CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT PLANNING DIVISION

DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 5

1. **Case Number:** PR-2024-001656 Tentative Tract Map (TM 38921)

2. **Project Title:** Warmington 49 SFR La Sierra/Victoria

3. **Hearing Date:** November 7, 2024

4. **Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor.
Riverside, CA 92522

5. **Contact Person:** Judy Egüez, Senior Planner
Phone Number: (951) 826-3969

6. **Project Location:** The project site is located south of the SR-91 Freeway at the southeast corner of La Sierra Avenue and Victoria Avenue in the City of Riverside (see Figure 1 - Regional Location Map and Figure 2 – Aerial Photo). The site is located at latitude 33º 53' 15" North and longitude 117º 27' 42" West and in Township 3 South, Range 6 West, Sections 24 and 25.

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

Matthew Esquivel
Warmington Homes
3090 Pullman Street
Costa Mesa, CA 92626

8. **General Plan Designation:** Low-Density Residential (LDR, 4.1 du/ac) La Sierra South Neighborhood

9. **Zoning:** R-1-1/2 – Single Family Residential Zone

10. **Description of Project:**

The applicant is proposing to construct 49 single-family homes on 9.91 gross acres at the southeast corner of La Sierra Avenue and Victoria Avenue. The site is surrounded by residential development on all sides. The site comprises one parcel (Assessor Parcel No. 136-220-016). The proposed project has a density of 4.95 units per gross acre. The current General Plan land use designation of the site is Low Density Residential (LDR) which allows up to 4.1 units per acre. The project applicant has applied for a density bonus under the California Density Bonus Law that would allow the development of 49 units on the site.

The proposed development site, designated as Low-Density Residential (LDR) in the general plan, permits up to 4.1 dwelling units per acre (du/ac) and is zoned R-1-1/2 Acre. Our project aims to achieve a density of 4.95 du/ac, consistent with the State Density Bonus Law (SDBL) requirements. Specifically, for the 9.91 gross acres, the base

density calculation allows for 41 units (4.1 du/ac * 9.91 acres, rounded up from 40.6). By proposing 8% of these units as below-market-rate (BMR) for very low-income households, we qualify for a 20% density bonus, resulting in 49 units (1.2 * 41, rounded up from 48.72). The project will thus consist of 49 single-family units, including 3 BMR units, aligning with both the general plan and the Housing Accountability Act.

Entitlement approvals will include a Vesting Tentative Tract Map (VTTM) and California Environmental Quality Act (CEQA) documentation. The SDBL will facilitate a Density Bonus Agreement, allowing us to use the general plan density instead of the reduced density prescribed by the zoning code and to obtain waivers for setback modifications. The development will integrate with existing utilities and preserve part of the Orange Groves along Victoria Avenue. Through SDBL, the project maximizes residential density while addressing affordable housing needs, ensuring adherence to the general plan's land-use policies.

As shown in Tentative Tract Map 38921 (Figure 4) and the Conceptual Site Plan (Figure 5), the lot sizes range from 3,690 square feet (sf) to 8,197 sf with an average lot size of 4,623 sf. The site will take vehicular access from a single road with an intersection off of La Sierra Avenue. The project will also provide half-width improvements to Millstreet Place along the eastern boundary of the site to complete that adjacent roadway, but there will be no direct vehicular access for the project from that roadway. There will also be no vehicular access from Victoria Avenue so the proposed citrus grove can be continuous across the northern boundary of the site. The architectural styles of the project are Spanish, Tudor Cottage, and Craftsman shown in Figures 8,9, and 10.

The Victoria Avenue Policy for Preservation, Design and Development, November 2019, requires that any existing, healthy trees and their roots, trunks and canopies, located along Victoria Avenue, or within 100 feet of Victoria Avenue's edge of roadway, shall be protected from any construction activity. In fulfillment of this policy, the project proposes to preserve 1.24 acres (54,110 square feet) of the northern portion of the site to become part of the Victoria Avenue historic landscaped parkway consistent with the Victoria Avenue Policy. This treatment along Victoria Avenue will have a 10-foot-wide decomposed granite (DG) multi-use trail through a grove of citrus trees that will remain from the existing onsite orchard that is no longer commercially harvested. This citrus grove represents 16% of the site area so the project does not propose any other onsite park or open space improvements The site will have extensive new landscaping to complement the planned Victoria Avenue "grove". (see Figure 6, Landscaping Plan).

The site currently drains to the northeast and the water quality management plan proposes a detention/infiltration basin in the northeast portion of the site along with a new onsite storm drainage system to collect surface runoff and channel it to the new basin. The project will connect to existing utility lines (water, sewer, etc.) in La Sierra Avenue and Millsweet Street. The project will be built in one phase and grading will require 6,252 cubic yards (CY) of cut and 29,04 CY of fill so overall earthwork will require the import of 22,788 CY of fill (Figure 7, Grading Plan).

11. Surrounding land uses and setting:

The site is largely surrounded by single-family residential uses within the City of Riverside to the north, east, and south, and within the County of Riverside to the west. The closest residences to the project site are to the northeast (60 feet), to the southeast (70 feet), to the southwest (115 feet), and the north (175 feet). The site is surrounded by some residential neighborhoods as seen in Figure 2, Aerial Photo and Figure 3, Site Photos. A commercial nursery is located just northeast of the site. Table 1 below describes surrounding land uses in more detail along with their General Plan land use designations and their zoning classifications.

Table 1: Surrounding Land Uses

Area/ Direction	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Inactive Orange Grove (Vacant-Remnant Structures)	Low Density Residential (LDR) (max. 4.1 du/ac)	Residential (R-1-1/2 Acre) 21,780 sf minimum lot size

Area/ Direction	Existing Land Use	General Plan Designation	Zoning Designation
North	Single Family detached residential neighborhood. and active Nursery	Agricultural/Rural Residential (A/RR) (max. 0.2 du/ac)	Residential Agricultural (RA-5) 5-acre minimum lot size
East	Single Family detached residential neighborhood	Low Density Residential (LDR) (max. 4.1 du/ac)	Residential (R-1-1/2 Acre) 21,780 sf minimum lot size
South	Single Family detached residential neighborhood	Low Density Residential (LDR) (max. 4.1 du/ac)	Residential (R-1-1/2 Acre) 21,780 sf minimum lot size
West (County[1])	Single Family detached residential neighborhood	Medium Density Residential (MDR) (max. 6.2 du/ac)	Residential (R-1-20000) 20,000 sf minimum lot size

Source: City General Plan Land Use Map (2021) and City Interactive Zoning Map (2021) SF = square feet du/ac = dwelling units per acre

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

a. South Coast Air Quality Management District (SCAQMD) – Dust Control Plan
b. Regional Water Quality Control Board (RWQCB), Santa Ana Region – National Pollutant Discharge Elimination System (NPDES) Construction General Permit
c. RWQCB, Santa Ana Regional Water Control Board – 401 Water Quality Certification – Waste Discharge Requirement (WDR)
d. Santa Ana Regional Water Quality Control Board – Water Quality Management Plan (WQMP); and
e. Santa Ana Regional Water Quality Control Board – Storm Water Pollution Prevention Plan (SWPPP)

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

On May 16, 2024, the City sent Assembly Bill (AB) 52 consultation notices to the following tribes to inquire if they wanted to initiate consultation: Gabrieleno Band of Mission Indians - Kizh Nation, Soboba Band of Luiseño Indians, Cahuilla Band of Indians, Pechanga Band of Luiseño Indians, Rincon Band of Luiseño Indians, San Manuel Band of Mission Indians, Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and San Gabriel Band of Mission Indians. The 30-day time period for tribes to request consultation ended on June 15, 2024. The Pechanga Band of Luiseño Indians, Soboba Band of Luiseño Indians, and Cahuilla Band of Indians requested a consultation with the City Riverside according to Public Resources Code Section 21080.3.1. No other tribes requested consultation within the required period. The results of the tribal consultations are discussed in Section 18, Tribal Cultural Resources of this Initial Study.

14. Sources Referenced in Preparation of this Initial Study:

a. City of Riverside General Plan 2025
b. City of Riverside General Plan 2025 Final Program Environmental Impact Report (FPEIR)
c. City of Riverside Municipal Code, Title 19, Zoning Code
d. City of Riverside Municipal Code, Title 20, Cultural Resources
e. City of Riverside 2020 2020 Urban Water Management Plan (UWMP)
f. City of Riverside Local Hazard Mitigation Plan

[1] Within the County's Lake Mathews/Woodcrest Area Plan

g. City of Riverside Economic Prosperity Action Plan and Climate Action Plan (CAP)
h. County of Riverside General Plan 2015, various elements
i. County of Riverside, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
j. Santa Ana Regional Water Quality Control Board, Water Quality Control Plan for the Santa Ana River Basin
k. Southern California Association of Governments, Connect SoCal (RTP/SCS)

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Appendix A –Air Quality and GHG Technical Memorandum– KPC EHS Consultants, LLC, Revised June 6, 2024
Appendix B – Biological Resources Assessment – VCS Environmental, April 1, 2024
Appendix C – Cultural Resources Survey Update – CRM Tech, April 15, 2024
Appendix D - Updated Preliminary Geotechnical Evaluation Tentative Tract 38921-Petra Geosciences, Inc., March 13, 2024
Appendix E– Phase I Environmental Site Assessment and Limited Soil Investigation - EFI Global December 19, 2019
Appendix F – Hydrology Report for TTM 38921 – Adkan Engineers February 26, 2024
Appendix G – Preliminary Water Quality Management Plan – Adkan Engineers February 22, 2024
Appendix H –Noise Assessment – Veneklasen Associates – May 3, 2024
Appendix I–Traffic Scoping Agreement – City Public Works Dept. – March 13, 2024
Appendix J- Vehicle Miles Traveled (VMT) Analysis, TJW Engineering, July 16, 2024

18. Acronyms

AQMP	Air Quality Management Plan
AUSD	Alvord Unified School District
CEQA	California Environmental Quality Act
CMP	Congestion Management Plan
EIR	Environmental Impact Report
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
MSHCP	Multiple-Species Habitat Conservation Plan
NCCP	Natural Communities Conservation Plan
OEM	Office of Emergency Services
OPR	Office of Planning & Research, State
PEIR	Program Environmental Impact Report
PW	Public Works, Riverside
RCALUC	Riverside County Airport Land Use Commission
RCALUCP	Riverside County Airport Land Use Compatibility Plan
RCP	Regional Comprehensive Plan
RCTC	Riverside County Transportation Commission
RMC	Riverside Municipal Code
RPD	Riverside Police Department
RPU	Riverside Public Utilities
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
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
WQMP	Water Quality Management Plan

Figure 1- Regional Location Map

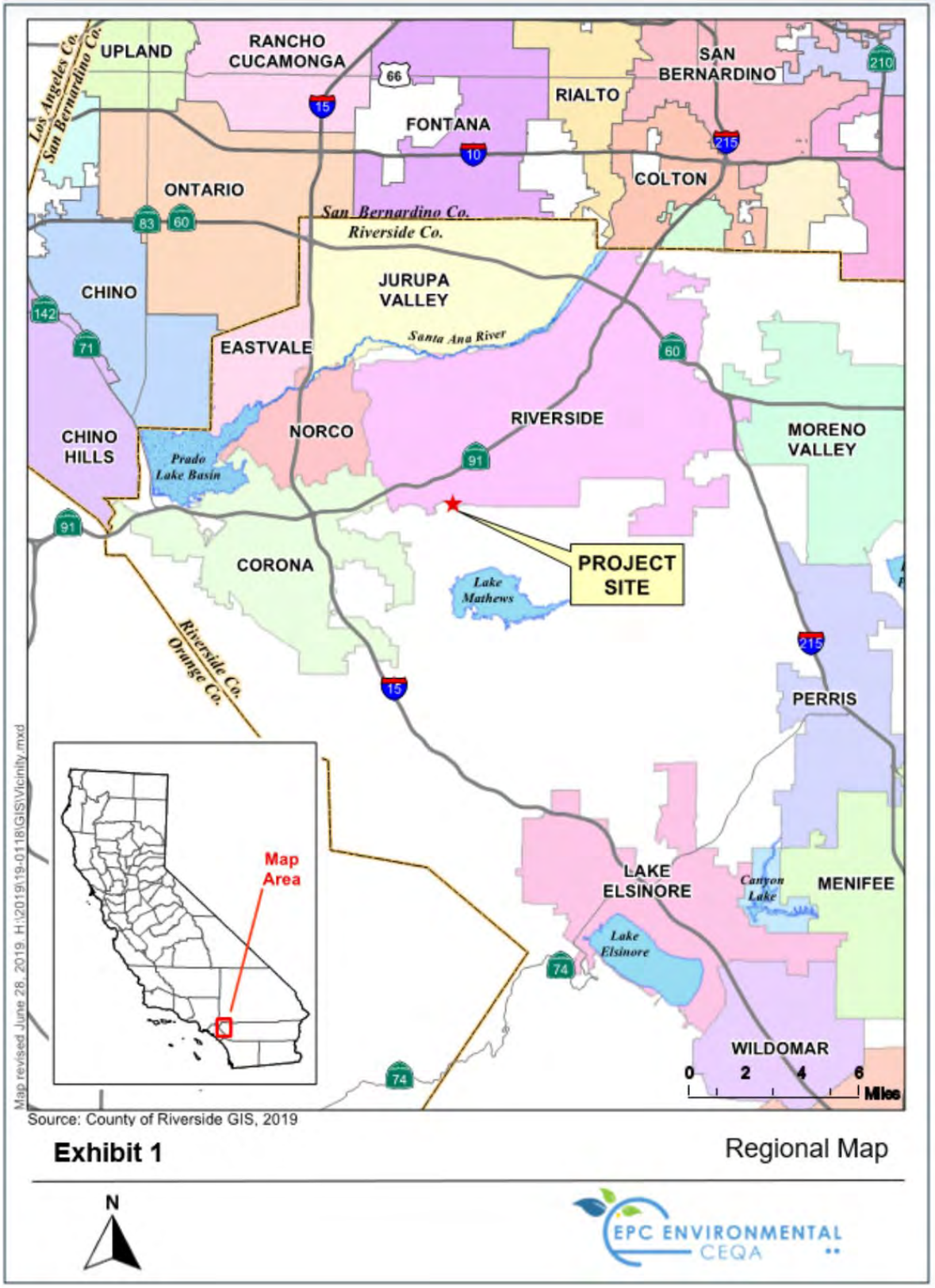

Figure 2- Aerial Photo

Figure 3- Site Photos

Photo 1: West-facing view of the northern portion of the survey area off Millsweet Place

Photo 3. West-facing view of the middle portion of the Project site.

