power Tools" used for maintenance be restricted to specific daytime hours?
167. Does the noise analysis include the "Public Address" (PA) systems for the roller rinks?
168. How will "Vibration" impact the structural integrity of the old "rail bridge" at Martha McLean?
169. What is the noise impact on "Sensitive Wildlife" (nesting birds) during the construction phase?
170. Will there be a "Noise Complaint" hotline for residents during the 3-year construction period?
171. How will the "Nature & Culture" areas be kept quiet for educational programs?
172. Does the "Skate Park" design utilize "solid fill" under ramps to reduce hollow drumming sounds?
173. How will the "Food Truck" generator noise be mitigated if they do not use the electrical hookups?
174. Is there a noise study for the "Secondary Lookout" relative to Ladera Lane?
175. How will the project ensure that "safety lighting" maintenance doesn't require loud nightly cherry-pickers?

VIII. Transportation & VMT (Questions 176–200)

176. Does the traffic study utilize SB 743 "VMT" metrics or outdated "Level of Service" (LOS) data?
177. How will the "SART Reroute" impact commuter cyclist speeds versus recreational walkers?
178. Will the "Food Truck Area" create a traffic queueing issue on Gregory Road?
179. Is there an "Alternative Transportation" incentive for park visitors (e.g., bike valets)?
180. How will the "240' Emergency Access" (Part 3, p. 15) be kept clear of park-visitor parking?
181. Does the "208-spot parking lot" satisfy the City's Municipal Code for "High-Intensity Recreation"?
182. How will the "Gregory Road/Tequesquite Ave" intersection be modified for safety?
183. Will the "Bike Speed Limit Zone" be enforceable through design or only signage?

184. How will the project handle the "Transit-to-Trails" connection from the nearest RTA bus stop?
185. What is the impact of "Construction Haul Routes" on the pavement life of Jurupa Avenue?
186. How will "Bike Parking" (Part 3, p. 2) be secured against theft to encourage cycling?
187. Does the "Separated Walking Path" provide enough width for emergency pedestrian evacuation?
188. How will the project manage "Equestrian/Cyclist" conflicts at the river access points?
189. Will "Wayfinding" include time-to-destination info for walkers to encourage active transport?
190. Is there a "Traffic Management Plan" for the Marcy Library during document review periods?
191. How will the project mitigate "u-turns" on Tequesquite Avenue from drivers looking for parking?
192. Does the "VMT Analysis" include the trips generated by the new "Beer/Coffee" concession?
193. Will the "Parking Lot" include permeable surfacing to satisfy "Greenway" aesthetic goals?
194. How will the "SART BICYCLE SPEED LIMIT ZONE" be monitored for safety?
195. What is the "Turning Radius" for the emergency vehicles entering the Cottonwood Trail?
196. How will the project prevent "overflow parking" on Indian Hill Road?
197. Is there a "Ride-Share" (Uber/Lyft) drop-off zone designed into the Tequesquite North plaza?
198. How will the "10-minute bike" and "25-minute walk" (Part 3, p. 15) travel times be verified?
199. Does the "Transportation" chapter evaluate the "Mission Inn Avenue" bridge traffic impacts?
200. Will "Bike Repair Stations" (Part 3, p. 2) be provided at the Tequesquite North trailhead?

IX. Hazards, Wildfire & Safety (Questions 201–225)

201. How does "brush clearing" at Camp Evans align with Very High Fire Hazard Severity Zone requirements?
202. Does the safety lighting plan increase the risk of encampment-induced fires in riparian zones?
203. Since the City acknowledges "non-existence of hazardous waste sites," what is the protocol for "illegal fill"?
204. Is there an "Evacuation Route" for park users at Martha McLean in the event of a river bottom fire?
205. How will "Earthen Berms" be engineered to prevent liquefaction during a seismic event?
206. Will the "Concession Area" have fire-suppression systems exceeding standard building codes?

207. How will the City handle the "Modern Refuse" (Part 9, p. 1) clogging the Spring Brook feature?
208. Does the project include a "Vector Control Plan" for the new water play areas?
209. How will the City prevent "Track-out" of invasive weed seeds across the 250-acre site?
210. What is the "Response Time" for the Riverside Fire Department to reach the furthest point of the Greenway?
211. Will "Hazardous Materials" (paints/solvents) be stored on-site during the 3-year construction?
212. How will the "High Pressure Gas Lines" (if any) in the river bottom be protected during grading?
213. Does the "Safety Plan" include "Blue Light" emergency phones in the unlit trail sections?
214. How will the project mitigate the "Heat Stress" for workers and park users in the 100°F+ Riverside summers?
215. Is there a "Pollution Prevention Plan" for the construction of the river-access points?
216. How will the "Slope Stability" of the Ladera Lane hillsides be monitored during Loring Park grading?
217. Will "Non-toxic" fertilizers be mandated for the new "Play Meadows" to protect river water quality?
218. How will the "132/133 Train Tracks" be fenced to prevent park users from trespassing?
219. What is the plan for "Crime Prevention Through Environmental Design" (CPTED)?
220. Will the "Water Play Area" include "UV filtration" to prevent waterborne illness?
221. How will the City handle "Public Safety" during the removal of the "dense vegetation" (Part 9, p. 1)?
222. Does the "Wildfire Plan" include a "Red Flag Warning" closure policy for the trails?
223. How will the "Restrooms" be ventilated to prevent the buildup of methane or odors?
224. Is there a "Spill Kit" required on every piece of heavy machinery on site?
225. How will the "1-meter deep buried resources" (Part 11, p. 100) be protected from "Hazardous Waste" leaching?

X. Long-term Sustainability & Alternatives (Questions 226–250)

226. Does the "No Project" alternative account for the continued degradation of alluvial fan sage scrub?
227. What is the 50-year maintenance plan for the "permeable paving" and "native garden buffers"?
228. How will "Carbon Sequestration" tracking be reported to the State Coastal Conservancy (the funder)?
229. Is the "7% Annual Escalation" sufficient for 50-year climate resilience costs?
230. Has the City evaluated a "Reduced Project Alternative" that eliminates the high-impact roller rinks?
231. How will the "Forest Restoration" be resilient to the projected 3°C global warming increase?
232. Does the project account for the "Cumulative Impact" of all five parks acting as a single system?

233. How will the project ensure the "State Coastal Conservancy" grant requirements are met for 20 years?
234. Will "Recycled Water" be used for the 250 acres of new landscaping?
235. What is the "Remediation Plan" if the "Native Planting Seeding Area" fails to achieve 70% coverage?
236. How does the project reconcile "Safety Lighting" with nocturnal wildlife corridor connectivity?
237. Will the "Interpretive Native Gardens" be updated to reflect changing climate conditions?
238. Does the "Hydromodification" analysis account for the cumulative increase in impermeable surfaces?
239. How will "Illegal Dumping" be prevented in the newly opened river access points?
240. What is the "End-of-Life" plan for the synthetic materials used in the "Parkour Features"?
241. How will the "Citrus Heritage" be sustained if the local water table continues to drop?
242. Is there a "Community Stewardship" program to help maintain the 250-acre suite?
243. How will the project handle "Tree Mortality" from invasive pests like the Goldspotted Oak Borer?
244. Does the "Sustainability Plan" include "Solar Power" for the restroom and concession hubs?
245. How will the project monitor the "Social Equity" impact over the next 10 years?
246. Will the "12' wide decomposed granite" path be replaced with more sustainable "Stabilized DG"?
247. How will the "Water Play Area" be managed during Riverside's frequent drought "Stage 3" restrictions?
248. Does the project include "Bee and Butterfly" corridors to support local pollination?
249. What is the "Adaptive Management" protocol for the Hidden Valley restoration?
250. How will the City ensure that "Putting the River back in Riverside" results in a measurable ecological gain?

Responses to Comment Letter 1: Mission Grove Neighborhood Alliance LLC

Phase 2: The Inquiry 250 Questions

I. Aesthetics, Light Pollution & Historic Heritage (Questions 1–25)

Response to Question Number 1: Riverside's citrus and agricultural heritage is protected in the Arlington Heights neighborhood, in the heart of Riverside's greenbelt. This project is not located within the greenbelt area, but rather adjacent to the Santa Ana River. This project complies with General Plan Objective LU-1 to increase the prominence of the Santa Ana River by providing better connections and increased recreational opportunities.

Response to Question Number 2: A lighting plan will be prepared during subsequent design development. Lighting will be designed to meet applicable limits to protect dark skies and any sensitive receptors.

Response to Question Number 3: A lighting plan will be prepared during subsequent design development. Lighting will be designed to meet applicable limits to protect dark skies and any sensitive receptors.

Response to Question Number 4: A lighting plan will be prepared during subsequent design development. Lighting will be designed to meet applicable codes and limits to protect dark skies and sensitive receptors.

Response to Question Number 5: The decomposed granite path will be located in the developed area of the existing park.

Response to Question Number 6: Material selection will take place during subsequent design development. The secondary lookout will likely be constructed from non-porous materials such as painted or powder coated metal. Both allow for durability and ease of graffiti removal, and hold up well in Riverside parks..

Response to Question Number 7: To prevent erosion, pavers, concrete steps, or other hardened material can be used to armor social trails that need to remain at the time of design development.

Response to Question Number 8:.Anti-skateboarding hardware could be incorporated into the Grand Stairs to deter skateboarding in areas that compromise the safety of park users, and to minimize damage to public facilities.

Response to Question Number 9: When seeding or planting native plants, use of local-genotypes will be emphasized.

Response to Question Number 10: The marker itself does not qualify as a historical resource under CEQA. It is not locally designated and not eligible for the CRHR. The historic marker will be protected in place during grading or if needed will be relocated to prevent damage.

Response to Question Number 11: A lighting plan will be prepared during subsequent design development. Lighting will be designed to meet applicable limits to protect dark skies and any sensitive receptors.

Response to Question Number 12: Material selection will take place during subsequent design development.

Response to Question Number 13: Visual impacts on the Mount Rubidoux Historic District were analyzed in the Loring Park Master Plan IS/MND (pgs 3.37-3.38) and determined to be less than significant.

Response to Question Number 14: Material selection will take place during subsequent design development. A combination of fencing and planting can be used to screen the railroad tracks.

Response to Question Number 15: Specific design details and material selection will take place during subsequent design development. The raincross symbol will be considered for incorporation into the plaza design.

Response to Question Number 16: The terraced seating at Loring Park is at ground level and does not obstruct protected view corridors.

Response to Question Number 17: There will be an approximately 20' wide planted buffer between the Santa Ana River Trail Greenway and the proposed new parking area at Tequesquite North. Plants and trees will be selected to allow a clear view into the parking lot from Tequesquite Avenue and from the trail, for safety purposes.

Response to Question Number 18: The grand staircase at Loring Park will be selected during design development. It will likely be concrete, which typically has an albedo of 0.20 – 0.40.

Response to Question Number 19: Safety lighting will use full-cutoff or shielded fixtures that direct light downward to minimize spillover.

Response to Question Number 20: The shaded overlook structure will be selected to complement the surrounding historic neighborhood and natural setting.

II. Air Quality & Greenhouse Gases (Questions 26–50)

Response to Question Number 26: The construction emissions modeling incorporates the requirements of SCAQMD Rule 403: Fugitive Dust by assuming that exposed surfaces would be watered three times per day, consistent with Standard Condition AQ-SC-1. The three times daily efficacy assumes watering every 2.1 hours and achieves a 74% reduction in fugitive dust emissions from grading equipment passes, bulldozing, and truck loading.

Response to Question Number 27: The sensitive receptors along Indian Hill Road are located across Indian Hill Road to the south of the Camp Evans project site. As discussed in the Camp Evans Master Plan IS/MND, Chapter 3, Section III, Air Quality, Impact AQ-c, the potential localized air quality impacts resulting from the proposed project on adjacent sensitive receptors during construction were quantitatively assessed using the SCAQMD Localized Significance Thresholds (LSTs), which represent the maximum emissions from a project that are not expected to cause or contribute to localized air quality impacts. As discussed therein, emissions from construction of the proposed project would not exceed the SCAQMD LSTs applicable to the proposed project. Therefore, additional quantitative analysis to assess local PM2.5 concentrations is not required.

Response to Question Number 28: The greenhouse gas (GHG) emissions analysis has been revised to account for the carbon sequestration loss from removing dense vegetation. The revised GHG emissions modeling incorporates the carbon sequestration loss from the removal of ruderal mustards and forbs (modeled as shrubland) and eucalyptus forest (modeled as broadleaf forests). By including the carbon sequestration loss in the GHG analysis of the Camp Evans Master Plan IS/MND, the net loss of carbon sequestration was estimated at 43.8 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. The total estimated annual GHG emissions for the project, as shown in Table VIII-3, increased to 738.7 $MTCO_2e$, which is below the applicable threshold of 3,000 $MTCO_2e$ per year. Therefore, GHG impacts remain less than significant.

Response to Question Number 29: The intent is to use permeable surface for the parking rows.

Response to Question Number 30: The contractor will be required to comply with SCAQMD Rule 403: Fugitive Dust, which requires that all track-out dust from an operation shall be removed at the conclusion of each workday or evening shift. Therefore, the contractor will be required to monitor and remove track-out dust daily. The City of Riverside will coordinate monitoring and reporting of

the implementation of the project-specific mitigation measures for the proposed project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of monitoring records.

Response to Question Number 31: The VOC limit for architectural coatings used on the Concession Area Hub is 50 grams of VOC per liter of colorant, less water and exempt compounds. The VOC limit is defined in Standard Condition AQ-SC-2 and SCAQMD, Rule 1113, Table of Standards 2, VOC Limits for Colorants. The contractor must comply with AQ-SC-2 and compliance is required upon submittal of specifications.

Response to Question Number 32: Power can be provided for authorized and permitted food trucks at Carlson Park.

Response to Question Number 33: The City's typical outdoor restroom buildings rely on high-efficiency passive ventilation rather than mechanical air filtration systems. Good air flow can be achieved through use of louvered and mesh covered openings and similar. Annual escalations costs are not specific to an air-filtration system, but are to be expected for the cost of the restroom building itself.

Response to Question Number 34: The parks are separate projects that are not functionally linked; each can be developed and serve the public on its own merits. Completion of one site does not commit the City to the completion of the others.

Response to Question Number 35: Tier 4 Final engines will not be mandated for any construction activities to reduce NO_X emissions. As shown in Chapter 3, Section III, Air Quality, criteria air pollutant emissions from the use of fleet average construction equipment would not exceed any SCAQMD regional air quality significance threshold or localized significance threshold. Appendix C shows that the construction emissions modeling assumed fleet average construction equipment for quantifying construction emissions. Therefore, the use of Tier 4 Final engines is not required.

Response to Question Number 36: The contractor will be required to comply with SCAQMD Rule 403: Fugitive Dust, which requires the contractor to apply water or stabilizing agents in sufficient quantity to prevent generation of dust plumes during grading activities and other earth-moving activities. Additionally, Rule 403 states that upwind fencing can prevent material movement on site during grading activities. Thus, required compliance with Rule 403 would prevent fugitive dust plumes from leaving the site during wind events.

Response to Question Number 37: The operational criteria air pollutant and greenhouse gas emissions modeling accounts for the mobile source emissions from the 208 new parking spaces included in the Tequesquite North Extension. As stated in Chapter 3, Section III, Air Quality, based on the traffic assessment for the proposed Tequesquite North Extension project prepared by Rick Engineering, the Tequesquite North Extension project is anticipated to generate a net increase of 295 trips per day on a typical weekday and a net increase of 278 trips per day on a typical Saturday compared to existing conditions. The mobile source emissions generated by these additional vehicle trips are included in the operational emissions modeling for the Tequesquite Sites and Stanta Ana River Greenway Master Plan IS/MND.

Response to Question Number 38: The project will be designed and constructed to meet building codes applicable at the time of project plan check submittal. Most likely, CalGreen Code will still be

in effect, and the project will provide the number of electric vehicle charging stations required by applicable codes.

