



*DRAFT MITIGATED NEGATIVE DECLARATION*

WARD: 4

1. **Case Number:** PR-2023-001080 (Conditional Use Permit, Design Review)
2. **Project Title:** Woodcrest Christian School Expansion
3. **Hearing Date:** TBD
4. **Lead Agency:** City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, California 92522
5. **Contact Person:** Judy Egüez
6. **Phone Number:** (951) 826-5371
7. **Project Location:** The Project involves an expansion to Woodcrest Christian School located at 18401 Van Buren Boulevard, Riverside, California 92508. The School fronts the south side of Van Buren Boulevard and the west side of Dauchy Avenue, with an existing commercial building located at the immediate southeast corner of Van Buren Boulevard and Dauchy Avenue. The school owns APNs 266-020-013, 014, 015, 057, 058 and 059. Undeveloped parcels APN 266-020-057 and 059) located south of the existing commercial building fronting the west side of Dauchy Avenue would be developed as part of the proposal. (Figure 1: Project Location).
8. **Project Applicant/Project Sponsor's Name and Address:**  
Jeff White  
Director of Development  
Woodcrest Christian School  
18401 Van Buren Blvd  
Riverside, CA 92508
9. **General Plan Designation:**  
Public Facilities/Institutional (PF) (APNs 266-020-013, 014, 015, 057 and 058);  
Mixed Use Village (MU-V) (APNs 266-020-059).
10. **Zoning:**  
PF-SP - Public Facilities and Specific Plan (Orangecrest) Overlay Zones (APNs 266-020-013, 014, 015, 057 and 058);  
MU-V-S-2-X-15-SP - Mixed Use Village, Building Stories (maximum of 2 stories), Building Setback (minimum setback of 15 feet from Van Buren Boulevard) and Specific Plan (Orangecrest) Overlay Zones (APNs 266-020-059).
11. **Description of Project:**  
The Woodcrest Christian School Expansion Project (Project) includes a master plan of development to increase enrollment capacity by 280 students (from 644 to 924 students). The improvements would be constructed in several phases resulting in the expansion of the existing administrative offices and construction of a new joint office/classroom building.

two high school classroom buildings, a performing arts building with a 300 to 500-seat amphitheater,, a joint high school classrooms/administrative offices building, a grub hub/student center, a high school classrooms/offices/storage building, a sports club/weight room/snack bar building, and multiple storage buildings/storage barns. The School currently contains approximately 98,055 square feet (SF) of building area. Upon completion of all proposed improvements, building area would be increased by approximately 74,921 SF. Daily operations of the School including hours of operation, weekday and weekend scheduled events, etc. would not be changed with approval of the proposed Project. The overall master plan of development is shown in Figure 2: Master Site Plan.

Woodcrest Christian School currently occupies approximately 29.2 acres on parcels designated Public Facilities/Institutional (PF) and Mixed Use-Village (MU-V) in the General Plan and zoned PF-SP - Public Facilities and MU-V-S-2-X-15-SP - Mixed Use-Village, and Specific Plan (Orangetown) Overlay Zones. Undeveloped parcels APN 266-020-057 and 059 would be developed and the access driveway on Dauchy Avenue improved as part of the ultimate master plan of development. The Project would require Conditional Use Permit (CUP) and Design Review approvals. Additional ancillary site improvements include the improved access driveway on Dauchy Avenue, parking, internal driveways, utility connections, landscaping, drainage and a retention basin.

Primary access to Woodcrest Christian School is currently provided by a full access driveway on Dauchy Avenue, an ingress only and full driveway on Dauchy Avenue south of the main driveway, an authorized vehicles only driveway near the southern part of the site on Dauchy Avenue, and a limited access, gated, right-in/right-out driveway on Van Buren Boulevard. The primary driveway would be slightly relocated to align with Ardenwood Lane on the east side of Dauchy Avenue and a second inbound lane would be added. The bus parking lot in the south end of the site would be relocated to allow additional vehicle storage for student drop-off and pick-up.

Construction of the Project would be conducted in four phases as follows:

- Phase 1: Approximately 12,426 SF two-story HS classrooms, offices, storage and approximately 7,220 SF Sports club w/storage, weight room, snack bar located north of the track & field; Approximately 2,880 SF of storage on east and west sides of the track & field.
- Phase 2: Approximately 10,223 SF HS classrooms and Admin space and approximately 5,605 SF Grub Hub & Student Center near Dauchy Avenue entrance; Approximately 5,440 SF storage barn on west side of Dauchy Avenue next to existing commercial development.
- Phase 3: Approximately 2,800 SF HS classrooms added to existing classrooms near Dauchy Avenue entrance; Approximately 14,980 SF Performing Arts building Dauchy Avenue entrance.
- Phase 4: Approximately 11,147 SF two-story MS classrooms and offices located south of existing MS classrooms in northwest portion of the site.

Limited demolition and grading would be required during construction to prepare for building construction, construct retaining walls, prepare and level soils for buildings, and to manufacture a slope for the outdoor amphitheater. Grading would be balanced on site. The grading plan for the Project is shown in Figure 3.

Overall construction is anticipated to take approximately 26 months and would include the following durations by construction phase.

- Demolition – 30 days
- Site preparation – 20 days

- Grading including - 45 days
- Building construction - 440 days
- Architectural coatings – 30 days weeks
- Paving – 35 days

Equipment used during construction would consist of concrete/industrial saws, rubber tired dozers, tractors/loaders/backhoes, graders, cranes, forklifts, generator sets, welders, air compressors, pavers, paving equipment, and rollers.

The proposed Project uses are consistent with the underlying PF and MU-V General Plan designations and zoning for the site. Development of the performing arts, HS classrooms, administration offices, and storage on the parcel zoned MU-V would require approval of a conditional use permit (CUP). For this reason, discretionary review and approval of the Project (Planning Case PR-2023-001080) is limited to approval of a CUP and Design Review.

Although the Project would be constructed in phases, potential environmental impacts have been addressed assuming the entirety of the Project would be constructed in a single phase. In this way, the full extent of potential impacts are addressed in this document.

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

	Existing Use	General Plan Designation	Zoning Designation
<b>Project Site</b>	Woodcrest Christian School	PF – Public Facilities/Institutions; MU-V Mixed Use Village	PF-SP – Public Facilities; MU-V-S-2-X-15-SP - Mixed Use Village; Specific Plan (Orangecrest) Overlay Zone
<b>North (Riverside County)</b>	Commercial	LI – Light Industrial (Riverside County)	M-SC - Manufacturing-Service Commercial (Riverside County)l
<b>East</b>	Commercial; Self-Storage facility; and Single- Family Residences	C – Commercial; MDR –MediumDensity Residential	C-SP – Commercial and Specific Plan (Orangecrest) Overlay Zones; R-1-8500-SP – Single Family Residential and Specific Plan (Orangecrest) Overlay Zones
<b>West</b>	Commercial; Residential	MU-V – Mixed Use-Village and VLDR – Very Low Density Residential	R-1-1/2 Acre-SP – Single Family Residential and Specific Plan (Orangecrest) Overlay Zones; MU-V-SP Mixed Use Village and Specific Plan (Orangecrest) Overlay Zones
<b>South</b>	Single-Family Development	LDR –Low Density Residential	R-1-10500-SP – Single Family Residential and Specific Plan (Orangecrest) Overlay Zones

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

None

## 14. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with AB 52, the City invited a total of 9 tribes to consult regarding the Project and four tribes requested consultation. As a result of the consultations, the City and tribes developed project-specific mitigation measures for inadvertent discoveries of both tribal cultural resources and human remains. These mitigation measures include on-site reburial locations (confidential) for re-burial of unearthed human remains determined to be of Native American origin as presented in this IS/MND (see Section 5. *Cultural Resources*). The analysis of impacts to tribal cultural resources utilizes the mitigation measures identified in *Cultural Resources* and is presented in Section 18. *Tribal Cultural Resources*.

## 15. Other Environmental Reviews Incorporated by Reference in this Review:

- General Plan 2025
- GP 2025 FPEIR
- Appendix A: Woodcrest Christian School Expansion Conceptual Plant Palette
- Appendix B: Woodcrest Photometrics
- Appendix C: Air Quality and Greenhouse Gas Emissions Impact Analysis Memorandum for the proposed Woodcrest Christian School Improvement Project
- Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School
- Appendix E: Project Specific Water Quality Management Plan
- Appendix F: Traffic Operational Analysis Woodcrest Christian School Expansion
- Appendix G: Vehicle Miles Traveled Analysis Woodcrest Christian School Expansion

## 16. List of Tables, Figures and Appendices

### Tables:

Table 3.b-1: Construction Emissions Summary  
Table 3.b-2: Construction Localized Impact Analysis  
Table 3.b-3: Project Operational Emissions  
Table 3.b-4: Localized Significance Summary of Operations  
Table 8.a-1: Proposed Project GHG Emissions  
Table 17.a-1: Project Trip Generation (Existing and Proposed)

### Figures:

Figure 1: Project Location  
Figure 2: Master Site Plan  
Figure 3: Grading Plan

### Appendices

Appendix A: Woodcrest Christian School Expansion Conceptual Plant Palette  
Appendix B: Woodcrest Photometrics  
Appendix C: Air Quality and Greenhouse Gas Emissions Impact Analysis Memorandum for the proposed Woodcrest Christian School Improvement Project  
Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School  
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## 17. Acronyms

AICUZ.....Air Installation Compatible Use Zone Study  
AQMP .....Air Quality Management Plan  
AUSD .....Alvord Unified School District  
CEQA .....California Environmental Quality Act  
CMP .....Congestion Management Plan  
EIR .....Environmental Impact Report  
EMWD .....Eastern Municipal Water District  
EOP .....Emergency Operations Plan  
FEMA.....Federal Emergency Management Agency  
FPEIR.....GP 2025 Final Programmatic Environmental Impact Report  
GIS .....Geographic Information System  
GHG .....Green House Gas

GP 2025.....General Plan 2025  
 IS .....Initial Study  
 LHMP.....Local Hazard Mitigation Plan  
 MARB/MIP.....March Air Reserve Base/March Inland Port  
 MJPA-JLUS .....March Joint Powers Authority Joint Land Use Study  
 MSHCP .....Multiple-Species Habitat Conservation Plan  
 MVUSD .....Moreno Valley Unified School District  
 NCCP .....Natural Communities Conservation Plan  
 OEM.....Office of Emergency Services  
 OPR.....Office of Planning & Research, State  
 PEIR.....Program Environmental Impact Report  
 PW.....Public Works, Riverside  
 RCA.....Western Riverside County Regional Conservation Authority  
 RCALUC.....Riverside County Airport Land Use Commission  
 RCALUCP .....Riverside County Airport Land Use Compatibility Plan  
 RCP .....Regional Comprehensive Plan  
 RCTC .....Riverside County Transportation Commission  
 RMC.....Riverside Municipal Code  
 RPD.....Riverside Police Department  
 RPU.....Riverside Public Utilities  
 RTIP .....Regional Transportation Improvement Plan  
 RTP .....Regional Transportation Plan  
 RUSD .....Riverside Unified School District  
 SCAG .....Southern California Association of Governments  
 SCAQMD.....South Coast Air Quality Management District  
 SCH.....State Clearinghouse  
 SKR-HCP.....Stephens' Kangaroo Rat Habitat Conservation Plan  
 SWPPP .....Storm Water Pollution Prevention Plan  
 USGS.....United States Geologic Survey  
 WMWD.....Western Municipal Water District  
 WQMP .....Water Quality Management Plan