Photo 2: Southwest-facing view of the southern portion of the Project site.

Photo 4. North-facing view of middle portion of the Project site depicting the citrus orchard in the background.

Exhibit 3 Site Photos

EPC ENVIRONMENTAL CEQA

Figure 4- Tentative Tract Map

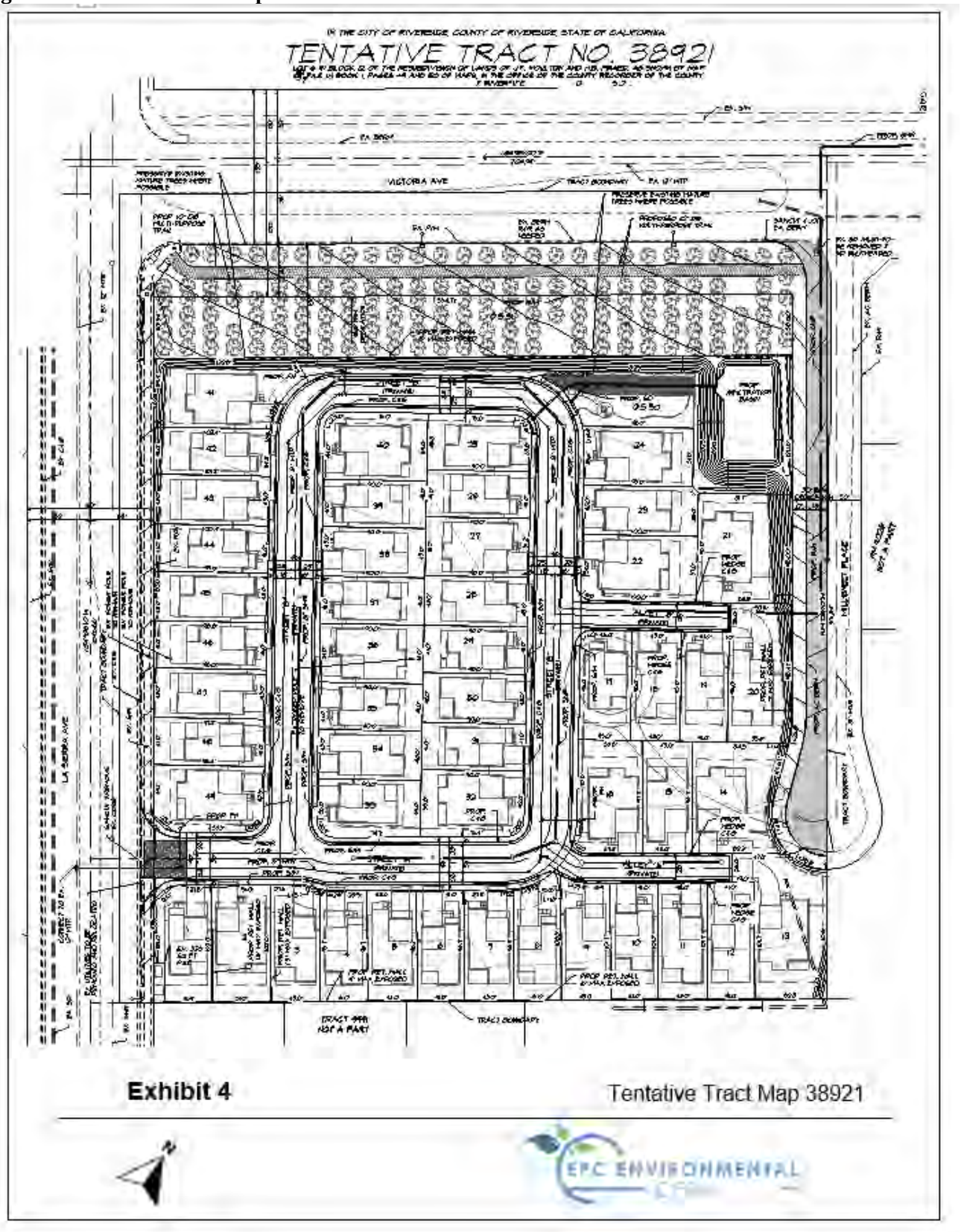

Figure 5- Conceptual Site Plan

Figure 6- Landscaping Plan

Figure 7- Grading Plan

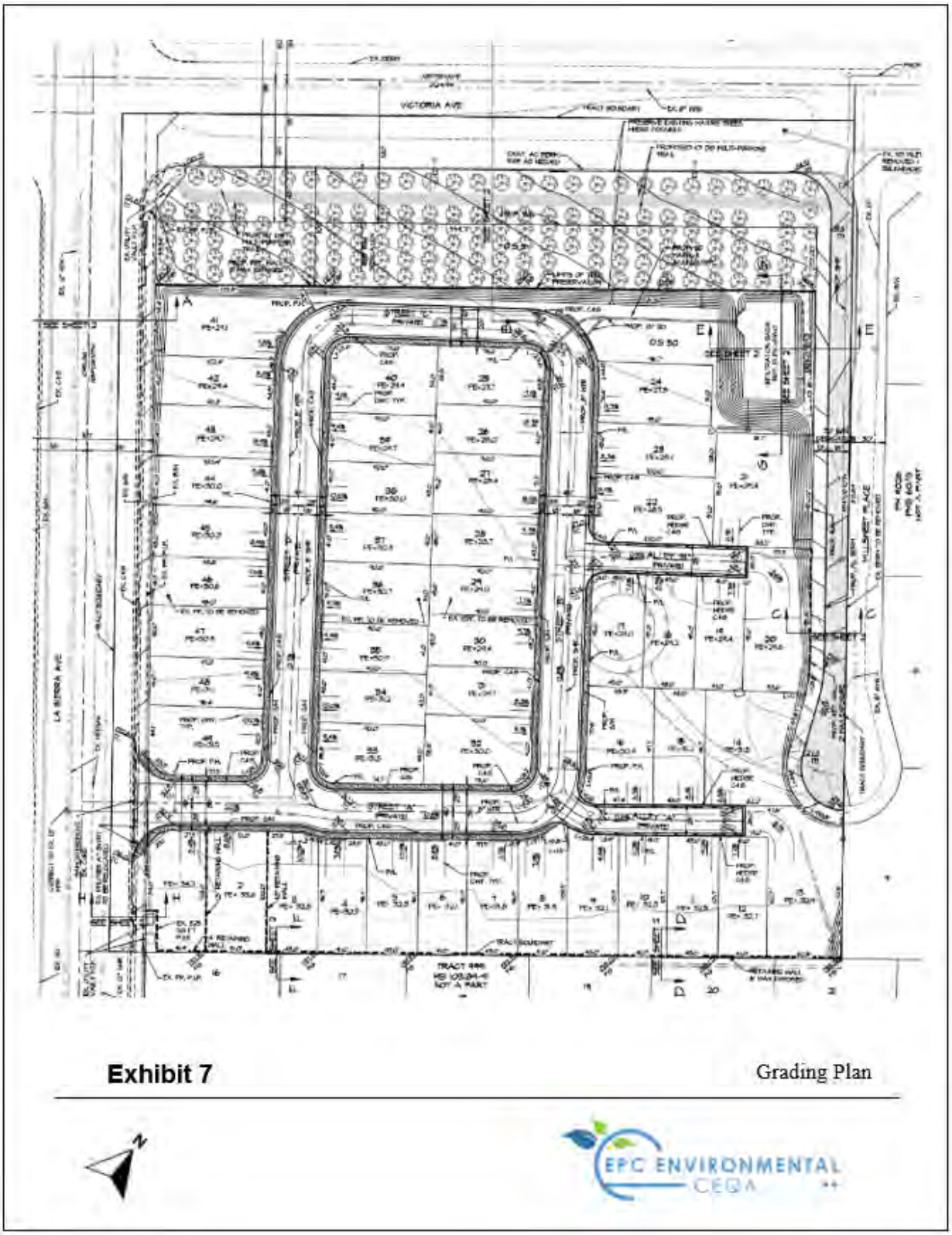

Figure 8- Typical Elevation- Spanish Style Architecture

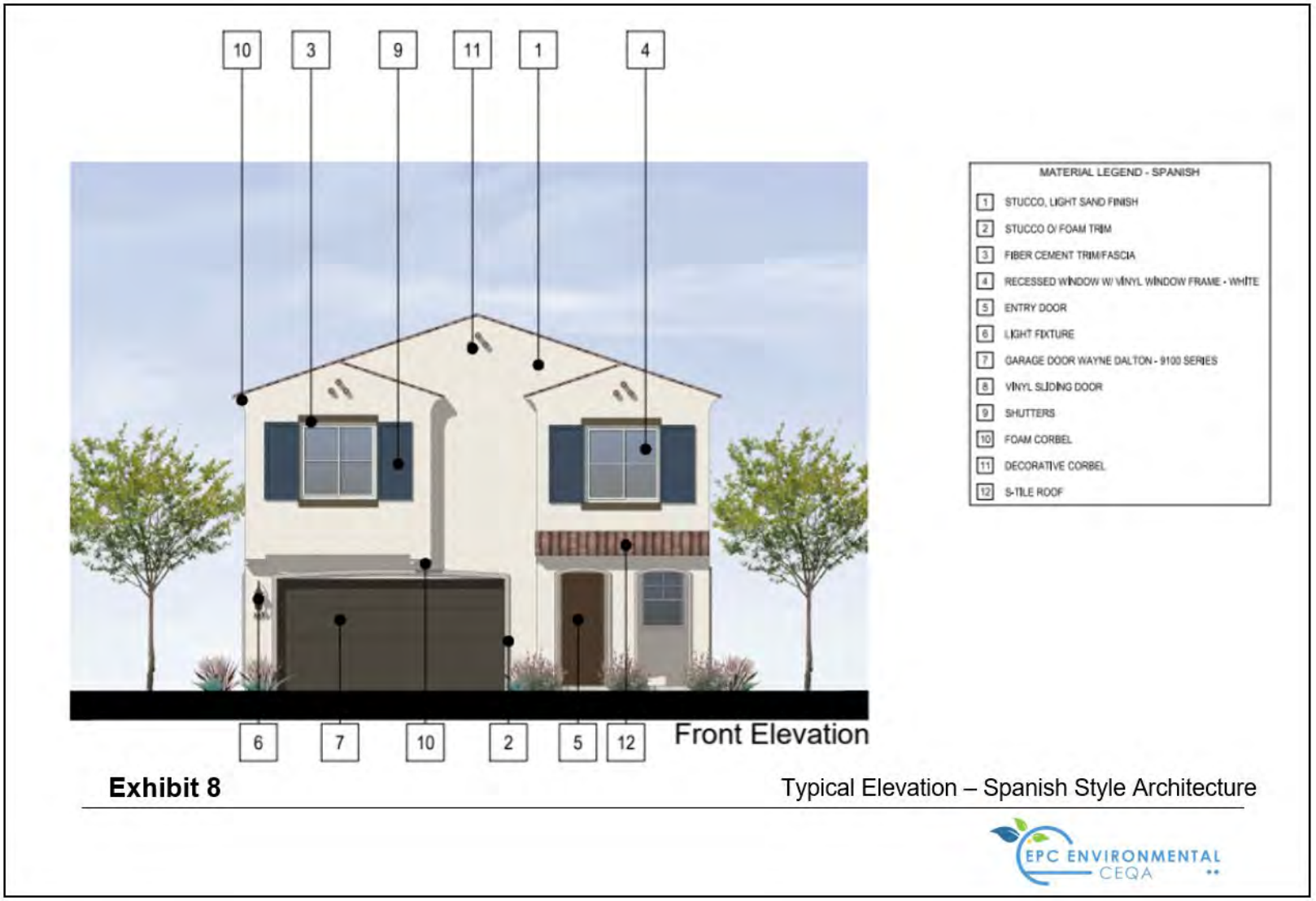

Figure 9- Typical Elevation- Tudor Cottage Style Architecture

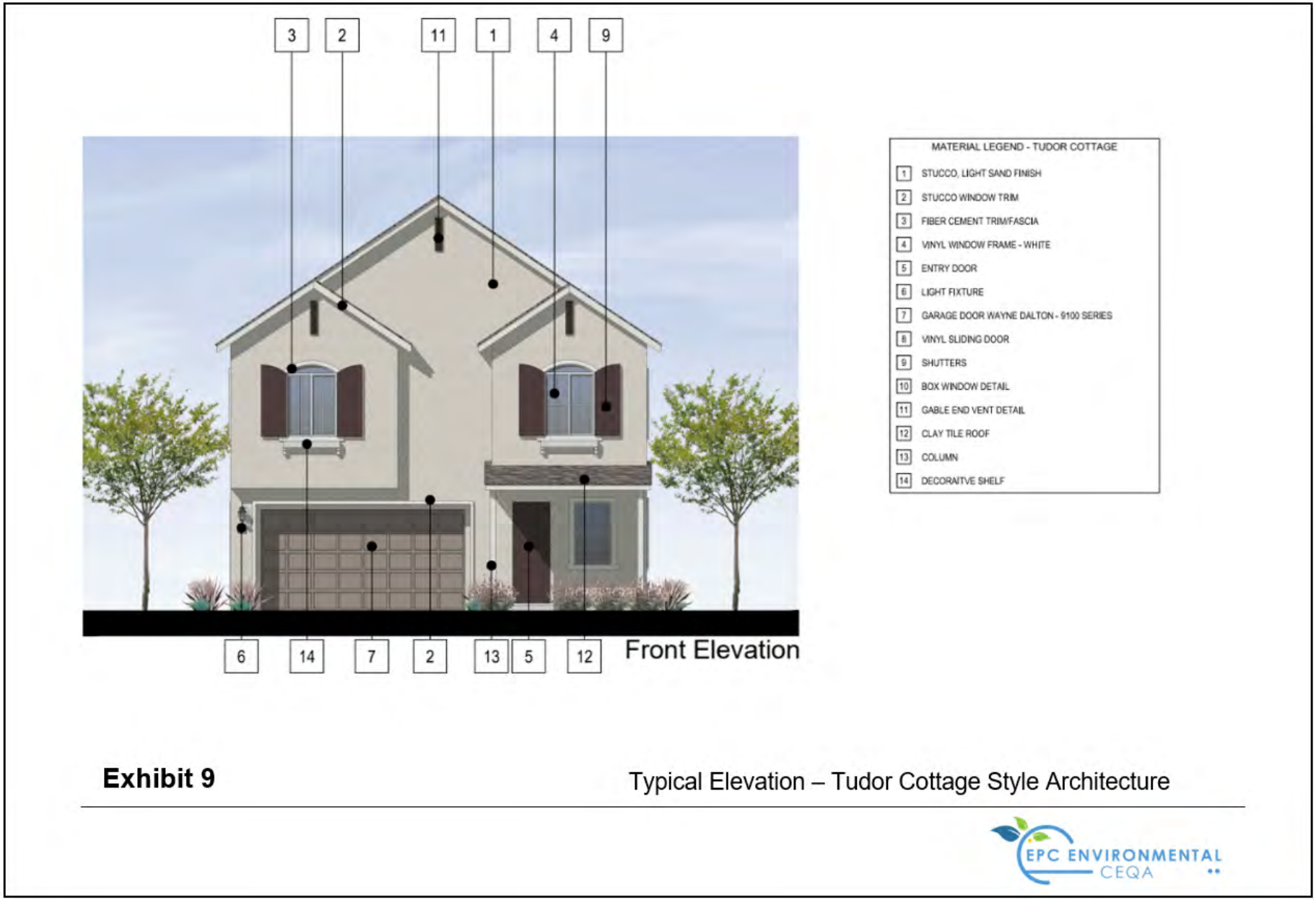

Figure 10- Typical Elevation – Craftsman Style Architecture

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ Aesthetics	☐ Agriculture & Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