Response to Question Number 39: The greenhouse gas (GHG) emissions analysis has been revised to account for the carbon sequestration loss from removing riparian, marsh, and grassland. The revised GHG emissions modeling incorporates the carbon sequestration loss from the removal of ruderal mustards and forbs (modeled as shrubland) and eucalyptus forest (modeled as broadleaf forests). By including the carbon sequestration loss in the GHG analysis of the Tequesquite Sites and Santa Ana River Greenway Master Plan IS/MND, the net loss of carbon sequestration was estimated at 52.8 $MTCO_2e$ per year. The total estimated annual GHG emissions from the project, as shown in Table VIII-3, increased to 1,264.4 $MTCO_2e$, which is below the applicable threshold of 3,000 $MTCO_2e$ per year. Therefore, GHG impacts remain less than significant

Response to Question Number 40: The CalEEMod GHG emissions modeling uses the same global warming potential (GWP) values as those shown in Table VIII-1, which are the GWPs used by the California Air Resources Board in its annual GHG inventory. These GWPs are based on the Intergovernmental Panel on Climate Change's (IPCC) *Fourth Assessment Report* (AR4) published in 2007. The CalEEMod User Guide, Section 4.3.1.3.2, Greenhouse Gases, states that CalEEMod uses the same GWPs as IPCC AR4.

Response to Question Number 41: The VOC limit for architectural coatings used on the new play court sources is 50 grams of VOC per liter of colorant, less water and exempt compounds. The VOC limit is defined in Standard Condition AQ-SC-2 and SCAQMD, Rule 1113, Table of Standards 2, VOC Limits for Colorants. The contractor must comply with AQ-SC-2 and compliance is required upon submittal of specifications. The City of Riverside will coordinate monitoring and reporting of the implementation of the project-specific mitigation measures for the proposed project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of monitoring records.

Response to Question Number 42: The nearest sensitive receptors to the Camp Evans Master Plan project site are adjacent to and east of the site, as discussed on page 3-16 of the Camp Evans Master Plan IS/MND. As discussed on page 3-18 of the Tequesquite Sites and Santa Ana River Greenway Master Plan IS/MND, the nearest sensitive receptors to the proposed Tequesquite North Extension project site are adjacent to and east of the site. The nearest sensitive receptors to the proposed Tequesquite South Extension project site are approximately 25 meters south of the site. The nearest sensitive receptors to the proposed Santa Ana River Greenway trail are adjacent to and east of the trail. As discussed on page 3-16 of the Loring Park Master Plan IS/MND, the nearest sensitive receptors are adjacent to and north and west of the project site. As discussed on page 3-23 of the Martha McLean Anza Narrows Park and Jurupa Avenue Trailhead Master Plans IS/MND, the nearest sensitive receptors are adjacent to and east of the site.

Response to Question Number 43: The City's Parks, Recreation and Community Services Department (PRCSD) and its contractors are in a transition period to phase-out gas powered equipment for landscape maintenance. The PRCSD will continue to use the current inventory of equipment until end of service life and will replace with zero emission alternatives.

Response to Question Number 44: As discussed in IS/MND section VIII, Greenhouse Gas Emissions, the project would be consistent with the City of Riverside's 2016 Economic Prosperity Plan and Climate Action Plan (2016 CAP), which is the applicable climate action plan for the City of

Riverside. As discussed therein, the proposed project would include GHG-reduction measures from the 2016 CAP and therefore would be consistent with the 2016 CAP. Additionally, as discussed in the IS/MND, the project would be consistent with the County of Riverside's 2019 Climate Action Plan and CARB's 2022 Scoping Plan.

Response to Question Number 45: The contractor will be required to comply with SCAQMD Rule 403: Fugitive Dust, which requires the contractor to apply water or stabilizing agents in sufficient quantity to prevent generation of dust plumes from disturbed surfaces and during earth-moving activities. Rule 403 states that upwind fencing can prevent material movement on site during earth-moving activities. The contractor will be required to comply with SCAQMD Rule 403, which may include upwind fencing if necessary to prevent the generation of dust plumes.

Response to Question Number 46: Restoration of the Hidden Valley Wetlands and Hidden Valley Ponds sites – including any dredging and clearing activities – would occur as part of the Upper Santa Ana River Restoration Project. Therefore, any odorous impacts associated with such restoration activities are not evaluated as part of the proposed project.

Response to Question Number 47: The contractor will be required to comply with Standard Condition AQ-SC-1, which requires the covering or watering of haul truck loads, consistent with the requirements of SCAQMD Rule 403. The City of Riverside will coordinate monitoring and reporting of the implementation of the project-specific mitigation measures for the proposed project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of monitoring records.

Response to Question Number 48: Additional mitigation measures to favor local construction labor to reduce vehicle miles traveled (VMT) and associated mobile source emissions is not specifically required by CARB's 2022 Scoping Plan, the County of Riverside's 2019 CAP, or the City's 2016 CAP. Regardless, such measures would not be necessary, as the project would result in a less than significant impact on GHG emissions.

Response to Question Number 49: The project specifications will require the contractor to comply with AQ-SC-2 and the VOC limits provided by SCAQMD, Rule 1113, Table of Standards 2, VOC Limits for Colorants. The PRCSD or its representative will review submittals prior to start of construction to confirm compliance.

Response to Question Number 50: This comment regarding the choice of drought-tolerant species and the global warming projection for 2100 is not related to any requirement under CEQA to evaluate GHG emissions. The proposed project would comply with CARB's 2022 Scoping Plan, the County of Riverside's 2019 CAP, or the City's 2016 CAP, and would not generate GHG emissions above any applicable threshold.

III. Biological Resources & MSHCP (Questions 51–75)

Response to Question Number 51: Because burrowing owls are highly mobile, prior to project construction, a preconstruction survey would be required to avoid direct impacts on burrowing owls. The details of this survey are included in BIO-22 (Burrowing Owl Management Plan). The BUOW management plan would require final approval from the RCA, USFWS, and CDFW. This would ensure that an approach would be available and agreed upon by the resource agencies to avoid and/or minimize impacts on the species if it moves into the LOD. It would also provide

strategies for passive or active relocation. This would avoid or minimize potential project delays and ensure compliance with the MSHCP.

Response to Question Number 52: To comply with Section 6.1.2, riparian/riverine resources were identified and mapped within the jurisdictional survey area in conjunction with the jurisdictional delineations performed for the project. Three separate jurisdictional delineation reports are provided for the project and included as appendices to the MSHCP Consistency Analysis.

To comply with Section 6.1.2 *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, habitat assessments were performed for the following special-status species, including: fairy shrimp; Riverside fairy shrimp (Streptocephalus woottoni); vernal pool fairy shrimp (Branchinecta lynchi); Santa Rosa Plateau fairy shrimp (Linderiella santarosae); riparian birds; least Bell's vireo (LBV; Vireo bellii pusillus); Southwestern willow flycatcher (SWFL; Empidonax traillii extimus); and Western yellow-billed cuckoo (WYBC; Coccyzus americanus occidentalis). Habitat assessments were also conducted for species that are dependent on riparian/riverine habitat or benefit from these areas, including narrow endemic plant species and criteria area plant species, fish, reptiles, and amphibians. Surveys were conducted for species determined to have potential habitat in the project area. Because none of the park sites fall within a mapped survey area for any amphibian species within MSHCP Section 6.3.2 *Additional Survey Needs and Procedures*, a habitat assessment for amphibian species was not required and no further action is required.

An evaluation of wildlife connectivity and linkages was also conducted. Focused surveys were conducted where suitable habitat was determined to be present. A review of riparian/riverine resources and vernal pools was performed and delineations of federal and State of California (State) jurisdictional waters and wetlands were conducted.

Response to Question Number 53: MM-Bio-14 describes that the mitigation will be coordinated with Clean Water Act Section 401 and 404 permitting and CDFW 1602 Streambed Alteration Agreement. The US Army Corps of Engineers and California Department of Fish and Wildlife will prescribe and have final approval over performance standards. The permits issued by these agencies include requirements to meet these performance standards.

Response to Question Number 54: During project implementation, compliance with Avoidance and Minimization Measures will delineate the biological avoidance zone for resource protection. Relevant project avoidance and minimization measures include BIO-6 (Construction and Project Limits) that states "Construction personnel will strictly limit their activities, vehicles, equipment, and construction materials to the proposed LOD and designated staging areas and routes of travel." and BIO-12(LODs and ESAs) that states "The LODs, including the upstream, downstream, and lateral extents on either side of any stream adjacent to the project's LOD, will be clearly defined and marked in the field. Biological monitors will review the LODs prior to initiation of construction activities (MSHCP Volume I, Section 7.5.3, and MSHCP Volume I, Appendix C). ESA fencing will be installed during construction to ensure avoidance of jurisdictional areas and riparian habitat."

Response to Question Number 55: During project implementation, contractors will comply with Avoidance and Minimization Measure BIO-7 (Exotic Species). Exotic plant species removed during construction will be properly handled to prevent sprouting or regrowth. Please refer to MSHCP

Chapter 8 for information on the MSHCP Monitoring Program to assess the condition of species and natural communities in the MSHCP Reserve System.

Response to Question Number 56: Arroyo chub is a Fully Covered species under the MSHCP; these species are discussed in Section 2.1.4 of the MSHCP, Volume I, and listed in Exhibit C to the IA and Section 9.2 of the MSHCP, Volume I.

Response to Question Number 57: Cooper's Hawk and sharp-shinned hawk are Covered species under the MSHCP; these species are discussed in Section 2.1.4 of the MSHCP, Volume I, and listed in Exhibit C to the IA and Section 9.2 of the MSHCP, Volume I. Furthermore, sharp-shinned hawks do not nest in the project area; they nest in Canada and in the northern United States.

Response to Question Number 58: The Santa Ana River was identified by the MSHCP wildlife corridor analysis as a wildlife corridor for animals including large mammals. Therefore, fences would not trap mammals against the river; the river is the corridor connecting to other open space.

Response to Question Number 59: The mule fat vegetation community is not considered a CDFW Sensitive Natural Community, and any loss of mule-fat prior to project approval does not raise a substantive issue. When seeding or planting native plants, use of local-genotypes will be emphasized.

Response to Question Number 60: The project is not within the MSCHP Delhi Sands flower-loving fly Species Survey Area. The project is near but not within the known soils and habitat for this species, and therefore, species specific plantings would not be appropriate.

Response to Question Number 61: BIO-1 (Nesting Bird Surveys and Vegetation Clearing Restrictions) provides the details of how nesting bird surveys would be conducted.

Response to Question Number 62: Sensitive species will be protected using aesthetically appropriate barriers and signage to separate sensitive areas from active use areas such as trails.

Response to Question Number 63: The equestrian rest stop will have receptacles for manure and signs will be posted to request owners to clean up after their animals.

Response to Question Number 64: MSHCP Criteria Cell 187 overlaps with the northwestern corner of Camp Evans. The exercise loop does not introduce impacts within Criteria Cell 187.

Response to Question Number 65: Buffers will be compliant with the MSCHP. Minimum buffers will be implemented or sound walls will be erected to protect habitat from disturbance.

Response to Question Number 66: The proposed Tequesquite Sites and Santa Ana River Greenway Master Plan, Riverside Gateway Parks is covered by the MSHCP and must therefore comply with the construction guidelines detailed in MSHCP Section 7.5.3. and Best Management Practices (MSHCP Appendix C). These construction guidelines would reduce the potential for indirect effects on sensitive habitat. Several construction guidelines are presented as MM-BIO-3 through MM-BIO-10, MM-BIO-15, and MM-BIO-18 through MM-BIO-20 to ensure their implementation and show how indirect effects on sensitive vegetation would be avoided.

Response to Question Number 67: Material selection will take place during subsequent design development. When seeding or planting native plants, use of local-genotypes will be emphasized.

Response to Question Number 68: The proposed project site does not fall within a mapped survey area for any mammal species that are included in the Additional Survey Needs and Procedures

under Section 6.3.2 of the MSHCP. No sensitive bat species were identified as occurring within the project area.

Response to Question Number 69: Please refer to MSHCP Chapter 8 for information on the MSHCP Monitoring Program to assess the condition of species and natural communities in the MSHCP Reserve System.

Response to Question Number 70: MSHCP Criteria Cells in Existing Core A that overlap with the BSA include 617, 621, 534, 443, and 187. These cells contribute to the assembly of Existing Core A, and the MSHCP Criteria for these Cells focus on the conservation of Riversidean alluvial fan sage scrub, riparian scrub, grassland, riparian scrub, woodland and forest habitat, and agricultural lands.

Response to Question Number 71: The project habitat assessment concluded that the riparian/riverine habitat in the BSA is not suitable to support southern mountain yellow-legged frog (*Rana muscosa*) or California red-legged frog (*Rana draytonii*), both of which are State- and/or federally listed species and listed in Section 6.1.2 of the MSHCP as being dependent on riparian/riverine resources. However, the BSA does contain suitable habitat to support the non-listed western spadefoot and Coast Range California newt; both species are listed in Section 6.1.2 of the MSHCP as being dependent on riparian/riverine resources or benefiting from these resources. Both western spadefoot and Coast Range California newt are MSHCP Covered species, the project is not within the MSHCP Amphibian Species Survey Area, and there are no other amphibian planning species for the BSA. The separated walking path will use materials that are non-toxic to amphibians.

Response to Question Number 72: The project will abide by the Best Management Practices of the MSHCP (Appendix C) requirement 13, which requires that to avoid attracting predators of the species of concern, the project site be kept as clean of debris as possible, and that all food related trash items will be enclosed in sealed containers and regularly removed from the site(s).

Response to Question Number 73: The project will comply with the Urban/Wildlands Interface Guidelines, which requires that night lighting be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting and that shielding be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Areas. The project will implement avoidance and minimization measure Bio-16 (Night Lighting Management) that states that any new permanent lighting structures that are installed as a part of the project will be designed to avoid impacts on conservation lands.

Response to Question Number 74: The project will implement avoidance and minimization measure Bio-16 (Waste Management) which states that **t**o avoid attracting predators of special-status species, the project site will be kept as clean of debris as possible. All food-related trash items will be enclosed in sealed containers and regularly removed from the site(s) (MSHCP Volume I, Appendix C). Waste, dirt, rubble, or trash will not be deposited in the Conservation Area or on native habitat (MSHCP Volume I, Section 7.5.3).

Response to Question Number 75: The MSHCP Consistency Analysis includes the impact of the Water Play area as a component of the Tequesquite North Project.

IV. Cultural & Tribal Resources (Questions 76–100)

Response to Question Number 76: question The Fairmount Park Master Plan avoids improvements in the location of ICF-LE-004. ICF-LE-004 does not meet any of the four criteria for

inclusion in the CRHR. The current recording of the feature has exhausted the site's research potential and this type of water conveyance feature is ubiquitous in the region. As such, ICF does not recommend the site as eligible for inclusion in the CRHR and it is not considered a historical resource per CEQA.

Response to Question Number 77: This is addressed in MMs CUL-3, CUL-4, CUL-5, and TCR-1.

Response to Question Number 78: At this conceptual master plan level of design, the project intent is to avoid improvements that would disturb culturally significant resources. The City will continue design coordination with the tribes during detailed design development for each of the sites. MMs CUL-3, CUL-4, CUL-5, and TCR-1 are to be adopted to provide procedures in case resources are found during site development. Additionally, the PRCSD has met with tribes beyond AB52 requirements during an Intertribal Summit in September 2025 to discuss Fairmount Park and other opportunity sites for partnerships in programming, art installations, education/interpretation, acknowledgements/ceremonies, and how sensitive historic sites should be handled. Representatives of the Cahuilla, Luiseno, Serrano, Gabrielino/Tongva, and Kumeyaay tribes were invited.

Response to Question Number 79: All project sites have been determined to be sensitive for archaeological and Native American resources, and as per the Survey Report and all ISMDs, Native American and Archaeological monitoring are recommended (MM CUL-2).

Response to Question Number 80: According to the cultural resources report, P-33-000678 is noted as largely buried due to road construction and private development uphill from the site. Cumulative impacts of foot traffic are not significant since the resource is buried and not at the ground surface.

Response to Question Number 81: . Only two of the ten sites, P-33-000127 and P-33-000678 are eligible for CRHR eligible; the other 8 sites (P-33-, -003357, -003358, -008698, -009652, -016848, -016849, -017331, and -022303) were not deemed historic resources eligible for CRHR. During design development for the specific project sites, the City will coordinate with the relevant interested tribes to find an appropriate design solution to protect resources.

Response to Question Number 82: This is MM-CUL-1.

Response to Question Number 83: This is MM-CUL-5.

Response to Question Number 84: The site was evaluated under all four criteria of the CRHR and recommended as ineligible. The analysis was based on the historical significance of the site and its current condition. Ultimately, it was determined that the documentation of the site for the current project has exhausted its research potential. The detailed evaluation is in the CR technical report.

Response to Question Number 85: The 1931 Aerial Photograph references an outcropping of boulders near the Union Pacific Railroad bridge north of Martha McLean Anza Narrows Park. The project does not propose work in this area.