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Figure 1: Project Location

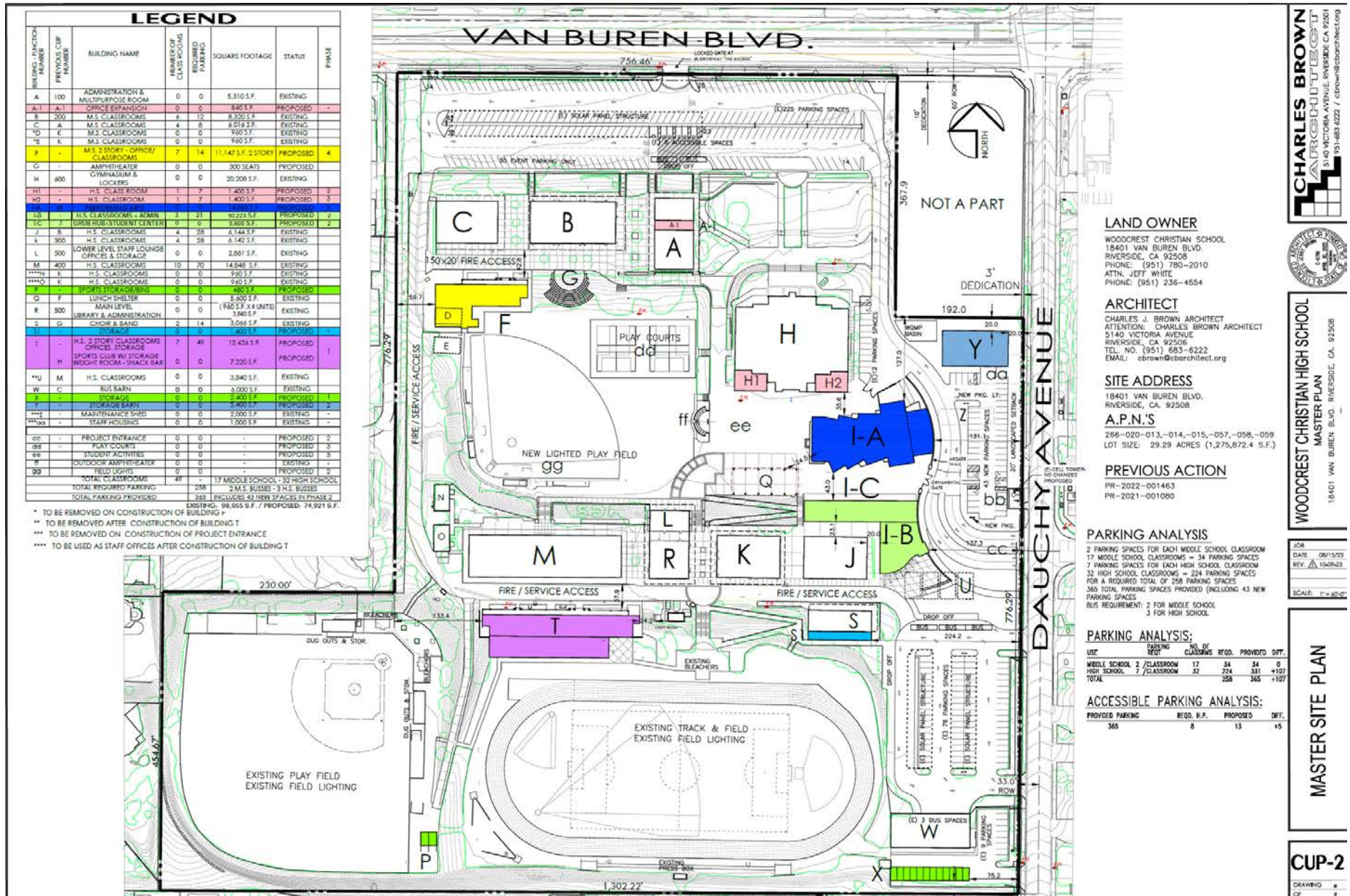


Source: Google Earth

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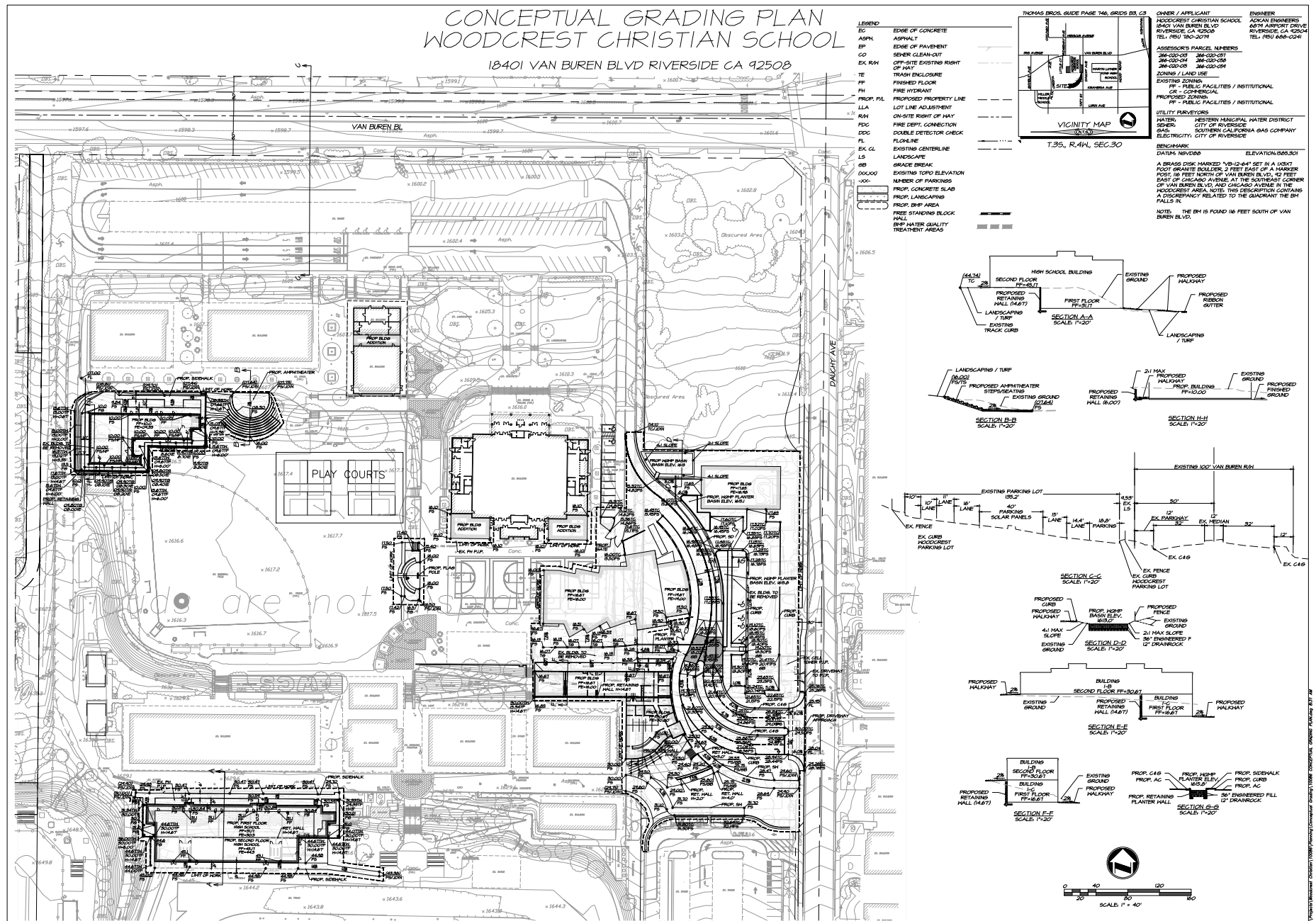
Figure 2: Master Site Plan



Source: Project Applicant

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### Figure 3: Grading Plan



Source: Project Applicant

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## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- |                                                          |                                                                |                                                                        |
|----------------------------------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture & Forest Resources        | <input type="checkbox"/> Air Quality                                   |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources         | <input type="checkbox"/> Energy                                        |
| <input type="checkbox"/> Geology and Soils               | <input type="checkbox"/> Greenhouse Gas Emissions              | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Land Use and Planning                 | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                           | <input type="checkbox"/> Population and Housing                | <input type="checkbox"/> Public Service                                |
| <input type="checkbox"/> Recreation                      | <input checked="" type="checkbox"/> Transportation and Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utility Systems                 | <input type="checkbox"/> Wildfire                              | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that:

The City of Riverside finds that the proposed Project COULD NOT have a significant effect on the environment, and a *NEGATIVE DECLARATION* will be prepared. ☐

The City of Riverside finds that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A *MITIGATED NEGATIVE DECLARATION* will be prepared. ☒

The City of Riverside finds that the proposed Project MAY have a significant effect on the environment, and an *ENVIRONMENTAL IMPACT REPORT* is required. ☐

The City of Riverside finds that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An *ENVIRONMENTAL IMPACT REPORT* is required, but it must analyze only the effects that remain to be addressed. ☐

The City of Riverside finds that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or *NEGATIVE DECLARATION* pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or *NEGATIVE DECLARATION*, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required. ☐

Signature \_\_\_\_\_

Date \_\_\_\_\_

Printed Name & Title Judy Egüez, Senior Planner

For City of Riverside





*ENVIRONMENTAL INITIAL STUDY*

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance.
- 9) Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS</b> Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>1a. Response:</b> <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)</i>  <b>Less Than Significant Impact.</b> According to the City’s General Plan 2025 FPEIR, the hills and ridgelines that surround the City provide scenic vistas to residents of the City where they can experience long distance views of natural terrain. Vista points can be found throughout the City, both as viewed from urban areas toward the hills and from wilderness areas toward Riverside. The most notable scenic vistas in the City include the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. The peaks of Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, and the La Sierra/Norco Hills provide scenic views of the City and the region.  The Project site is not identified as a scenic vista in the City General Plan 2025 and there are no scenic vistas in the Project site’s immediate vicinity. In addition, the proposed Project will not result in development on a scenic hillside or ridgeline. Therefore, the Project would result in a <b>less than significant impact</b> directly, indirectly or cumulatively to scenic vistas. No mitigation is required.				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>1b. Response:</b> <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City’s Urban Forest Tree Policy Manual, and Title 20 – Cultural Resources)</i>  <b>Less Than Significant Impact.</b> The City’s General Plan 2025 designates Scenic Boulevards and Parkways to protect scenic resources and enhance the visual character of Riverside. The proposed Project is adjacent to Van Buren Boulevard, a scenic parkway, which provides enhanced connections to key elements of Riverside Park. Construction related activities would be limited to within the Project site, would not occur within Van Buren Boulevard, and would be temporary in nature and not visible from Van Buren Boulevard. There are no trees, rock outcroppings, or historic buildings located within the Project site nor the Van Buren Boulevard right-of-way. The proposed Project would result in a <b>less than significant impact</b> directly, indirectly, or cumulatively to scenic resources and no mitigation is required.				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1c. Response: (Source: General Plan 2025, and General Plan 2025 FPEIR)</b> <b>Less Than Significant Impact.</b> Development of the proposed Project would include improvements and expansion of the existing school to increase enrollment capacity by 280 from 644 to 924 students. The existing school use is conditionally permitted under the existing General Plan land use (Public Facilities/Institutional) and zoning (Public Facilities). The proposed Project site is located in an urbanized portion of the City, surrounded by existing residential and commercial development on all sides. Furthermore, the proposed Project would implement applicable General Plan goals and policies and would be subject to Design Review to ensure consistency with applicable General Plan and zoning requirements and the Citywide Design and Sign Guidelines. The proposed Project would not conflict with the applicable zoning or other regulations governing scenic quality. Therefore, the Project would result in a <b>less than significant impact</b> directly, indirectly, or cumulatively to public views and scenic quality of the site and surroundings. No mitigation is required.				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>1d. Response: ((Source: General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, and Citywide Design and Sign Guidelines; Appendix B: Woodcrest Photometrics)</b> <b>Less Than Significant Impact.</b> According to the City’s General Plan EIR Figure 5.1-2, Mt. Palomar Nighttime Lighting Policy Area, the Project site is not within the Mount Palomar Lighting Area. Development of the proposed Project would include an incremental increase in light and glare within the existing operational school boundary. Such lighting would be similar to the current lighting produced as part of existing School operations and consistent with the existing developed character of the area. Introduction of new light would occur within the proposed parking lot on the eastern portion of the Project site adjacent to Dauchy Avenue. In compliance with City’s Zoning Code (Title 19), Chapter 19.590 (Performance Standards), a photometric plan (Appendix B) has been prepared for the Project that contains lighting standards to be implemented by the Project that would ensure all on-site lighting would be mounted and arranged to reflect light away from adjoining properties and public streets, and light shall not be directed skyward or in a manner that interferes with aircraft operation.  Compliance with Zoning Code and California Building and Green Code standards would reduce potential impacts to the built environment from new sources of substantial light or glare on day or nighttime views in the area to a <b>less than significant impact</b> directly, indirectly, or cumulatively. No mitigation is required.				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>2. AGRICULTURE AND FOREST RESOURCES</b>				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>2a. Response: (Source: General Plan 2025 – Figure OS-2)</b> <b>No Impact.</b> The Project is located in an urbanized area of the City surrounded by commercial and residential uses. As shown on Figure OS-2: Agricultural Suitability in the General Plan, the Project site is not designated as and not near any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. <b>No impact</b> would occur directly, indirectly or cumulatively to Prime, Unique, or Importance Farmland. No mitigation is required.				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-2 – Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)</b> <b>No Impact.</b> The Project site is located in Public Facilities zoning where agricultural uses are not allowed. As shown on Figure OS-3: Williamson Act Preserves in the General Plan, the Project site is not located within a Williamson Act Preserve or under a Williamson Act Contract. Therefore, the Project would have <b>no impact</b> directly, indirectly or cumulatively on Williamson Act Preserves, Contracts, or agricultural zoning. No mitigation is required.				
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2c. Response: (Source: GIS Map – Forest Data)</b> <b>No Impact.</b> The City has no forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project would have <b>no impact</b> directly, indirectly or cumulatively from conflicts with forestland, timberland, or land zoned timberland production. No mitigation is required.				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2d. Response: (Source: GIS Map – Forest Data)</b> <b>No Impact.</b> As described in response 2c above, the City has no forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project would have <b>no impact</b> directly, indirectly or cumulatively from the loss of forest land or conversion of forest land to non-forest use and no mitigation is required.				
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>2e. Response:</b> (<i>Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025 FPEIR, GIS Map – Forest Data</i>)</p> <p><b>No Impact.</b> The Project is located in an urbanized area of the City, identified as urban/built out land and therefore does not support agricultural resources or operations. The Project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. The City has no forest land that can support 10-percent native tree cover. Therefore, <b>no impact</b> will occur from this Project directly, indirectly or cumulatively to the conversion of farmland, to non-agricultural use or to the loss of forest land.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>3. AIR QUALITY</b></p> <p>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
<p><b>a.</b> Conflict with or obstruct implementation of the applicable air quality plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>3a. Response:</b> (<i>Source: South Coast Air Quality Management District, Final 2016 Air Quality Plan (AQMP). Adopted March 2017 and SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)</i>)</p> <p><b>Less Than Significant Impact.</b> The Project site is located in the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Measures to improve regional air quality, meet federal and State ambient air quality standards, and reduce greenhouse gas emissions are outlined in the SCAQMD's Air Quality Management Plan (AQMP). Vehicle miles reduction strategies are outlined in the Southern California Association of Government's (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).</p> <p>One purpose of the AQMP is to reduce air quality impacts from major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's <i>CEQA Air Quality Handbook</i>. The <i>Air Quality Handbook</i> refers to two consistency criteria as a means to determine a project's conformity with the AQMP. Consistency Criteria 1 refers to a proposed Project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation. Consistency Criteria 2 refers to a proposed Project's potential for exceeding the air pollution emissions assumptions for a project site as contained in the AQMP or other regional growth projections relevant to the AQMP's implementation and attainment of the plan's expressed objectives.</p> <p>In terms of Criteria 1, the Project's regional and localized construction and operational-source emissions would not exceed applicable regional significance thresholds and therefore the Project conforms to Criteria 1. As a result, a less than significant impact is expected. As discussed in section 3b and shown in Tables 3.b-1 and 3.b-2, estimated Project construction emissions are below the SCAQMD significance maximum daily thresholds for regional and localized emissions. As shown in Tables 3.b-3 and 3.b-4, estimated Project operational emissions are below the SCAQMD significance maximum daily thresholds for regional and localized emissions.</p> <p>Regarding Criteria 2, the proposed Project is consistent with the underlying Public Facilities/Institutional General Plan land use designation and Public Facilities zoning for the site. Projects that are consistent with a local general plan and therefore also consistent with the employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP. In addition, the General Plan 2025 FPEIR determined that implementation of the General Plan 2025 would generally meet attainment forecasts and attainment of the standards of the AQMP. Thus, projected operational air pollution emissions would be within the emissions projections estimated in the AQMP for the Project site and the Project conforms to Criteria 2.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Since the proposed Project would not be in violation of either Consistency Criteria, the Project's potential impacts are considered to be **less than significant impact** directly, indirectly, or cumulatively to the implementation of the AQMP and no mitigation is required.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**3b. Response: (Source: South Coast Air Quality Management District, Final 2016 Air Quality Plan (AQMP). Adopted March 2017; Appendix C – Air Quality and Greenhouse Gas Emissions Impact Analysis Memorandum for the proposed Woodcrest Christian School Improvement Project; Appendix G – Vehicle Miles Traveled Analysis Woodcrest Christian School Expansion**

**Less Than Significant Impact.** The Basin is in nonattainment status for the federal and state standards for ozone (O<sub>3</sub>) and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), and in nonattainment status for the state standards for particulate matter less than 10 microns in diameter (PM<sub>10</sub>) and nitrogen dioxide (NO<sub>x</sub>). For all other federal and state criteria pollutant standards, the Basin is in attainment/maintenance/unclassified status. Additionally, the SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same; therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. The proposed Project would result in the creation of short-term construction and long-term operational (vehicle trip generation, energy consumption, and stationary activities) air pollution emissions. Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NO<sub>x</sub> and ROG, both ozone precursors, and PM<sub>10</sub>, PM<sub>2.5</sub> and CO. The City is located in a non-attainment area for ozone, PM<sub>10</sub> and PM<sub>2.5</sub> under State standards, and as a non-attainment area for ozone, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> under Federal standards.