Based on 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 Eguez /Senior Planner For City of Riverside

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 a "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 which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a. the significance criteria or threshold, if any, used to evaluate each question; and

   b. the mitigation measure identified, if any, to reduce the impact to less than significance

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

1a. Response: (*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*)

Less than Significant Impact. The proposed project is situated in a largely residential area although there are more commercial-oriented uses further to the north along the SR-91 Freeway and La Sierra Avenue. The lower La Sierra/Norco Hills and the taller San Gabriel Mountains are visible to the north at many times of the year, the Santa Ana Mountains are always visible to the west, and the low Temescal Mountains are visible to the south and southeast of the project area. Figure CCM-4, Master Plan of Roadways, in the City General Plan, designates La Sierra Avenue and Victoria Avenue as scenic "Parkways" which have enhanced landscaping requirements. Travelers along these roadways have views of surrounding hills and mountains to the south, west, and north. However, the Riverside City General Plan does not designate any specific scenic resources or vistas in the vicinity of the project site.

Travelers on La Sierra Avenue and Victoria Avenue would not have views blocked by project residences as they would be of similar height, bulk, and appearance to those that already exist in the surrounding area. East- and westbound travelers on SR-91 would not have their daytime views of the mountains to the north or hills to the south blocked for any amount of time after the construction of the proposed single-family residences, which would be approximately one mile south of the freeway and similar height to all the other residences in all directions of the surrounding area.

The City's General Plan 2025 policies aim at balancing development interests with broader community preservation objectives. The following General Plan policies relate to development impacts on public scenic views:

Policy OS-2.3: Control the grading of land, pursuant to the City's Grading Code, to minimize the potential for erosion, landscaping, and other forms of land failure, as well as to limit the potential negative aesthetic impact of excessive modification of natural landforms.

Policy OS-2.4: Recognize the value of ridgelines, hillsides, and arroyos as significant natural and visual resources and strengthen their role as features, that define the character of the City and its individual neighborhoods.

Policy LU-54.3: Minimize the visual impact of new development, particularly along ridgelines and hillsides.

The project site is relatively flat, and the proposed development would not substantially change the natural contours or the topography of the site, so the project is consistent with Policy OS-2.3. The project does not contain and would not block public views of the mountains to the north or hills to the south, so it is consistent with Policy OS-2.4 and Policy LU-54.3. The project meets the requirements as well as applicable portions of the City's Zoning Code relative to the design and appearance of residential buildings. For these reasons, the project will have less than significant direct, indirect, and cumulative impacts on scenic vistas, and 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?	☐	☐	☒	☐

1b. Response: (*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), Caltrans Scenic Highways Program website at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways)*

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

Less than Significant Impact. According to the Caltrans "Scenic Highways" program website, there are no designated State Eligible Scenic Highways or other designated scenic routes in the general surrounding area. Similarly, according to the County General Plan, there are no designated County Eligible Scenic Highways in the surrounding area. Figure CCM-4, Master Plan of Roadways, in the City General Plan, designates La Sierra Avenue and Victoria Avenue as scenic "Parkways" that have enhanced landscaping requirements. Travelers along these roadways have views of surrounding hills and mountains to the south, west, and north.

The project consists of the construction of new single-family detached residential homes with 1- and 2-stories (max height 28 feet) and an internal access street approximately one mile south of the SR-91 Freeway. There are dozens of remnant orange trees on the project site, but they are in generally poor health and no longer maintained as an active orchard. Other than the orange trees, the project site contains no scenic resources such as rock outcroppings or historic buildings, and no other resources are within view of the proposed project. According to the state Department of Transportation (Caltrans) website, no officially designated State scenic highways or any eligible State scenic highways traverse the City or its Sphere of Influence, including the SR-91 Freeway one mile north of the site.

The proposed project site is located along two roadways considered by the City to have scenic qualities (La Sierra and Victoria) as designated by the City of Riverside's General Plan 2025 in the Circulation & Community Mobility Element for roadways designated as Scenic Highways or Parkways. The project will be conditioned to provide enhanced landscaping along the frontage of these two roadways, especially for Victoria Avenue and it is within the Victoria Avenue Policy area. This is considered regulatory compliance and not unique mitigation under CEQA. Therefore, the project will have a less than significant impact on scenic resources within a scenic highway or roadway 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?	☐	☐	☒	☐

1c. Response: (*Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)*

Less than Significant Impact. According to CEQA Statue and Guidelines §21071, a city that has a population of at least 100,000 is considered to be an urbanized area. The City's current population is approximately 313,676 people so the City is considered an urbanized area (DOF). As such, the project design was evaluated to determine consistency with applicable regulations governing scenic quality through the City's design review procedures process required by Municipal Code section 19.710.020.

Additionally, Victoria Avenue is designated as a Parkway Scenic Boulevard, and Special Boulevard in the Circulation and Community Mobility Element of the General Plan 2025 (GP 2025), As shown on Figure 6, Landscape Plan, the project proposes 1.4 acres of the northern portion of the site to become part of the Victoria Avenue historic landscaped parkway consistent with the Victoria Avenue Policy requirements. This treatment along Victoria Avenue will have a 10-foot-wide decomposed granite (DG) multi-use trail through a grove of citrus trees that will remain from the existing onsite orchard that is no longer commercially harvested. The site will have extensive new landscaping to complement the planned Victoria Avenue "grove". As such, the project would not conflict with applicable zoning and other regulations governing scenic quality.

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

1d. Response: (*Source: General Plan 2025, and General Plan 2025 FPEIR, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)*

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

Less than Significant Impact. Impacts from lighting may occur if excessive or inappropriately directed lighting impacts nearby residential uses and reduces the ability to see the night sky and stars. The project would result in an incremental increase in new sources of light or glare, but it will be consistent with similar existing uses in the surrounding area. All lighting would comply with applicable standards from the City's Municipal Code (Chapter 19.556, Outdoor Lighting and Chapter 19.590, Performance Standards) and California Building Code (Title 24, California Code of Regulations) standards, which would ensure that light and glare impacts from the proposed project would be less than significant. Furthermore, an exterior lighting plan shall be submitted to Design Review staff for review and approval prior to construction of the project.

Additionally, exterior building materials are proposed that would not contribute to daytime glare impacts and also be similar to those types of materials already used by existing residences in the surrounding area. With the lighting limits outlined in the City Zoning Code and implementation of the recommended Condition of Approval, the project will have less than significant direct, indirect, or cumulative impacts related to light, glare, or day or nighttime views, and no mitigation is required.

2. AGRICULTURE AND FORESTRY RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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 complied 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?	☐	☐	☒	☐

2a. Response: (*Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability & General Plan. Farmland Mapping and Monitoring Program (FMMP), state base map last updated 1/1/2024 and located on the state website at https://www.conservation.ca.gov/dlrp/fmmp)*

Less Than Significant Impact. The Project is located within a largely developed urbanized area. Figure OS-2 – Agricultural Suitability of the General Plan 2025 indicates the project site is not designated as agricultural land. However, the 8,8-acre site is part of a 10-acre area designated as Prime Farmland by the State Department of Conservation through their Farmland Mapping and Monitoring Program (FMMP). This 10-acre remnant area is totally surrounded by land designated as "Urban and Built-up Land" although there is some land designated "Farmland of Local Importance" approximately 500 northeast of the project site across Victoria Avenue. This property currently supports a large commercial nursery. In addition, there are properties supporting citrus orchards 0.4-mile northeast of the site south of Victoria Avenue but the extent to which they are actively producing citrus is not currently known. The project site represents 88% of the remnant Prime Farmland property with the remaining 12% already covered by residential development just south of the project site. There are no other lands classified as, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the project vicinity. The project site used to support a citrus orchard but is no longer being actively harvested. According to the FMMP, all of the land

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
surrounding the site is classified as "Urban and Built Up" land so the agricultural value of this property would be negligible, and its loss would have no significant impact on agricultural resources in this area. The project site does have a state Farmland designation but does not currently support agricultural resources or operations. There are no agricultural operations or farmlands within proximity of the site although there is a commercial nursery northeast of the site. Based on these conditions, the project will have a less than significant impact on a direct, indirect, or cumulative basis on Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Farmland), and no mitigation is required.				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
2b. Response: (*Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)* **No Impact.** A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR reveals that the project site is within a built environment and not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. The closest Williamson Act Preserve is located over a half mile southeast of the project site. The Project is consistent with the GP 2025 policies related to agricultural preservation and would not result in new roads or other infrastructure that could facilitate the conversion of agricultural land. Implementation of the Project would result in the expansion of a residential neighborhood adjacent to the defined Greenbelt 2025 area, that area, as defined, has previously been fully developed with single-family residences; therefore, the Project would allow the continued use of existing Farmland within the Arlington Greenbelt in a manner that will ensure the viability and sustainability existing agriculture/crop production. Moreover, the project site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the Project will have no impact on a direct, indirect, or cumulative basis and 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))?	☐	☐	☐	☒
2c. Response: (*Source: County GIS Map – Forest Data, CalFire FRAP mapping at https://frap.fire.ca.gov/)* **No Impact.** The City of Riverside has no forest land that supports 10 percent native tree cover nor does it have any timberland, including the project site and surrounding area. In addition, the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) assesses the amount and extent of California's forests and rangelands, analyzes their condition, and identifies alternative management and policy guidelines. The most current FRAP map from the CalFire website indicates the project site and surrounding area do not contain any designated forest resources. Therefore, no impact will occur from this project on a direct, indirect, or cumulative basis on zoning for forest land and no mitigation is required.				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☒	☐
2e. Response: (Source: General Plan – Figure OS-2 – *Agricultural Suitability, Figure OS-3 – Williamson Act Preserves,* General Plan 2025 FPEIR – *Appendix I – Designated Farmland Table (use only if your property on this table), Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data)* **Less than Significant Impact**. For this analysis, state Farmland and agricultural land considered under this threshold include Farmland of Local Importance, Land subject to Proposition R and Measure C, land under the Williamson Act Contract, as well as any other land being used for agricultural uses as non-conforming uses. The project is located in an urbanized area of the City of Riverside in an existing residential area around the La Sierra Avenue/Victoria Avenue intersection.				

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

Additionally, the site and surrounding areas are identified as urban/built-out land and do not support agricultural resources or operations although there is a commercial nursery 500 feet northeast of the project site. The project will result in the conversion of 9.91 acres of designated farmland to non-agricultural uses. However, this land is surrounded by "Urban and Built-Up Land" and no longer supports citrus production. In addition, there are no agricultural operations or farmlands currently within proximity of the subject site. The City of Riverside has no forest land that can support 10 percent native tree cover. Therefore, less than significant impact will occur from this project on a direct, indirect, or cumulative basis related to the conversion of farmland to non-agricultural use or the loss of forest land, and no mitigation is required.

3. AIR QUALITY:

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

3a. Response: (*Source: South Coast Air Quality Management District's 2022 Air Quality Management Plan (AQMP CalEEMod Model)l and Air Quality and Greenhouse Gas Technical Memorandum prepared by KPC EHS Consultants, LLC on 3-29-2024).*

Less than Significant Impact. The project is located within the South Coast Air Basin. The project site is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) designate air basins where ambient air quality standards are exceeded as nonattainment areas. Conflicts and obstructions that hinder implementation of the AQMP can delay efforts to meet attainment deadlines for criteria pollutants and maintain existing compliance with applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, consistency with the South Coast Air Basin 2022 AQMP is affirmed if the Project: (1) Is consistent with the growth assumptions in the AQMP; and (2) Does not increase the frequency or severity of an air quality standards violation or cause a new one.

Consistency Criterion 1 refers to the growth forecasts and associated assumptions included in the 2022 AQMP. The 2022 AQMP was designed to achieve attainment for all criteria air pollutants within the Basin while still accommodating growth in the region. Projects that are consistent with the AQMP growth assumptions would not interfere with the attainment of air quality standards, because this growth is included in the projections used to formulate the AQMP.

The Project site's General Plan land use is designated as Low-Density Residential (LDR) with a maximum density allowed of 4.1 du/ac. Under the LDR designation, the maximum number of units allowed is 41 (9.91 acres x 4.1 = 40.63 rounded to 41). However, the project proponent has applied for a density bonus under the state affordable housing law, which would increase the number of units to 49.