Response to Question Number 86: No. GPR is not really an appropriate method of investigation to identify individual artifacts. If there were potential for archaeological features such as house floors or buried building foundations this might be appropriate. But, such work would require "ground truthing" to be useful, and because sites are mostly being avoided or there will not be substantial impacts, this kind of study is not warranted. The ground truthing part of the process might unnecessarily disturbed archaeological materials that would not otherwise be disturbed.

Response to Question Number 87: As specified in the Tequesquite Sites and Santa Ana River Greenway Master Plan IS/MND (pgs. 3.116 - 3.120) implementation of mitigation measure MM-NOI-2, Buffer Distances and Use of Less Vibration-Intensive Construction Equipment to Avoid Potential Building Damage Impacts During Project Construction, will ensure that residential properties that contribute to the Rio Verde Terrace Tract of the Cliffside Neighborhood Historic District near the master plan area will not be subject to damage from construction vibration.

Response to Question Number 88: All local tribes will be invited to collaborate with the PRCSD on interpretive signage design and content.

Response to Question Number 89: Because no locally designated or otherwise CRHR-eligible or listed water conveyance features would be subject to significant impact from the master plans, the project does not include specified plans to treat and protect such features as historical resources under CEQA.

Response to Question Number 90: There is no MM for previously recorded Isolates (-33-017330 and 017332) as these were by previous researchers that discovered them. It is unknown where these isolated artifacts were curated.

Response to Question Number 91: During design development, the PRCSD will continue to coordinate with the local tribes to develop the park designs and interpretive messaging, in particular to the cultural significance of the Santa Ana River to the areas past, present, and future inhabitants of the area.

Response to Question Number 92: Concerns and input provided at the time of the report is presented in the Coordination Table. At this conceptual master plan level of design, the project intent is to avoid improvements that would disturb culturally significant resources. The City will continue design coordination with the tribes during detailed design development for each of the sites. MMs CUL-3, CUL-4, CUL-5, and TCR-1 are to be adopted to provide procedures in case resources are found during site development. Additionally, the PRCSD has met with tribes beyond AB52 requirements during an Intertribal Summit in September 2025 to discuss Fairmount Park and other opportunity sites for partnerships in programming, art installations, education/interpretation, acknowledgements/ceremonies, and how sensitive historic sites should be handled. Representatives of the Cahuilla, Luiseno, Serrano, Gabrielino/Tongva, and Kumeyaay tribes were invited.

Response to Question Number 93: The Cultural Resources Technical Report shall be removed from documents for public review.

Response to Question Number 94: MM-CUL-3 calls for the development of an Archaeological Monitoring Plan by the contractor, the City, and consulting tribes. A curation agreement should be part of that Monitoring Plan.

Response to Question Number 95: The project design will be adjusted if needed to accommodate discovered resources.

Response to Question Number 96: During construction, a temporary chain link fence will be installed to exclude the existing utility building from the contractor's work area.

Response to Question Number 97: Because no locally designated or otherwise CRHR-eligible or listed buildings, structures, or landscapes would be subject to significant impact from the master

plans, the project does not include plans for Historic American Building Survey, Historic American Engineering Record, or Historic American Landscape Survey documentation.

Response to Question Number 98: TCRs are defined by CEQA under AB52 and in consultation with Native American consulting parties.

Response to Question Number 99: There has been no Archaeological Monitoring Plan developed to date. It is assumed that the monitoring plan would include a research design such that unanticipated discoveries could be evaluated for the CRHR. It is also assumed that Native American consulting parties would have input on the development of the Monitoring Plan and research design.

Response to Question Number 100: Martha McLean's advocacy played an important part in saving the Santa Ana River in Riverside from becoming a concrete lined channel. During the design development phase of the project, the style, color, and materials of the park improvements will be selected to complement the Santa Ana River.

V. Hydrology & Water Quality (Questions 101–125)

Response to Question Number 101: SP ADFR-16 is not within the project limits. A 2022 Aquatic Resources Delineation Report is included as an Appendix to the Mitigated Negative Declaration.

Response to Question Number 102: Permeable asphalt used in the parking lot can be cleaned using a regenerative air sweeper.

Response to Question Number 103: Stormwater Pollution Prevention Plans are not being prepared during this park master planning phase of the project. MM HAZ-BMP-1 requires the City to prepare a project-specific SWPPP when the project is closer to implementation. The SWPPP will be prepared prior to start of construction.

Response to Question Number 104: Runoff from replaced and/or new impervious surfaces are proposed to be treated by methods in accordance with the 2010 Santa Ana Region (SAR) MS4 Permit (Order No. R8-2010-0033, as amended by Order No. R8-2013-0024) and Water Quality Management Plan guidance document for the Santa Ana Region of Riverside County, dated October 22, 2012.

Response to Question Number 105: The SART re-route will be designed to conform to existing topography, avoiding large-scale grading that disrupts established drainage paths.

Response to Question Number 106: The water play area at Tequesquite North is planned to have a recirculating water system.

Response to Question Number 107: Prevention of the track-out of silt during construction will be addressed by the project SWPPP.

Response to Question Number 108: The hydrology and hydraulic analyses were prepared prior to 2024 rainfall events.

Response to Question Number 109: If previously undocumented wetland is discovered, the PRCSD will have a biologist review the site and the project will be adjusted accordingly. The intent is to avoid impacts to riparian/riverine resources.

Response to Question Number 110: Runoff from replaced and/or new impervious surfaces are proposed to be treated by methods in accordance with the 2010 Santa Ana Region (SAR) MS4 Permit (Order No. R8-2010-0033, as amended by Order No. R8-2013-0024) and Water Quality Management Plan guidance document for the Santa Ana Region of Riverside County, dated October 22, 2012.

Response to Question Number 111: Agronomic soils tests will be conducted prior to planting. Native plant species will be selected as appropriate for the soils found, and/or soil will be amended as appropriate.

Response to Question Number 112: Section 404 and other regulatory permits will be obtained to cover work to the storm drain outfall.

Response to Question Number 113: If the water table is encountered during construction work, a solution acceptable to the PRCSD will developed with contractor's recommendation and to meet any required regulatory framework.

Response to Question Number 114: River access grading is not a part of the current project.

Response to Question Number 115: A WQMP has not been prepared at this level of planning.

Response to Question Number 116: Work in the old pond areas is not a part of the current project.

Response to Question Number 117: Oxidized rhizospheres will be protected by avoidance and minimization of work in riparian areas. Otherwise, techniques such as soil moisture maintenance, strategic earthwork and sod banking, and mycorrhizal inoculation will also be considered.

Response to Question Number 118: Hydraulic leaks from heavy equipment will be handled using BMPs such as using diapering or using biodegradable hydraulic fluid. The SWPPP will be prepared at the time of construction and will include BMPs for construction..

Response to Question Number 119: Runoff from replaced and/or new impervious surfaces are proposed to be treated by methods in accordance with the 2010 Santa Ana Region (SAR) MS4 Permit (Order No. R8-2010-0033, as amended by Order No. R8-2013-0024) and Water Quality Management Plan guidance document for the Santa Ana Region of Riverside County, dated October 22, 2012.

Response to Question Number 120: Standing water is not anticipated in areas proposed for improvements.

Response to Question Number 121: Yes, refer to Initial Study Chapter 3 Section 4.

Response to Question Number 122: The top 0.5-1" of soil can be scaped and set aside for use to re-establish biocrust after planting. Lab-grown cyanobacteria may also be used.

Response to Question Number 123: Aquatic invertebrate population will not be monitored as a baseline for river health. The project is topographically and hydrologically separated from the Santa Ana River .

Response to Question Number 124: Site grading will route sheet-flow around the earthen berm.

Response to Question Number 125: The PRCSD's project specifications will include requirements for the contractor to keep the work site clean and free of trash and debris.

VI. Social, Economic & Infrastructure (Questions 126–150)

Response to Question Number 126: The Santa Ana River Trail re-route separates bicycle traffic from vehicular traffic on Tequesquite Avenue.

Response to Question Number 127: Yes.

Response to Question Number 128: Emergency response vehicle access to the Cottonwood Trail will be coordinated with the Fire and Police Departments during design development to ensure design and construction materials meet requirements.

Response to Question Number 129: The contractor will be required to water the exposed ground three times a day, clean trucks, remove track-outs, and cover/water haul truck loads (Mitigation Measure AQ-SC-1).

Response to Question Number 130: City of Riverside Municipal Code table 19.580.060 indicates 1 parking space/100 square feet of floor area is required. The skating rinks together will be about 6,506 square feet. About 65 parking spaces would be needed and the project is providing more than that with about 208 parking spaces.

Response to Question Number 131: The proposed primary purpose of the bike hub at Jurupa Avenue Trailhead is to support Santa Ana River Trail users with supplies for minor bike repairs, small snacks, water, and similar. This will not likely impact small businesses in Arlanza

Response to Question Number 132: The Santa Ana River Trail Greenway segment from Carlson Park to Tequesquite South aims to connect and enhance existing trails by improving safety and user experience through better edge conditions, connections, and rest areas. The project includes lighting.

Response to Question Number 133: Illegal dumping is less prevalent at improved recreation areas due to increased lighting, and natural surveillance as a byproduct of increased usage of the site. Illegal dumping can be deterred using territorial reinforcement tools such as decorative barriers with designated entries to the park space, and with the on-going maintenance that will take place once the park is developed.

Response to Question Number 134: The Opinion of Probable Cost is developed with prevailing wage requirements.

Response to Question Number 135: There are bus routes provided by Riverside Transit Agency, along with sidewalks and bikeways in the city to support equitable access for residents.

Response to Question Number 136: CEQA review is not required for social impacts. Concessionaire agreements allowing sales of refreshments in parks would typically need to be approved by City Council.

Response to Question Number 137: Park improvements on previously undeveloped land will require an increase in operating budgets.

Response to Question Number 138: Annual escalations are approximations and are in this case intended to broadly cover increases for all implantation costs

Response to Question Number 139: The fitness trail will be ADA compliant.

Response to Question Number 140: A shuttle plan has not been developed as part of this project.

Response to Question Number 141:. The City has considered the potential for parking overflow into the adjacent residential neighborhoods. Per Municipal Code Chapter 17.188, one space per 8,000 sf of active recreational area is needed, and 1 space per acre of passive recreational area is needed. The Park Master Plan proposes the following parking. One parking spot is proposed at Loring Park where three are recommended due to spatial constraints. The one space will be ADA accessible. Additional parking is planned about a quarter of a mile away in Camp Evans to serve Loring Park.

Site	Spaces needed per Municipal Code	Spaces proposed
Camp Evans	34	88
Tequesquite North and South	132	208
Jurupa Avenue Trailhead	4	31
Martha McLean Anza Narrows Park	36	63
Loring Park	3	1

Response to Question Number 142: The specific method to be used for providing wayfinding signage in Spanish will be determined during design development. The sign may include the content in both English and Spanish, or a QR code may be used to link to an online Spanish language version of the signage.

Response to Question Number 143: Fire and Police emergency response have 24/7 access to the project sites.

Response to Question Number 144: The PRCSD has not had a problem with park drinking fountain water lines freezing. Vandal resistant drinking fountain models are selected.

Response to Question Number 145: Community feedback was used to develop the park master plans, and any subsequent comments will inform design development prior to construction.

Response to Question Number 146: Youth employment programs are not specifically identified for this project at this park master planning stage. It will be considered during design development, as conservation corp participation is promoted through grant programs often used to fund park construction.

Response to Question Number 147: The Housing Element of the Phase 1 General Plan Update adopted in 2021 discusses the City's comprehensive strategy for promoting safe, decent, and affordable housing throughout the community.

Response to Question Number 148: Pollution liability insurance coverage for contractors is determined by the City's Risk Management Division on a case by case basis. The contractor's cost for insurance is typically a general condition or general contractor fee.

Response to Question Number 149: The PRCSD typically has the water service for water play areas on a timer programmed to operate only seasonally during scheduled open hours.

Response to Question Number 150: While a new separated concrete path represents a higher initial capital outlay, it is the more fiscally responsible choice over a 25-year period. Concrete's 40-

year service life and minimal maintenance requirements result in a lower total cost of ownership compared to asphalt, which requires costly seal coats every 5 years and a full resurfacing after 15 years. The concrete path better supports long-term ADA accessibility and reduces the City's long-term maintenance liability..

VII. Noise & Vibration (Questions 151–175)

Response to Question Number 151: Rock crushing is not anticipated.

Response to Question Number 152: No vibration impacts were identified for historic resources. The various IS/MNDs identify impact distances beyond which potential damage due to ground-borne vibration would not occur. No vibration-intensive construction activities are predicted to occur within the identified impact distances of built features of historic resources.

Response to Question Number 153: The proposed skatepark does not include acoustic baffles. Skatepark noise is analyzed in the Noise section of the Tequesquite Sites and Santa Ana River Greenway Master Plan IS/MND. As shown in Table XIII-6 and Table XIII-7, noise levels from the skatepark, either individually or when combined with other park activities, are predicted to comply with the applicable noise ordinance standards at the closest homes in the City of Riverside and the City of Jurupa Valley.

Response to Question Number 154: Pickleball noise is assessed against the applicable municipal code standards of the City of Riverside and the City of Jurupa Valley, using the L_{50} and L_{max} noise metrics, respectively. These noise levels include the contributions of any impulsive noise. However, neither noise ordinance provides methods or requirements to specifically quantify the impulsiveness of the noise source.

Response to Question Number 155: Construction hours for the Martha McLean Anza Narrows Park and Jurupa Avenue Trailhead would comply with the City of Riverside Municipal Code. Construction activities will be limited to the hours of 7:00 a.m. to 7:00 p.m. on weekdays, 8:00 a.m. to 5:00 p.m. on Saturdays, and shall not occur at any time on Sundays or federal holidays.

Response to Question Number 156: Train operations are pre-existing, and are part of the baseline condition against which project impacts are measured. The project does not increase the frequency or volume of train noise. Because users on the nature walk are in motion and only exposed to intermittent train noise for brief periods, this does not constitute a significant impact on human health or the environment.

Response to Question Number 157: Temporary noise barriers are not proposed for the homes adjacent to the Tequesquite North staging area. As specified in the Noise section of the Tequesquite Sites and Santa Ana River Greenway Master Plan IS/MND, mitigation measure MM-NOI-1 would be required to limit noise-generating construction activity to the permitted daytime hours and to implement standard noise-reduction methods to minimize potential annoyance at nearby noise-sensitive receptors.

Response to Question Number 158: Vibration monitoring is not proposed during the installation of the proposed Grand Stairs at Loring Park. As specified in the Loring Park Master Plan IS/MND, implementation of mitigation measure MM-NOI-2, Observe Buffer Distances and Use Less Vibration-intensive Construction Equipment to Avoid Potential Building Damage Impacts during Project Construction, will avoid potential damage to surrounding properties from construction vibration.

Response to Question Number 159: Traffic impacts on local roads were found to be less than significant because the Riverside Gateway projects would not add substantial traffic relative to existing traffic volumes. The increase in traffic on Van Buren Bouleverd due to the park projects would be negligible compared to existing traffic volumes on the street. Therefore, traffic noise increases would also be negligible.

Response to Question Number 160: Replacing backup alarms on construction equipment with white noise strobes is not proposed. Mitigation measures are specified to limit noise-generating construction activity to the permitted daytime hours and to implement standard noise-reduction methods to minimize potential annoyance at nearby noise-sensitive receptors.

Response to Question Number 161: Operating hours for any concessions proposed as part of this project will comply with the City's Municipal Code Title 7 – Noise Control.

Response to Question Number 162: High intensity active recreation facilities, such as pickleball and the skatepark, are located more than 300' away from biological avoidance areas to mitigate impacts.

Response to Question Number 163: Operations for the skating rink will conform to City Municipal Code Title 7 for Noise Control.

Response to Question Number 164: The thresholds of significance vary by noise and vibration source. Construction noise and vibration annoyance are assessed relative to the City noise ordinances, which control the hours during which construction activities are permitted (rather than using a specific dB level). On-site operational noise is assessed based on City noise ordinances; for receptors in the City of Riverside the noise limits used are 55 dBA L_{50} during the day and 45 dBA L_{50} at night; for receptors in the City of Jurupa Valley the noise limits used are 55 dBA L_{max} during the day and 45 dBA L_{max} at night. Traffic noise is assessed based on predicted noise increases, with increases of 3 dB or less considered less than significant. Potential building damage impacts from construction vibration are assessed using criteria provided by Caltrans of 0.25 inches/second PPV for historic buildings, 0.3 inches/second PPV for older residential structures, and 0.5 inches/second PPV for new residential structures.