The Project's short-term construction and long-term operational emissions were calculated using the CalEEMod version 2020.4.0 (refer to Appendix C – AQ/GHG Analysis). Project construction would be subject to SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), and Rule 1113 for architectural coatings. In addition, the proposed Project would also be required to comply with existing rules contained in the California Code of Regulations that establish building energy standards and waste reuse/recycling standards during demolition. Maximum daily and localized emissions from Project construction are summarized below and compared to the SCAQMD's daily regional thresholds.

**Table 3.b-1: Construction Emissions Summary**

Construction Phase	Emissions (lbs/day)*							
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	Fugitive PM <sub>10</sub>	Exhaust PM <sub>10</sub>	Fugitive PM <sub>2.5</sub>	Exhaust PM <sub>2.5</sub>
Demolition	1	14	14	<1	<1	<1	<1	<1
Site Preparation	1	12	7	<1	3	<1	1	<1
Grading	1	14	9	<1	3	<1	2	<1
Building Construction	2	12	14	<1	<1	<1	<1	<1
Architectural Coating	7	1	2	<1	<1	<1	<1	<1
Paving	<1	5	9	<1	<1	<1	<1	<1
<b>Maximum Daily Emissions</b>	<b>7</b>	<b>14</b>	<b>14</b>	<b>&lt;1</b>	<b>4</b>		<b>2</b>	
SCAQMD Regional Threshold	75	100	550	150	150		55	
<b>Threshold Exceedance?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>		<b>No</b>	

Source: AQ/GHG Impact Analysis Memo (LSA, 2025)

\* With Construction Mitigation Per CalEEMod Emissions Model Outputs

**Table 3.b-2: Construction Localized Impact Analysis**

On-Site Emissions	Emissions (lbs/day)*			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
On-Site Emissions	14	13	4	2

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Localized Significance Threshold	340	4,149	62	19
<b>Threshold Exceedance?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: AQ/GHG Impact Analysis Memo (LSA, 2025)

\* With Construction Mitigation Per CalEEMod Emissions Model Outputs

As shown above, estimated Project construction emissions are below the SCAQMD significance maximum daily thresholds.

The maximum daily emissions and localized emissions from Project operations are summarized in Tables 3.b-3 and 3.b-4, respectively.

**Table 3.b-3: Project Operational Emissions**

Source	Emissions (lbs/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Existing Operation Emissions</b>						
Area Source	2	<1-	<1	<1-	<1-	<1-
Energy Source	<1	<1	<1	<1-	<1	<1
Mobile Source	8	11	93	<1	21	6
<b>Total Existing Emissions</b>	<b>10</b>	<b>12</b>	<b>93</b>	<b>&lt;1</b>	<b>21</b>	<b>6</b>
<b>Proposed Operation Emissions</b>						
Area Source	3	<1-	<1	<1-	<1-	<1-
Energy Source	<1	<1	<1	<1-	<1	<1
Mobile Source	10	11	111	<1	31	8
<b>Total Project Emissions</b>	<b>12</b>	<b>12</b>	<b>111</b>	<b>&lt;1</b>	<b>31</b>	<b>8</b>
<b>Net Change in Emissions</b>	<b>2</b>	<b>0</b>	<b>18</b>	<b>&lt;1</b>	<b>10</b>	<b>2</b>
SCAQMD Regional Threshold	55	55	550	150	55	150
<b>Threshold Exceedance?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: AQ/GHG Impact Analysis Memo (LSA, 2025)

**Table 3.b-4: Localized Significance Summary of Operations**

On-Site Emissions	Emissions (lbs/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
On-Site Emissions	<1	6	2	<1
Localized Significance Threshold	340	4,149	15	5
<b>Threshold Exceedance?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: AQ/GHG Impact Analysis Memo (LSA, 2025)

As shown in the tables, estimated maximum daily operational emissions are below the SCAQMD significance thresholds. Based on the analysis presented above, the short-term construction and long-term operation of the Project would not exceed applicable regional or localized thresholds established by SCAQMD. Because the proposed Project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the Project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. As a result, the proposed Project would not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, the proposed Project would not cause a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>3c. Response:</b> (Source: SCAQMD's 2016 Air Quality Management Plan, SCAQMD's CEQA Air Quality Handbook Appendix 9 as amended 2017, and SCAQMD's Historical Air Quality Data by Year <a href="http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year">http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year</a>)</p> <p><b>Less Than Significant Impact.</b> As detailed previously in response 3b, short-term construction and long-term operational emissions have been found to be below the applicable localized significance thresholds established by SCAQMD. Thus, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations resulting in a <b>less than significant</b> directly, indirectly, and cumulatively. No mitigation is required.</p>				
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>3d. Response:</b> (Source: SCAQMD's CEQA Air Quality Handbook)</p> <p><b>Less Than Significant Impact.</b> Projects typically associated with odor complaints include agricultural, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. While exact quantification of objectionable odors cannot be determined due to the subjective nature of what is considered "objectionable," the nature of the proposed expansion of Woodcrest Christian School and associated infrastructure improvements present a potential for the generation of objectionable odors associated with short-term construction activities. However, these odors would be short-term in duration, and would be isolated to the immediate vicinity of the construction site. Therefore, they would not expose a substantial number of people to objectionable odors. Operations associated with the Project would consist of conventional school facility activities that do not produce objectionable odors and would be consistent with current operations. Therefore, the Project would not cause objectionable odors affecting a substantial number of people and a <b>less than significant impact</b> directly, indirectly and cumulatively would occur. No mitigation is required.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>4. BIOLOGICAL RESOURCES</b></p> <p>Would the project:</p>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>4a. Response:</b> (Source: Project Site)</p> <p><b>Less Than Significant Impact with Mitigation Incorporated.</b> The Project site consists of developed lands containing school facilities and paved parking lots. Portions of the Project site on the east includes developed residential and commercial uses with ruderal, non-native grassland vegetation and ornamental trees. The Project site is surrounded by urbanized development.</p> <p>The Project site is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP). According to the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP), the Project site is not located in a criteria cell group or criteria cell, is not in an amphibian survey area, is not located in the burrowing</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>owl survey area, is not in a mammal survey area, is not in a narrow endemic plant species survey area, and is not located in a criteria area plant species survey area.<sup>1</sup></p> <p>Due to the developed and therefore disturbed condition of the Project site in combination with a lack of protocol surveys required by the WR-MSHCP, it can be concluded no sensitive animal or plant species occur on-site. Although development of the Project site would result in the direct removal of non-native and ruderal plant species, the quantity of such plant species is limited and the quality of the habitat these plants provide even for nesting birds is extremely limited because of the high volume and frequency of humans (students and staff) that occur on the site during school operations. Therefore, the proposed Project would not adversely affect special-status or sensitive species, resulting in a less than significant impact directly, indirectly, and cumulatively. No mitigation is required.</p>				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4b. Response:</b> (Source: United States Fish and Wildlife Service. National Wetlands Inventory. <a href="https://www.fws.gov/Wetlands/data/Mapper.html">https://www.fws.gov/Wetlands/data/Mapper.html</a>)</p> <p><b>No Impact.</b> As previously stated, the Project site is developed and surrounded by urbanized development. There are no riparian habitats or other sensitive natural communities existing on-site or within proximity to the Project site. As a result, <b>no impact</b> directly, indirectly, or cumulatively to riparian habitats or other sensitive natural communities would result from the proposed Project's implementation and no mitigation is required.</p>				
c. Have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4c. Response:</b> (Source: United States Fish and Wildlife Service. National Wetlands Inventory. <a href="https://www.fws.gov/Wetlands/data/Mapper.html">https://www.fws.gov/Wetlands/data/Mapper.html</a>)</p> <p><b>No Impact.</b> The Project site is developed and surrounded by urbanized development, and no wetlands or riparian habitats are present on-site or in the surrounding area. No state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on site or within proximity to the Project site. The Project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include U.S. Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. The proposed Project would have <b>no impact</b> directly, indirectly, or cumulatively to state or federally protected wetlands directly, indirectly, or cumulatively and no mitigation is required.</p>				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>4d. Response:</b> (Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage)</p> <p><b>Less Than Significant.</b> The Project site is developed and surrounded by urbanized development, and both Project site and surrounding developed area limit wildlife movement through the vicinity. The area encompassing the Project site and</p>				

<sup>1</sup> Western Riverside County Regional Conservation Authority, RCA MSHCP Information Map, site accessed January 28, 2025. <https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=2b9d4520bd5f4d35add35fb58808c1b7>



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>surrounding lands itself does not serve as a wildlife movement corridor and is not within an MSHCP criteria cell, linkage, or core area. Due to the Project site's developed and disturbed nature, it can be determined there is little chance the proposed Project would interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Therefore, a less than significant impact directly, indirectly and cumulatively would occur related to the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites would occur with implementation of the proposed Project.</p> <p>However, the site has the potential to support avian ground nests due to the lack of vegetation and limited ground cover. Nesting activity typically occurs from February 15 to August 31. Disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Wildlife Code Section 3503. These procedures are routinely implemented by the City as standard conditions of approval. Through compliance with the existing federal MBTA and State Fish and Wildlife Code, direct impacts to breeding birds (e.g. through nest removal) or indirect impacts (e.g. by noise causing abandonment of the nest) would be reduced to a less than significant level and no mitigation is required.</p>				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4e. Response: (Source: City of Riverside Urban Forest Tree Policy Manual)</b></p> <p><b>No Impact.</b> Projects under review by the City that propose planting of street trees or trees within a public city right-of-way must follow the Urban Forest Tree Policy Manual, which provides guidelines for planting, pruning, preservation, and removal of trees in city rights-of-way. With implementation of the obligatory requirements contained in the Urban Forest Tree Policy Manual, the Project would be consistent with applicable local biological resource protection measures and <b>no impact</b> directly, indirectly, or cumulatively would occur. No mitigation is required.</p>				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), and Stephens' Kangaroo Rat Habitat Conservation Plan)</b></p> <p><b>Less Than Significant Impact.</b> The Project site is not located within any MSHCP Criteria Areas, Cell Groups, or Subunits. The Project site is also not located in survey areas for Amphibians, Mammals, Narrow Endemic Plants Overlay, or Special Linkage areas. Therefore, the Project would be consistent with applicable provisions of the MSHCP and impacts directly, indirectly and cumulatively are <b>less than significant</b>. No mitigation is required.</p>				
<p><b>5. CULTURAL RESOURCES</b></p> <p>Would the project:</p>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>5a. Response: (Source: General Plan 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D; Title 20 of the Riverside Municipal Code)</b></p> <p><b>Less Than Significant Impact with Mitigation Incorporated.</b> The proposed Project would not cause a substantial adverse change in the significance of a historical resource, as identified in Section 15064.5 of the CEQA Guidelines. The Project site is an existing school surrounded by urbanized development. The existing structures along Dauchy Avenue would be demolished and replaced by additional parking and an improved driveway entry. While the structures on the property appear to have been</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
constructed more than 50 years ago, they are not associated with lives, persons, or events, important in City's past and is not architecturally significant. The Project site is not designated by the City as historic and has not been found to be eligible for listing in the California Register of Historic Places.				
According to Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity of the General Plan EIR, the Project site is located in high archaeological sensitivity and prehistoric cultural sensitivity zones. Although construction and ground disturbance activities would occur on an existing developed site, any disturbance of native soils has a potential to directly impact unknown historical resources. For this reason, mitigation in the form of an on-call archaeological monitor during ground disturbances is required. Implementation of <b>MM CUL-1 through 6</b> would result in a <b>less than significant impact with mitigation incorporation</b> directly, indirectly, or cumulatively.				
<b>MM CUL-1:</b> Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.				
<b>MM CUL-2: Archaeological Monitoring:</b> At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. <ol style="list-style-type: none"> <li>1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: <ol style="list-style-type: none"> <li>a. Project grading and development scheduling;</li> <li>b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;</li> <li>c. The protocols and stipulations that the Applicant, tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;</li> <li>d. Treatment and final disposition of any cultural, sacred sites, and human remains if discovered on the project site; and e.</li> <li>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4</li> </ol> </li> </ol>				
<b>MM CUL-3: Native American Monitor:</b> Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following: <ol style="list-style-type: none"> <li>a. The treatment of known cultural resources;</li> <li>b. The treatment and final disposition of any tribal cultural resources, sacred sites, archaeological and cultural resources inadvertently discovered on the Project site;</li> <li>c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and</li> <li>d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities.</li> </ol>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The developer/permit applicant shall provide sufficient evidence that they have made a reasonable efforts to reach an agreement with the consulting tribes regards to items a-d, as listed above.</p> <p><b>MM CUL-4: Treatment and Disposition of Cultural Resources:</b> In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures would be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. <b>Notification to City and Consulting Tribes:</b> within 24 hours of discovery, the City and consulting tribe(s) shall be notified via email and phone by the project archaeologist. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li>2. <b>Inadvertent Finds Assessment:</b> 1 <ol style="list-style-type: none"> <li>a. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the Planning Division to discuss the significance of the find.</li> <li>b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the Planning Division, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.</li> <li>c. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.</li> <li>d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the consulting tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.</li> <li>e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</li> </ol> </li> <li>3. <b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and</li> <li>4. <b>Treatment and Final Disposition:</b> The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: <ol style="list-style-type: none"> <li>a) Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</li> <li>b) A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be</li> </ol> </li> </ol>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;</p> <p>c) If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and</p> <p>5. <b>Phase IV Report.</b> At the completion of grading, excavation, trenching and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.</p> <p><b>MM CUL-5: Cultural Sensitivity Training:</b> The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p> <p><b>MM CUL-6: Non-Disclosure.</b> It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.</p>				
<p>b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>5b. Response: (Source: General Plan 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity)</b></p> <p><b>Less Than Significant Impact with Mitigation Incorporated.</b> As determined above in response 5a, the proposed Project would not cause a substantial adverse change in the significance of an unknown historical resource, with implementation of mitigation measures <b>MM CUL-1</b> thru <b>CUL-6</b>. The Project site is an existing school surrounded by urbanized development. Construction and ground disturbance activities within the existing developed site would have the potential to directly impact unknown historical resources. Similar to response 5a, because there is potential to unearth such unknown resources during initial ground disturbance, implementation of previously referenced <b>MM CUL-1</b> thru <b>CUL-6</b> would result in a <b>less than significant impact with mitigation incorporated</b> directly, indirectly, or cumulatively.</p>				
<p>c. Disturb any human remains, including those interred outside of formal cemeteries?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>5c. Response: (Source: General Plan 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity)</b></p> <p><b>Less Than Significant Impact.</b> The proposed Project site is not located on any known cemetery, and conditions on site remain substantially developed including the surrounding area. Consistent with State laws protecting human remains, sites containing</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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human remains must be identified and treated in a sensitive manner. In the event human remains are inadvertently discovered during Project related construction activities, there would be the potential for significant adverse impacts to human remains. Consistent with applicable State Public Resources Codes that govern the inadvertent finds of human remains, the City routinely implements a condition of approval requiring contractors, developers and governmental agencies to take certain steps starting with notification of the County Coroner. Implementation of this condition of approval would be reduce impacts to a **less than significant level** and no mitigation is required directly, indirectly, or cumulatively.