The projections in the AQMP for growth assumptions are based on the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is updated every four years with the current adopted plan being the 2020-2045 RTP/SCS. According to the 2020-2045 RTP/SCS, the forecast for the City's population growth is estimated at 19,000 residents and an additional 5,500 households. The proposed project would include the development of 49 single-family dwelling units. According to the State of California Department of Fina*nce E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023*, the City has an estimated 3.06 persons per household[2]. The project would therefore increase the current population by approximately 150 residents versus 125 that would result from the current General Plan designation. The increase of 150 residents (net +25) is well within the estimated 5,500 projected increase in residents and as such the Project would be consistent with the growth assumptions from the 2020-2045 RTP/SCS used in the SCAQMD plans.

[2] California Department of Finance E-5 Spreadsheet, accessed: https://dof.ca.gov/forecasting/Demographics/estimates/e-5-population-and-housing-estimates-for-citiescounties-and-the-state-2020-2023/

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

Consistency Criterion 2 refers to the California Ambient Air Quality Standards (CAAQS). In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's emissions would be cumulatively considerable (SCAQMD, 2003; page D-3). As described below in Section 3. b, the proposed Project would not generate construction or operational emissions above SCAQMD criteria air pollutant thresholds.

Based on the analysis of the two criteria above, it is also consistent with the AQMP. The project will have a less than significant direct, indirect, and cumulative impact on the implementation of an air quality plan.

Therefore, the proposed project would not conflict with the SCAQMD 2022 AQMP. Impacts are less than significant, and no mitigation is required.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

3b. Response: (*Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 AQMP, CalEEMod, Model; and Air Quality and Greenhouse Gas Technical Memorandum prepared by KPC EHS Consultants, LLC on 3-29-2024.*

Less Than Significant Impact. The project is located within the City of Riverside, in the northwest portion of Riverside County, and lies within the South Coast Air Basin (Basin). The project area is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600 square mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. SCAQMD identifies the following criteria pollutants: ozone (0_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), lead, and particulate matter (PM_{10} and $PM_{2.5}$). These pollutants can harm your health and the environment, and cause property damage. The Environmental Protection Agency (EPA) calls these pollutants "criteria" air pollutants because it regulates them by developing human health-based and/or environmentally based criteria for setting permissible levels. An Air Quality Model, conducted using CalEEMod 2016.3.2, was completed for the project. The results of the air quality model showed that the proposed project would generate emissions far lower than the SCAQMD thresholds for significance for air quality emissions.

Construction emissions for the Project were estimated by using the California Emissions Estimator Model (CalEEMod)version 2022.1.1.22, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the SCAQMD. Construction emissions are summarized inTable3.1-1. Construction emissions were based on CalEEMod Land Use for development of a 49 Single-Family dwelling unit Project. Construction was estimated for a 300-day construction schedule, with default values used for the schedule. Default values were used for each construction phase including site preparation, grading, building construction, paving, and architectural coating as well as defaults for off-road construction equipment. Peak emissions represent the highest value from the summer and winter modeling. SCAQMD significance thresholds were used for determining the project's impacts. All construction emissions are below the SCAQMD thresholds.

Table 3-1: Summary of Peak Construction Emissions (No Mitigation)

Year/Season	Emissions (lbs/day)					
	ROG	NOX	CO	SOX	PM10	PM2.5
Construction 2024 (Summer)	3.74	36.0	34.4	0.10	9.49	5.47
Construction 2024 (Winter)	1.29	11.5	14.3	0.02	0.78	0.53
Construction 2025 (Summer)	30.0	10.7	14.5	0.02	0.71	0.47

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

Construction 2025 (Winter)	1.20	10.7	14.1	0.02	0.71	0.47
Maximum Daily Emissions	**30.0**	**36.0**	**34.4**	**0.10**	**9.49**	**5.47**
SCAQMD Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod 2022.1.1.22 Datasheets. (Appendix A).

Operations emissions include stationary (residence emissions), mobile (transportation emissions), and area (on-going architectural coatings, consumer product use, landscaping maintenance emissions), default values were used. SCAQMD significance thresholds were used for determining the project's impacts. Operation emissions are summarized in Table 3.2. All operations emissions are below the SCAQMD thresholds.

Table 3-2: Summary of Peak Operational Summer Emissions

Source	Emissions (lbs/day)					
	VOC/ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Source	1.85	1.56	14.4	0.03	3.06	0.79
Area Source	2.46	0.03	2.78	<0.005	<0.005	<0.005
Energy Source	0.03	0.44	0.19	<0.005	0.04	0.04
Total Maximum Daily Emissions	**4.33**	**2.03**	**17.3**	**0.04**	**3.10**	**0.83**
SCAQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod 2022.1.1.22 Datasheets. (Appendix A).

Table 3-3: Summary of Peak Operational Winter Emissions

Source	Emissions (lbs/day)					
	VOC/ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Source	1.73	1.56	12.2	0.03	3.06	0.79
Area Source	2.21	-	-	-	-	-
Energy Source	0.03	0.44	0.19	<0.005	0.04	0.04
Total Maximum Daily Emissions	**3.96**	**2.12**	**12.4**	**0.04**	**3.10**	**0.83**
SCAQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod 2022.1.1.22 Datasheets. (Appendix A).

Based on the air quality modeling contained in the Air Quality and GHG Memo prepared for the project (Appendix A), short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of

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

significance. The Air Quality and GHG Memo also found that long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance. The project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP. The above tables compare the project emissions (short-term and long-term) to the SCAQMD daily thresholds and show that project-related emissions will not exceed established significance thresholds.

Therefore, the project will not 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. Impacts will be less than significant, and no mitigation is required.

c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

3c. Response: (*Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2022 Air Quality Management Plan, CalEEMod Air Quality and Greenhouse Gas Technical Memorandum prepared by KPC EHS Consultants, LLC on 3-29-2024.*

Less Than Significant Impact. Sensitive receptors are those segments of the population that are most susceptible to poor air quality such as children, the elderly, the sick, and athletes who perform outdoors. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours. The closest sensitive receptors to the Project site are shown in Table 3-4 and are various residences located from 60 to 175 feet from the project site (at their closest point so this would be considered the "worst case" condition).

Table 3-4: Sensitive Receptor Locations

Closest Receptor (Direction)	Distance from Project Site Boundary (feet)	Distance from Project Construction Center (feet)
Residence (southeast)	75	425
Residence across Millsweet Place (northeast)	60	370
Residence across Victoria Avenue (north)	175	500
Residences across La Sierra Avenue (southwest)	115	450

Source: Table 3.5-1, KPC 2024

Localized Significance Thresholds (LSTs)

Construction. The proposed Project's maximum daily construction emissions are compared against the SCAQMD's-recommended LSTs in Table 3-5. The LSTs are for SRA 23 (Metropolitan Riverside County) in which the proposed project is located. Construction emissions were estimated against the SCAQMD's thresholds for a 5-acre project size. A receptor distance of 25 meters (82 feet) was used to evaluate impacts at sensitive residential receptor locations for construction activities. This is considered to be a conservative approach as 1) the project would involve grading/site disturbance of approximately 8.8 acres, which is more than 5 acres, and 2) the nearest sensitive receptor property (i.e., residence) is approximately 60 feet northeast of the Project site.

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

Table 3-5: Construction Emissions LST Analysis

Construction Activity	Maximum Onsite Pollutant Emissions (lbs./day)			
	NOx	CO	PM10	PM2.5
Maximum Daily Emissions[3]	36.0	34.4	9.49	5.47
SCAQMD LST Threshold	270	1,577	13	8
Threshold Exceeded?	No	No	No	No

Source: Table 3.6-2, Air Quality and GHG Memo, KPC 2024

Operation. According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes substantive stationary sources of emissions, or uses that attract mobile sources that may spend long periods queuing and idling at the site (e.g., industrial uses, transfer facilities, and warehouses). The Project does not propose or require uses that would constitute substantive stationary sources of emissions; or uses that attract mobile emissions sources that may spend long periods queuing and idling at the site. Accordingly, no operational source emissions LST analysis is required.

CO "Hot Spots". The SCAB is designated attainment under the CAAQS and NAAQS for CO. An adverse CO hotspot would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. According to the SCAQMD, CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. Due to changing regulations vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, the introduction of cleaner fuels, and the implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin has steadily declined.

The SCAQMD, as part of their 2003 AQMP, conducted modeling for CO Hotspot Analysis at multiple congested intersections in their South Coast Air Basin, including the intersection of Wilshire Boulevard and Veteran Avenue, considered one of the most congested intersections in Southern California with an ADT of approximately 100,000 vehicles. The CO concentrations modeled by the SCAQMD's analysis identified all traffic-induced CO levels below Federal and State thresholds. As the CO hotspots were not modeled at an intersection that accommodates over 100,000 vehicles per day, it can be reasonably deduced that CO hotspots would not be experienced at any intersections in the vicinity of the proposed Project.

Given the extremely low level of CO concentrations in the Project area and no significant traffic-related impacts by the Project at any intersections, project-related vehicle emissions are not expected to result in the CO concentrations exceeding the State or federal CO standards.

Therefore, the Project would not result in potentially adverse CO concentrations or "hotspots." Further, detailed modeling of Project-specific carbon monoxide (CO) "hot spots" is not needed to reach this conclusion. Impacts will be less than significant, and no mitigation is needed.

Toxic Air Contaminants. The Project is a residential development and does not produce toxic air contaminants (TAC) such as those generated by industrial manufacturing uses or uses that generate heavy-duty diesel truck emissions. Therefore, the Project would not result in potentially significant TAC emissions and detailed modeling of TAC emissions is not needed to reach this conclusion. Impacts will be less than significant, and no mitigation is needed.

Cumulative Impacts. The project area is designated as a non-attainment area for ozone and a non-attainment area for PM2.5 and PM10. The Project would comply with the mandatory requirements of SCAQMD's Rule 403 (fugitive dust control) during construction, as well as all other adopted AQMP emissions control measures. The project also is required to comply with California Code of Regulations Title 13, Division 3, and specifically its Chapter 1, Article 4.5, Section 2025,

[3] Emissions presented are worst-case emissions and may reflect summer or winter emissions levels. In general, due to rounding, there is no difference between summer and winter emissions levels for the purposes of this table.

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

"Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles" and its Chapter 10, Article 1, Section 2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling." Per SCAQMD rules and mandates, and California Code of Regulation requirements, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements are imposed on all projects in the South Coast Air Basin.

In determining whether the project would 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 (including releasing emissions, that exceed quantitative thresholds for ozone precursors), the non-attainment pollutants of concern for this impact are ozone and PM10. In developing the thresholds of significance for air pollutants disclosed above the SCAQMD considered the emission levels for which a project's emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts on the region's existing air quality conditions.

As shown above, the Project does not exceed the identified significance thresholds, as such, emissions would not be cumulatively considerable so impacts would be less than significant.

Summary of Air Quality Impacts. Due to the size and nature of the Project, criteria pollutant emissions during both construction and operation will be less than significant both on a project level and on a cumulative basis. The Project will not exceed the SCAQMD's Localized Significance Thresholds (LSTs), and emissions of Diesel Particulate Matter and other TACs will not exceed established thresholds for cancer health risks. Therefore, impacts will be less than significant, and no mitigation is required.

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

3d. Response: (*Source: Air Quality and Greenhouse Gas Technical Memorandum prepared by KPC EHS Consultants, LLC on 3-29-2024.*

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed Project would not result in the construction of new uses that could generate odors related to land use, operations, or equipment use (e.g., oils, lubricants, fuel vapors). The residential activities proposed as part of the Project would not generate sustained odors that would affect substantial numbers of people or nearby sensitive receptors. Through compliance with SCAQMD Rule 402 to control dust during construction, the proposed Project is not anticipated to cause objectionable odors affecting a substantial number of people, and less than significant impacts on a direct, indirect, or cumulative basis will occur, and no mitigation is required.

4. BIOLOGICAL RESOURCES:

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

4a. Response: (*Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area), Biological Resources Assessment (BRA),* VCS Environmental, April 1, 2024 *(Appendix B).*

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

Less than Significant Impact. The project site has been the subject of two habitat assessments approved by the City in 2014 for the "Original Project" and in 2019 for the "Revised Project ".

Original Project (2014) Findings

The Environmental Checklist in the City of Riverside Planning Commission Memorandum for P19-0380 and P19-0480 (July 25, 2019) described the previous onsite biological resources as follows:

"*Original Project: Less than Significant Impact / No Impact. The Original Project site is within the boundary of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); however, it is not within a Criteria Cell; is not classified as Public/ Quasi-Public (P/ QP) land; and it not within an identified Linkage. The Original Project site is within the MSHCP survey area for burrowing owl. As part of the 2014 Initial Study, a project-specific habitat assessment and focused burrowing owl study was prepared. The findings of these studies concluded that the Original Project was in compliance with the MSHCP and no candidate species, sensitive species, species of concern, or special status species or suitable habitat for such species were present on the Original Project site. Additionally, the Original Project site did not support riparian habitat or any other sensitive natural community. For these reasons, the 2014 Initial Study concluded that implementation of the Original Project would result in no impact with regard to candidate, sensitive or special status species; riparian habitat; the movement of native or migratory species; or conflict with the provisions of the MSHCP. The 2014 Initial Study concluded that due to the Original Project site being located within an urban built-up area and having a long history of severe site disturbance, implementation of the Original Project would not have a substantial effect on federally protected wetlands; therefore, impacts would be less than significant. The 2014 Initial Study also concluded that impacts with regard to local policies protecting trees would be less than significant because the planting and maintenance of street trees proposed as part of the Original Project will be in compliance with the City's Urban Forest Tree Policy Manual.*

Revised Project (2019) Findings

"*No Substantial Change from Previous Analysis. As with the Original Project, the Revised Project must be consistent with and comply with the provisions of the MSHCP and the City's Urban Forest Tree Policy Manual. Gonzales Environmental Consultant, LLC, conducted a burrowing owl survey in March 20192 (the 2019 survey) to determine if site conditions had changed since the2014surveys conducted for the Original Project. The results of the 2019 survey confirm the findings of the 2014 surveys; specifically, there is no suitable burrowing owl habitat; no owl burrows or burrowing owls present on the site or in adjacent areas. Additionally, there are no stockpiles of material or areas that burrowing owls would be found. Thus, the2019 survey concurred with the findings of the 2014 surveys. Because the 2019 survey confirmed the results of the earlier surveys and the Revised Project will comply with the MSHCP and City's Urban Forest Tree Policy Manual, the Revised Project will result in the same impacts as the Original Project."*

Proposed Project (2024) Findings

A biological site visit conducted on March 22, 2024, by VCS biologist Vanessa Tucker within the approximately 8.8-acre La Sierra & Victoria Project located in the County of Riverside and confirms the results of the biological resources survey previously completed in 2014 by Victor M. Horchar and the burrowing owl survey conducted in 2019 by Gonzales Environmental Consulting, LLC. While general biological resources are discussed, the focus of this assessment is on those resources considered to be sensitive and to determine any changes in conditions from the prior studies. A Habitat Assessment prepared based upon the results of a literature review and field visit on March 22,2024 (Appendix B.)