Response to Question Number 165: Acoustic reflection off the Santa Ana River was not identified as causing any noise impacts and the project does not propose measures to prevent acoustic reflection off the river water surface. High acoustical reflectivity is a natural characteristic of still flat water surfaces and is less pronounced for flowing water surfaces, such as a river.

Response to Question Number 166: Using power tools for maintenance is considered a construction activity and would be restricted to the daytime hours permitted by the City's municipal code. Construction activities will be limited to the hours of 7:00 a.m. to 7:00 p.m. on weekdays, 8:00 a.m. to 5:00 p.m. on Saturdays, and shall not occur at any time on Sundays or federal holidays.

Response to Question Number 167: The project does not include public address (PA) systems for the roller rinks.

Response to Question Number 168: The rail bridge is northwest of Martha McLean-Anza Narrows Park, outside of the park boundary. The project would not generate substantial ground-borne vibration at the bridge. For context, please note that the primary sources of vibration at the bridge are the existing trains, which are not associated with the proposed project.

Response to Question Number 169: Noise impacts on birds present in the project area would depend upon the type and duration of the construction activity, the proximity to habitat, and the time of year. Mitigation measure BIO-17, Santa Ana River – Nesting Season Noise Requirements would avoid or minimize such impacts.

Response to Question Number 170: The project does not propose a noise complaint hotline for residents during project construction. The City's 311 system may be used by residents to notify the City of concerns.

Response to Question Number 171: There is not development for high intensity active recreation in the passive recreation areas where nature education would generally take place, so no significant noise from recreation is anticipated.

Response to Question Number 172: The PRCSD intends for the skatepark to be concrete.

Response to Question Number 173: Food trucks on project property will be by permit only. Permittees will be required to operate within set guidelines. Food trucks will conform to City Municipal Code Title 7 for Noise Control

Response to Question Number 174: There is no specific noise study for the proposed Secondary Lookout at Loring Park. Noise from the construction and operation of the Secondary Lookout is covered by the analysis in the Noise section of the Loring Park Master Plan IS/MND, which considers the entire park. It is noted that the overlook would be adjacent to Mission Inn Avenue, on the opposite side of the park from Ladera Lane.

Response to Question Number 175: Maintenance of lights in parks is typically completed during a standard work day. The work will conform to City Municipal Code Title 7 for Noise Control

VIII. Transportation & VMT (Questions 176–200) – RICK Traffic responses and highlighted yellow for others responses needed.

Response to Question Number 176: The City of Riverside's Traffic Impact Analysis Guidelines (July 2020) provides screening thresholds for both SB-743/VMT analysis (CEQA) and for LOS analysis (non-CEQA). All of the proposed individual park projects within the Riverside Gateway Parks are screened out from both CEQA VMT analysis and non-CEQA LOS analysis.

Response to Question Number 177: Bicycle speed reduction signage is recommended along the SART Reroute section within the Tequesquite North Extension Park.

Response to Question Number 178: There is a steep slope separating Gregory Road from the concessions area, making it unlikely for cars to queue on Gregory Road. There is a parking lot about 115' away that would be more convenient for people to use.

Response to Question Number 179: Each park would provide pedestrian and bicycle access and circulation to encourage non-vehicular trips to the parks.

Response to Question Number 180: Signage, gates and other similar tools can keep emergency access routes clear. The methods and configurations used for this project will be determined during design development.

Response to Question Number 181: A total of 132 parking spaces are required for the combined Tequesquite North and South Extension Parks per the City's parking requirements for "active recreation area within a park" (1 per 8,000 sq. ft) and for "passive recreation within a park" (1 per acre). The proposed 208 parking spaces for Tequesquite North and South Extension Parks would exceed the City's parking requirements for the two parks.

Response to Question Number 182: No modifications or improvements to the Gregory Road/Tequesquite Ave intersection are currently proposed with the project.

Response to Question Number 183: Bike speed reductions are typically enforced with signage and the frequency and number of pedestrians using the multi-use trails.

Response to Question Number 184: "Transit to Trails" will rely on Riverside Transit Agency bus routes and other public transportation options such as PRCSD's Riverside Connect special transportation shuttles.

Response to Question Number 185: The City of Riverside will use prescriptive routing, financial safeguards, and project specific operational conditions for construction hauling.

Response to Question Number 186: The City will provide lighting and bike racks. As at any City park, park patrons must bring their own locks and cables to secure their bicycles.

Response to Question Number 187: The width of the trail can accommodate emergency response vehicles.

Response to Question Number 188: Signage can be posted to indicate pedestrians yield to equestrians, bicyclists yield to everyone, and equestrians yield to no one.

Response to Question Number 189: Wayfinding signage can include time and/or distance to destination information.

Response to Question Number 190: There is no traffic management plan for the Marcy Library during the document review period.

Response to Question Number 191: Tequesquite Avenue is not wide enough for u-turn maneuvers. The project cannot prevent a few drivers a day from making 3-point turns to u-turn if that is their desire.

Response to Question Number 12: None of the park projects included VMT analysis. A VMT assessment was conducted that determined that all park projects would be locally-serving and were screened out from VMT analysis.

Response to Question Number 193: The parking lot at Tequesquite North will include permeable surfacing in the parking bays.

Response to Question Number 194: Monitoring of Santa Ana Trail User speeds is not part of this project. However, trail etiquette signage and speed limit signs can be posted to educate trail users.

Response to Question Number 195: The needed turning radius for the Cottonwood Trail will be determined during design development.

Response to Question Number 196: The 2.5-acre Loring Park is expected to have very low parking demand, and an 11-stall parking lot will be provided off Mission Inn Avenue as part of the Camp Evans park project that will be walking distance from Loring Park.

Response to Question Number 197: There is not a designated ride-share drop-off zone, however ride-share can pull into the parking lot for pick-up and drop-off.

Response to Question Number 198: The metric can use an algorithmic baseline of the lowest common denominator average that factors in older adults and children.

Response to Question Number 199: The Camp Evans at Fairmount Park traffic assessment recommended operational and safety improvements along Mission Inn Avenue between the bridge and Scout Lane, including the existing driveway serving the 11-stall parking lot that will be provided.

Response to Question Number 200: A bike repair station will be provided at the bike rest stop and near bike parking.

IX. Hazards, Wildfire & Safety (Questions 201–225)

Response to Question Number 201: The project is not within a Very High Fire Hazard Severity Zone. The PRCSD performs selective brush clearing to reduce fire fuel load while preserving native habitat when possible.

Response to Question Number 202: Riparian zones in the project are generally avoided and thus not lighted. The master plans intend to activate underutilized park land and increase foot traffic, which provides natural surveillance that deters unauthorized activities.

Response to Question Number 203: Illegal fill observed by City staff will be reported to the appropriate agency.

Response to Question Number 204: An evacuation route has not been prepared as part of the park master plans.

Response to Question Number 205: A licensed civil engineer will be part of the design team for design development and will engineer the appropriate design for the berms including proper subgrade preparation to reduce the risk of liquefaction.

Response to Question Number 206: A typical concession building in Riverside's PRCSD is a medium risk facility due to limited food preparation (such as popcorn, hot dogs, nachos, coffee, and similar). The concession building will be built to meet appropriate building fire and mechanical codes as adopted by the City.

Response to Question Number 207: Though not part of this project, Springbrook Wash, also known as University Wash, is undergoing re-design to facilitate maintenance operations including preventing and cleaning up modern refuse.

Response to Question Number 208: A Vector Control Plan has not been prepared for this project. Water play areas will be designed to avoid prolonged standing water.

Response to Question Number 209: Equipment decontamination will be required under construction contracts to avoid spread of weed seeds.

Response to Question Number 210: The average response time for City of Riverside Fire Department is about 7 minutes and 38 seconds from dispatch to arrival at the scene. The furthest distance on the trail from an entry point is about 2,000'. Driving on the trail at about 5 miles per

hour, it would take an additional 4 minutes and 33 seconds for the emergency response vehicle to reach the furthest point on the SART greenway trail.

Response to Question Number 211: There will likely be typical construction materials and products such as solvents, adhesives and similar stored on site during the construction period. These materials are typically stored in a secured containers within a secured fenced temporary work yard.

Response to Question Number 212: This project does not propose any grading in the Santa Ana River bottom. There are no high pressure gas distribution lines at the project sites.

Response to Question Number 213: Use of blue light emergency communication stations on the trail will be determined at the time of design development.

Response to Question Number 214: California Division of Occupational Safety and Health has legally mandated protocols that the contractor must follow for safety when temperatures reach 95°F.

Response to Question Number 215: No construction at a river access point is proposed as part of this project.

Response to Question Number 216: A civil engineer and geotechnical testing consultant will monitor slope stability during grading.

Response to Question Number 217: In California, fertilizers are regulated by the California Department of Food and Agriculture, with safe limits set for heavy metals and deleterious or harmful ingredients in amounts that could pose a threat to public safety. The park grading will be designed to keep stormwater onsite and not run directly into the Santa Ana River without being treated or managed through a water quality Best Management Practice.

Response to Question Number 218: A vandal resistant barrier between the park and the railroad tracks will be coordinated at the time of design development.

Response to Question Number 219: Crime Prevention Through Environmental Design principles will be used during design development.

Response to Question Number 220: The water recycling system for the water play area is required by state health codes to use ultraviolet light in addition to chlorine treatment.

Response to Question Number 221: For vegetation removal work, the work area is demarcated with tape and signs to inform the public.

Response to Question Number 222: The PRCSD will not likely close trails within this project area during red flag warnings as they are in a developed urban area and not in an inaccessible back county setting.

Response to Question Number 223: Typical park restrooms are well ventilated by use of mesh covered openings near the ceilings.

Response to Question Number 224: During design development, a Stormwater Pollution Prevention Plan will be prepared. It will include Best Management Practices requiring equipment to have a spill cleanup materials readily accessible.

Response to Question Number 225: No hazardous material leaching is anticipated on the project sites.

X. Long-term Sustainability & Alternatives (Questions 226–250)

Response to Question Number 226: An alternatives analysis is not required for a CEQA mitigated negative declaration. Any alluvial fan sage scrub degradation taking place is part of the environmental baseline and not a result of the proposed project.

Response to Question Number 227: Maintenance of any permeable pavement and native garden buffers would be on-going in perpetuity for the life of the site similar to the rest of the city park system.

Response to Question Number 228: There is no current requirement for the City to track carbon sequestration for this project, which is park master plans. Requirements for tracking carbon sequestration may come with later implementation grants. At which time, the City will coordinate with the State Coastal Conservancy to use an acceptable method for tracking carbon sequestration.

Response to Question Number 229: The 7% annual escalation intends to account for the rising costs of construction each year. Any changes to construction costs caused by climate changes is assumed to be incorporated into this cost for preliminary estimating purposes.

Response to Question Number 230: Alternatives analysis are not required for CEQA mitigated negative declarations.

Response to Question Number 231: Temporary and/or seasonal irrigation and use of recycled water when available, can help sustain trees to counteract the urban heat island effect and global warming.

Response to Question Number 232: The parks are separate projects that are not functionally linked; each can be developed and serve the public on its own merits. Completion of one site does not commit the City to the completion of the others.

Response to Question Number 233: When accepting grant funds, the City will sign a grant agreement committing to the terms of the Coastal Conservancy.

Response to Question Number 234: The Riverside Parks, Habitat, and Water Project (https://riversideca.gov/utilities/projects) will bring recycled water distribution lines near the project site. The PRCSD is coordinating with Riverside Public Utilities Department to coordinate future connections of parks to the system.

Response to Question Number 235: The PRCSD will work consultant and contractor to use an adaptive management plan to find the appropriate native and near-native plant palette to fit the site conditions.

Response to Question Number 236: The PRCSD will select from options such as using an appropriate light color/spectrum (amber or other warm color LED), shielding the light from spillover, and programming the light operation times appropriately for wildlife.. An adaptive management strategy will be used to determine appropriate native and near-native plants to meet changing climate and site conditions over time.

Response to Question Number 238: The project will not result in substantial erosion or siltation as discussed in section X of the Initial Study.

Response to Question Number 239: No new river access points are proposed as part of this project.

Response to Question Number 240: When park features are replaced, they are disposed of in a legal manner.

Response to Question Number 241: The proposed project does not have an impact on the City's citrus heritage. There are no known citrus trees existing on the project sites.

Response to Question Number 242: The PRCSD has an Adopt-A-Park program to encourage park stewardship. Contact 951-826-2000 for more information.

Response to Question Number 243: Park trees are inspected and treated if they show signs of infection. If the tree cannot be saved, replacement trees are planted.

Response to Question Number 244: The PRCSD will evaluate the use of solar power for restrooms and concessions buildings for the project during the later design development stage.

Response to Question Number 245: The City performs a city-wide Quality of Life survey every few years to get information about the community's needs, including how well the city park system is serving the community. The PRCSD will continue to use metrics developed by the Trust for Public Land to gauge progress towards social equity in the city's park system (https://www.tpl.org/city/riverside-california)

Response to Question Number 246: The PRCSD typically uses stabilized decomposed granite for recreational trails.

Response to Question Number 247: New water play areas will use recirculating water systems where water is sanitized similar to a swimming pool. These are typically allowed to remain open during drought conditions to allow families to continue to recreate and cool off during hot weather. Operations of this recreation amenity will conform to applicable laws and restrictions.

Response to Question Number 248: While not necessarily designated bee and butterfly corridors, the planting palette will emphasize use of native and near-native plants to support local pollinators.

Response to Question Number 249: The Hidden Valley pond restoration is not part of this project. Some of this project's environmental analysis overlapped with the Hidden Valley pond project, and was referenced periodically.

Response to Question Number 250: The primary purpose of this park master plan project is to develop the plans to enhance park spaces along the Santa Ana River, so that these parks can serve as a gateway to bring people to the river to view and learn about it, while doing no harm and hopefully enhancing local ecology through the use of a primarily native plant palette. Since ecological restoration is not the primary goal of the park projects, the PRCSD will not likely conduct on-going assessments for ecological conditions after project implementation other than relying on visual inspections and adaptive plant management For any required mitigation involving habitat restoration, the City will carry out the restoration and management plan approved by regulatory agencies, which usually has a 5 year duration.

Comment Letter 2: Ellen Baer – January 2, 2026

From: Ellen Baer <ejb33@yahoo.com>

Sent on: Friday, January 2, 2026 6:35:50 PM

To: CEQA-PRCSD <CEQA-PRCSD@riversideca.gov>

CC: EJ B <ejb33@yahoo.com>

Subject: [EXTERNAL] Fairmount Park - Feedback on NOTICE OF INTENT TO ADOPT MITIGATED NEGATIVE DECLARATION FOR THE CITY OF RIVERSIDE, CALIFORNIA

Please verify receipt.

Reviewed 3 documents:

California Environmental Quality Act (CEQA) Documents:

- Notice of Intent - Camp Evans at Fairmount Park

Riverside Gateway Park Master Plans

  - Park Master Plan - Camp Evans at Fairmount Park

Preliminary Grading Plans

- Preliminary Grading Plan - Camp Evans

January 2, 2026 10:19 AM

Feedback on the CEQA and Master Plan for Camp Evans in Fairmount Park.

First I want to say that I love Fairmount Park and I am good with it the way it is today, except for the bathrooms and carelessness from individuals and some maintenance issues. The serenity and lovely views of the waterfowl on the lakes are priceless and it should be embraced and maintained.

Camp Evans documents questions and feedback:

2-1 How much of Camp Evans acreage is proposed for the Boy Scouts/Youth usage? I could not get a response from the park office and did not see it noted in the Master Plan or the Draft CEQA document dated September 2025 (CEQA document).

2-2 First, I object to the camping grounds being for Boy Scouts and youth only. Any citizen of Riverside should have access for camping, and enjoying the area. As noted on the Riverside Gateway Park Master Plan (Master plan) it states on the second to last row that there may be 'Potential Reservation only camping.' I also object to there being a lease of any kind to the Boy Scouts whether it be for 99 years or any duration. This is a public park and the community should have access to all of it. There should also be a limit to the number of people who can use the area at any given time, particularly for camping or events. I see nothing on the Master plan regarding Boy Scouts. Most of what I read in the CEQA document was regarding the Boy Scouts past experiences from 1917 to the 1970s. Also, note that there are two areas within Fairmount Park that are designated for children at this time.