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

Would the project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**6a. Response:** *(Source: California Building Code, California Energy Commission – California Commercial End Use Survey; Metrolink, Stations, Stations, <https://metrolinktrains.com/rider-info/general-info/stations/>; Riverside Transit Agency, Route Info, <https://www.riversidetransit.com/index.php/route-info>)*

**Less Than Significant Impact.** The proposed Project may impact energy resources during construction and operation. Energy resources that would be potentially impacted by land use development projects result from energy demand for electricity, natural gas, vehicle and equipment fuels, and utility distribution. The proposed Project would comply with existing, applicable City and State regulatory compliance measures related to air pollution and greenhouse gas emissions reduction, trip and trip length reduction, and water efficiency which all promote the efficient use of energy. The Project would also be constructed in accordance with all applicable City and State building codes that require use of energy efficient designs and materials resulting in the conservation energy. These existing regulatory compliance measures establish an inherent baseline of energy efficiencies common to all development projects in the City.

**Construction Energy:** Construction activities would require short-term and therefore limited energy consumption and are not expected to have an adverse impact on available energy supplies and infrastructure. Electricity demand during construction would be temporary, nominal, and would cease upon the completion of construction and supplied by the schools' existing electrical connection. Natural gas typically is not consumed during construction. Construction impacts associated with the installation of new natural gas connections for building heating would likely not occur because new building construction would be required to comply with all-electric energy as mandated by state law and implemented by City Code (RMC 16.26). In the event new or relocated natural gas connections are required, these lines would be confined to trenching in order to place the lines below surface. By coordinating with the Southern California Gas Company to identify locations and depths of all existing gas lines, the Project would not disrupt local gas service. While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. The proposed Project would have a **less than significant impact** directly, indirectly, or cumulatively related to electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during construction. No mitigation is required.

**Operation Energy:** Energy would be consumed during existing Project operations and operations related to the increased student capacity at the school. The proposed Project would be required to comply with applicable federal, state, and local standards promoting energy efficiency including Title 24 building code standards. The proposed Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Additionally, there would not be any inefficient, wasteful, or unnecessary energy usage in comparison to similar development projects of this nature regarding construction-related fuel



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>consumption. Therefore, implementation of the proposed Project would result in <b>less than significant impacts</b> on energy resources.</p> <p>Continued use of energy resources is consistent with the anticipated growth within the city and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. The proposed Project would have a <b>less than significant impact</b> directly, indirectly, or cumulatively related to electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during operation. No mitigation is required.</p>				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>6b. Response:</b> (Source: California Building Code, California Energy Commission – California Commercial End Use Survey)</p> <p><b>Less Than Significant Impact.</b> As stated in response to 6a, the proposed Project would be designed and constructed in accordance with the City’s Building Code requirements that are consistent with the California Green Building Standard. The proposed buildings would be designed in accordance with Title 24, California’s Energy Efficiency Standards for Nonresidential Buildings. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), and indoor and outdoor lighting. The incorporation of the Title 24 standards into the design of the proposed Project would ensure that the proposed Project would not result in the use of energy in a wasteful manner. In addition, the General Plan 2025 and Climate Action Plan (CAP) include policies related to energy conservation; the proposed Project’s consistency with these policies are discussed in GHG Impact 8b. As a result, the potential impacts are considered to be <b>less than significant</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>7. GEOLOGY AND SOILS</b></p> <p>Would the project:</p>				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>7ai. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones &amp; General Plan 2025 FPEIR California Department of Conservation. Table 4; and, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of January 2010)</p> <p><b>Less Than Significant Impact.</b> The entire Southern California region, including the Project site, is considered to be seismically active. No known faults traverse the City but there are several faults in the region which have the potential to produce seismic impact within the City. There are no Alquist- Priolo Fault Zones in the City of Riverside, and the project site does not contain any known fault lines. The General Plan 2025 identifies three significant faults which pass within 20 miles of the City: the San Andreas Fault, the San Jacinto Fault, and the Elsinore Fault. The nearest Alquist-Priolo fault is the Elsinore Fault located beyond the City boundary. The Project site does not contain any known fault lines and the potential for fault rupture is low, resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7a.ii. Response: (Source: General Plan 2025 FPEIR)</b> <b>Less Than Significant Impact.</b> The entire Southern California region, including the City and the Project area, is considered seismically active. Therefore, the Project could be subject to ground shaking generated from activity on regional faults. The California Building Code contains building standards and regulations for each region of the state based on the magnitude of earthquakes anticipated for the region. The building standards result in the design and construction of structures capable of withstanding an acceptable strength of an earthquake for each region of the state. Compliance with the California Building Code regulations would result in a <b>less than significant impact</b> directly, indirectly, or cumulatively related to strong seismic ground shaking and no mitigation is required.				
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7a.iii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR; and Figure PS-3 – Soils with High Shrink-Swell Potential)</b> <b>Less Than Significant Impact.</b> The Project site is not located in a liquefaction zone as depicted in the City’s General Plan 2025 <i>General Liquefaction Zones</i> – Figure 5.6-3. As discussed in response 7a.ii, compliance with the California Building Code regulations would result in a <b>less than significant impact</b> directly, indirectly, or cumulatively related to seismic-related ground shaking, including liquefaction, and no mitigation is required.				
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7a.iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope)</b> <b>Less Than Significant Impact.</b> The Project site and the surrounding area is developed and generally flat in topography. In addition, the Project site is not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 FPEIR. Although Project area is not subject to landslides, the Project’s construction requires retaining walls, minor fills or cut that would be conditioned and compacted as required with the California Building Code regulations and geotechnical recommendations to create these surfaces. As a result of the Project grading plans to further stabilize onsite soil conditions, impacts would be <b>less than significant</b> directly, indirectly, or cumulatively and no mitigation is required.				
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 –Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code)</b> <b>Less Than Significant Impact.</b> The Project’s construction would not result in substantial soil erosion or the loss of topsoil since the Project site is currently developed. In addition, the Project Applicant would be required to adhere to Section 14.12.315(H) of the City’s Municipal Code, which states that “no person or business shall allow runoff containing pollutants associated with construction sites, activities, materials, or waste.” Erosion and sediment control methods would be implemented as part of the Project’s Storm Water Pollution Prevention Plan (SWPPP) that is a required for construction activities. The Project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. With the grading and erosion control standards for which all development activity must comply in the Subdivision Code (Title 18, Chapter 18.200) and the Grading Code (Title 17, Chapters 17.16 and 17.28), implementation of measures designed to minimize soil erosion would occur in accordance with the SWPPP. Compliance with State and federal requirements as well as with Titles 18 and 17 of the City’s Code would ensure that soil erosion or loss of topsoil would result in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
<b>7c. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 –Soils, Table 5.6-B – Soil Types; Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School (Appendix D)</b> <b>Less Than Significant Impact.</b> The Project site is primarily developed and construction would involve minimal clearing and grubbing of existing vegetation and light debris. The Project site is located in an area with soils that have high shrink-swell potential per the General Plan 2025 Figure PS-3. As noted in the Infiltration Feasibility Report, the Project site has been substantially modified by historical cut-and-fill grading. However, the proposed grading and development shall meet all requirements of the City Building Code that would result in the reduction of settlement under Project design loads with proper conditioning and compaction of cut and fill soils. Furthermore, blasting is not expected to occur due to bedrock was encountered at depths beyond the required excavation depths. Therefore, the likelihood of on-site landslides, lateral spreading, subsidence, liquefaction or collapse is considered to be remote. As a result, the potential impacts are anticipated to be <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7d. Response: (General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils)</b> <b>Less Than Significant Impact.</b> Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. As previously stated, the Project site is within a high shrink-swell potential zone. However, the proposed grading and development shall meet all requirements of the City Building Code that would result in the reduction of settlement under Project design loads with proper conditioning and compaction of cut and fill soils. As a result, a <b>less than significant impact</b> directly, indirectly, or cumulatively would occur related to expansive soils and no mitigation is required.				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>7e. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)</b> <b>No Impact.</b> No septic tanks would be used as part of proposed Project. As a result, <b>no impact</b> associated with the use of septic tanks would occur directly, indirectly, or cumulatively as part of the proposed Project's implementation and no mitigation is required.				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>7f. Response: (Source: General Plan 2025 Policy HP-1.3)</b> <b>Less Than Significant Impact with Mitigation Incorporated.</b> The Project is located on a previously developed site within an urbanized area. Although the Project site has been previously graded, it is located in a high paleontological sensitivity area as depicted in Figure 5.5-2 of the GP 2025 PEIR Section 5.5 and ground disturbance/construction activities from the new development could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are generally considered to be significant resources, as defined in CEQA Guidelines §15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact. With implementation of on call paleontological construction monitoring, the Project would not affect significant unknown paleontological resources. Implementation of <b>MM GEO-1</b> would result in a <b>less than significant impact with mitigation incorporated</b> directly, indirectly and cumulatively.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>MM GEO-1: On Call Paleontological Monitoring:</b> Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Paleontologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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## 8. GREENHOUSE GAS EMISSIONS

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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### 8a. Response: *(Source: Appendix C – Air Quality and Greenhouse Gas Emissions Impact Analysis Memorandum for the proposed Woodcrest Christian School Improvement Project)*

**Less Than Significant Impact:** Woodcrest Christian School proposes a four-phase expansion project to increase its enrollment capacity by 280 from 644 to 924 students. The Project would include new buildings such as a joint office/classroom building, a performing arts building, and a student center. The total building area would increase from approximately 98,056 SF to 172,977SF. Overall, the following activities associated with the proposed Project could directly or indirectly contribute to the generation of GHG emissions:

- **Construction Activities:** During construction of the Project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicle trips.
- **Gas, Electricity, and Water Use:** Natural gas use results in the emission of two GHGs: CH<sub>4</sub> (the major component of natural gas) and CO<sub>2</sub> (from the combustion of natural gas).
- **Solid Waste Disposal:** Solid waste generated by the Project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees.
- **Motor Vehicle Use:** Transportation associated with the proposed Project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

*Construction:* Although temporary, construction activities associated with maximum buildout would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Furthermore, CH<sub>4</sub> is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

*Operations:* Long-term GHG emissions are typically generated from mobile sources (e.g., cars, trucks and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile source GHG emissions would include project-generated vehicle and truck trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project generated waste. The site has an existing photovoltaic system that provides approximately 95 percent of the total electricity used by the school. After the proposed expansion the photovoltaic system would continue to provide approximately 95 percent of the total electricity used.