The conditions within the Project site are consistent with the 2014 and 2019 surveys. The site does not support riparian habitat or any other sensitive natural community, and no candidate or sensitive species or suitable habitat for such species was present on the Project site. The Project is in compliance with the MSHC P and the City's Urban Forest Tree Policy Manual

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

The Habitat Assessment and burrowing owl survey also confirms the findings of the previous habitat assessments and focused burrowing owl studies. Done in 2014 and 2019. Although all of the studies determined that there is no habitat or no signs on burrowing owls on the property, because the project site is located within the MSHCP burrowing owl survey area, a 30-day preconstruction survey is recommended prior to the commencement of project activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding grading activities. This is included as a Standard Condition of Approval.

A Standard Condition of Approval will include the following – Consistent with the Western Riverside County Multiple Species Habitat Conservation Plan:

> **Standard Condition of Approval-Pre-Construction Burrowing Owl Clearance Survey.** Prior to the commencement of construction activities (i.e., demolition, earthwork, clearing, and grubbing), a 30-day pre-construction survey for burrowing owls shall occur following the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan. The results of the single one-day survey shall be submitted to the City Planning Division, for review and acceptance, prior to obtaining a grading permit. If burrowing owls are not detected during the pre-construction survey, no further mitigation is required. If burrowing owls are detected during the pre-construction survey, a Burrowing Owl Protection and Relocation Plan shall be prepared for and approved by the Regional Conservation Authority (RCA) and the Wildlife Agencies prior to initiating ground disturbance. If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a pre-construction survey shall again be necessary to ensure the burrowing owl has not colonized the site since it was last disturbed and shall be submitted to the City Planning Division, for review and acceptance.

There are several large mature trees such as citrus, avocado, sycamore, jacaranda, and pine that could support nesting birds within the Project site. Therefore, a Standard Condition of Approval is recommended,

A Standard Condition of Approval will include the following – Consistent with the Migratory Bird Treaty Act of 1918

> **Standard Condition of Approval -Nesting Birds Survey.** To the extent feasible, (i.e., earthwork, clearing, and grubbing) shall occur outside of the general bird nesting season for migratory birds. The general nesting season is February 15 through August 31 for songbirds and January 15 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory birds and raptors (January 15 through August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than seven days before the commencement of construction activities. If construction is inactive for more than seven days, an additional survey shall be conducted. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The biological monitor may modify the buffer or propose other recommendations to minimize disturbance to nesting birds.

With implementation of the Standard Conditions of Approval described above, impacts would be less than significant, and no mitigation is required.

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?	☐	☐	☒	☐

4b. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), and Biological Resources Assessment (BRA), VCS Environmental, April 1, 2024 (Appendix B). **Less than Significant Impact.** General and focused biological surveys were conducted on the project site in 2014 and 2024. During the field visits, no jurisdictional waters or water features were observed within the Project site. The results of the March 2024 survey confirm that the site conditions have not changed since the 2014 and 2019 surveys. The site does not support riparian habitat or any other sensitive natural community, and no candidate or sensitive species or suitable habitat for such species was present on the Project site. Therefore, potential impacts in this regard are less than significant and no mitigation is required.				
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
4c. Response: (*Source: City of Riverside GIS/CADME USGS Quad Map Layer), and Biological Resources Assessment (BRA), VCS Environmental, April 1, 2024 (Appendix B).* **Less Than Significant Impact.** General and focused biological surveys were conducted on the project site in 2014 and 2024. During the field visits, no jurisdictional waters or water features were observed within the Project site. The results of the March 2024 survey confirm that the site conditions have not changed since the 2014 and 2019 surveys. The site does not support any jurisdictional areas, wetlands or water retention features, riparian habitat, or any other sensitive natural community. Therefore, the proposed project would have a less than significant impact 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 on a direct, indirect, or cumulative basis with adherence to existing regulations and code requirements. No mitigation is required.				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
4d. Response: (*Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage), and Biological Resources Assessment (BRA), VCS Environmental, April 1, 2024 (Appendix B).* **Less than Significant.** The project site is surrounded by development and does not directly connect to large blocks of habitat. The site is constrained by existing development in all directions so it would not facilitate local movement of wildlife within its boundaries. Therefore, the implementation of the proposed project would not impact the regional wildlife movement. Construction activities within the project site could disturb or destroy active migratory bird nests, including eggs and young. Disturbance to or destruction of migratory bird eggs, young, or adults violates the MBTA and CFG Code. To avoid project impacts on nesting birds, a Standard Condition of Approval nesting birds) outlined in Section 4. a above. With the implementation of that condition , the project will have a less than significant impact on wildlife movement on a direct, indirect, or cumulative basis.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
**4e. Response: (*Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of*				

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

Riverside Urban Forest Tree Policy Manual), and Biological Resources Assessment (BRA), VCS Environmental, April 1, 2024 (Appendix B).

Less Than Significant Impact. The proposed project is subject to the MSHCP and is consistent with the General Plan 2025 policies regarding biological resources. The proposed project will not conflict with General Plan 2025 Policy OS-6.4, which requires the City to continue efforts to establish various wildlife movement corridors. It will also not conflict with General Plan 2025 Policy OS-6.1, which addresses preserving wildlife migration areas in general, and with Policies OS-7.3 and LU-5.6, which address wildlife movement through the preservation and expansion of the Santa Ana River open space and the crossing of Alessandro Arroyo.

Implementation of the proposed project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.

The project site is located along the south side of Victoria Avenue and will provide landscaping, including trees, consistent with the requirements of the overlay district for that roadway.

Any project within the City of Riverside's boundaries that proposes planting a street tree within a City right-of-way must follow the Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. If applicable, the project will comply with the Tree Policy Manual when planting a tree within a City right-of-way. This is considered regulatory compliance and not unique mitigation under CEQA. Therefore, impacts will be less than significant, and no mitigation is required,

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

4f. Response: (*Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan, and Natural Community Conservation Plan), and Biological Resources Assessment (BRA), VCS Environmental, April 1, 2024 (Appendix B).*

Less Than Significant Impact.

MSCHP

The project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area. The MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on the conservation of species and their associated habitats in Western Riverside County. The MSHCP's overall goal is to provide for the conservation of covered species and their habitats, as well as maintain biological diversity and ecological processes while allowing for future economic growth within the urbanized areas. The project site is not located in any MSHCP Existing Cores, Linkages, non-contagious habitat blocks, MSHCP Cell area, MSHCP criteria cell. The project site is not classified as Public/ Quasi-Public (P/ QP) land or located within the Stephens' Kangaroo Rat *(Dipodomys stephensi)* habitat Conservation Plan area for the endangered Stephen's Kangaroo Rat. Furthermore, the project site is located outside of the mapped Stephen's Kangaroo Rat suitable habitat area. A search of the MSHCP database and other appropriate databases identified no potential for a candidate, sensitive or special status species, or suitable habitat for such species onsite. Plant species that may not be listed as endangered, threatened, candidate, or proposed species under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA), but are still considered rare, are generally assigned a rarity code by

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

the California Native Plant Society (CNPS). CNPS has compiled an inventory of the geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species in California.

Sensitive Vegetation Communities/Habitats

Sensitive vegetation communities/habitats are considered either rare within the region or sensitive by CDFW. Communities are given a Global and State (S) ranking on a scale of 1 to 5. Communities afforded a rank of 5 are most common while communities with a rank of 1 are considered highly periled. CDFW considers sensitive communities as those with a rank between S1 and S3. According to the general biological surveys, the project site does not support any sensitive plant communities.

Rare Plant Species

Rare plant species are those listed or candidates listed as federally threatened or endangered by the U.S. Fish and Wildlife Service (USFWS), State listed as threatened or endangered or considered sensitive by the CDFW, and/or are on the CNPS California Rare Plant Rank (CRPR) List 1A, 1B, 2A, 2B, or 3 species, as recognized in the CNPS's Inventory of Rare and Endangered Vascular Plants of California and consistent with the CEQA Guidelines. Nine rare plant species were recorded within the Riverside West quadrangle database search conducted on the California Natural Diversity Data Base (CNDDB) and CNPS. However, these species are not considered to have the potential to occur based on geographic range, elevation range, lack of suitable habitat, or onsite physical conditions.

Sensitive Animal Species

Sensitive wildlife species are those listed, or candidate listed as federally threatened or endangered by USFWS; and/or State listed as threatened or endangered or considered species of special concern (SSC) by CDFW. CNDDB occurrences for coastal California gnatcatcher (CAGN, *Polioptila californica*, federally threatened, MSHCP covered), occur approximately 0.6 miles south of the site (CDFW 2024). However, no suitable habitat was observed within or adjacent to the Project site. Therefore, no focus surveys are required. In addition, CNDDB occurrences for Stephen's kangaroo rat (SKR, *Dipodomys stephensi*, MSHCP covered and federally threatened) occur approximately 0.5 miles southwest of the site (CDFW 2024). However, no suitable habitat was observed within the Project site. Riverside County Habitat Conservation Agency (RCHCA) requires a SKR mitigation fee because the Project site falls within Riverside County's SKR Plan Fee.

With payment of the MSHCP Local Development Mitigation Fee (LDMF), no additional mitigation is required for potential impacts to these species. The project site is within the SKR HCP but is not located within any of the core reserves. Therefore, the project is required to pay a SKR mitigation fee for incidental take authorization under the SKR HCP.

The LDMF and SKR HCP mitigation fees are discussed further under Adopted Habitat Conservation Plans in Section 4. f below. In addition, the site contains numerous trees and may support nesting birds that are protected under the Migratory Bird Treaty Act (MBTA), therefore, the project includes a condition of approval requiring a pre-construction Nesting Bird Survey prior to ensure nesting birds are not impacted. .

Riverside Fairy Shrimp

Riverside fairy shrimp (RFS) (*Streptocephalus woottoni*) is a federally endangered species and is conditionally covered under the MSHCP. During the 2019 and 2024 field visits, no jurisdictional waters or water features were observed within the Project site, including wetlands or vernal pools. The results of the March 2024 survey confirm that the site conditions have not changed since the 2014 and 2019 surveys. The site does not support riparian habitat or any other sensitive natural community, and no protected fairy shrimp species or suitable habitat for such species was present on the Project site and no mitigation is required.

Burrowing Owl (BUOW)

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

BUOW is a state SSC and is conditionally covered under the MSHCP. This species inhabits dry, low-growing, sparse vegetation, such as the disturbed and non-native vegetation habitats that occur on the project site. Gonzales Environmental Consultant, LLC, conducted a burrowing owl survey in March 2019 to determine if site conditions had changed since the 2014 surveys conducted for the original project. The results of the 2019 survey confirmed the findings of the 2014 surveys; specifically, there is no suitable burrowing owl habitat; no owl burrows or burrowing owls present on the site or in adjacent areas. Additionally, there are no stockpiles of material or areas where burrowing owls would be found. Impacts are considered to be less than significant, but a pre-construction survey is required pursuant to the MSHCP is required to ensure burrowing owls are not detected..

The project site is also within the SKR HCP but is not located within any of the core reserves. Therefore, the project is required to pay an SKR mitigation fee for incidental take authorization under the SKR HCP. Similar to the LDMF fee, the SKR fee is required to ensure impact would be less than significant. No mitigation is required.

5. CULTURAL RESOURCES:

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☐	☒	☐

5a. Response: (*Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix C, Title 20 of the Riverside Municipal Code, and site-specific Cultural Resources Survey Update (CRSU) prepared by CRM TECH in April 2024)*

Less than Significant Impact. According to the CRSU, a standard Phase I cultural resources survey for a proposed residential development project was conducted on the same parcel by McKenna in 2014. As a result of that study, a site of historical age was recorded that coincided with the entire project site. The resource was designated 33-023901 (CA-RIV-11736H) in the California Historical Resources Inventory and consisted of an orange grove that had been cultivated on the property since 1902 along with associated irrigation features and a wind machine. The 2014 study concluded that Site 33-023901 did not meet any of the established significance criteria and thus did not qualify as a "historical resource" under CEQA. In 2019, McKenna updated the 2014 study and again concluded that no significant cultural resources were present on the project site. Although there has been no change to the property since that time, the CRSU conducted supplemental research and field investigation to re-verify the results of the previous research on this site.

The CRSU completed a new records search through the Eastern Information Center (EIC) at the University of California, Riverside. The results of the records search indicate the 2014 McKenna survey remains the only systematic cultural resources study of the project site. Within a one-mile radius, the records search identified a total of 24 previously recorded cultural resources, an increase of 10 from the 14 resources reported in the original 2014 McKenna survey. None of these studies were on properties near the project site and do not require further consideration during the assessment of the project site.

The CRSU includes a written request to the State of California Native American Heritage Commission (NAHC) for an update to the Sacred Lands File search completed on the project site during the 2014 study. The NAHC responded the Sacred Lands File identified no Native American tribal cultural resources in or near the project area. The NAHC recommended that local Native American groups be consulted for further information and provided a referral list of potential contacts for that purpose (see Section 18, Tribal Cultural Resources). During the field survey, the CRSU found Isolate 4101-1 consisting of a granitic metate which was the only physical artifact found within the boundaries of the project site.