2-3 Also noting in the CEQA document page bottom/section 3.15 that there could be 470 people on Saturday routinely and page / section 3.18 that as much as 477 people or 'weekday trips' and slightly less on Saturdays, 450. Is a 'weekday trip' a person? I am assuming this is the case. Fairmount Park does not normally get this kind of traffic, so who would these people be? Campers? Boy Scouts? This should be spelled out in the CEQA document where they are getting their numbers from. I think that nearly 500 people in this area daily is too much and limits need to be placed on number of people overall as well as in any camping area. There would not be enough parking and it would be worse than a mall at Christmas time being so crowded. How could anyone enjoy nature. The number of vehicles to get to/from the park whether individual vehicles or school/scout buses would adversely affect the air quality and surrounding community; both within Fairmount Park, and residences on the surrounding streets. Certainly, any wildlife as well. I do not recall

2-3 cont. seeing the transportation of the people or weekday trip non maintenance being considered in the document, did I miss this?

2-4 Please note that the Boy Scouts have an array of camping opportunities at much larger Boy Scout camps owned and operated by the Boy Scouts of America in this area.

2-5 Also noting in page bottom/section 3.15 of the same plan that they are suggesting 322 maintenance trips a year. That is nearly once a day and seems extreme for maintenance though maintenance should occur as needed. With regard to parking, in the CEQA document page 1118, 17 parking spaces are noted in a diagram for the future and on page 1120, 60 parking spaces are noted on another diagram of what appears to be the same area within Camp Evans, though the parking lots are face different directions. Unclear if they are going to want to have 2 parking lots or what? Parking and main area is noted on page 1117, not clear if that is the same reference to parking as stated above or not?

2-6 Should there be camping in the Camp Evans area, it would make sense to have a smaller bathroom for basics only, not showering. Otherwise, I am against any additional buildings in this area. Also, not seeing who is paying for the maintenance and upgrades to host the Boy Scouts or other groups who may camp there. Will it cost money for people to camp? What are the details? Having a 1209-page document is nice, time consuming but having additional overall summaries/tables of information would be helpful.

2-7 Re, grading. I looked at the grading document but there is no text describing it in that document. I read the grading text in the CEQA document...though this document outlines how much grading can be done per day (3 acres) and how it will affect some wildlife, it is still limited on how it will affect wildlife not mentioned.

2-8 No BB guns or any guns should be allowed. Nor should alcohol or drugs including Narcan be allowed.

2-9 Page bottom/section 3-6, who evaluates and what is the basis for the evaluation.

2-10 How is the land classified if not forest?

2-11 3.13 page bottom/section – How is 'forest habitat' defined, if the land is considered non forest?

2-12 3.20 page bottom/section - What mitigation is involved for wildlife (d) that are not mentioned/identified such as squirrels, boar, skunks, racoons, possums and other birds. Is this because there is no state protection (E) that they are not considered? They should be considered because of the building occurring within the community leaving less green space they need the park to help them survive. And because they exist so how can't they be considered?

2-13 3.27 page bottom/section. Well established 'invasive' trees such a eucalyptus should be kept and not taken out. This section suggests that a third of Camp Evans would be altered.

2-14 3.33 page bottom/section. Riparian birds, suggest that 2 of the 5 noted bird species would not be supported (yellow warbler and yellow breasted chat), why not? It further mentions that the western pond turtle is the only turtle specie that would be protected/considered. Is that the only turtle type in the park? I have seen turtles in Fairmount Lake and suspect that they move about in Camp Evans, any turtle species should be considered.

2-15 3.35-3.36 page bottom/section. Birds... birds that benefit from visiting the area though they may not breed in the area should also be considered and protected. Nesting or not. Birds need to eat and rest, so clearly this area is relevant to their survival.

2-16 Also, regarding the Master Plan, photo of burned palm trees (3rd row from the top) as a reference to their being invasive species and insinuating that they and the park is more at risk because of their presence. Please qualify this, these trees were burnt due to a homeless encampment. But not for the homeless person(s) setting a fire under the trees they likely would not have caught fire. And all trees need to be properly maintained taking out dead wood, or prongs, etc.

Thank you for your consideration. Please let me know if any questions. I asked questions and would appreciate responses. Thank you again.

Ellen Baer

Resident of Riverside, CA

562-506-4891 - Confidential

Responses to Comment Letter 2: Ellen Baer – January 2, 2026

Response to Comment 2-1: ~5,000 sf

Response to Comment 2-2: Comment is noted. Programming of the potential camping area is yet to be determined, but any camping will be allowed only in a controlled and permitted manner.

Response to Comment 2-3: Trips are calculated as number of vehicles, not number of people. Each vehicle generates one inbound trip and one outbound trip, so each vehicle generates two trips. The trip rates per acre are based on traffic counts that were collected at Ryan Bonamino Park, which is a developed park with sports fields and other amenities that generate higher trips than a more passive park. The increase of 477 trips per day at Camp Evans/Fairmount Park is not very high considering that Ryan Bonamino Park currently generates 1,800 vehicle trips on a typical weekday. The 477 trips would be dispersed over an entire day with 39 trips during the AM peak hour and

with 45 trips during the PM peak hour. The project is expected to provide a sufficient number of parking spaces per the City's parking requirements for a park use.

Response to Comment 2-4: Comment noted.

Response to Comment 2-5: Maintenance may not necessarily be needed once per day, and will be fine tuned once the project is implemented. The Camp Evans/Fairmount Park project would provide a parking lot with 60 stalls, a second parking lot with 17 stalls, and a third parking lot with 11 stalls, for a total of 88 parking stalls.

Response to Comment 2-6: The City's intent is to provide low cost nearby camping for the community. Specific operation details are yet to be determined.

Response to Comment 2-7: Impacts of grading on wildlife are described in the Intial Study, Section IV.

Response to Comment 2-8: Comment noted.

Response to Comment 2-9: Question is unclear.

Response to Comment 2-10: The project site has a zoning designation of Public Facilities (PF) and a GP 2025 land use designation of Private Recreation (PR).

Response to Comment 2-11: Please see response to comment 2-10.

Response to Comment 2-12: Response from ICF pending While common (non-special status) species are not sensitive resources considered under CEQA, the City's participation in the MSHCP and implementation of the preserve design provides broad habitat protections that benefit common and special status species; additionally, the project's avoidance and minimization measures for special status species also benefit common species.

Response to Comment 2-13: Non-native invasive species are not afforded protection because they threaten the existence of native species.

Response to Comment 2-14: Yellow warbler and yellow-breasted chat are Covered Species under the MSHCP; these species are discussed in Section 2.1.4 of the MSHCP, Volume I, and listed in Exhibit C to the IA and Section 9.2 of the MSHCP, Volume I. Per the MHSCP, high quality riparian habitat within Existing Core A (composed largely of PQP lands in the Prado Basin and the Santa Ana River in the northwest region of the MSHCP Area.) and along the edges must be maintained for species such as SWFL, yellow warbler, yellow-breasted chat, WYBC, and other species listed for Existing Core A. The MND identifies that Other riparian bird species associated with riparian communities and listed in Section 6.1.2 of the MSHCP would also be expected to occur in the riparian/riverine community adjacent to the Park Site. Project measures will be implemented to prevent inadvertent potential indirect effects on migratory birds. The MND identifies that yellow warbler and yellow-breasted chat were detected throughout suitable habitat during riparian bird surveys. The MND also identifies that surveys were conducted for southwestern willow flycatcher and western yellow-billed cuckoo and that surveys were negative.

The only reptile listed as benefiting from the preservation of riparian/riverine resources in MSHCP Section 6.1.2 (RCIP 2003) is western pond turtle, which is federally proposed as threatened and a state SSC and is a Fully Covered species under the MSHCP. Western pond turtles were not observed during surveys; however, the non-native invasive red-eared slider turtle (Trachemys scripta

elegans) was observed during surveys. Non-native invasive species threaten the existence of native species and are therefore not afforded protection.

Response to Comment 2-15: The City's participation in the MSHCP and implementation of the preserve design provides broad habitat protections that benefit migrating avian species. Sensitive bird species are specifically addressed in the MND.

Response to Comment 2-16: Comment noted.

Comment Letter 3: Sierra Club – January 2, 2026

SAN GORGONIO CHAPTER

Moreno Valley/Box Springs Group

SENT VIA EMAIL
January 2, 2026

Alisa Sramala; Principal Park Project Manager
Donesia Gauge; City Clerk
City of Riverside
Email: ceqa-prcsd@riversideca.gov; asramala@riversideca.gov; city_clerk@riversideca.gov

RE: Public comment for the Riverside Gateway Park CEQA IS/MND projects – SCH # 2025120424; 2025120370; 2025120520; 2025120369

Dear Ms. Sramala, City Clerk,

Thank you for the opportunity to provide comments on the Riverside Gateway Parks to develop additional passive and active recreational opportunities at multiple sites adjacent to the Santa Ana River in Riverside. The Sierra Club supports preserving natural spaces, limiting development, prioritizing low-impact recreation, ensuring equitable access for all communities, and advocating for sustainable management to connect people with nature.

The Riverside Gateway project encompasses at least four separate planning projects to develop a series of parks and open spaces along the Santa Ana River. The Camp Evans Master Plan is 100 acres of undeveloped land adjacent to Lake Evans; Loring Park Master Plan is for 2.5 acres at Loring Park on Mt. Rubidoux Drive; Tequesquite Sites and Santa Ana River Greenway Master Plan includes 100 acres of largely undeveloped and riparian area; and the Martha McLean and Jurupa Ave Trailhead Master Plan is for 40 acres of additional passive and active recreational amenities. In total, these projects encompass over 240 acres of additional passive and active recreational areas along the Santa Ana River.

In our review, the Sierra Club Box Springs Group identified four primary issues that are of concern in the four Mitigated Negative Declarations for the projects described. These are described below.

3-1

1. The comment period occurring over from December 3rd to January 2nd included two major holidays yet included a comment period of exactly 30 days. The four projects had significant environmental documentation to review and the City of Riverside did not provide notification to the Sierra Club despite a request to the City to provide notification on all planning projects that required environmental documentation. We ask for an extended comment period to be able to fully review these documents to provide more thorough comments on the projects.

3-2

2. Cumulative impacts – the four Riverside Gateway projects are clearly connected projects, each comprising part of a Riverside Gateway Master Planning process. Unfortunately, the City has

3-2 cont.

treated the CEQA process piecemeal, separating each of the individual pieces of the larger project into four separate planning documents. The definition of cumulative impacts under CEQA Sections 15130 and 15355 requires an analysis of the individual effects from multiple separate projects. A list approach or a projection approach are the approved options for cumulative impacts analysis. Both would require analysis of the Riverside Gateway in a cumulative manner. The Riverside Gateway projects ignore this imperative and instead treat the four projects independently and piecemeal the air quality, biological, and other environmental impacts associated with the Riverside Gateway planning. To be clear, the projects can have four separate planning documents but need to analyze for all cumulative impacts of all projects holistically – air quality, biological, hydrological, wildfire, and land-use impacts cannot be treated piecemeal and ignore the total impact of the four park projects.

3-3

3. Biological Surveys – The biological surveys for rare plants occurred in April 2022, which was at the tail end of a long period of extreme drought in Southern California[1]. CEQA biological surveys require strict seasonal timing requirements and may need to occur over multiple points-in-time to ensure representativeness. Given the overlap with Multiple Habitat Conservation Plan cells, it is critical to ensure that the rare and endangered plants along the Santa Ana River are identified and protected to the maximum extent possible. Drought conditions can stunt and suppress plant growth and represent unusual conditions that are unlikely to be representative of more normal precipitation years. Therefore, we request that an additional survey is performed now that the drought has ended to ensure that all rare and endangered plants are appropriately surveyed.
4. Omission of land-use and planning consistency with the Riverside Parks Master Plan – None of the MND documents reviewed include land-use and planning consistency checks with the overall Riverside Parks Master Plan document (2020)[2]. The City of Riverside states that the '*...Master Plan serves as a guide and implementation tool for the management and development of parks and recreational facilities and programs for the City. The Master Plan was adopted on February 4, 2020, and is part of the defined strategy to continue to address the primary actions and policies set forth in the Parks and Recreation Element of the General Plan.*' As the key document guiding development of Parks in the City, it is imperative to ensure that the Riverside Gateway projects follow the prescriptions in the Park Master Plan. Specifically, the key goal is to '*Alleviate parkland shortage, provide parks in underserved areas, and strive to preserve natural resources and open space in a cost-effective manner to enhance the living environment for all residents.*' The Riverside Gateway projects do not check for consistency with this overarching objective. Below, we highlight inconsistencies with the Park Master Plan.

3-4

   a. The Riverside Gateway projects do not *provide parks in underserved areas*. Multiple areas of the city are identified as underserved for parks, and none of them are in Ward 1. Adding parks and open space to an area rich in parks has great network effects, but is inconsistent with the areas of highest need (see exhibit 5.1-1; Park Master Plan; policy PR-1.2)

3-5

   b. It isn't clear from the planning documents that the parks are adequately *preserving natural resources and open space*. Please document clearly the cumulative area that will be preserved vs turned into passive/active recreation areas such that it is possible to characterize the relative fraction of area devoted to natural resource conservation vs active and passive recreation amenities.

3-6

   c. It is not clear the proposed Riverside Gateway projects are *cost-effective*. The proposed costs are from 2022 and are likely at least a factor of 2 below current costs. Page 127 of the Master Plan states that new park parcels will costs $4,000 to $10,000 per acre annually to maintain; with 250 acres of cumulative parks, this project could have $2.5M of annual maintenance costs. Environmental documentation should describe

[1] https://water.ca.gov/-/media/DWR-Website/Web-Pages/Water-Basics/Drought/Files/Publications-And-Reports/Water-Year-2022-Brochure_ay11.pdf

[2] https://riversideca.gov/park_rec/planning-projects/parks-master-plan-vision-2030

3-6 cont.

the cumulative cost and why these projects are cost-effective at meeting the needs of residents, especially relative to low-impact recreation and natural space alternatives.

3-7

d. The Riverside Gateway project appears to be inconsistent and far more with the LU-1 Santa Ana River Goal: *Increase the prominence of the Santa Ana River by providing better connections, increased recreational opportunities, and development of Class I Bike Path and Recreational Trail along the length of the river within the City of Riverside including an adjacent decomposed granite walkway*. The additional amenities described in the Riverside Gateway are far more expensive and active than the City adopted goals. Given limited resource availability for parks, it is important to prioritize meeting the Park Master Plan goals rather than devote excessive resources to projects in overserved areas of the City.

Summary

Thank you again for the opportunity to comments on the Mitigated Negative Declarations for the Riverside Gateway Park CEQA IS/MND projects – SCH # 2025120424; 2025120370; 2025120520; 2025120369. We hope these comments are taken seriously and addressed fully to ensure the City of Riverside follows its own directives for development of parks within the City.

Please keep the Sierra Club Box Springs Group notified of all documents and meetings related to the projects.

Sincerely,

Michael McCarthy, PhD
Sierra Club Box Springs Group
Conservation Co-Chair
Email: mikem@radicalresearch.llc
P.O. Box 1325
Moreno Valley, CA 92556-1325

Responses to Comment Letter 3: Sierra Club – January 2, 2026

Response to Comment 3-1: Comment noted. City will add the Sierra Club as a stakeholder during community meetings for subsequent design development of the project.

Response to Comment 3-2: The parks are separate projects that are not functionally linked; each can be developed and serve the public on its own merits. Completion of one site does not commit the City to the completion of the others.

Response to Comment 3-3: An additional rare plant survey will be conducted for each site prior to subsequent design development to ensure avoidance of special status plants.

Response to Comment 3-4: The PRCSD continues to seek grant funding to implement and renovate parks throughout the city. The grant used for this project was restricted to use for parks within a certain distance of the Santa Ana River.

Response to Comment 3-5:. Please see table below regarding areas proposed for active recreation versus passive recreation and natural lands.

Site	Proposed New Developed Acres	New Planting Area Acres	Acres to Remain As-is	Acres Total site
Camp Evans	21	33	55	110
Loring Park	0.4	2	0	2.4
Tequesquite North	12	8	43	64
Tequesquite South	10	14	35	60
Martha McLean	4	3	33	39
Jurupa Ave Trailhead	2	3	3	8
	50	64	169	282

Response to Comment 3-6: Comment noted. During design development, the PRCSD will work to balance recreational infrastructure development with anticipated maintenance costs to find the best value to meet the community's needs.

Response to Comment 3-7: Comment noted.