The estimated GHG emissions for the proposed Project are summarized below on Table 8.a-1.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Table 8.a-1: Proposed Project GHG Emissions**

Source	Emissions (MT/yr)			
	Total CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> e
<b>Existing Operational Emission</b>				
Area	<1	<1	<1	<1
Energy	51	<1	<1	52
Mobile	2,702	<1	<1	2,740
Waste	48	1	<1	59
Water	43	<1	<1	46
<b>Total Existing Operational Emission</b>	<b>2,820</b>	<b>1</b>	<b>&lt;1</b>	<b>2,897</b>
<b>Proposed Operational Emission</b>				
Area	<1	<1	<1	<1
Energy	74	<1	<1	74
Mobile	3,518	<1	<1	3,565
Waste	34	2	<1	85
Water	62	<1	<1	66
<b>Total Proposed Operational Emission</b>	<b>3,687</b>	<b>2</b>	<b>&lt;1</b>	<b>3,790</b>
<b>Construction Emissions Amortized Over 30 Years</b>				<b>21</b>
<b>Total Net Change to GHG Emissions</b>				<b>914</b>
<b>SCAQMD Threshold (Adjusted for 2026)</b>				<b>2,280</b>
<b>Net Emissions Exceed Threshold?</b>				<b>No</b>

Source: AQ/GHG Impact Analysis Memo (LSA, 2025)

The City of Riverside has not adopted thresholds of significance with respect to GHG emissions. However, the South Coast Air Quality Management District (SCAQMD) developed draft screening thresholds for local agencies including a screening threshold of 3,000 MTCO<sub>2</sub>e/yr for applicable Tier 3 projects.<sup>2</sup> Use of SCAQMD's draft recommendations has become a widely accepted practice by lead agencies, such as the City, that have not adopted thresholds of significance with respect to GHG emissions. For this reason, a 3,000 MTCO<sub>2</sub>e/yr threshold has been used as a screening threshold for the proposed Project. As shown in Table 8.a-1, the Project's net change to GHG emissions would be an increase of 914 MT CO<sub>2</sub>e per year. This is less than SCAQMD's threshold of 3,000 MT CO<sub>2</sub>e/yr and less than the post- 2020-adjusted Tier 3 threshold of 2,280 MT CO<sub>2</sub>e/yr. Therefore, the net increase in GHG emissions resulting from implementation of the proposed Project would result in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**8b. Response: (Source: Appendix C – Air Quality and Greenhouse Gas Emissions Impact Analysis Memorandum for the proposed Woodcrest Christian School Improvement Project; Riverside Restorative Growthprint-Climate Action Plan, 2015)**

**Less Than Significant Impact.** The SCAQMD supports State, federal, and international policies to reduce levels of ozone-depleting gases through its Global Warming Policy and rules, and the proposed Project would comply with the SCAQMD's interim GHG threshold. The proposed Project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. In addition, the proposed Project would comply with all SCAQMD applicable rules and regulations during construction of the operational phase. As indicated above, Project emissions would not exceed the 3,000 MTCO<sub>2</sub>e threshold, and therefore it would not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 40 percent reduction in GHG emissions below 1990 levels by 2030 as stated in

<sup>2</sup> Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold, SCAQMD, 2008.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Executive Order S-3-05. Based upon the Air Quality and Greenhouse Gas Emissions Impact Analysis Memorandum and the discussion above, the proposed Project would not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG. Thus, a <b>less than significant impact</b> related to GHG emissions from Project construction and operation would occur and no mitigation is required.				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>9. HAZARDS &amp; HAZARDOUS MATERIALS</b>				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9a. Response:</b> (Source: General Plan 2025 Public Safety Element; GP 2025 FPEIR; California Health and Safety Code; Title 49 of the Code of Federal Regulations; Title 13 of the California Code of Regulations; California Building Code)</p> <p><b>Less Than Significant Impact.</b> Similar to the construction of any development project, construction of the proposed Project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials typically delivered to and used at construction sites. These commonplace materials are typical of materials delivered to construction sites. In the unlikely event regulated hazardous materials are transported to the site and used during construction, the United States Department of Transportation, Office of Hazardous Materials Safety, stipulates strict regulations ensuring hazardous materials are safely transported (Title 49 of the Code of Federal Regulations) as implemented in California by Title 13 of the California Code of Regulations (CCR). With adherence to these regulations resulting in the proper handling of any hazardous materials delivered to the site, a significant threat to the safety of motorist and truckers along the transport route during transport and employees at the adjacent industrial oriented land uses during delivery would not occur.</p> <p>Once operational, small quantities of hazardous materials may be stored and used on the site typical of any school or public facilities such as fuels, oils, solvents, adhesives, pesticides, electronic waste, and other materials. However, due to the limited quantities of these materials to be used once the Project is operational, they are not considered hazardous to the public at large. Compliance with applicable Federal, State and local laws, the likelihood and severity of accidents would be reduced to an accepted level.</p> <p>With adherence to these existing regulations, the use and storage of hazardous materials during construction and operations would be reduced resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively. No mitigation is required.</p>				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9b. Response:</b> (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)</p> <p><b>Less Than Significant Impact.</b> As discussed in response 9a, the Project may involve the limited use of hazardous materials during construction and operations. Compliance with applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous materials will reduce risks from release of hazards to the environmental to an accepted level, resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively. No mitigation is required.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9c. Response:</b> (<i>Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code</i>)</p> <p><b>Less Than Significant Impact.</b> Construction and operation of proposed Project would inherently occur on the existing Woodcrest Christian School. However, use of hazardous materials during construction and operations of the proposed Project, as stated in response 9a, would be subject to applicable existing federal, State, and local statutes and regulations. Compliance would ensure that children, teachers, staff, and visitors at Woodcrest Christian School are not exposed to hazardous materials, resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9d. Response:</b> (<i>Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites</i>)</p> <p><b>Less Than Significant Impact.</b> A review of the federal, State and local environmental databases was conducted and no RECs were identified onsite as well as on adjoining, off-site locations. Based on the review of historical use on the Project site and review of environmental databases, the Project site and adjoining properties do not contained an REC and no additional environmental investigation is required. Therefore, ground disturbance during Project construction is not anticipated to create a significant hazard to the public or environment, resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9e. Response:</b> (<i>Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas; March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (2014), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005), Flabob Airport Compatibility Plan <a href="http://www.rcaluc.org/Portals/13/PDFGeneral/plan/newplan/14-%20Vol.%201%20Flabob.pdf">http://www.rcaluc.org/Portals/13/PDFGeneral/plan/newplan/14-%20Vol.%201%20Flabob.pdf</a></i>)</p> <p><b>Less Than Significant Impact.</b> The Project site is not located within two miles of a private or public use airport. The closest airport is the March Inland Port (MIP) Airport within March Air Reserve Base, located approximately 4.5 to the east of the Project site. According to General Plan, Figure PS-6B, the Project site is located within the Other Airport Environs for the MIP Airport, defined as Zone E in the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan characterized by low impact from aircraft noise. Due to the location of the Project site aircraft activity at MIP would fly at elevations much higher than the elevation of the Project site and proposed structures. The Project will not interfere with planes using the MIP Airport due to the Project's height and the distance to March airport. As a result, the proposed Project would not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people working in the Project area and a <b>less than significant impact</b> would occur directly, indirectly, or cumulatively. No mitigation is required.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9f. Response:</b> (Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials; 2019 California Fire Code Section 503)</p> <p><b>No Impact.</b> Vehicular traffic to and from the Project will be served by fully improved Van Buren Boulevard and Dauchy Avenue, as well as nearby local streets and private driveways. All streets in the Project vicinity have been previously designed and constructed in accordance with City Public Works and Fire Departments specifications, and the Project would not affect any of them. The Project is on a vacant site that will be improved with paved driveways with adequate width for emergency access and emergency vehicle maneuverings onsite.</p> <p>As mentioned, the proposed Project would be constructed and operated in accordance with the City’s Emergency Operations Plan to ensure a coordinated and effective planned response by the City Police and Fire Departments to extraordinary emergency situations and disasters. The proposed Project will comply with the current California Fire Code Section 503-Fire Apparatus Access Roads including Sections 503.1.1 Buildings and Facilities and 503.2.1 Dimensions. It should be noted that construction of the Project will not require any street closures. The Project would have <b>no impact</b> directly, indirectly, and cumulatively on emergency response or evacuation plans and no mitigation is required.</p>				
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9g. Response:</b> (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas)</p> <p><b>No Impact.</b> The proposed Project is located in an urbanized area where no wildlands exist within the property. According to CalFire and the General Plan 2025 FPEIR, the Project site is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ. Thus, <b>no impact</b> regarding wildland fires either directly, indirectly or cumulatively from this Project will occur.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>10. HYDROLOGY AND WATER QUALITY</b>				
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>10a. Response:</b> (Source: General Plan 2025 Public Facilities and Infrastructure Element; Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</p> <p><b>Less Than Significant Impact.</b> The proposed Project will consist of construction of 5 new buildings and building additions to two existing buildings with new parking areas, driveways and landscape areas on the easterly side of the site along Dauchy Avenue. A treatment area located on the east side of the site is an oversized bio-retention area design to treat the amount of runoff required by all new building areas and building additions. The buildings proposed on the westerly side of the site and the building additions will use flow guard downspout filters to treat the run off due to limited area.</p> <p>Since the proposed Project would include ground disturbance activities greater than one acre in area, the Project Applicant would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge</p>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Elimination System (NPDES) regulations. The SWPPP will be included and implemented as part of the NPDES General Industrial Activities Storm Water Permit obtained by the Project Applicant. The SWPPP will contain construction and operational best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains, based on the <i>Project Specific Water Quality Management Plan</i> prepared for the Project (Appendix E). The SWPPP must be obtained prior to the commencement of construction in order to ensure applicable BMPs are implemented. A SWPPP remains on a project site during construction and during project operations, so that private development entities are informed as to the measures required to be implanted and RWQCB field staff can monitor compliance with the required measures. Adherence to the BMPs outlined in the mandatory SWPPP will ensure that the Project's construction and operations do not violate any water quality standards or waste discharge requirements. A <b>less than significant impact</b> regarding water quality standards and waste discharge will occur directly, indirectly, and cumulatively. No mitigation is required.</p>				
<p>b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>10b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply, Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, RPU Urban Water Management Plan; Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</b></p> <p><b>Less Than Significant Impact.</b></p> <p><i>Groundwater Supplies</i></p> <p>According to the Riverside Public Utilities (RPU) Service's 2015 Urban Water Management Plan (UWMP), the City of Riverside depends on groundwater from the Bunker Hill Basin, Rialto-Colton Basin, Riverside Basin, and Arlington Basin. The UWMP contains existing and projected water supplies and demands for the City of Riverside during normal and dry-year scenarios. As determined in the UWMP, the City anticipates having sufficient water source for multiple-dry years. Additionally, Table PF-2, RPU Projected Water Demands, within the General Plan FPEIR, has projected water demand through year 2030 by water use sector. As noted in Table PF-2, the proposed Project is not one of the major sectors and can be assumed that the proposed Project is part of the "Other" sector which is estimated a water demand of 499 acre-feet per year (afy).</p> <p>Because the City's General Plan elements and UWMP are updated periodically and feed off each other, it is presumed that the Project site's water demand is account for in RPU's project water demand. The proposed Project is anticipated to require a minimal net increase in water use, due to the reduction in watering of landscaping to accommodate the student and building square footage increase.</p> <p>Therefore, the Project's water usage would represent only a nominal percentage of projected surplus (projected supply minus project demand) for the multiple dry year scenarios (conservative). Groundwater supplies impacts would be <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required</p> <p><i>Groundwater Recharge</i></p> <p>The Project site is generally flat with a gradient of four percent and runoff onsite drains as sheet flow towards the north direction. The site elevation ranges from 1,644 to 1,599 feet above mean sea level from south to north. The Project site does not contain any discernable streams or rivers and the proposed improvements will maintain the existing drainage pattern of the site.</p> <p>The proposed Project includes three bio-retention basins centrally located on the eastern portion of the site. The runoff from the proposed site will be collected by gutters, swales, and an on-site storm drain system. Most of the runoff from the new buildings and building additions and parking lot areas will be collected and diverted into the bio-retention basins that will treat stormwater. Outflow from the basins will discharge into the existing on-site eight-inch storm drain ultimately into the Master Planned storm drain in Van Buren Boulevard. The Project site will implement BMPs to reduce the accumulation of litter and debris, to minimize the use of pesticides, and to collect and dispose of any wash-water to the sanitary sewer. In addition, the imposition of BMPs would ensure that federal and state water quality standards will not be violated and are considered less than significant without mitigation. Because the Project would continue to recharge groundwater basins and because the City has plenty of water resources and the Project is not anticipated to limit recharge, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Additionally, the inclusion of the BMPs will maintain</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
impacts to the existing drainage pattern of the site or area to a level of less than significant. Groundwater supplies impacts would be <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10ci. Response: (Source: Google Earth; Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</b> <b>Less Than Significant Impact.</b> As discussed in response 10a above, the Project will comply with Federal NPDES regulations as implemented through a SWPPP. The SWPPP will contain construction and operational BMPs that will restrict the discharge of sediment into the streets and local storm drains. Adherence to the BMPs outlined in the mandatory SWPPP will ensure that the Project's construction and operations does not violate any water quality standards or waste discharge requirements. Storm water runoff will be discharged off-site into local storm drains after being retained by a bio-retention basin system. Construction of the Project would be restricted to the Project site and the Project would not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The Project will have a <b>less than significant impact</b> directly, indirectly, or cumulatively to existing drainage patterns and no mitigation is required.				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10cii. Response: (Source: Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</b> <b>Less Than Significant Impact.</b> The Project will include new building and building additions, paved parking, walkways, landscaped areas, and designed drainage bio-retention basins. Following construction, runoff from the proposed buildings and impervious surfaces will be conveyed to a new storm drain system including the three bio-retention basins. As discussed in response 10b, the basins would provide a hydrologic benefit by reducing the speed of and retaining stormwater flows so that flows from the site are maintained at or below existing levels, thereby reducing erosion potential. Project implementation will not adversely affect the existing drainage patterns in the area and will match pre-developed flows. The Project will not increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site. The Project will have a <b>less than significant impact</b> directly, indirectly, or cumulatively regarding surface runoff and no mitigation is required.				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10ciii. Response: (Source: Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</b> <b>Less Than Significant Impact.</b> As discussed in responses 10b and 10cii, following construction, runoff from the proposed buildings and building additions will be conveyed to a new storm drain system including three bio-retention basins. The basins would provide a hydrologic benefit by reducing the speed of and retaining stormwater flows so that flows from the site are maintained at or below existing levels, thereby not affecting the existing capacity of the Project's on-site storm drain and the City's storm drains in Van Buren Boulevard. Because Project implementation will result in the same rate and amount of surface runoff as in the existing condition the Project will not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. In addition, with implementation of the SWPPP as discussed in response 10a, the Project would not create substantial amounts of additional sources of polluted runoff. The Project will have a <b>less than significant impact</b> directly, indirectly, or cumulatively regarding surface runoff and no mitigation is required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>10civ. Response:</b> (Source: General Plan Public Safety Element Figure PS-4 Flood Hazard Areas; Federal Emergency Management Agency (FEMA). <a href="https://msc.fema.gov/portal/search?AddressQuery=riverside#searchresultsanchor">https://msc.fema.gov/portal/search?AddressQuery=riverside#searchresultsanchor</a>, FEMA. Flood Zones, Definition/Description. <a href="http://www.fema.gov/floodplain-management/flood-zones">http://www.fema.gov/floodplain-management/flood-zones</a>; Appendix D-2: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</p> <p><b>No Impact.</b> The Project site is located on an existing generally flat developed site with little to no probability of natural flooding events or flood flows. According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Riverside, the proposed Project site is located in Zone D. This flood zone are areas possible but undetermined flood hazards. Properties located in Zone D are not located within a 100-year flood plain. Also, according to Figure PS-4 of the Safety Element, the Project is outside the nearest flood hazard area defined as areas with a 1 percent annual chance of flooding. Therefore, <b>no impact</b> potential for redirecting flood waters exists either directly, indirectly, or cumulatively and no mitigation is required.</p>				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>10d. Response:</b> (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality, General Plan Public Safety Element Figure PS-4 Flood Hazard Areas)</p> <p><b>No Impact.</b> As discussed in response 10civ, the proposed Project site is not located in an area that is subject to flooding. The Project site is not exposed to inundation by tsunami or seiche. The Project site is located inland approximately 35 miles from the Pacific Ocean and the Project site would not be exposed to the effects of a tsunami. Furthermore, a seiche in the nearest large waterway or body of water (Lake Mathews to the southeast) is not likely to occur due to the approximate 6-mile distance between the site and the lake.</p> <p>As illustrated in Figure PS-4 of the Safety Element, the Project site is located outside of the nearest inundation areas for the small bodies of water in the City including Sycamore Canyon Dam; the Box Springs Dam; or the Fairmount Dam. As a result, no impact with regards to flooding, tsunamis, seiches, or dam inundation will occur. Therefore, <b>no impact</b> potential for seiche or mudflow exists either directly, indirectly, or cumulatively and no mitigation is required.</p>				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>10e. Response:</b> (Source: Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</p> <p><b>Less Than Significant Impact.</b> Chapter 14.12 of the City of Riverside Municipal Code is responsible for implementing the NPDES and MS4 storm water runoff requirements. As discussed in response 10a above, the Project will comply with Federal NPDES regulations as implemented through a SWPPP. The Applicant will also be required to install the post-construction structural BMPs identified in the SWPPP. In addition, the Project's construction and operations would not interfere with any groundwater management or recharge plan. As a result, <b>a less than significant impact</b> directly, indirectly, or cumulatively is anticipated and no mitigation is required.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>11. LAND USE AND PLANNING</b>				
Would the project:				
a. Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11a. Response: (Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers)</b>  <b>No Impact.</b> Development of the Proposed Project would be within the existing operational Woodcrest Christian School site. The Project site has a General Plan designation of Public Facilities/Institutional (PF) for APNs 266-020-013, 014, 015, 057 and 058 and Mixed Use-Village (MU-V) for APN 266-020-059. In addition, the Project site is located in the Orangecrest Specific Plan Overlay Zone and has a Zoning of Public Facilities (PF) for APNs 266-020-013, 014, 015, 057 and 058 and Mixed Use-Village (MU-V) for APN 266-020-059. Thus, the proposed Project would require approval of a Conditional Use Permit (CUP). Development the proposed Project is consistent with the existing School development and the surrounding area providing adequate access, circulation and connectivity consistent with the General Plan 2025, and in compliance with the requirements of the Zoning and Subdivision Codes. Therefore, the proposed Project would not physically divide an established community resulting in <b>no impact</b> directly, indirectly or cumulatively. No mitigation is required.				
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11b. Response: (Source: General Plan 2025 Figure LU-10 – Land Use Policy Map, Zoning Map of the City of Riverside)</b>  <b>No Impact.</b> The City of Riverside General Plan’s Land Use and Urban Design Element Map has designated the Project site as PF and MU-V and the site is located in the Orangecrest Specific Plan Overlay Zone and is zoned PF and MU-V. As previously stated, the Project would require a CUP to allow the development of public or institutional facilities. The Project is consistent with the intent of the Orangecrest Specific Plan Overlay Zone, although there are no applicable Specific Plan development standards. With approval of the CUP, the Project would not conflict with the adopted General Plan, Specific Plan and Zoning. Additionally, the existing buildings are not of historical significance and no historical resources are anticipated to be impacted. Consequently, the Project would have <b>no impact</b> directly, indirectly, or cumulatively on applicable land use plans, policies, or regulations, and no mitigation is required.				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>12. MINERAL RESOURCES</b>				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>12a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)</b>  <b>No Impact.</b> The proposed Project would construct new buildings and building additions to increase the student capacity of the existing Woodcrest Christian School. The Project site is developed and surrounded by urbanized development. Thus, no portion of the Project or surrounding area would involve extraction of mineral resources. In addition, as illustrated in Figure OS-1 of the City’s Open Space and Conservation Element, the Project site and vicinity is located within an MRZ-3 mineral resource zone. Consequently, the area contains known or inferred mineral occurrences of undetermined mineral resource significance. Scattered areas harbor marginally economic deposits of feldspar, silica, limestone and other rock products. As a result, the Project will have <b>no impact</b> on mineral resources directly, indirectly, or cumulatively on regionally significant mineral resources. No mitigation is required.				