The CRSU concluded that Site 33-023901 was previously determined not to be eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, or for local designation by the City of Riverside, and the CRSU did not discover any new information that would change that conclusion. The CRSU also concluded that Isolate 4101-1 also did not meet the threshold of a potential "historical resource" under CEQA because it was a locality with fewer than three artifacts. Therefore, the CRSU concluded the project site did not contain a "historical resource" under CEQA.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The proposed project also does not involve restoration, rehabilitation, alteration, or demolition of a historical resource as defined under Section 15064.5 (a) of the CEQA Guidelines. If any structures or artifacts from past activities are unearthed during grading, the project must comply with the CEQA Guidelines and Title 20 of the Riverside Municipal Code. With this regulatory compliance, the project will have less than significant impact on a direct, indirect, or cumulative basis on historical resources as defined under Section 15064.5 (a) of the CEQA Guidelines. No mitigation is required.				
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☒	☐	☐

5b. Response: (*Source CRM TECH in April 2024)*

Less Than Significant Impact with Mitigation. A Phase I Cultural Resources Assessment (CRA) was prepared for the site in 2014 and updated in 2019. In 2024 a cultural resources survey update (CRSU) was prepared for the project site to determine if the conclusions of the original survey and its update were still valid. The CRSU determined that the results of the previous studies were still valid (i.e., no significant historical resources on the site) but recommended monitoring of grading by an archaeologist. It should be noted that pursuant to AB 52, the City notified Native American tribes in the area of the proposed Project. Detailed responses and results of consultation are included in Section 18- Tribal Cultural Resources of this Initial Study.

The CRSU fieldwork in 2024 found Isolate 4101-1 consisting of a granitic metate which was the only physical artifact found within the boundaries of the project site. Unfortunately, it had been degraded/contaminated by concrete from construction activities during the 1900 and the CRSU concluded it was not a significant archaeological resource.

Though no significant archeological resources are known to be present on the site. implementation of Mitigation Measures CUL-1 will help reduce potential impacts in the event an unintended discovery is made, and any archeological resources would be protected. Through the implementation of these mitigation measures, impacts to archeological resources on a direct, indirect, or cumulative basis as a result of the project can be reduced to a less than significant level.

Mitigation Measures

MM-CUL-1 Notification of Changes to Project Design. 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 resources 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.

MM-CUL-2: Archaeological Monitoring: At least 30 days prior to application for a grading permit and before any tree removal, 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:

a.Project grading and development scheduling;

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

b. The development of a schedule in coordination with the developer/applicant, the project archaeologist, and for designated Native American Tribal Monitors from the consulting tribes for tree removal, grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and project archeologist and Native American Tribal Monitors' authority to stop and redirect grading activities;

c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;

d. In conjunction with the Archeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

e. Treatment and final disposition of any archeological and cultural and paleontological resources, sacred sites, if discovered on the project site; and

f. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-5.

MM-CUL-3: Native American Monitor: 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:
a. The treatment of known cultural resources;
b. The treatment and final disposition of any tribal cultural resources, sacred sites, human remains, or archaeological and cultural resources inadvertently discovered on the Project site;
c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and
d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities.
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.

MM-CUL-4 Treatment and Disposition of Cultural Resources: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. Notification to City and Consulting Tribes: within 24 hours of discovery, the City and the consulting tribe(s) shall be officially notified via email and phone. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.

2. Inadvertent Finds Assessment:

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.

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.

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

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.

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.

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.

3. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site shall require the approval of the Consulting Tribes and all resources subject to such removal must be thoroughly inventoried with a tribal monitor from each consulting tribe to oversee the process; and

4. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:

a. Preservation-In-Place of the cultural resources, if feasible as determined through coordination between the project archeologist, developer/applicant, and consulting tribal monitor(s). Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources in perpetuity;

b. 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, with an exception that sacred items, burial good and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains and grave goods. Any reburial process shall be culturally appropriate. List of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV report shall be prepared by the project archeologist and shall be filled with the City under a confidential cover and not subject to a Public Records Request;

c. If reburial is not feasible, 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; and

d. Phase IV Report. 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.

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

MM-CUL-5: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

MM-CUL-6: Non-Disclosure. 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.

A STANDARD CONDITION OF APPROVAL WILL INCLUDE THE FOLLOWING – CONSISTENT WITH STATE LAW:

Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.
The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply, and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

With the implementation of MM CUL-1 through MM CUL-6 and the Standard Conditions of Approval, impacts would be less than significant.

c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

5c. Response: (*Source:* California Public Resource Code (PRC) Section 5097***)***

Less Than Significant. No known cemeteries are located on the Project site. According to California Health and Safety Code regulations Sections 57051 and 7054, and California Public Resources Code Section 5097.98, in the unlikely event that suspected human remains are uncovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the proper authorities and standard procedures for the respectful handling of human remains will be adhered to. The proposed Project would also be required to comply with regulatory requirements for the treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 as well as California Public Resource Code (PRC) Section 5097. These regulations prohibit the interference with any human remains or "cause

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

severe irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site or sacred shrine."

Through mandatory compliance with existing regulations 1, impacts concerning disturbing human remains, including those interred outside of dedicated cemeteries will be less than significant.

6. ENERGY: Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

6a. Response: ***(Source: Air Quality and GHG Memorandum prepared by KPC EHS Consultants on March 29, 2024)***

Less Than Significant Impact. Implementation of the project would increase the demand for energy at the project site during construction and operation. However, the proposed residences would be required to -meet current CalGreen Code requirements. The proposed project would not use energy in a wasteful, inefficiency, or unnecessary manner. Electric power would be required for lighting and electronic equipment (e.g., computers) located in trailers used by the construction crew. However, the electricity used for such activities would be temporary and would have a negligible contribution to the project's overall energy consumption. Natural gas consumption is not anticipated during construction of the project. Fuels used for construction would generally consist of diesel and gasoline, which are discussed in the next subsection. Any amount of natural gas that may be consumed during project construction would be nominal and would have a negligible contribution to the project's overall energy consumption.

Diesel and gasoline fuels also referred to as petroleum in this subsection, would be consumed throughout the construction of the Project. Fuel consumed by construction equipment would be the primary energy resource consumed throughout construction, and vehicle miles traveled (VMT) associated with the transportation of construction materials (e.g., deliveries to the site) and worker trips to and from the site would also result in petroleum consumption. Whereas on-site, heavy-duty construction equipment and delivery trucks would predominantly use diesel fuel, construction workers would generally rely on gasoline-powered vehicles to commute to and from the project site.

The operation of heavy-duty, off-road equipment associated with project construction would consume diesel fuel. Worker, vendor, and hauling trips associated with project construction are estimated to consume gasoline and diesel fuel. Given the small size of the project, the consumption of fuel would not be significant. On- and off-road petroleum-powered vehicles/equipment would be subject to various rules and regulations at the federal and state levels. On the federal level, on-road vehicles would be subject to the SAFE Vehicles Rule. On the state level, off-road equipment at the site would also be required to comply with CARB's Airborne Toxic Control Measures, which restricts heavy-duty diesel vehicle idling to five minutes. In addition, the efficiency of petroleum use is related to numerous other state-wide regulations and programs, such as the LCFS (on- and off-road vehicles/equipment), ACC Program (on-road passenger vehicles), and ACT Program (on-road trucks). Since petroleum use during construction would be temporary and is a necessary component when conducting development activities, it would not be considered wasteful or inefficient.

During the operation of the new residences, the project would consume electricity from appliance operation, indoor lighting, refrigeration, HVAC equipment, and outdoor lighting. Based on estimates generated by CalEEMod, the proposed project would consume approximately 457,623 kilowatt-hours (kWh) per year of electricity. The proposed project would be required to comply with the standards contained in the CalGreen Code (i.e., Part 11 of the Title 24 Building Code) that requires the buildings constructed at the site to meet energy efficiency standards that improve upon those from previous years.

The proposed project would also indirectly benefit from other, regulatory actions taken at the state level. For example, SB 100 requires 60% of the power purchased by California to come from renewable sources by 2030. SB 100 further requires

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

all retail electricity to be carbon-free by 2045. Based on these state-wide mandates, electricity consumed at the site will become more and more green (e.g., not requiring the burning of fossil fuels), which will lead to the more efficient use of energy resources.

Although electricity would increase at the site under the implementation of the project, the proposed facility would be designed to the current Title 24 Building Code standards, and benefit from other actions taken at the State level. For these reasons, the electricity consumed by the project is not considered to be inefficient or wasteful.

Natural gas consumption would be required during the operation of the project for various purposes, such as hot water and cooking. Based on estimates generated by CalEEMod, the proposed project would consume approximately 1,742,651 kilos or thousand British thermal units (kBtu) per year of natural gas. Although natural gas consumption would increase at the site under the implementation of the project, the buildings would be more efficient because of the energy efficiency requirements outlined in the 2019 Title 24 Building Code. For these reasons, the natural gas that would be consumed by the project is not considered to be inefficient or wasteful.

Gasoline and diesel would be consumed during the operation of the proposed project. Both forms of petroleum fuel would be consumed by future workers and customers traveling to and from the site. As estimated in CalEEMod, based on the trip generation rates and trip distances provided for in the Traffic Scoping Agreement (Appendix I), the project is anticipated to generate approximately 1,528,042 VMT on an annual basis. Based on average fuel consumption of 25 miles per gallon and vehicle fleet mix attributable to the proposed project, vehicle trips associated with the proposed project are estimated to consume approximately 61,122 gallons of gasoline and diesel fuel on an annual basis. This fuel consumption estimate is based on vehicle efficiency in 2024 and would be expected to decrease in future years as passenger vehicles and small trucks become more fuel-efficient and ZEV trucks are more commonly available and used within Riverside County.

Numerous regulations in place require and encourage fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and ZEVs in California. In addition, per the requirements identified in SB 375, CARB adopted a regional goal for the SCAG region of reducing per-capita GHG emissions from 2005 levels by 8% by 2020 and 19% by 2035 for light-duty passenger vehicles. The SB 375 goal would help reduce emissions from worker and customer trips at the site. The proposed project would also benefit from actions taken at the state level concerning the ACT Program and Sustainable Freight Plan. The implementation of these programs will help reduce the number of diesel trucks on California roadways and improve the fuel efficiency of those diesel trucks that remain in operation. Accordingly, the operation of the project is expected to decrease the amount of petroleum it consumes in the future due to advances in fuel economy.

Although the project would increase petroleum use in the region during construction and operation, the use would be a small fraction of the statewide use and would have its overall fuel consumption decrease over time. As such, petroleum consumption associated with the project would not be considered inefficient or wasteful. Therefore, impacts will be less than significant, and no mitigation is required.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

6b. Response: ***(Source: Air Quality and GHG Memorandum prepared by KPC EHS Consultants on March 29, 2024)***

The proposed project would not conflict with nor obstruct a state or local plan adopted to increase the amount of renewable energy or energy efficiency. As discussed above, the project would be subject to the California Title 24 Building Code energy efficiency standards for non-residential buildings, which would help reduce energy consumption. Equipment and vehicles associated with the construction and operation of the project would also be subject to fuel standards at the state and federal levels. The project would inherently benefit from programs implemented to achieve the goals of the Sustainable Freight Plan, such as the turnover of older, less fuel-efficient trucks, as fuel economy standards are rolled out and ZEV trucks become

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
more widely available and cost-effective for business. Therefore, the project would not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts will be less than significant, and no mitigation is required.				
7. GEOLOGY AND SOILS: Would the project:				
A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

7i. Response: (*Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix D – Phase I Environmental Site Assessment (ESA) and Limited Soil Investigation Report, TTM 37764. Prepared by EFI Global, December 19, 2019)*

Less than Significant Impact. The entire Southern California region is subject to strong ground shaking as a result of the many regional faults present throughout the basin. As shown in the City's 2025 General Plan Public Safety Element, Figure CP-1 Regional Fault Zones, there are no Alquist-Priolo zones in the City. (GP Tech Report, p. 3) including the project area. California is divided into eight geomorphic provinces which are further divided into blocks and sub-blocks. The project site is located within Structural Province I, Peninsular Range Block, Riverside sub-block. Several large active fault systems occur in the surrounding region including the Whitter-Elsinore, San Jacinto, and the San Andreas Faults. The project site is located approximately 8.7 miles northeast of the Whitter-Elsinore Fault zone, 12.4 miles southwest of the San Jacinto Fault zone, and 16 miles southwest of the San Andres Fault zone. Overall, the potential for fault rupture or strong seismic shaking in the project area is considered low.

Primary seismic hazards include fault or ground rupture along the surface trace of a fault and moderate to strong ground shaking. Secondary seismic hazards result from the interaction of ground shaking with existing soil and bedrock conditions and include liquefaction, differential settlement, and landslides.

The project would be required to comply with all California Building Code (CBC) seismic regulations and requirements of any onsite geotechnical evaluation. Thus, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving the rupture of a known earthquake fault. Compliance with the CBC regulations and site-specific geotechnical data will ensure that a less than significant impact related to fault rupture will occur on a direct, indirect, or cumulative basis. No mitigation is required.

ii. Strong seismic ground shaking?	☐	☐	☒	☐

7ii. Response: (*Source: General Plan 2025 FPEIR)*

Less than Significant Impact. As discussed above in Response 7(a)(i), the Project site is located on the northern portion of the Riverside sub-block. Due to the project site being approximately 9 to 16 miles away from fault zones, as mentioned above, ground shaking hazards caused by earthquakes can occur that have the potential to cause moderate to intense ground shaking. However, the proposed project would be required to comply with CBC regulations and any requirements of a site-specific geotechnical investigation for foundation design. Thus, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving strong seismic ground shaking. Therefore, impacts associated with strong seismic ground shaking will have less than significant impact on a direct, indirect, or cumulative basis. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

7iii. Response: (*Sources: 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), Updated Preliminary Geotechnical Evaluation Tentative Tract 38921, prepared by Petra Geosciences, March 13, 2024 (Appendix D).*

Less Than Significant Impact Liquefaction is a process whereby strong seismic ground shaking causes sediment layers that are saturated with groundwater to lose solidity and behave as a liquid. Factors influencing a site's potential for liquefaction include area seismicity, on-site soil type and consistency, and groundwater level. Liquefaction effects can manifest in several ways including loss of bearings, lateral spread, dynamic settlement, and flow failure. The County of Riverside Map My County website identifies the subject property area as being within a moderate to high liquefaction susceptibility zone.[4] Based on the lack of shallow groundwater encountered and the hard to very hard nature of the older alluvial fan deposits and granitic bedrock further underlying the site, the potential for manifestation of liquefaction and for seismic (i.e., dynamic) settlement, in the form of dry sand settlement, are expected to be very low. Accordingly, Petra has performed updated dynamic settlement analyses to determine the settlement potential of the loose near-surface soils in accordance with 2022 CBC requirements within the site.