Comment Letter 4: California Department of Fish and Wildlife (CDFW), January 23, 2026

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director

January 23, 2026
Sent via email

Alisa Sramala, Principal Park Project Manager
Parks, Recreation, and Community Services Department
City of Riverside
3900 Main Street Parks, Recreation and Community Services
Riverside, CA 92522
asramala@riversideca.gov

Subject: Draft Mitigated Negative Declaration, Camp Evans Park Master Plan, Riverside Gateway Parks Program (Project), State Clearinghouse No. 2025120424, City of Riverside

Dear Alisa Sramala:

The California Department of Fish and Wildlife (CDFW) received a Mitigated Negative Declaration (MND) from the City of Riverside (City) for the Camp Evans Park Master Plan, Riverside Gateway Parks Program (Project) for the City of Riverside Parks, Recreation and Community Services Department (Project Applicant/Proponent) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

1 CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as per Section 2800, et seq., of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. CDFW is providing the following comments as they relate to the Project's consistency with the MSHCP and CEQA.

PROJECT DESCRIPTION AND SUMMARY

Description: The City of Riverside Parks, Recreation, and Community Services Department (PRCSD), Planning and Design Division is preparing several Park Master Plans for sites along the Santa Ana River Trail in Riverside, California under the Riverside Gateway Parks Program.

The proposed Project includes the development of a 100-acre public park to provide a variety of passive recreational opportunities including paths and trails, public art installations, a community garden, seating, shade structures, educational opportunities, and gathering areas. The Project proposes active park elements including archery, challenge course, and play areas. To connect the historic residential neighborhood to the north to the Fairmont Park Camp Evans area and the Santa Ana River Trail, ADA-accessible, meandering walking and biking trails would be designed with entrances along the Santa Ana River Trial, Mission Inn Avenue, and Dexter Drive. The main entrance along Dexter Drive would include parking and the entry location adjacent to Lake Evans would also include a nature play area, restrooms, concessions, and a seating area.

Location: The Project is located in the City of Riverside, Riverside County, California. The site is bordered by the Santa Ana River to the west, Mission Inn Avenue to the south, Indian Hill Road to the east, and Dexter Road and Lake Evans to the north, The Santa Ana River Trail is directly west of the proposed project site.

COMMENTS AND RECOMMENDATIONS

Based on the documents for review, CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Western Riverside County Multiple Species Habitat Conservation Plan

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP.

To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP; and demonstrates compliance with: 1) HANs process and/or Joint Project/Acquisition Review Process (Section 6.1.1 and Section 6.6.2 subitem E of the MSHCP) or equivalent process to ensure application of the Criteria and thus, satisfaction of the City's obligation to the MSHCP Conservation Area 2) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP); 3) Urban/Wildlands Guidelines (Section 6.1.4 of the MSHCP); 4) Maintenance of Other Existing Facilities Within Public/Quasi-Public lands and Allowable Uses in the MSHCP Conservation Area (MSHCP Section 7.2.5 and 7.4) 5) the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

Specific Comments

Comment #1: MSHCP Consistency

4-1 The City of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. The Project and other associated projects within the Riverside Gateway Parks Program are located in the Jurupa Area Plan in Subunit 1,

and are proposing Project activities within MSHCP Criteria Cells 187, 443, 534, 621, and 617 adjacent to the Santa Ana River. The MND is missing information on how the Project might contribute to, or conflict with, assembly of the MSHCP Conservation Area consistent with the reserve configuration requirements. The MND lacks the specifications of Criteria for Cells within the Projects' location and does not address how Public/Quasi Public Lands (PQP) are being impacted and how they will be replaced. The City as a Permittee to the MSHCP should reach out to the Western Riverside County Regional Conservation Authority (RCA) and discuss the Joint Project Review (JPR) process set forth in Section 6.6.2 and the Determination of Biological Equivalent or Superior Preservation (DBESP) in Section 6.1.2 of the MSHCP for proposed discretionary Projects within the Criteria Area and discuss any impacts to habitats within existing PQP lands.

The City is required to ensure that all public and private projects complete the Consistency Analysis process prior to completion and adoption of the MND to
4-1 demonstrate implementation of MSHCP requirements in the CEQA documentation. To meet this requirement, the City must prepare and submit a JPR and a DBESP to RCA, CDFW, and United States Fish and Wildlife Service (USFWS) for review and response to determine if the project is consistent with Reserve Assembly, PQP requirements, and that the mitigation proposed for the impacts to riparian/riverine resources is biologically equivalent or superior to an avoidance alternative.

Absent completion of this process, including the associated analysis, CDFW is concerned that the Project could be inconsistent with the MSHCP and could potentially harm MSHCP Conservation Areas through incompatible use of PQP Lands of which the reserve was based. Recreation can have significant impacts on wildlife and ecosystem health (Hammitt et al. 2015; Marion et al. 2016) and areas identified within the MND as being designed for additional trails, archery and challenge courses should be analyzed for their impacts not only on riparian/riverine resources but also on the MSHCP Conservation Area and specific habitat types.

CDFW requests that the City complete the Consistency Analysis process, and once the Consistency Analysis is complete, then update the MND with any additional measures identified through the JPR and DBESP process in the Consistency Analysis. This process would demonstrate the Project's consistency with and the City's implementation of the MSHCP.

Comment #2: Burrowing Owl

The MND identifies that burrowing owl have the potential to occur within the Project site and provides the results of focused surveys completed in 2022. CDFW is concerned
4-2 that the information provided in the MND is outdated and may not effectively assess potential impacts. The Project site is within the Burrowing Owl survey area of the MSHCP (Section 6.3.2) which requires recent focused surveys to determine occupancy. CDFW recommends focused breeding seasons surveys be conducted, and where

appropriate, mitigation required for the unavoidable impacts (see recommended language for inclusion in the MND). Further recommended revisions to MM-BIO-22 have been added below to address additional avoidance and minimization measures if burrowing owls are found during the pre-activity surveys.

On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl as endangered under the California Endangered Species Act (Fish & G. Code, § 2050 et seq.), determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. During its candidacy, burrowing owl is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Project construction and activities may result in injury or mortality of burrowing owl, disrupt natural burrowing owl breeding behavior, and reduce reproductive capacity. Also, the Project may impact breeding, wintering, and foraging habitat for the species. Habitat loss could result in local extirpation of the species and contribute to local, regional, and statewide declines of burrowing owl. Therefore, the following revisions are recommended.

4-2

Recommended Potentially Feasible Mitigation Measure(s):

To avoid take of active burrowing owl burrows (nests) and comply with MSHCP Additional Survey Needs and Procedures for burrowing owl under Section 6.3.2, CDFW requests the City include the following edits to mitigation measure MM-BIO-22 in the MND per below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1"Mitigation Monitoring and Reporting Program".

MM-BIO-22: Focused Surveys and Pre-Construction Surveys for Burrowing Owl.

> **During burrowing owl breeding season (March 1-August 31), a total of four focused surveys for BUOW shall be conducted by a qualified biologist within the Project area and a 500 ft buffer around the disturbance footprint prior to ground disturbance to reevaluate the locations of active BUOW burrows. In addition to breeding season surveys, pre-construction presence/absence surveys for BUOW shall be conducted and submitted to USFWS and CDFW by a qualified biologist within 30 days prior to the commencement of ground disturbing activities to avoid direct take of BUOW (MSHCP Species Specific Objective 6). If survey results are negative (i.e., no occupied burrows or live burrowing owls are detected) and ground-disturbing Project activities are scheduled to begin within 30 days of the final survey, then no additional preconstruction survey or biological monitoring requirements will be necessary. If BUOWs are identified on-site, during either the breeding season or pre-construction surveys, a Burrowing Owl Protection and Relocation Plan shall be**

developed in compliance with the MSHCP and in coordination with the California Department of Fish and Wildlife, United States Fish and Wildlife Service and the Western Riverside County Regional Conservation Authority. The City shall implement the following measures as well as any others developed in coordination with CDFW, USFWS and RCA:

- **A biological monitor will be present during vegetation clearing, grading, and construction, to monitor occupied BUOW burrows and any construction-related impacts.**

- **Prior to any ground disturbance, all limits of Project construction will be delineated and marked to be clearly visible to personnel on foot and in heavy equipment. All construction-related activities (e.g., vegetation removal, grading, equipment lay-down and storage, and contractor parking) will occur inside the limits of construction and designated staging areas. Construction staging and equipment storage will be located outside any occupied BUOW burrow locations.**

- **The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.**

- **A qualified biologist will conduct any necessary BUOW passive relocation that may be required to avoid Project effects to BUOW.**

- **If BUOWs must be moved away from the proposed work area, passive relocation techniques (e.g., use of one-way doors and collapse of burrows) would be used rather than actual avian trapping. At least one or more weeks would be necessary to accomplish this to allow the birds to acclimate to alternate**

burrows.

- **The Project shall provide funding for long-term management and monitoring of the protected lands acquired for BUOW impacts. This monitoring would include an annual report submittal to the CDFW.**

~~A Burrowing Owl Management Plan (Plan) will be prepared by a qualified biologist and will include:~~

~~1) Focused Survey for Burrowing Owl – Include within the Plan, the results of the MSHCP protocol survey conducted.~~

~~2) Preconstruction Survey for Burrowing Owl – Performed within 14 days prior to ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground disturbing activities. If ground disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owls have not colonized the site since it was last disturbed. The BSA shall be the LOD and a 500 foot BSA.~~

~~3) Protocol for Presence – Steps necessary for handling the presence of burrowing owl (if found during either of the two surveys), which may include full avoidance, if feasible, or passive relocation by a qualified ornithologist. 4) Agency Approval – The Burrowing Owl Management Plan will need approval by RCA, USFWS, and CDFW. 5) If burrowing owls are confirmed present and passive or active relocation is necessary, a Burrowing Owl Protection and Relocation Plan may be required based on coordination with the RCA and the Wildlife Agencies. This Plan would need to be reviewed and approved with the RCA and Wildlife Agencies, including the State banding permit office and Federal MBTA office (for active relocation only) and this information will be included within the Burrowing Owl Management Plan. Coordination with the RCA and Wildlife Agencies will occur during the preparation of the Plan. The Plan will be reviewed and approved prior to initiating ground disturbance.~~

The Burrowing Owl Protection and Relocation Plan will be submitted to CDFW and USFWS for approval prior to initiating ground disturbance within the project site. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl

has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

Comment #3: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)

The MND identified that the Project site would impact 1.90 acres of riparian vegetation communities. Based on the description in the MND, the Project activities will impact fish and wildlife resources within the three drainages onsite – the concrete drainage channel, low flow channel, and a spillway channel that converges with the low-flow channel –and could potentially have impacts to the downstream portion of the Santa Ana River as a result of increased energy of flow and deposition of debris, waste or other materials. Based on review of materials submitted with the draft MND and review of aerial photography, the Project has the potential to impact fish and wildlife resources and is subject to Fish and Game Code section 1600 et seq.

4-3 Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. CDFW requests the MND edit mitigation measure MM-BIO-15, as shown below, to require a notification of lake or streambed alteration be submitted to CDFW, as required by Fish and Game Code section 1602.

Additionally, there are areas within the Project area that may be subject to an active lake and streambed alteration agreement (LSAA), including the associated mitigation obligations, that are not represented nor discussed within the MND. CDFW requests the City coordinate with CDFW to identify potential overlap with impact or mitigation areas and whether any conflicts with existing requirements of the LSAA could occur as a result.

MM-BIO 15: ~~Compensatory Mitigation~~ **Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)**

Direct and indirect permanent impacts to rivers, streams, and lakes shall be addressed through Section 1602 of the California Fish and Game Code. Prior to the grading of the Project site and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts subject to Fish and Game Code section 1602 and obtain one of the following: a CDFW-executed Lake and Streambed Alteration Agreement (LSAA) authorizing impacts to Fish and Game Code section 1602 resources

associated with the Project, written documentation from CDFW that notification is not required, or written documentation that a Lake and Streamed Alteration Agreement is not required.

The notification to CDFW should provide the following information:

1. **A stream delineation including the bed, bank and channel;**

2. **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);**

3. **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and**

4. **A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.**

~~(Compensatory mitigation) Purchase of mitigation bank credits will be through an agency approved mitigation bank or in-lieu fee program and/or establishment of riparian/riverine, and/or creation of riparian/riverine resources, including federal and state jurisdictional water resources.~~ **If an LSAA is required, the Applicant shall provide compensatory mitigation at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. Onsite mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.**

Comment #4: Crotch's Bumblebee

4-4 The California Fish and Game Commission accepted a petition to list Crotch's bumble bee (*Bombus crotchii*) as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch's bumble bee is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the

Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the Terrestrial and Vernal Pool Invertebrates of Conservation Policy (CDFW 2017).

The MND recognizes that Crotch's bumble bee has the potential to nest onsite and that impacts to an active nest could be significant. CDFW adds that the Project may result in
4-4 temporal or permanent loss of suitable nesting and foraging habitat.

Crotch's bumble bee could be directly affected by damage to suitable habitat, including grassland and scrub habitats near the Santa Ana River. Direct effects would also include the permanent conversion of occupied habitat to project infrastructure or changes to micro/local hydrology. Indirect effects on Crotch's bumble bee during construction would include the accumulation of fugitive dust resulting in degradation of habitat for these invertebrates. In addition, changes to local runoff would have negative effects on the health and vigor of plants that make up suitable habitat. CDFW appreciates the inclusion of MM-BIO-24, and requests the City incorporate the revision shown below to address the potential need for the City to obtain "take" authorization and mitigate the loss of habitat, in addition to implementing avoidance and minimization measures aimed at addressing direct impacts to individual adults, eggs, and/or larvae.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To avoid take of Crotch's bumble bee, CDFW requests the City include the following mitigation measures in the MND per below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program.

MM-BIO 24: Crotch's Bumble Bee Pre-Construction Surveys: **Site specific surveys for Crotch's bumble bee shall be conducted in accordance with any Crotch's bumble bee survey protocol provided by CDFW. If Crotch's bumble bee are determined to be present within the impact site and it is determined the species will be impacted by Project implementation, appropriate mitigation will be determined in**

consultation with CDFW. In addition, the Project Applicant shall adhere to the following:

- **Inactive small mammal burrows and thatched/bunch grasses should be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it should be resurveyed for Crotch's bumble bee presence within seven (7) days prior to the scheduled disturbance.**

- Pre-construction surveys for Crotch's bumble bee should be conducted no more than 30 days prior to any ground disturbance that would occur between March and September (the flight season). If pre-construction surveys identify occupied Crotch's bumble bee habitat within the project area, the project biologist should notify the CDFW and establish, monitor, and maintain no-work buffers around active nest colonies and any associated floral resources identified. The size and configuration of the no-work buffer should be based on best professional judgment of the project biologist in consultation with the CDFW. At a minimum, the buffer should provide at least 50 feet of clearance from construction activities around any nest entrances and maintain disturbance-free airspace between the nest and nearby floral resources. Construction activities should not occur within the no-work buffers until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for 3 consecutive days, indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). **If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take.**

- **The Project does not have the authority to take a candidate species and shall obtain an Incidental Take Permit (ITP) prior to grading with CDFW. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the Project proponent should obtain appropriate take authorization from CDFW pursuant to Fish and Game Code section 2081 subdivision (b).**

- **Any floral resource associated with Crotch's bumble bee that will be removed or damaged by the Project should be replaced at no less than 1:1. Floral resources should be replaced as close to their original location as is feasible. If active Crotch's bumble bee nests have been identified and**

floral resources cannot be replaced within 200 meters of their original location, floral resources should be planted in the most centrally available location relative to identified nests. This location should be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources should be maintained in perpetuity and should be replanted and managed as needed to ensure the habitat is preserved.

Additional Recommendations

Mitigation and Monitoring Reporting Plan

CDFW recommends updating the MND's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of

environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND for Camp Evans Park Master Plan, Riverside Gateway Parks Project (Project), State Clearinghouse No. 2025120424 to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. CDFW requests that the City of Riverside address CDFW's comments and concerns prior to adoption of the MND for the Project.