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**12b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)**

**No Impact.** As stated in response 12a, there is no potential for the site to be a source of mineral extraction given the City’s decision to designate the site for public facility and mixed-use development. The Project will have **no impact** directly, indirectly, or cumulatively on locally significant mineral resources and no mitigation is required.

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**13. NOISE**

Would the project:

a. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**13a. Response: (Source: Project Site)**

**Less Than Significant Impact.**

*Construction Noise*

Short-term construction noise can occur from crew commutes and transport of equipment and materials to the Project site. Additional short-term construction noise comes from site preparation, grading, building construction, architectural coating, and paving. Typically, the most impactful noise impacts derive from the use of large construction equipment or loud operational activity near sensitive receptors. For the proposed Project, the nearest sensitive receptor are the residences directly adjacent to the Project site to the south and west. Other sensitive receptors are the residences beyond Dauchy Avenue to the east. The residences are located at greater distances from the Project and will experience lower noise levels due to the additional attenuation from distance the Project site.

The City exempts noise associated with construction, repair, remodeling, or grading of any real property, provided a permit has been obtained from the City and activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday (Section 7.35.020.G of Title 7 – Noise Control). However, to be conservative this analysis used the Federal Transit Administration (FTA)’s threshold of 80 dBA (8-hour Leq) for residential uses and 85 dBA (8-hour Leq) for non-residential uses to evaluate construction noise impacts.

Although the Project’s construction noise would be higher than ambient noise levels, the Project’s construction activities would be typical in nature and are required to comply with the allowed construction hours per the City’s Municipal Code Noise Ordinance. Therefore, noise levels from Project construction noise are within applicable standards, resulting in a less than significant impact directly, indirectly, or cumulatively and no mitigation is required.

*Operational Noise*

Long-term operational noise can occur from student and faculty commutes, and transport of equipment and materials to the Project site. Additional long-term operational noise comes from student outdoor activities and but not limited to mechanical HVAC systems. Operational noise impacts from the proposed Project are regulated by the City Noise Code (Title 7 of the City of Riverside Municipal Code). The Noise Code presents exterior and interior sound level standards to evaluate the compatibility of proposed land uses relative to existing and future exterior noise levels. The applicable noise standards for the proposed Project are those related to those of the existing school land uses. Residential and commercial land uses surround the Project site and

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>dominate the land use pattern in the vicinity. In accordance with the Noise Code, an exterior noise level standard of 45 dBA (night 10p.m.-7a.m.) and 55 dBA (day 7a.m.-10p.m.) 5 dBA for residential uses and 65 dBA for commercial uses.</p> <p>Although the proposed Project would result in an increase in enrollment capacity of 280 students resulting in a total student count of 924, the proposed Project land use would not change and would remain a school use surrounded by residential and commercial land uses. Thus, when compared to the existing school operations, it can be assumed the additional students would not alter the existing daily operations of the school. In addition, the school generates an existing 1,872 daily trips, and the proposed Project would generate 814 additional daily trips (see further discussion in Section 17, Transportation). In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a 3-dBA increase<sup>3</sup>. Since the Project would only generate a maximum of 814 daily trips, the increase is not enough to double existing traffic and traffic noise is not anticipated to increase ambient levels. Thus, a less than significant impact would occur.</p> <p>The construction and operational noise levels associated with the proposed Project will satisfy the noise level standards at all nearby receiver locations, resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>13b. Response:</b> (Source: California Department of Transportation Environmental Program. Technical Noise Supplement - A Technical Supplement to the Traffic Noise Analysis Protocol. Sacramento, CA : s.n., September 2013.)</p> <p><b>Less Than Significant Impact.</b> The potential for ground-borne vibration impacts occurs during construction activities. Once construction activities cease, no further ground-borne vibration impacts of significance would occur for light industrial uses such as the proposed Project. Ground-borne noise and vibration from construction activity has the potential to be high when activities occur near Project boundaries, however most construction activities are more central to the Project site. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are used to estimate the potential for building damage using vibration assessment methods defined by the FTA.<sup>3</sup></p> <p>Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec) for older residential buildings and 0.5 PPV (in/sec) for modern industrial/commercial buildings, the Project construction vibration levels will satisfy the building damage thresholds at all surrounding receiver locations including the closest residential to the east approximately 90 feet. The proposed Project construction of the new building and building additions would result in less than significant generation of groundborne vibration and groundborne noise. This includes the most impactful use of earthwork equipment for demolition, grading, and paving of the driveway and parking along the Dauchy Avenue frontage. Upon completion, the proposed Project will produce an acceptable pedestrian and vehicular traffic and correspondingly a less than significant operational generated groundborne vibration and groundborne noise. Groundborne vibration and groundborne noise levels during Project construction and operations would result in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>13c. Response:</b> (Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour)</p> <p><b>No Impact.</b> As stated in response 9e, the closest airport is the March Inland Port (MIP) Airport within March Air Reserve Base, located approximately 4.5 to the east of the Project site. As defined by the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, the Project site is located in Zone E characterized by low impact from aircraft noise. Therefore, the</p>				

<sup>3</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project site is not located in a high noise area of the MIP Airport or any other airport. The proposed Project would not expose people to excessive aircraft noise and **no impact** would occur directly, indirectly, or cumulatively. No mitigation is required.

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

Would the project:

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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##### 14a. Response:

**No Impact.** The proposed Project would construct new buildings and building additions to increase the enrollment capacity by 280 from 644 to 924 students. Temporary labor force would be required to construct the proposed Project. The short-term nature of this temporary construction workforce would not induce substantial population growth. The Project is an existing school that is anticipated to serve the existing community. Due to the capacity increase, the proposed Project is anticipated to result in the generation of new jobs, however minimal. Therefore, the Project will not induce direct, unplanned, and substantial growth in the form of new employees. In addition, the Project will not induce indirect, unplanned, and substantial growth by removing an impediment to growth such as an extension of a roadway or utilities. The Project would result in **no impact** directly, indirectly, or cumulatively from direct and indirect growth inducement and no mitigation is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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##### 14b. Response:

**No Impact.** The Project site is within the existing Woodcrest Christian School site planned for Public Facility uses. Although the residence located on the eastern portion of the Project boundary would be demolished to construct the proposed entry and parking area along Dauchy Avenue, the current MU-V land use allows for the development of the proposed Project with approval of a CUP. Thus, the proposed Project will not displace existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, there will be **no impact** on existing housing either directly, indirectly, or cumulatively and no mitigation is required.