The Geotechnical Evaluation (Appendix D) prepared for the project has reanalyzed the boring data concerning the potential for liquefaction and dry sand settlement within the site development. The analysis was performed following the guidelines contained in Special Publication 117A published by the California Geological Survey (1997, Revised 2008) and those in the 2022 California Building Code (2022 CBC). Based on the updated analysis, seismically induced settlement within the site is calculated to be on the order of 1 to 1 ½ inches under the very unlikely scenario of high groundwater returning to a level of 5 feet below the ground surface. Based on our calculations, the differential settlement between various locations within the site is not expected to exceed 1 inch in 40 feet, which is considered well within tolerable limits for seismic differential settlement. Earthwork will be performed under the Grading Code of the City of Riverside, in addition to the applicable provisions of the 2022 CBC. Grading should also be performed following the following site-specific recommendations prepared by Petra based on the proposed construction including the Grading Specifications presented in the Updated Geotechnical Evaluation With mandatory compliance with the CBC seismic regulations and the recommendation from the Updated Geotechnical Evaluation potential liquefaction impacts related to seismic ground failure would be less than significant. No mitigation is required.

iv. Landslides?	☐	☐	☐	☒

7iv. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Title 18 – Subdivision Code, Title 17 – Grading Code, and for projects over 1 acre: Storm Water Pollution Prevention Plan SWPPP)*

No Impact. The project site is located in an urbanized area with generally flat topography and is not located in an area with steep slopes that would be prone to landslides (GP PEIR, p. 5.6-3). Because the site is relatively flat and not close to significant slopes, the potential for earthquake-induced landslides to occur at the site is considered very low. Thus, the project is not anticipated to cause potential substantial adverse effects directly or indirectly, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides. No mitigation is required.

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

7b. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, and for projects over 1 acre: SWPPP)*

Less Than Significant Impact. Erosion and loss of topsoil could occur as a result of the project. State and Federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The project must also comply with the National Pollutant Discharge

[4] https://gis-wmwd.hub.arcgis.com/documents/576b6a0f573845c19effc87f54b9af68/explore. Accessed June7, 2024.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Elimination System (NPDES) regulations. The project is also required to prepare a Water Quality Management Plan (WQMP) to address the potential for long-term water quality impacts. In addition, with the erosion control standards for which all development activity must comply (Title 18), the Grading Code (Title 17) requires the implementation of measures designed to minimize soil erosion. Compliance with State and Federal requirements as well as with Title 17 will ensure that both short- and long-term soil erosion or loss of topsoil will have a less than significant impact on a direct, indirect, or cumulative basis. No mitigation is required.				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐

7c. Response: (*Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6–1 - Areas Underlain by Steep Slope, and Figure 5.6-4 – Soils, Table 5.6-B – Soil Types), Updated Preliminary Geotechnical Evaluation Tentative Tract 38921, prepared by Petra Geosciences, March 13, 2014 (Appendix D).*

Less than Significant Impact. The project site is located in an urbanized area and the general topography of the subject site is flat. The project site is currently vacant but with hundreds of citrus trees from a former orchard. As stated in Response 7(a)(iv) above, the project site is not located in an area prone to landslides (GP PEIR, p. 5.6-3).

As stated in Threshold 7(a) (iii) above, grading would be performed in accordance with the site-specific recommendations prepared by Petra based on the proposed construction including the Grading Specifications presented in the Updated Geotechnical Evaluation (Appendix D). With mandatory compliance with the CBC seismic regulations and the recommendation from the Updated Geotechnical Evaluation potential impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

As stated in Threshold 7(a)(iii) above, based on the lack of shallow groundwater encountered and the hard to very hard nature of the older alluvial fan deposits and granitic bedrock further underlying the site, the potential for manifestation of liquefaction and for seismic (i.e., dynamic) settlement, in the form of dry sand settlement, are expected to be very low and less than significant. No mitigation is required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	☐	☐	☒	☐

7d. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code), Updated Preliminary Geotechnical Evaluation Tentative Tract 38921, prepared by Petra Geosciences, March 13, 2014 (Appendix D).*

Less than Significant Impact. An expansion index test was performed on a selected sample of soil in accordance with ASTM D4829. The expansion potential classification was determined from 2010 CBC Section 1802.3.2 on the basis of the expansion index value which is the test result Expansion Index of "0" per ASTM Test Method D 1557. An Expansion Index of 0-20 is considered very low. As such, there is no impact. No mitigation is required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

7e. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, and Table 5.6-B – Soil Types)*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. The proposed project will be connected to and served by City sewer infrastructure. Therefore, the project will have **no impact** related to septic systems**.** No mitigation is required.				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

7f. Response: (*Source: General Plan 2025 Policy HP-1.3)*

Less than Significant with Mitigation Incorporated. According to Figure 5.5-2, Prehistoric Cultural Resources Sensitivity, of the 2025 General Plan 2025 PEIR[5], the Project site is within an area described as having a "Medium "sensitivity for paleontological resources. CEQA documents prepared in 2014 and 2019, the project site is in an area considered sensitive for paleontological resources at depths below five feet. Therefore, to reduce potential impacts to a less than significant the 2014 Initial Study required protection of paleontological resources.

Mitigation Measures

MM GEO-1: Paleontological Resources Protection. Prior to the issuance of a grading permit, the following note shall be placed on the grading plan:

"If one or more fossils are discovered during construction, all ground-disturbing activities within 50 feet of the area of the find shall be ceased and the applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology (SVP) qualifications standards for the Project Paleontologist to oversee the documentation of the extent and potential significance of the finds as well as recovery efforts. Ground-disturbing activities may resume in the area of the finds at the discretion of the Project Paleontologist. If the fossils are significant per SVPs 2010 criteria, then paleontological monitoring shall be conducted on an as-needed basis for further ground-disturbing activities in the Project area."

With implementation of MM GEO-1, impacts would be less than significant.

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?	☐	☐	☒	☐

8a. Response: (*Source: Air Quality and GHG Memorandum prepared by KPC EHS Consultants, LLC on March 29, 2024*)

Less Than Significant Impact. The analysis methodologies from SCAQMD are used in evaluating potential impacts related to GHG from implementation of the proposed Project. SCAQMD does not have approved thresholds; however, the agency does have draft thresholds that provide a tiered approach to evaluate GHG impacts, which include:

• Tier 1: determine whether or not the project qualifies for any applicable exemption under CEQA.

• Tier 2: determine whether the project is consistent with a greenhouse gas reduction plan, which would mean that it does not have significant greenhouse gas emissions; and

• Tier 3: determine if the project would be below screening values; if a project's GHG emissions are under one of the following screening thresholds, then the project is less than significant: o All land use types: 3,000 MTCO2e per year

o Residential: 3,500 MTCO2e per year

o Commercial: 1,400 MTCO2e per year

o Mixed use: 3,000 MTCO2e per year In addition, SCAQMD methodology for determining GHG emissions from a project's construction is to average those emissions over a 30-year span and then to add them to the project's operational emissions to

[5] https://riversideca.gov/cedd/planning/city-plans/general-plan-0. Accessed June 7, 2024.

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

determine if the project would exceed the screening values listed above. To determine whether the project is significant, the City of Riverside uses the conservative SCAQMD Tier 3 threshold of 3,000 MTCO2e per year for all land use types. Construction The Project construction activities would be temporary but could contribute to greenhouse gas impacts. Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips. The total estimated construction-related GHG emissions for construction of the proposed residences are shown in Table GHG-1. As shown, the estimated GHG emissions during construction would equal approximately 619 MTCO2e, which is equal to approximately 30 MTCO2e per year after amortization over 30 years. Per SCAQMD methodology the 30-year amortized construction emissions are added to annual operational emissions and compared to the threshold.

The *AQ/GHG Memot* estimated the short- and long-term GHG emissions expected by project construction and operation, respectively. These estimates are shown in Tables 8-1 and 8-2. It is estimated the project will emit 456.9 metric tons of carbon dioxide equivalent ($MTCO_2e$) annually during construction (2024-2025), and ongoing operations will emit approximately 792.8 $MTCO_2e$ each year once the project is completed and occupied. The GHG study concluded the project's short-term and long-term emissions would not exceed the SCAQMD interim threshold of 3,000 MTCO2E per year. Once operational, the proposed project would generate annual emissions of GHG from area, energy, mobile, off-road, water/wastewater, and solid waste sources.

Table 8-1: Project Construction GHG Emissions

Source	Annual GHG Emissions (MT/Year)[1]			
	CO_2	CH_4	N_2O	Total $MTCO_2e$
Maximum Annual	456.8	0.1	0.0	456.90
Amortized GHG Estimate[2]	15.23	0.0	0.0	15.23

2 Source: Table 3.3-1, Air Quality and GHG Memo, 20 0.0 does not mean zero but rather greater than zero but less than 0.05.
2 Emissions are amortized over the life of the Project, which is presumed to be 30 years.

Table 8-2: Project Operation GHG Emissions

Source	Annual GHG Emissions (MT/Year)[1]			
	CO_2	CH_4	N_2O	Total $MTCO_2e$
Area	0.84	<0.005	<0.005	0.85
Energy	186	0.02	<0.005	186
Mobile	549	0.03	0.03	559
Refrigerant	--	--	--	0.11
Solid Waste	4.00	0.40	0.00	14.0
Water/Wastewater	15.4	0.07	<0.005	17.6
Amortized Construction	15.23	0.0	0.0	15.23
Total				**792.79**
SCAQMD 2020 Interim Threshold				**3,000**
SCAQMD Interim Threshold or Project-specific Goal Exceeded?				**No**

2 Source: Table 3.3-1, Air Quality and GHG Memo, 20 0.0 does not mean zero but rather greater than zero but less than 0.05.
2 Emissions are amortized over the life of the Project, which is presumed to be 30 years.

As shown in Tables 8.1 and 8.2 above, the project will produce GHG emissions, both during construction or operation, that will have a less than significant direct, indirect, or cumulative impact on the environment. 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?	☐	☐	☒	☐

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

8b. Response: (*Source: Air Quality and GHG Memorandum prepared by KPC EHS Consultants, LLC on March 29, 2024*), City of Riverside General Plan, City of Riverside Economic Prosperity Action Plan and Climate Action Plan (CAP),

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 has established an interim Greenhouse Gas (GHG) threshold. As indicated in Question A, above, the project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction and as demonstrated in this analysis, will not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05.

The City's ***Economic Prosperity Action Plan and Climate Action Plan (CAP),*** prioritizes the implementation of policies that enable the City to fulfill the requirements of State initiatives, Assembly Bill 32 and Senate Bill 375. The CAP includes a baseline GHG inventory for local government operations and the community as a whole and establishes emission reduction targets consistent with State law. Strategies in the CAP to reduce GHG emissions include increasing energy efficiency in buildings and facilities, utilizing renewable energy sources, increasing vehicle fuel efficiency, supporting alternative modes of transportation, reducing waste generation, and reducing water consumption.

If a project is consistent with the CAP, it is also considered to be consistent with any applicable plan, policy, or regulation of an agency adopted to reduce emissions. As discussed in Section 1, Project Description, 3, Air Quality, Section 6, Energy, and Section 8, Greenhouse Gas Emissions, the project implements the following GHG reduction measures:

Measure SR-2: 2013 California Building Energy Efficiency Standards (Title 24, Part 6) Mandatory energy efficiency standards for buildings.

Measure SR-13: Construction & Demolition Waste Diversion Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 90% of C&D waste from landfills by 2035.

Measure E-2: Shade Trees Strategically plant trees at new residential developments to reduce the urban heat island effect.

Measure T-1: Bicycle Infrastructure Improvements Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.

Measure T-6: Density Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.

Measure W-1: Water Conservation and Efficiency Reduce per capita water use by 20% by 2020. Additionally, as the project meets the current interim emissions targets/thresholds established by SCAQMD (as described in Section V, Air Quality Standards), the project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by SB-32. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the project will be required to comply with these regulations as they come into effect.

Based upon the analysis for this project and the discussion above, the project will not conflict with any applicable plan, policy, or regulation related to the reduction in the emissions of GHG, and thus a less than significant impact will occur on a direct, indirect, or cumulative basis in this regard. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS & HAZARDOUS MATERIALS: Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

9a. Response: (*Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, Phase I Environmental Site Assessment and Limited Soil Investigation Report, TTM 37764 prepared by EFI Global, December 19, 2019 (Appendix E)*

Less than Significant Impact. The proposed project does not involve the transport, use, or disposal of any hazardous material because as a residential it does not involve the transportation of hazardous materials. The United States Department of Transportation (USDOT) Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in Title 49 of the *Code of Federal Regulations* and implemented by Title 13 of the CCR. The project would be required to comply with all applicable Federal and State laws and submit a business plan to the City of Riverside's Fire Department. The proposed project does not include any transportation or storage of hazardous waste, and storage of hazardous materials onsite would be stored in compliance with all applicable regulations. Therefore, the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials as the project would include the delivery and disposal of hazardous materials such as fuels, oils, solvents, and other materials. However, these materials are typical of materials delivered to construction sites and with proper handling procedures would not pose a significant threat to the safety of the adjacent land uses or residential properties.

The future occupancy or operational use of the site would typically include the isolated storage and use of small amounts of commercial hazardous materials such as fuels, oils, solvents, pesticides, electronic waste, and other materials. These materials would be stored in small quantities in individual residences and therefore would not pose a significant threat to the public.

Oversight by the appropriate Federal, State, and local agencies, and compliance by the new development with applicable regulations related to the handling, storage, and disposal of hazardous materials will result in the project having a less than significant impact related to hazardous materials. Therefore, there would be less than a significant impact on a direct, indirect, or cumulative basis to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation is required.