Questions regarding this letter or further coordination should be directed to Breanna Machuca, Senior Environmental Scientist Specialist, at Breanna.Machuca@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kim Freeburn
84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec: **California Department of Fish and Wildlife**
Carly Beck, Senior Environmental Scientist Supervisor
Carly.Beck@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@lci.ca.gov

Western Riverside County Regional Conservation Authority
Harry Sandoval, Deputy Director
Hsandoval@rctc.org

REFERENCES

California Department of Fish and Game (CDFG). 2012. Staff report on burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM)		**Timing**	**Responsible Party**
Burrowing Owl	MM-BIO-22: Focused Surveys and Pre-Construction Surveys for Burrowing Owl. During burrowing owl breeding season (March 1-August 31), a total of four focused surveys for BUOW shall be conducted by a qualified biologist within the Project area and a 500 ft buffer around the disturbance footprint prior to ground disturbance to reevaluate the locations of active BUOW burrows. In addition to breeding season surveys, pre-construction presence/absence surveys for BUOW shall be conducted and submitted to USFWS and CDFW by a qualified biologist within 30 days prior to the commencement of ground disturbing activities to avoid direct take of BUOW (MSHCP Species Specific Objective 6). If survey results are negative (i.e., no occupied burrows or live burrowing owls are detected) and ground-disturbing Project activities are scheduled to begin within 30 days of the final survey, then no additional preconstruction survey or biological monitoring requirements will be necessary. If BUOWs are identified on-site, during either the breeding season or pre-construction surveys, a Burrowing Owl Protection and Relocation Plan	Prior to commencing ground- or vegetation disturbing activities	Project Proponent

	shall be developed in compliance with the MSHCP and in coordination with the California Department of Fish and Wildlife, United States Fish and Wildlife Service and the Western Riverside County Regional Conservation Authority. The City shall implement the following measures as well as any others developed in coordination with CDFW, USFWS and RCA: • A biological monitor will be present during vegetation clearing, grading, and construction, to monitor occupied BUOW burrows and any construction-related impacts. • Prior to any ground disturbance, all limits of Project construction will be delineated and marked to be clearly visible to personnel on foot and in heavy equipment. All construction-related activities (e.g., vegetation removal, grading, equipment lay-down and storage, and contractor parking) will occur inside the limits of construction and designated staging areas. Construction staging and equipment storage will be located outside any occupied BUOW burrow locations. • The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed		

	implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval. • A qualified biologist will conduct any necessary BUOW passive relocation that may be required to avoid Project effects to BUOW. • If BUOWs must be moved away from the proposed work area, passive relocation techniques (e.g., use of one-way doors and collapse of burrows) would be used rather than actual avian trapping. At least one or more weeks would be necessary to accomplish this to allow the birds to acclimate to alternate burrows. • The Project shall provide funding for long-term management and monitoring of the protected lands acquired for BUOW impacts. This monitoring would include an annual report submittal to the CDFW. The Burrowing Owl Protection and Relocation Plan will be submitted to CDFW and USFWS for approval prior to initiating ground disturbance within the project site. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing		

	owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.		
Lake and Streambed Alteration Agreement	MM-BIO 15: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA) Direct and indirect permanent impacts to rivers, streams, and lakes shall be addressed through Section 1602 of the California Fish and Game Code. Prior to the grading of the Project site and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts subject to Fish and Game Code section 1602 and obtain one of the following: a CDFW-executed Lake and Streambed Alteration Agreement (LSAA) authorizing impacts to Fish and Game Code section 1602 resources associated with the Project, written documentation from CDFW that notification is not required, or written documentation that a Lake and Streamed Alteration Agreement is not required. The notification to CDFW should provide the following information: 1. A stream delineation including the bed, bank and channel; 2. Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should		

	be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009); 3. A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and 4. A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. If an LSAA is required, the Applicant shall provide compensatory mitigation at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. Onsite mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.		
Crotch's Bumble Bee	MM-BIO 24: Crotch's Bumble Bee Pre-Construction Surveys: Site specific surveys for Crotch's bumble bee shall be conducted in accordance with any Crotch's bumble bee	Prior to commencing ground- or vegetation	Project Proponent

	survey protocol provided by CDFW. If Crotch's bumble bee are determined to be present within the impact site and it is determined the species will be impacted by Project implementation, appropriate mitigation will be determined in consultation with CDFW. In addition, the Project Applicant shall adhere to the following: • Inactive small mammal burrows and thatched/bunch grasses should be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it should be resurveyed for Crotch's bumble bee presence within seven (7) days prior to the scheduled disturbance. • Pre-construction surveys for Crotch's bumble bee should be conducted no more than 30 days prior to any ground disturbance that would occur between March and September (the flight season). If pre-construction surveys identify occupied Crotch's bumble bee habitat within the project area, the project biologist should notify the CDFW and establish, monitor, and maintain no-work buffers around active nest colonies and any associated floral resources identified. The size and configuration of the no-work buffer should be based on best professional judgment of the project biologist in consultation with the CDFW. At a minimum, the buffer should provide at least 50 feet of clearance from construction activities around any nest entrances and maintain disturbance-free airspace between the nest and nearby floral resources. Construction activities should not occur	disturbing activities	

	within the no-work buffers until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for 3 consecutive days, indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take. • The Project does not have the authority to take a candidate species and shall obtain an Incidental Take Permit (ITP) prior to grading with CDFW. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the Project proponent should obtain appropriate take authorization from CDFW pursuant to Fish and Game Code section 2081 subdivision (b). • Any floral resource associated with Crotch's bumble bee that will be removed or damaged by the Project should be replaced at no less than 1:1. Floral resources should be replaced as close to their original location as is feasible. If active Crotch's bumble bee nests have been identified and floral resources cannot be replaced within 200 meters of their original location, floral resources should be planted in the most centrally available location relative to identified nests. This location should be no more than 1.5 kilometers from any identified		

	nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources should be maintained in perpetuity and should be replanted and managed as needed to ensure the habitat is preserved.		

Responses to Comment Letter 4: California Department of Fish and Wildlife (CDFW), January 23, 2026

Response to Comment 4-1: The City will complete the Consistency Analysis process, and once the Consistency Analysis is complete, the MNDs will be updated with any additional measures identified through the JPR and DBESP process in the Consistency Analysis to demonstrate the Project's consistency with and the City's implementation of the MSHCP.

Response to Comment 4-2: The Draft Mitigated Negative Declaration, Camp Evans Park Master Plan, Riverside Gateway Parks Program has been updated per CDFW's recommendation to avoid take of active burrowing owl burrows (nests) and comply with MSHCP Additional Survey Needs and Procedures for burrowing owl under Section 6.3.2; edits were made to mitigation measure MM-BIO-22 (burrowing owl).

Response to Comment 4-3: The City will coordinate with CDFW to identify potential overlap with impact or mitigation areas and whether any conflicts with existing requirements of the Lake and Streambed Alteration Agreement (LSAA) could occur as a result. The Draft Mitigated Negative Declaration, Camp Evans Park Master Plan, Riverside Gateway Parks Program has been updated per CDFW's recommendation; edits were made to mitigation measure MM-BIO-15 (rivers, streams, and lakes).

Response to Comment 4-4: The Draft Mitigated Negative Declaration, Camp Evans Park Master Plan, Riverside Gateway Parks Program has been updated per CDFW's recommendation; edits were made to mitigation measure MM-BIO-24 (Crotch's bumblebee).

Comment Letter 5: California Department of Fish and Wildlife (CDFW), January 23, 2026

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director

February 2, 2026
Sent via email

Alisa Sramala, Principal Park Project Manager
Parks, Recreation, and Community Services Department
City of Riverside
3900 Main Street Parks, Recreation and Community Services
Riverside, CA 92522
asramala@riversideca.gov

Subject: Draft Mitigated Negative Declaration, Tequesquite Sites and Santa Ana River Greenway Park Master Plans, Riverside Gateway Parks Program (Project), State Clearinghouse No. 2025120520, City of Riverside

Dear Alisa Sramala:

The California Department of Fish and Wildlife (CDFW) received a Mitigated Negative Declaration (MND) from the City of Riverside (City) for the Tequesquite Sites and Santa Ana River Greenway Park Master Plans, Riverside Gateway Parks Program (Project) for the City of Riverside Parks, Recreation and Community Services Department (Project Applicant/Proponent) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review

1 CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as per Section 2800, et seq., of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. CDFW is providing the following comments as they relate to the Project's consistency with the MSHCP and CEQA.

PROJECT DESCRIPTION AND SUMMARY

Description: The City of Riverside Parks, Recreation, and Community Services Department (PRCSD), Planning and Design Division is preparing several Park Master Plans for sites along the Santa Ana River Trail in Riverside, California under the Riverside Gateway Parks Program.

Tequesquite Extension North

The proposed Project would develop 41 acres of the undeveloped City-owned and managed parkland which includes the anticipated buildout of overlooks, shaded picnic area, water play area, restrooms and storage, bike rest stop, biological avoidance zones, proposed parking lot expansion, arroyo walk, Santa Ana River Trail reroute, equestrian rest stop with corral, water, seating and shade structure, exercise loop, planting buffer, pickleball courts, concession area and bike rest stop, two roller rinks, parking lot with permeable paving at parking rows, interpretive native garden and trailhead, flex meadow, signage, portion of the Santa Ana River Greenway rail, and lighting.

Tequesquite Extension South

The proposed Project would develop the 55 acres of undeveloped City-owned and maintained parkland which includes the anticipated buildout of skatepark half pipe, bike rest stop, skate park, nature play area and tot track, junior pump track and champions

plaza, cultural interpretive walk and demonstration gardens, pump track, Santa Ana River Greenway trail, riparian forest with sculpture installations, farm incubator plots, biological avoidance zone, ecological interpretive feature and overlook, and lighting.

Santa Ana River Greenway Park Project

The proposed Project would develop an approximately 2 mile long and 12-foot-wide decomposed granite trail. The proposed route would run along portions of the existing Santa Ana River Trail (SART) and Rubidoux Avenue. The proposed route would run along portions of the existing SART and would reroute a portion of the existing SART. The anticipated buildout for the project site includes lighting, seating/benches, shade structures, shade trees, bike path, signs, and walking trails.

Location: The Tequesquite Extension North Project is between the base of Mount Rubidoux and the Santa Ana River in Ward 1 of the Grand neighborhood area. The Project site is surrounded by Tequesquite Avenue to the south, a residential neighborhood to the east, and undeveloped open space to the west. The site extends from Carlson Park to the existing developed Ryan Bonaminio Park at the Tequesquite Arroyo. The Tequesquite Extension South Project lies at the base of a bluff in Ward 1 of the Grand neighborhood area and is bordered by the Santa Ana River Bike Path to the north, Ryan Bonaminio Park to the east, and an access road to the south and west. The Santa Ana River Greenway runs from the back of Carlson Park, along the Tequesquite Extension North site, past Ryan Bonaminio Park, the 4-acre private parcel, and to the Tequesquite Extension South site.

COMMENTS AND RECOMMENDATIONS

Based on the documents for review, CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Western Riverside County Multiple Species Habitat Conservation Plan

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP.

To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP; and demonstrates compliance with: 1) HANs process and/or Joint Project/Acquisition Review Process (Section 6.1.1 and Section 6.6.2 subitem E of the MSHCP) or equivalent process to ensure application of the Criteria and thus, satisfaction of the City's obligation to the MSHCP Conservation Area 2) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP); 3) Urban/Wildlands Guidelines (Section 6.1.4 of the MSHCP); 4) Maintenance of Other Existing Facilities Within Public/Quasi-Public lands and Allowable Uses in the MSHCP Conservation Area (MSHCP Section 7.2.5 and 7.4) 5) the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

Specific Comments

Comment #1: MSHCP Consistency

The City of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. The Project and other associated projects within the Riverside Gateway Parks Program are located in the Jurupa Area Plan in Subunit 1, and proposing Project activities within MSHCP Criteria Cells 187, 443, 534, 621, and 617 adjacent to the Santa Ana River. The MND is missing information on how the Project might contribute to, or conflict with, assembly of the MSHCP Conservation Area consistent with the reserve configuration requirements. The MND lacks the specifications of Criteria for Cells within the Projects' location and does not address how Public/Quasi Public Lands (PQP) are being impacted and how they will be replaced. The City as a Permittee to the MSHCP should reach out to the Western Riverside County Regional Conservation Authority (RCA) and discuss the Joint Project Review (JPR) process set forth in Section 6.6.2 and the Determination of Biological Equivalent or Superior Preservation (DBESP) in Section 6.1.2 of the MSHCP for proposed discretionary Projects within the Criteria Area and discuss any impacts to habitats within existing PQP lands. 5-1

The City is required to ensure that all public and private projects complete the Consistency Analysis process prior to completion and adoption of the MND to demonstrate implementation of MSHCP requirements in the CEQA documentation. To meet this requirement, the City must prepare and submit a JPR and a DBESP to RCA, CDFW, and United States Fish and Wildlife Service (USFWS) for review and response to determine if the project is consistent with Reserve Assembly, PQP requirements, and that the mitigation proposed for the impacts to riparian/riverine resources is biologically equivalent or superior to an avoidance alternative.

5-1 Absent completion of this process, including the associated analysis, CDFW is concerned that the Project could be inconsistent with the MSHCP and could potentially harm MSHCP Conservation Areas through incompatible use of PQP Lands of which the reserve was based. Recreation can have significant impacts on wildlife and ecosystem health (Hammitt et al. 2015; Marion et al. 2016) and areas identified within the MND as being designed for additional trails, pickleball courts, skating rinks, and any other construction should be analyzed for their impacts not only on riparian/riverine resources but also on the MSHCP Conservation Area and specific habitat types.

CDFW requests that the City complete the Consistency Analysis process, and once the Consistency Analysis is complete, then update the MND with any additional measures identified through the JPR and DBESP process in the Consistency Analysis. This process would demonstrate the Project's consistency with and the City's implementation of the MSHCP.

Comment #2: Burrowing Owl

The MND identifies that burrowing owl have the potential to occur within the Project site and provides the results of focused surveys completed in 2022. CDFW is concerned that the information provided in the MND is outdated and may not effectively assess potential impacts. The Project site is within the Burrowing Owl survey area of the MSHCP (Section 6.3.2) which requires recent focused surveys to determine occupancy. CDFW recommends focused breeding seasons surveys be conducted, and where appropriate, mitigation required for the unavoidable impacts (see recommended language for inclusion in the MND). Further recommended revisions to MM-BIO-2 have been added below to address additional avoidance and minimization measures if burrowing owls are found during the pre-activity surveys.

5-2 On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl as endangered under the California Endangered Species Act (Fish & G. Code, § 2050 et seq.), determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. During its candidacy, burrowing owl is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

Project construction and activities may result in injury or mortality of burrowing owl, disrupt natural burrowing owl breeding behavior, and reduce reproductive capacity. Also, the Project may impact breeding, wintering, and foraging habitat for the species. Habitat loss could result in local extirpation of the species and contribute to local, regional, and statewide declines of burrowing owl. Therefore, the following revisions are recommended.

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Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: To avoid take of active burrowing owl burrows (nests) and comply with MSHCP Additional Survey Needs and Procedures for burrowing owl under Section 6.3.2, CDFW requests the City replace MM-BIO-2 with the following:

MM-BIO-2: Focused Surveys and Pre-Construction Surveys for Burrowing Owl.

During burrowing owl breeding season (March 1-August 31), a total of four focused surveys for BUOW shall be conducted by a qualified biologist within the Project area and a 500 ft buffer around the disturbance footprint prior to ground disturbance to reevaluate the locations of active BUOW burrows. In addition to breeding season surveys, pre-construction presence/absence surveys for BUOW shall be conducted and submitted to USFWS and CDFW by a qualified biologist within 30 days prior to the commencement of ground disturbing activities to avoid direct take of BUOW (MSHCP Species Specific Objective 6). If survey results are negative (i.e., no occupied burrows or live burrowing owls are detected) and ground-disturbing Project activities are scheduled to begin within 30 days of the final survey, then no additional preconstruction survey or biological monitoring requirements will be necessary. If BUOWs are identified on-site, during either the breeding season or pre-construction surveys, a Burrowing Owl Protection and Relocation Plan shall be developed in compliance with the MSHCP and in coordination with the California Department of Fish and Wildlife, United States Fish and Wildlife Service and the Western Riverside County Regional Conservation Authority. The City shall implement the following measures as well as any others developed in coordination with CDFW, USFWS and RCA:

- **A biological monitor will be present during vegetation clearing, grading, and construction, to monitor occupied BUOW burrows and any construction-related impacts.**
- **Prior to any ground disturbance, all limits of Project construction will be delineated and marked to be clearly visible to personnel on foot and in heavy equipment. All construction-related activities (e.g., vegetation removal, grading, equipment lay-down and storage, and contractor parking) will occur inside the limits of construction and designated staging areas. Construction staging and equipment storage will be located outside any occupied BUOW burrow locations.**
- **The Burrowing Owl Plan shall include the number and location of**

occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

- **A qualified biologist will conduct any necessary BUOW passive relocation that may be required to avoid Project effects to BUOW.**
- **If BUOWs must be moved away from the proposed work area, passive relocation techniques (e.g., use of one-way doors and collapse of burrows) would be used rather than actual avian trapping. At least one or more weeks would be necessary to accomplish this to allow the birds to acclimate to alternate burrows.**
- **The Project shall provide funding for long-term management and monitoring of the protected lands acquired for BUOW impacts. This monitoring would include an annual report submittal to the CDFW.**

The Burrowing Owl Protection and Relocation Plan will be submitted to CDFW and USFWS for approval prior to initiating ground disturbance within the project site. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

Comment #3: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)

5-3

The MND and the Jurisdictional Delineation provided identified that the Project site has CDFW stream resources onsite as identified as Feature 5 within the Santa Ana River

Greenway site. Based on the description in the MND, the Project activities may impact fish and wildlife resources with the development of the park and could potentially have impacts to the downstream portion of the Santa Ana River as a result of increased energy of flow and deposition of debris, waste or other materials. Based on review of materials submitted with the draft MND and review of aerial photography, the Project has the potential to impact fish and wildlife resources and is subject to Fish and Game Code section 1600 et seq.