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

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

a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**15a. Response:** (Source: General Plan 2025 FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Less than Significant Impact.</b> The Riverside Fire Department (RFD) provides fire protection services to the City and the existing Woodcrest Christian School, thus the Project site. The closest fire station, Station 11, is located at 19595 Orange Terrace Parkway, located approximately 1.2 miles northeast of the Project site. The average on-site response time is 5 minutes and 30 seconds, according to the GP 2025 FPEIR. The RFD's goal is to maintain a five-minute response time for the first arriving units 90 percent of the time for all emergency medical services and fire-related incidents.</p> <p>The Project would construct new buildings and building additions to ultimately increase the enrollment capacity by 280 from 644 to 924 students. Due to the nature of the existing site, compared to the proposed Project, it is anticipated that the proposed Project could generate more calls or need for fire protection services than what is currently provided to the site. However, as shown on Figure PS-7 – Fire Hazard Areas, of the General Plan 2025, the Project is not located within a Very High, High, or Moderate Fire Severity Zone nor is it located adjacent to wildland areas. Additionally, the proposed Project will be constructed pursuant to the latest California Fire Code as adopted and amended by the City of Riverside. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be <b>less than significant</b> impacts on the demand for additional fire facilities or services either directly, indirectly or cumulatively. No mitigation is required.</p>				
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>15b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)</b>				
<p><b>Less Than Significant Impact.</b> The Riverside Police Department (RPD) provides police protection services to the City and the project site. The two nearest RPD stations are located at 4102 Orange Street and 3775 Fairmount Boulevard, 3.7 miles southwest of the project site. The RPD operating standard for response times for priority calls is within 7 minutes, and within 12 minutes for second priority calls, according to the GP 2025 FPEIR.</p> <p>The Project site is located in an urbanized area, in an area currently served by the RPD. The existing PF land use is conservatively assumed to operate 24 hours a day, 7 days a week, with the exception of some holidays. The proposed Project would cause an incremental increase in the need for police protection services in an area already served by the RPD. However, it would not create the need for new or altered police services as new employees associated with the proposed project are expected to be generated from the existing workforce within the City of Riverside and surrounding areas. Furthermore, the proposed Project would include crime reduction features such as adequate nighttime lighting and gated access throughout the site, which would further reduce the need for police services.</p> <p>The proposed Project would result in a minimal, incremental, increase in the demand for police services. Therefore, the Project will not increase demand on police services resulting in the renovation of an existing police station or construction of a new police station that would result in an impact to the environment. There would be a <b>less than significant</b> directly, indirectly, or cumulatively. No mitigation is required.</p>				
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>15c. Response: (Source: General Plan 2025 FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD)</b>				
<p><b>No Impact.</b> The objective of the proposed Project is to increase the capacity of the existing Woodcrest Christian School, currently servicing the community. Thus, the Project would not directly generate school aged children. However, it could be assumed the proposed Project would produce minimal new jobs that could otherwise generate school aged children.</p> <p>The Project is non-residential and would not create or induce unplanned population growth to the area. Therefore, the Project will not increase demand on schools resulting in the renovation of an existing school or construction of a new school that would result in an impact to the environment. There would be <b>no impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>15d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)</b>				
<p><b>No Impact.</b> The Project is non-residential and will not directly generate residents and increase demand for parks or recreational facilities. The proposed Project includes an outdoor 300-seat amphitheater, a performing arts building, a grub hub/student center,</p>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>and a sports club/weight room/snack bar building. The School currently contains approximately 127,700 SF and upon completion of all proposed improvements, building area would be increased by approximately 40,000 SF. Thus, the proposed facilities would compensate for increase in student capacity as proposed.</p> <p>In addition, the proposed Project will produce minimal, new jobs that could otherwise generate new employees and an associated increase in demand for parks. Because the Project is expected to generate a minimal increase in new employment, the Project will not increase demand on parks resulting in the renovation of an existing park or construction of a new park that would result in an impact to the environment. There would be <b>no impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>15e. Response:</b> (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers)</p> <p><b>No Impact.</b> The Project is in an urbanized area and does not propose new residences. Adequate public transit service from RTA bus lines and the Metrolink Station are nearby and available to serve the Project. The Project would have a minimal effect on the demand for other public services such as libraries, community centers, and healthcare facilities. Therefore, Project will not result in the renovation or construction of other public facilities that would result in an impact to the environment. There would be <b>no impact</b> directly, indirectly, or cumulatively from the renovation or construction of other public facilities and no mitigation is required.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>16. RECREATION</b></p> <p>Would the project:</p>				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>16a Response:</b> (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)</p> <p><b>No Impact.</b> As stated in response 15d, the Project will result in a minimal increase in demand for parks or recreational facilities, and will not result in the renovation of an existing park or construction of a new park that would result in an impact to the environment. Similar to existing conditions, operation of Woodcrest Christian School would not require students to use existing neighborhood or regional parks. The proposed Project would enhance and update the school’s outdoor and indoor recreational spaces. The activity level would be similar within the new facilities as the existing, but inherently increase with implementation of the proposed Project. As previously stated, the proposed facilities would compensate for increase in student capacity as proposed. However, the Project could be subject to Development Impact Fees (DIF), at the discretion of the City Parks, Recreation and Community Services Department. There would be <b>no impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>16b Response:</b> (Source: The project is a private school)</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**No Impact.** As analyzed in this initial study, the Project will not include new recreational facilities or require the construction of new or expansion of existing recreational facilities that would result in an impact to the environment. There would be **no impact** directly, indirectly, or cumulatively and no mitigation is required.

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

Would the project:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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### 17a Response: (Source: General Plan 2025 Circulation and Community Mobility Element; Appendix F - Supplemental Traffic Operational Analysis Memo Woodcrest Christian School Expansion)

**Less Than Significant Impact.** The City's *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* requires preparation of a traffic study for development projects to determine if the project requires traffic improvements to maintain the City's level of service (LOS) standard in accordance with the Circulation and Community Mobility Element. The Project site is an existing private middle and high school, consistent with the underlying Public Facility/Institution land use and Public Facility zoning. The Circulation and Community Mobility Element describes the circulation system within the City and most of the policies pertain to the broader circulation system that the proposed Project would not impact. Within the Project site, the plans are consistent with the policies to accommodate all forms for circulation. For example, the Project includes connecting paths of travel to sidewalks from all parking areas to classrooms, administration/office space, indoor athletic/performance buildings, and outdoor athletic areas. As a result, implementation of the Project would be consistent with the City's General Plan 2025.

The City's adopted vehicle LOS policies set standards for which local roadways and intersections are required to maintain outside of the scope of CEQA. In accordance with the Traffic Study Guidelines, projects expected to generate more than 100 trips during the AM or PM peak hour based on the latest version of the ITE Trip Generation Manual are required to prepare a detailed LOS analysis.

The proposed Project trip estimate is shown in Table 17.a-1. The Project is estimated to generate 814 average daily trips, with 303 trips during the AM peak hour and 209 trips during the PM peak hour. This trip generation is greater than the 100 peak hour trip threshold and a detailed LOS analysis was prepared.

**Table 17.a-1: Project Trip Generation (Existing and Proposed)**

Land Use	Units	Peak Hour						Daily
		AM Peak Hour			PM Peak hour			
		In	Out	Total	In	Out	total	
Existing School Trip Generation <sup>1</sup>	644 STU	396	302	698	181	300	481	1,872
Proposed Project Trip Generation	280 STU	172	131	303	79	130	209	814

Source: Supplemental Traffic Operations Analysis Memorandum (LSA, 2025); Traffic Operational Analysis (LSA, 2024).

<sup>1</sup> The trip generation was developed based on existing driveway counts taken by Counts Unlimited on October 14 and 19, 2021.

The *Supplemental Traffic Operations Memo* and *Traffic Operations Analysis* (traffic study) prepared for the proposed Project analyzed 22 intersections/driveways and three roadway segments in the project vicinity as determined by the trip generation estimate. The study area intersections included 12 on Van Buren Boulevard from Washington to Barton Streets, 5 on Trautwein Road from Washington to Barton Streets, and the four Project driveways plus Krameria Avenue on Dauchy Avenue/Taft Street. Based on the LOS analysis, 14 intersections were determined to exceed LOS thresholds. Feasible improvements in the form of approach lane additions/modifications or traffic control were identified that would result in satisfactory operations at 9 intersections. Most of the offsite improvements would be funded by TUMF and implemented in the future with impacts addressed

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>as part of future CEQA documents. The identified offsite improvements that are unfunded are necessitated by level of service thresholds and therefore not considered an environmental impact, The onsite improvements, limited to the three Dauchy Avenue driveways and the Van Buren driveway, would be constructed as part of the Project construction. The five remaining intersections forecast to operate at a deficient LOS due to right-of-way constraints for improvements are not considered to be a CEQA impact and no improvements are necessary. Therefore, with the Project's obligatory payment of TUMF and DIF fees and construction of the Dauchy and Van Buren Avenue driveways, traffic conflicts with a program, plan, ordinance, or policy addressing the circulation system will result in a <b>less than significant impact</b> directly, indirectly or cumulatively and no mitigation is required.</p>				
<p>b. Would the project conflict or be inconsistent with <i>CEQA Guidelines</i> Section 15064.3, subdivision (b)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>17b Response: (Source: General Plan 2025 Circulation and Community Mobility Element; Appendix G – Vehicle Miles Traveled Analysis Woodcrest Christian School Expansion)</b></p> <p><b>Less Than Significant Impact.</b> CEQA Guidelines Section 15064.3 specifies that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts. Based on the City's <i>Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment</i>, the Project doesn't meet screening criteria for VMT evaluation and detailed VMT analysis is required. The City's guidelines provide guidance regarding VMT analysis based on the proposed land use type. The proposed Project is a school expansion which falls under "other land use projects" category. A significant VMT impact would occur for proposed school expansion if the "plus project" net total VMT is higher than the "without project" net total VMT.</p> <p>The Project is located on the eastern boundary of the City and because of this location and the unique operational characteristics of the proposed school expansion, it was determined that use of City boundary may not be suitable for estimation of net change in VMT for project evaluation. Instead, a catchment area for the Project was identified based on existing student enrollment information which was used to estimate net change in VMT using the Riverside County Transportation Model (RIVCOM). Based on the VMT analysis, the Project would result in a <b>less than significant impact</b> directly, indirectly or cumulatively and no mitigation is required.</p>				
<p>c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>17c Response: (Source: General Plan 2025 Circulation and Community Mobility Element; Appendix F - Traffic Operational Analysis Woodcrest Christian School Expansion)</b></p> <p><b>Less Than Significant Impact.</b> As defined in the traffic study, several off-site and on-site roadway improvements were determined to be necessary to accommodate Project traffic in a safe and efficient manner. The off-site improvements involve capacity and traffic control measures at the Dauchy Avenue/Van Buren Avenue intersection required to maintain the City's LOS standard. The on-site improvements involve driveway access control measures primarily required to accommodate peak inbound and outbound school traffic at the Project driveways. These improvement measures include:</p> <ol style="list-style-type: none"> <li>Dauchy Avenue/Van Buren Boulevard: a) Upgrade the existing three crosswalks to high visibility crosswalks at north, south and west approaches. b) Upgrade existing six (6) pedestrian push buttons to Polara audible pedestrian push buttons (or City approved equal) with a central control unit system. An acceptable audible pedestrian push button assembly and system is the Polara Model iDS2 with 5" x 7" R10-3 face plates. c) Modify the traffic signal to implement optimized timing plans with a 130-second cycle and coordinate the timing with adjacent signals at Van Buren Village Driveway @ Van Buren Blvd. d) Extend the existing northbound left turn lane storage length from 65' to 200'.</li> <li>Driveway 1/Van Buren Boulevard: a) Install the right turn only sign (R3-5) at the project access driveway at its intersection with van Buren Blvd to restrict left turn out turning movement. b) Install "DO NOT ENTER" and "WRONG WAY" signs facing eastbound Van Buren Blvd traffic to restrict ingress movements. Dauchy Avenue/Project Driveway 2 – Ardenwood Lane: a) Construct a stop sign (R1-1), stop bar, stop legend, at project driveway. Stop signs must conform to City Standard 664 and the stop bar and legend must conform to the City standard 650. b) Install a left turn restriction sign with modified hours of application (R33A (CA)) to restrict left turn out movements during the weekday AM peak period between 7:30 AM to 8:30 AM and weekday PM period between 2:30 PM to 3:30 PM at the west leg of the intersection (project driveway) as shown on Figure 6 included in the approved Supplemental Traffic Operations Analysis Memorandum dated March 31, 2025. During peak periods, applicant shall add cones to direct traffic to right</li> </ol>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>turn out only movements. During peak periods, applicant shall add cones to direct traffic to right turn out only movements. c) Install a 20' red curb on the east side of Dauchy Avenue starting from the intersection as shown on Figure 6 included in the approved Supplemental Traffic Operations Analysis Memorandum dated March 31, 2025.</p> <p>3. Dauchy Avenue/Project Driveway 3: a) Project driveway will serve as ingress only driveway. Project is proposing to close this driveway during the peak hours. Project shall install a modified "DO NOT ENTER" (R5-1) during the weekday AM peak period between 7:30 AM to 8:30 AM and PM period between 2:30 PM to 3:30 PM at the project driveway. b) Project shall implement other physical barriers such as closing gate or placing cones across the driveway on project site to close the driveway during the peak period.</p> <p>4. Dauchy Avenue/Project Driveway 4: a) Install a left turn restriction sign with modified hours of application (R33A (CA)) to restrict left turn out movements during the weekday AM peak period between 7:30 AM to 8:30 AM and weekday PM period between 2:30 PM to 3:30 PM at the west leg of the intersection (project driveway) as shown on Figure 6 included in the approved Supplemental Traffic Operations Analysis Memorandum dated March 31, 2025. During peak periods, applicant shall add cones to direct traffic to right turn out only movements.</p>				
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>17d. Response: (Source: Project Site)</b></p> <p><b>No Impact.</b> As discussed in response 9f, Van Buren Boulevard and Dauchy Avenue are fully improved in accordance with City Public Works and Fire Department specifications to allow for adequate maneuvering. The proposed improvements to the Dauchy Avenue main driveway would be constructed in accordance to similar specifications, resulting adequate width for emergency ingress, egress, and vehicular maneuverings onsite.</p> <p>Also discussed in response 9f, the proposed Project would be constructed and operated in accordance with the City's Emergency Operations Plan to ensure a coordinated and effective planned response by the City Police and Fire Departments to extraordinary emergencies requiring such assistance. The proposed Project would also comply with current California Fire Code Section 503-Fire Apparatus Access Roads, including Sections 503.1.1 Buildings and Facilities and 503.2.1 Dimensions, further ensuring adequate width for emergency ingress, egress, and vehicular maneuverings would be provided onsite. It should be noted that construction of the Project will not require any street closures. The Project would result in <b>no impact</b> directly, indirectly, and cumulatively on emergency response and no mitigation is required.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>18. TRIBAL CULTURAL RESOURCES</b>				
<p>Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>				
<p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or</p> <p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>18a and 18 b. Response: (Source: AB52 Consultation)</b></p> <p><b>Less Than Significant Impact with Mitigation Incorporated.</b> In accordance with AB 52, the City invited a total of 9 tribes to consult regarding the Project and four tribes requested consultation including the Soboba Band of Luiseño Indians, Pechanga Band of Indians, Rincon Band of Luiseño Indians and Agua Caliente Band of Cahuilla Indians. As a result of the consultations, the City and tribes developed project-specific mitigation measures for inadvertent discoveries of both tribal cultural resources and human remains. These mitigation measures include on-site reburial locations (confidential) for re-burial of unearthed human remains determined to be of Native American origin as presented previously in this IS/MND (see <b>MMs CUL 1-6</b> contained in Section 5. Cultural Resources). Although construction and ground disturbance activities would occur on an existing developed site, any disturbance of native soils has a potential to directly impact unknown tribal cultural resources. For this reason, mitigation in the form of an on-call archaeological and native American monitor during ground disturbances is required. With implementation of previously defined mitigation measures <b>MMs CUL 1-6</b>, a <b>less than significant impact with mitigation incorporation</b> directly, indirectly, or cumulatively would occur to tribal cultural resources.</p>				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>19. UTILITIES AND SYSTEM SERVICES</b></p> <p>Would the project:</p>				
<p>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>19a. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply, Table PF-2 – RPU Projected Water Demand, General Plan 2025 FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-K -Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, Table 5.16-L -Estimated Future Wastewater Generation for the Planning Area Served by WMWD, Figure 5.16-4 – Water Facilities, and Figure 5.16-6 – Sewer Infrastructure; Appendix D: Preliminary WQMP Infiltration Feasibility Report Woodcrest Christian School; Appendix E: Project Specific Water Quality Management Plan)</b></p> <p><b>Less Than Significant Impact.</b> The Western Municipal Water District (WMWD) provides water and sewer service in the vicinity of the Project site. Electricity and natural gas are provided by Southern California Edison and SoCal Gas, respectively.</p> <p><i>Water</i></p> <p>An existing water line runs along adjacent Van Buren Boulevard. The proposed Project would connect into the existing water line to provide potable water to the Project. Water distribution lines would be installed and loop through the Project site in order to provide water supply to each of the buildings. Water for each building would be separately metered as shown in Figure 2: Project Site Plan. The necessary on-site water distribution line installation is included as a design feature of the Project and would not result in any physical environmental effects beyond what is analyzed in this environmental document. Off-site improvements to water lines located in the surrounding streets would not be required as the piping is correctly sized to continue to provide adequate water delivery to the Project site. Implementation of the proposed Project would not require or result in the relocation or construction of new water infrastructure, resulting in a <b>less than significant</b> directly, indirectly, or cumulatively and no mitigation is required.</p> <p><i>Wastewater</i></p> <p>The proposed Project will generate a minimal quantity of additional wastewater. Therefore, the proposed Project will not result in the construction of new wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. <b>No impact</b> directly, indirectly, or cumulatively will occur and no mitigation is required.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Storm Water Drainage</i></p> <p>On-site storm water drainage infrastructure would be developed as part of the Project design in conformance with the Final Hydrology and WQMP Reports prepared for the Project. The on-site storm water biofiltration system would connect to existing storm water infrastructure in the City’s right-of-way. The stormwater for the Project site will be mitigated by using gutters and pipes to concentrate the flow and drop inlets to capture and move stormwater into the bioretention basins and underground storm chambers for the developed areas. As presented in the Hydrology study for the Project, off-site storm water drainage facilities would not need to be upgraded with implementation of the proposed Project as existing off-site infrastructure has enough capacity to accommodate development on the Project site. Implementation of the proposed Project would not require or result in the relocation or construction of new off-site storm water infrastructure resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p> <p><i>Electric Power / Natural Gas</i></p> <p>The proposed Project would tie into existing electrical and natural gas infrastructure that exists along Van Buren Boulevard adjacent to the site. Such connections may require trenching within the adjacent roads; however, construction to connect to existing electrical and natural gas infrastructure would be temporary. Implementation of the proposed Project would not require the relocation or construction of new electrical/natural gas infrastructure resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p> <p><i>Telecommunications</i></p> <p>The proposed Project would tie into existing telecommunication lines that exist on poles within the Van Buren Boulevard right of way. Such connections would result in little to no ground disturbances and therefore no impact on the environment. Implementation of the proposed Project would not require the relocation or construction of new telecommunication infrastructure resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>19b Response:</b> (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Water Systems Consulting, Inc. 2020 Urban Water Management Plan for the Riverside Public Utilities Water Division. Report dated July 2021.)</p> <p><b>Less Than Significant Impact.</b> Water to the Project site is supplied by the WMWD. As outlined in WMWD’s 2020 Urban Water Management Plan (UWMP), the WMWD service areas within the City from 2016 to 2020 used between 27,586 and 21,457 acre-feet annually of water. In 2020, the WMWD provided the City service areas 22,969 acre-feet. The UWMP water demand projections for the WMWD service areas in the City are 27,647 acre-feet in 2025, 31,101 acre-feet in 2030, and 43,178 in 2045. Because the Project is consistent with the General Plan land use, Orangecrest Specific Plan, and zoning designations, it can be concluded the water demand from the Project site is included in the 2020 UWMP demand projections. In addition, the 2020 UWMP (Tables 11-2 through 11-4) details that water supplies are projected to exceed the projected demand under normal, single dry, and multiple-dry year conditions through the year 2045. Thus, the UWMP identifies the availability of adequate water supplies for planned City development including the Project in normal, dry and multiple dry years. The Project will not result in development beyond that projected in the UWMP, and sufficient water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.</p>				
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>19c Response:</b> (Source: General Plan 2025 FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, and Table 5.16-L -Estimated Future Wastewater Generation for the Planning Area Served by WMWD)</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Less Than Significant Impact.</b> The proposed Project will generate minimal wastewater. The Project will not result in the generation of wastewater flows that would exceed the available and projected capacity of the City's wastewater treatment systems resulting in a <b>less than significant impact</b> directly, indirectly, or cumulatively and no mitigation is required.				
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>19d. Response:</b> (Source: General Plan 2025 FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area, Waste Management. El Sobrante Landfill. <a href="https://www.wm.com/location/california/inland-empire/riverside-county/el-sobrante.jsp">https://www.wm.com/location/california/inland-empire/riverside-county/el-sobrante.jsp</a> , and CalRecycle. Facility/Site Summary Details: Bandlands Sanitary Landfill. <a href="https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367">https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367</a> )				
<b>Less Than Significant Impact.</b> The Project is consistent with the General Plan 2025 Typical Build-Out scenario where future landfill capacity was determined to be adequate as shown in Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR. Therefore, a <b>less than significant impact</b> to landfill capacity will occur directly, indirectly or cumulatively				
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>19e. Response:</b> (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)				
<b>No Impact.</b> The proposed Project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any federal, State, or local regulations related to solid waste. Therefore, <b>no impact</b> related to solid waste statutes will occur directly, indirectly, or cumulatively and no mitigation is required.				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>20. WILDFIRE</b>				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>20a. Response:</b> (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, General Plan 2025 Public Safety Element, CalFire Very High Severity Zones in LRA Map, April 1, 2024).				
<b>No Impact.</b> As discussed in response 9f, Van Buren Boulevard and Dauchy Avenue are fully improved in accordance with City Public Works and Fire Department specifications to allow for adequate maneuvering. The proposed improvements to the Dauchy Avenue main driveway would be constructed in accordance to similar specifications, resulting adequate width for emergency ingress, egress, and vehicular maneuverings onsite.				
Also discussed in response 9f, the proposed Project would be constructed and operated in accordance with the City's Emergency Operations Plan to ensure a coordinated and effective planned response by the City Police and Fire Departments to extraordinary emergencies requiring such assistance. The proposed Project would also comply with current California Fire Code Section 503-Fire Apparatus Access Roads, including Sections 503.1.1 Buildings and Facilities and 503.2.1 Dimensions, further ensuring adequate width for emergency ingress, egress, and vehicular maneuverings would be provided onsite. It should be noted that construction of the Project will not require any street closures. The Project would result in <b>no impact</b> directly, indirectly, and cumulatively on emergency response or evacuation plans and no mitigation is required.				
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
concentrations from a wildfire or the uncontrolled spread of a wildfire?				
<b>20b. Response:</b> (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, General Plan 2025 Public Safety Element, CalFire Very High Severity Zones in LRA, April 1, 2024).  <b>Less Than Significant Impact.</b> As discussed in response to 9g, the proposed Project is located in an urbanized area where no wildlands exist in the vicinity. The Project site is mostly developed, occupied by Woodcrest Christian School. According to CalFire and the General Plan 2025 FPEIR, the Project site is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ. A <b>less than significant impact</b> directly, indirectly or cumulatively related to exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur and no mitigation is required.				
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>20c. Response:</b> (Source: General Plan 2025 Public Safety Element)  <b>Less Than Significant Impact.</b> As discussed in response to 20b, the proposed Project is located in an urbanized area where no wildlands exist in the vicinity. The Project would not require the installation or maintenance of roads, fuel breaks, emergency water sources, power lines, or other utilities that would otherwise exacerbate fire risk or result in temporary or ongoing impacts to the environment resulting in a <b>less than significant impact</b> directly, indirectly or cumulatively and no mitigation is required.				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>20d. Response:</b> (Source: General Plan 2025 Public Safety Element)  <b>Less Than Significant Impact.</b> The Project site is on relatively flat grade, with a slight slope of approximately 4% towards the north. The relatively flat grade in combination with no wildlands nearby would reduce the threat of downslope or downstream flooding or landslides from as a result of post-fire slope instability or drainage changes to a <b>less than significant impact</b> directly, indirectly, and cumulatively and no mitigation is required.				
ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>21. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>21a. Response:</b> (Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 -Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code )</i></p> <p><b>Less Than Significant with Mitigation Incorporated.</b> Potential impacts related to habitat of fish or wildlife species were discussed in the Section 4 of this Initial Study, and were all found to result in <b>no impact</b> or a <b>less than significant impact</b> directly, indirectly, and cumulatively. Potential impacts to cultural, archaeological, and paleontological resources related to major periods of California and the City’s history or prehistory were discussed in Sections 5, 7 and 18 of this IS/MND. As identified in the IS/MND, mitigation measures <b>MMs CUL 1-6</b> and <b>MM GEO-1</b> were introduced to reduce impacts. Implementation of these mitigation measures would result in a <b>less than significant impact with mitigation incorporated</b> directly, indirectly, and cumulatively.</p>				
<p>b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>21b. Response: (Source: General Plan 2025 FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)</b></p> <p><b>Less Than Significant Impact with Mitigation Incorporated.</b> As described in this Initial Study, the significance of all potential environmental effects were determined to be <b>no impact</b>, <b>less than significant impact</b>, or <b>less than significant impact with mitigation incorporated</b> directly, indirectly, and cumulatively. The Project is consistent with the General Plan 2025 and General Plan 2025 FPEIR. No new cumulative impacts are anticipated beyond those previously considered in the GP 2025 FPEIR. No additional mitigation is required.</p>				
<p>c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>21c. Response: (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)</b></p> <p><b>Less Than Significant Impact with Mitigation Incorporated.</b> Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology and water quality, noise, population and housing, hazards and hazardous materials, traffic and utilities sections of this Initial Study and found to be <b>no impact</b>, <b>less than significant impact</b>, or <b>less than significant impact with mitigation incorporated</b>. Based on the analysis and conclusions in this Initial Study, the Project will not cause substantial adverse effects, directly, or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project would be are <b>less than significant</b> and no additional mitigation is required.</p>				

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## Mitigation Monitoring and Reporting Program

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Cultural Resources	<b>MM CUL-1:</b> Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	<p>Provide copy of consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation.</p> <p>Halt any work in the event of inadvertent discoveries of archeological resources.</p>	Prior to issuance of grading permits for the project.	<p>Community &amp; Economic Development Department, Planning Division</p> <p>Historic Preservation Officer</p> <p>Project Applicant</p>			
	<b>MM CUL-2: Archaeological Monitoring:</b> At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.  1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: <ul style="list-style-type: none"> <li>a. Project grading and development scheduling;</li> <li>b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to</li> </ul>	<p>Provide evidence to the City that a qualified Archeological Monitor has been retained.</p> <p>Submit Archeological Monitoring Plan for review/acceptance.</p>	At least 30 days prior to issuance of grading permits for the project and before any ground disturbing activities.	<p>Community &amp; Economic Development Department - Planning Division</p> <p>Historic Preservation Officer</p>			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	<p>stop and redirect grading activities in coordination with all project archaeologists;</p> <p>c. The protocols and stipulations that the Applicant, tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;</p> <p>d. Treatment and final disposition of any cultural, sacred sites, and human remains if discovered on the project site; and</p> <p>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.</p>						
	<p><b>MM CUL-3: Native American Monitor:</b> Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following:</p> <p>a. The treatment of known cultural resources;</p> <p>b. The treatment and final disposition of any tribal cultural resources, sacred sites, archaeological and cultural resources inadvertently discovered on the Project site;</p> <p>c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and</p> <p>d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities.</p> <p>The developer/permit applicant shall provide sufficient evidence that they have made a reasonable effort to reach an agreement with the consulting tribes regards to items a-d, as listed above.</p>	<p>Provide evidence to the City that a qualified Archeological Monitor has been retained.</p> <p>Submit Archeological Monitoring Plan for review/acceptance.</p>	At least 30 days prior to issuance of grading permits for the project and before any ground disturbing activities.	<p>Community &amp; Economic Development Department - Planning Division</p> <p>Historic Preservation Officer</p>			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	<p><b>MM CUL-4: Treatment and Disposition of Cultural Resources:</b> In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures would be carried out for treatment and disposition of the discoveries:</p> <p>1. <b>Consulting to City and Consulting Tribes:</b> within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</p> <p>2. <b>Inadvertent Finds Assessment:</b></p> <ol style="list-style-type: none"> <li>1) All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the Planning Division to discuss the significance of the find.</li> <li>2) At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the Planning Division, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.</li> <li>3) Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.</li> <li>4) Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the consulting tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in</li> </ol>	Developer to provide emails contacting consulting tribe(s) to the City	Within 24 hours of any discovery of Native American cultural resources.	Community & Economic Development Department - Planning Division			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	<p>perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.</p> <p>5) If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p> <p>3. <b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and</p> <p>4. <b>Treatment and Final Disposition:</b> The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:</p> <p>a) Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</p> <p>b) A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;</p> <p>c) If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the</p>						



Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	<p>disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and</p> <p>5. <b>Phase IV Report.</b> At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.</p>						
	<p><b>MM CUL-5: Cultural Sensitivity Awareness:</b> The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide a briefing regarding the potential inadvertent cultural discoveries prior to the start of construction activities. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. Neither project archeologist nor consulting tribe shall be allowed to bring any samples of the cultural and archeological artifacts to this meeting. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p>	Sign-in sheet from Cultural Sensitivity Training for all construction personnel to be provided to City and included in the Phase IV Monitoring Report	Pre-grading meeting, prior to any grading activities for the project.	<p>Community &amp; Economic Development Department - Planning Division</p> <p>Project Archeologist</p> <p>Native American Monitors</p>			
	<p><b>MM CUL-6: Non-Disclosure:</b> It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be</p>						

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.						
<b>Geology (Paleontological Resources)</b>	<b>MM GEO-1: On Call Paleontological Monitoring:</b> Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Paleontologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.	Provide evidence to the City that a qualified Archeological Monitor has been retained.  Submit Archeological Monitoring Plan for review/acceptance.	At least 30 days prior to issuance of grading permits for the project and before any ground disturbing activities.	Community & Economic Development Department - Planning Division  Historic Preservation Officer			