5-3 Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. CDFW requests the MND edit mitigation measure MM-BIO-15, as shown below, to require a notification of lake or streambed alteration be submitted to CDFW, as required by Fish and Game Code section 1602.

Mitigation Measure: To ensure compliance with F&GC section 1602, CDFW requests the City include the following measure:

MM-BIO-XX: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)

Direct and indirect permanent impacts to rivers, streams, and lakes shall be addressed through Section 1602 of the California Fish and Game Code. Prior to the grading of the Project site and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts subject to Fish and Game Code section 1602 and obtain one of the following: a CDFW-executed Streambed Alteration Agreement (SAA) authorizing impacts to Fish and Game Code section 1602 resources associated with the Project, written documentation from CDFW that notification is not required, or written documentation that a Streamed Alteration Agreement is not required.

The notification to CDFW should provide the following information:

1. **A stream delineation including the bed, bank and channel;**
2. **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on**

vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);

3. **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and**

4. **A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.**

If an SAA is required, the Applicant shall provide compensatory mitigation at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. Onsite mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.

Comment #4: Crotch's Bumblebee

5-4

The California Fish and Game Commission accepted a petition to list Crotch's bumble bee (*Bombus crotchii*) as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch's bumble bee is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the Terrestrial and Vernal Pool Invertebrates of Conservation Policy (CDFW 2017).

The MND recognizes that Crotch's bumble bee has the potential to nest onsite and that impacts to an active nest could be significant. CDFW adds that the Project may result in temporal or permanent loss of suitable nesting and foraging habitat. Crotch's bumble bee could be directly affected by damage to suitable habitat, including grassland and scrub habitats near the Santa Ana River. Direct effects would also include the

permanent conversion of occupied habitat to project infrastructure or changes to micro/local hydrology. Indirect effects on Crotch's bumble bee during construction would include the accumulation of fugitive dust resulting in degradation of habitat for these invertebrates. In addition, changes to local runoff would have negative effects on the health and vigor of plants that make up suitable habitat. CDFW appreciates the inclusion of MM-BIO-11, and requests the City incorporate the revision shown below to address the potential need for the City to obtain "take" authorization and mitigate the loss of habitat, in addition to implementing avoidance and minimization measures aimed at addressing direct impacts to individual adults, eggs, and/or larvae.

5-4

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To avoid take of Crotch's bumble bee, CDFW requests the City include the following mitigation measures in the MND per below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program.

MM-BIO-11: Crotch's Bumble Bee **Habitat Assessment and** Pre-Construction Surveys: **Crotch's bumble bee is a CDFW candidate endangered species, and shall be surveyed for prior to construction. Prior to ground disturbance, a habitat assessment for Crotch's bumble bee will be conducted within the Project Site and an appropriate survey buffer by a qualified biologist with experience surveying for and observing Crotch's bumble bee. If the qualified biologist determines that suitable habitat is present, site specific surveys for Crotch's bumble bee shall be conducted in accordance with any Crotch's bumble bee survey protocol provided by CDFW. If Crotch's bumble bee are determined to be present within the impact site and it is determined the species will be impacted by Project implementation, appropriate mitigation will be determined in consultation with CDFW. In addition, the Project Applicant shall adhere to the following:**

- **Inactive small mammal burrows and thatched/bunch grasses should be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it should be resurveyed for Crotch's bumble bee presence within seven (7) days prior to the scheduled disturbance.**

- Pre-construction surveys for Crotch's bumble bee should be conducted no more than 30 days prior to any ground disturbance that would occur between March and September (the flight

season). If pre-construction surveys identify occupied Crotch's bumble bee habitat within the project area, the project biologist should notify the CDFW and establish, monitor, and maintain no-work buffers around active nest colonies and any associated floral resources identified. The size and configuration of the no-work buffer should be ~~based on best professional judgment of the project biologist~~ in consultation with the CDFW. ~~At a minimum, the buffer should provide at least 50 feet of clearance from construction activities around any nest entrances and maintain disturbance-free airspace between the nest and nearby floral resources. Construction activities should not occur within the no-work buffers until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for 3 consecutive days, indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony).~~ **If Crotch's bumble bee is present, the qualified biologist should identify the location of all nests in or adjacent to the Project site. If nests are identified, 15-meter no disturbance buffer zones should be established around nests to reduce the risk of disturbance or accidental take. If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take.**

- **The Project does not have the authority to take a candidate species and shall obtain an Incidental Take Permit (ITP) prior to grading with CDFW. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the Project proponent should obtain appropriate take authorization from CDFW pursuant to Fish and Game Code section 2081 subdivision (b).**

- **Any floral resource associated with Crotch's bumble bee that will be removed or damaged by the Project should be replaced at no less than 1:1. Floral resources should be replaced as close to their original location as is feasible. If active Crotch's bumble bee nests have been identified and floral resources cannot be replaced within 200 meters of their original location, floral resources should be planted in the most centrally available location relative to identified nests. This location should be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources should be maintained in**

perpetuity and should be replanted and managed as needed to ensure the habitat is preserved.

Additional Recommendations

Mitigation and Monitoring Reporting Plan

CDFW recommends updating the MND's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND for Tequesquite Sites and Santa Ana River Greenway Master Plans, Riverside Gateway Parks Project (Project), State Clearinghouse No. 2025120520 to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. CDFW requests that the City of Riverside address CDFW's comments and concerns prior to adoption of the MND for the Project.

Questions regarding this letter or further coordination should be directed to Breanna Machuca, Senior Environmental Scientist Specialist, at Breanna.Machuca@wildlife.ca.gov.

Sincerely,

Kim Freeburn

Kim Freeburn
Environmental Program Manager

ec: **California Department of Fish and Wildlife**
Carly Beck, Senior Environmental Scientist Supervisor
Carly.Beck@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@lci.ca.gov

Western Riverside County Regional Conservation Authority
Harry Sandoval, Deputy Director
Hsandoval@rctc.org

REFERENCES

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM)		**Timing**	**Responsible Party**
Burrowing Owl	MM-BIO-XX: Focused Surveys and Pre-Construction Surveys for Burrowing Owl. During burrowing owl breeding season (March 1-August 31), a total of four focused surveys for BUOW shall be conducted by a qualified biologist within the Project area and a 500 ft buffer around the disturbance footprint prior to ground disturbance to reevaluate the locations of active BUOW burrows. In addition to breeding season surveys, pre-construction presence/absence surveys for BUOW shall be conducted and submitted to USFWS and CDFW by a qualified biologist within 30 days prior to the commencement of ground disturbing activities to avoid direct take of BUOW (MSHCP Species Specific Objective 6). If survey results are negative (i.e., no occupied burrows or live burrowing owls are detected) and ground-disturbing Project activities are scheduled to begin within 30 days of the final survey, then no additional preconstruction survey or biological monitoring requirements will be necessary. If BUOWs are identified on-site, during either the breeding season or pre-construction surveys, a Burrowing Owl Protection and Relocation Plan	Prior to commencing ground- or vegetation disturbing activities	Project Proponent

	shall be developed in compliance with the MSHCP and in coordination with the California Department of Fish and Wildlife, United States Fish and Wildlife Service and/~~or~~ the Western Riverside County Regional Conservation Authority. These measures would include the following as well as any others developed in coordination with CDFW, USFWS and RCA: • A biological monitor will be present during vegetation clearing, grading, and construction, to monitor occupied BUOW burrows and any construction-related impacts. • Prior to any ground disturbance, all limits of Project construction will be delineated and marked to be clearly visible to personnel on foot and in heavy equipment. All construction-related activities (e.g., vegetation removal, grading, equipment lay-down and storage, and contractor parking) will occur inside the limits of construction and designated staging areas. Construction staging and equipment storage will be located outside any occupied BUOW burrow locations. ○ All movement of contractors, subcontractors, or their agents and equipment will be restricted to the limits of construction and staging areas. ○ A qualified biologist will conduct any necessary BUOW passive relocation that may be required to avoid Project effects to BUOW. • If BUOWs must be moved away from the proposed		

	work area, passive relocation techniques (e.g., use of one-way doors and collapse of burrows) would be used rather than actual avian trapping. At least one or more weeks would be necessary to accomplish this to allow the birds to acclimate to alternate burrows. • The Project would provide funding for long-term management and monitoring of the protected lands acquired for BUOW impacts. This monitoring would include an annual report submittal to the CDFW. • The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.		

	The Burrowing Owl Protection and Relocation Plan will be submitted to CDFW and USFWS for approval prior to initiating ground disturbance within the project site. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.		
Lake and Streambed Alteration Agreement	MM-BIO-XX: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA) Direct and indirect permanent impacts to rivers, streams, and lakes shall be addressed through Section 1602 of the California Fish and Game Code. Prior to the grading of the Project site and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts subject to Fish and Game Code section 1602 and obtain one of the following: a CDFW-executed Streambed Alteration Agreement (SAA) authorizing impacts to Fish and Game Code section 1602 resources associated with the Project, written documentation from CDFW that notification is not required, or written documentation that a Streamed Alteration Agreement is not required. The notification to CDFW should provide the following information: 1. A stream delineation including the bed, bank and		

	channel; 2. Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009); 3. A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and 4. A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. If an SAA is required, the Applicant shall provide compensatory mitigation at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. Onsite mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the		

	criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.		
Crotch's Bumble Bee	MM-BIO-11: Crotch's Bumble Bee Habitat Assessment and Pre-Construction Surveys: Crotch's bumble bee is a CDFW candidate endangered species, and shall be surveyed for prior to construction. Prior to ground disturbance, a habitat assessment for Crotch's bumble bee will be conducted within the Project Site and an appropriate survey buffer by a qualified biologist with experience surveying for and observing Crotch's bumble bee. If the qualified biologist determines that suitable habitat is present, site specific surveys for Crotch's bumble bee shall be conducted in accordance with any Crotch's bumble bee survey protocol provided by CDFW. If Crotch's bumble bee are determined to be present within the impact site and it is determined the species will be impacted by Project implementation, appropriate mitigation will be determined in consultation with CDFW. In addition, the Project Applicant shall adhere to the following: • Inactive small mammal burrows and thatched/bunch grasses should be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it should be resurveyed for Crotch's bumble bee presence within seven (7) days prior to the scheduled disturbance. • Pre-construction surveys for Crotch's bumble bee	Prior to commencing ground- or vegetation disturbing activities	Project Proponent

	should be conducted no more than 30 days prior to any ground disturbance that would occur between March and September (the flight season). If pre-construction surveys identify occupied Crotch's bumble bee habitat within the project area, the project biologist should notify the CDFW and establish, monitor, and maintain no-work buffers around active nest colonies and any associated floral resources identified. The size and configuration of the no-work buffer should be in consultation with the CDFW. If Crotch's bumble bee is present, the qualified biologist should identify the location of all nests in or adjacent to the Project site. If nests are identified, 15-meter no disturbance buffer zones should be established around nests to reduce the risk of disturbance or accidental take. If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take. • The Project does not have the authority to take a candidate species and shall obtain an Incidental Take Permit (ITP) prior to grading with CDFW. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the Project proponent should obtain appropriate take authorization from CDFW pursuant to Fish and Game Code section 2081 subdivision (b). • Any floral resource associated with Crotch's bumble		

	bee that will be removed or damaged by the Project should be replaced at no less than 1:1. Floral resources should be replaced as close to their original location as is feasible. If active Crotch's bumble bee nests have been identified and floral resources cannot be replaced within 200 meters of their original location, floral resources should be planted in the most centrally available location relative to identified nests. This location should be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources should be maintained in perpetuity and should be replanted and managed as needed to ensure the habitat is preserved.		

Responses to Comment Letter 5: California Department of Fish and Wildlife (CDFW), February 2, 2026

Response to Comment 5-1: The City will complete the Consistency Analysis process, and once the Consistency Analysis is complete, the MNDs will be updated with any additional measures identified through the JPR and DBESP process in the Consistency Analysis to demonstrate the Project's consistency with and the City's implementation of the MSHCP including how the Project might contribute to, or conflict with, assembly of the MSHCP Conservation Area consistent with the reserve configuration requirements; specifications of Criteria for Cells within the Projects' location; and how Public/Quasi Public Lands (PQP) are being impacted and how they will be replaced. The City will prepare and submit a JPR and a DBESP to RCA, CDFW, and United States Fish and Wildlife Service (USFWS) for review and response to determine if the project is consistent with Reserve Assembly, PQP requirements, and that the mitigation proposed for the impacts to riparian/riverine resources is biologically equivalent or superior to an avoidance alternative.

Response to Comment 5-2: The Draft Mitigated Negative Declaration, Tequesquite Sites and Santa Ana River Greenway Park Master Plans, Riverside Gateway Parks Program has been updated per CDFW's recommendation to avoid take of active burrowing owl burrows (nests) and comply with MSHCP Additional Survey Needs and Procedures for burrowing owl under Section 6.3.2; edits were made to mitigation measure MM-BIO-22 (burrowing owl).

Response to Comment 5-3: The Draft Mitigated Negative Declaration, Tequesquite Sites and Santa Ana River Greenway Park Master Plans, Riverside Gateway Parks Program has been updated per CDFW's recommendation to require a notification of lake or streambed alteration be submitted to CDFW, as required by Fish and Game Code section 1602; edits were made to mitigation measure MM-BIO-21 (rivers, streams, and lakes).

Response to Comment 5-4: The Draft Mitigated Negative Declaration, Tequesquite Sites and Santa Ana River Greenway Park Master Plans, Riverside Gateway Parks Program has been updated per CDFW's recommendation; edits were made to mitigation measure MM-BIO-11 (Crotch's bumblebee).

Comment Letter 6: Regional Conservation Authority (RCA) – January 7, 2026

Sramala, Alisa

From: Harry Sandoval <hsandoval@rctc.org>
Sent: Wednesday, January 7, 2026 11:25 AM
To: Sramala, Alisa
Subject: [EXTERNAL] City of Riverside Gateway Parks Project

Hello Alisa,

6-1 This is a friendly reminder that the City must complete the HANS/Joint Project Review with the RCA and Wildlife Agencies to determine consistency of the Project with the MSHCP prior to approving its CEQA document (MSHCP Vol. 3 – Resolution Sec III).

For Project, JPR 24-04-05-01, the RCA, as a Responsible Agency under CEQA (Pub. Resources Code, §21069; State CEQA Guidelines, § 15381.) did not receive notification of the Project's CEQA documentation and only recently received the Mitigated Negative Declaration documents from the CA Department of Fish and Wildlife.

Continued coordination with the RCA and Wildlife Agencies for JPR 24-04-05-01 is necessary to determine consistency of the Project with the MSHCP and subsequently complete the CEQA process.

In addition, please add the RCA to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Project, as required under CEQA and local and state laws, including the Ralph M. Brown Act.

The RCA looks forward to working with the City to ensure that the Project complies to the requirements of the MSHCP and does not result in any significant environmental impacts to any described conservation lands.

Please feel free to reach out if you have any questions or concerns.

Thank you.

Harry Sandoval
Regional Conservaiton Deputy Director
Riverside County Transportation Commission
951.787.7141 W | 951.206.7520 C
4080 Lemon St. 3rd Fl. | P.O. Box 12008 Riverside, CA 92502
rctc.org | wrc-rca.org

Responses to Comment Letter 6: Regional Conservation Authority (RCA) – January 7, 2026

Response to Comment 6-1: The City initiated Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Joint Project Review (JPR) with the Regional Conservation Agency and the wildlife agencies in April 2024 and was assigned Joint Project Review number JPR 24-04-05-01. The City will continue to work with the RCA and wildlife agencies to complete the JPR prior to proceeding with implementation of the project. If any changes are needed to the park master plan, mitigated negative declaration or mitigation measures resulting from the JPR, the City will prepare an amended park master plan, MND and/or MMRP and return to City Council for adoption of the amended documents prior to proceeding with the project implementation.