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

9b. Response: (*Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside's EOP, 2002)*

Less Than Significant Impact. A Phase I Environmental Site Assessment (ESA) and Limited Soil Investigation Study was conducted on the project site in 2019. The ESA indicated citrus production had occurred on the site from at least the mid-1920's to approximately 1990, and the site currently contains hundreds of citrus trees that are no longer in active production. In the past citrus growing involved the use of arsenic and organochlorine pesticides (OCPs) as herbicides and to control a variety of pests during citrus production. To determine if or to what degree the site may be contaminated with these materials, the ESA included a limited soil investigation including soil sampling and laboratory testing. The ESA concluded that the level of both arsenic and OCPs in the onsite soil was at or below appropriate health standards for these materials and did not recommend additional testing or remediation of these materials during grading (ESA 2019, pp. 25-27). The ESA also determined the potential for finding other kinds of contaminants on the site, such as asbestos-containing materials (ACMs) or lead-based paint (LBP) was low. However, based on the subject property's historical agricultural use, it is possible that buried/concealed/hidden agricultural by-products, both above and below ground may have existed or exists on the subject

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
property. Any discovery of these types of hazardous materials found during construction regulated by state and federal laws that the Project is required to strictly adhere to. As a result, the routine transport, use or disposal of hazardous materials during construction activities of the proposed Project would be less than significant. Additionally, the project may involve the limited use of hazardous materials by contractors and residences who are expected to comply with all applicable Federal, State, and local laws and regulations about the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials. With compliance with all applicable Federal, State, and local laws related to the transportation, use, and storage of hazardous materials, the potential and severity of accidents involving hazardous materials will be reduced to less than significant levels on a direct, indirect, or cumulative basis. No mitigation is required.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
9c. Response: ***(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7–D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RSD Boundaries, Table 5.13-D RSD Schools)*** **No Impact.** The closest school to the proposed project site is the Arizona Middle School located at 11045 Arizona Avenue. At its closest point, the school is 0.28 miles north of the project site. It should be noted the project is residential so the amount and type of hazardous materials and or waste generated from the site will be limited and would be subject to all applicable safety regulations and would not pose a health risk to nearby existing schools. Therefore, the Project will have no impact on schools regarding the risk of hazardous materials. No mitigation is required.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
9d. Response: (*Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites, and Phase I Environmental Site Assessment and Limited Soil Investigation Report, TTM 37764 prepared by EFI Global, December 19, 2019 (Appendix D)* **No Impact.** The Phase I ESA indicated that a review of hazardous materials site lists compiled according to Government Code Section 65962.5 found that the project site is not included on any such lists. Therefore, the project would have no impact on creating any significant hazard to the public or environment on a direct, indirect, or cumulative basis. No mitigation is required.				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
9e. Response: (*Source: Map My County, General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base)*				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. According to *Map My County*,[6] the project site is not within an Airport Compatibility Area or an Airport Influence Area. The closest airport to the project site is the Riverside Municipal Airport located 4.1 miles northeast of the site. Therefore, the project will have no impact resulting in a safety hazard for people residing or working in the project area on a direct, indirect, or cumulative basis. No mitigation is required.				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

9f. Response: (*Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside's EOP, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM's Strategic Plan)*

Less Than Significant Impact. The proposed construction activities, including equipment and supply staging and storage, would largely occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. During construction of sidewalks and infrastructure connections, traffic on La Sierra Avenue and Victoria Avenue would be temporarily diverted around the construction activity but through access would not be blocked. Thus, impacts related to interference with an adopted emergency response of evacuation plan during construction activities would be less than significant.

Operation of the proposed Project would also not result in a physical interference with an emergency response evacuation. Direct access to the Project site would be provided from La Sierra Avenue which is adjacent to the Project site. As such, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. Therefore, the project would have a less than significant impact on a direct, indirect, or cumulative basis on an emergency response or evacuation plan. No mitigation is required.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

9g. Response: *(Source: General Plan Public Safety Technical Background Report, October 5, 2021, Figure CP-5, Very-High Fire Hazard Safety Zone Area.)*

Less Than Significant Impact. The proposed project is not located in an area of dense, dry vegetation, particularly in canyon areas and on hillsides, that poses the greatest potential for wildfire risks. Additionally, according to the General Plan Safety Element, the project site is not located in a Very-High Fire Hazard Safety Zone. With adherence to the City of Riverside building and fire safety code requirements, the project will have a less than significant impact regarding wildland fires on a direct, indirect, or cumulative basis from this project will occur. No mitigation is required.

10. HYDROLOGY AND WATER QUALITY:

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

10a. Response: (*Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, Appendix–E - Hydrology Report for TR 38921 in the City of Riverside (Hydro Study), prepared by Adkan Engineers, February 26, 2024, Appendix F – Project Specific Water Quality Management Plan (WQMP) for TTM 38921 prepared by Adkan Engineers, February 22, 2024)*

Less than Significant Impact. The proposed project is located within the Santa River Watershed (see GP 2025 FPEIR Figure 5.8-1) and more specifically in the Prado Basin/Temescal Creek Reach 1. Runoff from the site surface flows north to

[6] Riverside County Map My County website, https://gis-wmwd.hub.arcgis.com/documents/576b6a0f573845c19effc87f54b9af68/explore. Accessed May 9, 2024.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
the Arizona Channel, then to the Arlington Channel, then into Temescal Creek Reach 1, and then into Prado Creek Basin, Major pollutants of concern include nutrients, pathogens, and total suspended solids (Table A.1, WQMP 2024). The project will result in physical alterations to the project site (i.e. tree removal, grading, ground disturbance, structure, or paving) that would affect water quality or be affected by water quality standards or waste discharge requirements. The project involves the construction of new residences on a vacant former orchard. The project will be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) to control runoff and water pollution during construction and a Water Quality Management Plan (WQMP) to control runoff and water quality during occupancy of the project. Based on the results of the *Hydro Study*, the *WQMP* recommends an infiltration basin in the northeast corner of the site with runoff collected via a new onsite storm drain system. The *WQMP* also calls for the preservation of citrus trees in the northern portion of the site within 100 feet of Victoria Avenue consistent with the Victoria Avenue Policy. In these ways downstream runoff from the site will not increase from the pre- to the post-development condition so onsite and offsite water quality will be protected. Before grading, a final approved WQMP will be required for the project, as well as coverage under the State's General Permit for Construction Activities, administered by the Santa Ana RWQCB. Storm water management measures will be required to be implemented to effectively control erosion sedimentation and other construction-related pollutants during construction. Given compliance with all applicable local, state, and federal laws regulating surface water quality and the fact that the project will result in a net increase of surface water runoff but will have onsite filtration, the proposed project as designed is anticipated to result in a less than significant impact on a direct, indirect, or cumulative basis to any water quality standards or waste discharge. No mitigation is required.				
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
10b. Response: ***(Source: General Plan 2025 Table PF-1 – Riverside Public Utilities (RPU) Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, and RPU Urban Water Management Plan*****, prepared by Water Systems Consulting, Inc., July 1, 2021*****).*** **No Impact.** The proposed project is located within the Santa Ana River Water supply Basin. The project will not directly pump or use well water, nor will it affect a groundwater recharge area and will therefore not directly or indirectly deplete groundwater supplies or interfere substantially with ground water recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. None of the proposed physical alterations to the project site (i.e. grading, ground disturbance, structures, or paving) would affect the local groundwater table. The project is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements that will ensure the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there will be no impact on groundwater supplies and recharge either directly, indirectly, or cumulatively. 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?	☐	☐	☒	☐
10c.i. Response: (*Source: Preliminary grading plan, Appendix–E - Hydrology Report for TR 38921 in the City of Riverside (Hydro Study), prepared by Adkan Engineers, February 26, 2024, Appendix F – Project Specific Water Quality Management Plan (WQMP) for TTM 38921 prepared by Adkan Engineers, February 22, 2024)*				

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

Less Than Significant Impact. The site's current surface flows to the north, is collected in storm drains along Victoria Avenue and La Sierra Avenue, and then flows north to the Indiana and Arlington Channels. The *Hydro Report* and *WQMP* both indicate the direction of drainage in the post-development condition will be maintained similar to the pre-development condition. During tree removal, grading, and site preparation, it is possible that onsite runoff could result in offsite transport of soil materials (i.e., erosion). To prevent possible erosion during construction, the City's water quality procedures require a Storm Water Pollution Prevention Plan (SWPPP) as well as a Water Quality Management Plan (WQMP) to indicate how the project will runoff and prevent erosion during occupancy of the proposed residences. Therefore, the project will have a less than significant impact on a direct, indirect, or cumulative basis on existing drainage patterns. No mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or-off-site?	☐	☐	☒	☐

10c.ii. Response: (*Source: Preliminary grading plan, Appendix–E - Hydrology Report for TR 38921 in the City of Riverside (Hydro Study), prepared by Adkan Engineers, February 26, 2024, and Appendix F – Project Specific Water Quality Management Plan (WQMP) for TTM 38921 prepared by Adkan Engineers, February 22, 2024)*

Less than Significant Impact. The project will directly result in physical alterations to the site and immediate surrounding area through tree removal, grading, ground disturbance, and building new structures and paving. However, the Hydro Study and WQMP indicate the project would not alter the existing drainage pattern of the site.

No alterations to a natural stream or river or increase in the rate or amount of surface runoff that would result in flooding on- or off-site is proposed. The project consists of the construction of 49 new single-family residences and supporting internal streets and utility infrastructure. The project design incorporates surface water drainage patterns that collect storm water runoff to storm drains that channel the water to a proposed infiltration basin in the northeast corner of the site. Based on requirements of the Riverside County Flood Control and Water Conservation District (RCFCWCD), the site is required to treat the 2-year, 24-hour storm event through the use of an infiltration basin with an additional gravel layer beneath it. Since site flows are tributary to the Arizona Channel, all other storm events (5, 10 & 100 years) are not required to be analyzed. The *Hydro Study* indicates the infiltration basin is designed with a total capacity of 17,472 cubic feet (cf). At present (i.e., pre-development), the 2-year, 24-hour storm volume of the site is 8,223 cf but this will increase to 26,528 cf in the post-development condition by the addition of impervious surfaces. The onsite drainage system will have a total flood volume storage of 17,472 cf while the proposed 2-year, 24-hour storm volume (mitigated to 110% of the existing volume) is 9,056 cf as shown in Table 10-1, Proposed Infiltration Basin Characteristics.

Table 10-1: Proposed Infiltration Basin Characteristics

Drainage or Basin Characteristic	Cubic Feet (cf)
Existing 2-Year 24-Hour Storm Volume	8,233
Allowable 2-Year 24-Hour Storm Volume (mitigated to 110% of existing volume)	**9,056**
Post Development 2-Year 24-Hour Storm Volume	26,528
Minus Total Flood Volume of Basin Stored	-17,472
Remaining Storm Volume of Basin	**9,056**
Remaining Basin Volume meets or exceeds 110% of existing volume?	**Yes**

Source: Hydro Study, Summary Table, p. 2)

With the implementation of the proposed flood control and water quality improvements, the project site will not result in an increase in offsite downstream runoff, as shown in Table 10-1. All applicable Best Management Practices will be employed to prevent onsite flooding in the event of a storm event. Therefore, no flooding on or off-site as a result of the project will occur and there will be less than significant impact on a direct, indirect, or cumulative basis that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐

10c.iii. Response: (*Source: Preliminary Grading Plan, Appendix–E - Hydrology Report for TR 38921 in the City of Riverside (Hydro Study), prepared by Adkan Engineers, February 26, 2024, and Appendix F – Project Specific Water Quality Management Plan (WQMP) for TTM 38921 prepared by Adkan Engineers, February 22, 2024)*

Less Than Significant Impact. Within the scope of the project is the installation of a storm water drainage system, specifically as described within the project description portion of this project. As the storm water drainage system will be installed concurrently with the construction of this project, the *Hydo Report* indicates the storm water drainage system will be adequately sized to accommodate the drainage created by this project (see Table 10-1 in threshold 10.c.ii above). Onsite flows will be directed toward the northeast via a series of gutters throughout the project site. Surface flows in these proposed gutters will be captured via drop inlets and conveyed via an onsite storm drain system to an infiltration basin located in the northeast corner of the site. The infiltration basin will have an additional gravel layer beneath to mitigate the 2-year, 24-hour storm flow as described in Threshold 10.c.ii above.

As a residential development, the project is expected to generate the following pollutants: sediment/turbidity, nutrients, trash and debris, oxygen-demanding substances, bacteria and viruses, oil & grease, and pesticides. These expected pollutants will be treated through the incorporation of the site design, source control, and treatment control measures (i.e., infiltration basin) specified in the project-specific Water Quality Management Plan (WQMP). Table D.3 of the *WQMP* indicates the site will have a design capture volume of 8,812.8 cubic feet while the treatment volume of the proposed onsite basin is 9,177.5 cubic feet (+4.1%). Therefore, pollutants will be adequately addressed through the project site design, source control, and treatment controls already integrated into the project design, and the project will not create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. project impacts regarding polluted runoff will be less than significant on a direct, indirect, or cumulative basis. No mitigation is required.

iv. Impede or redirect flood flows?	☐	☐	☐	☒

10c.iv. Response: (*Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Panel 06065C0715G dated 8-27-2008)*

No Impact. The project site is not located within or near a 100-year flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 06065C0745G Effective Date August 28, 2008). The FIRM map shows the site in Zone X which is an "area of minimal flood hazard". Therefore, the project will not place a structure within a 100-year flood hazard area that would impede or redirect flood flows and no impact will occur on a direct, indirect, or cumulative basis.

d. In floor hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

10d. Response: (*Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)*

No Impact. The project site is not located within or near a flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 06065C0715G Effective Date August 27, 2008). Additionally, according to the California Department of Water Resources, California Inundation Map Resources website, the Project site is not located within the dam inundation area for Lake Matthews.[7]

[7] California Department of Water Resources, California Inundation Map Resources website, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2/ Accessed May 9, 2024.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis will occur on a direct, indirect, or cumulative basis. The proposed project site and its surroundings have generally flat topography are within an urbanized area and are not adjacent to any steep upland areas, and the site's relative distance from existing hillsides would lower the likelihood of mudflow. The project consists of the development of 49 single-family residences within an urbanized area and will result in direct physical alterations to the project site through tree removal, grading, ground disturbance, building structures, and paving. The site design does not substantially alter the existing topography. Therefore, there is no impact potential for the release of pollutants from flooding, tsunami, seiche, or mudflow on a direct, indirect, or cumulative basis to affect the project site. No mitigation is required.				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

10e. Response: (*Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, Appendix E–F - Hydrology Study and Water Quality Management Plan prepared by Adkan Engineers, Inc., February 2024, and the State Department of Water Resources (DWR) Adjudicated Areas Interactive Map Website 2021 https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin)*

Less than Significant Impact.

Water Quality Control Plan. The proposed project is located within the Santa River Watershed (see GP 2025 FPEIR Figure 5.8-1). The project will not directly or indirectly result in physical alterations to the project site (i.e. tree removal, grading, ground disturbance, structure, or paving) that would affect water quality or be affected by water quality standards or waste discharge requirements. The project involves the construction of 49 new single-family residential units located on a vacant parcel of land with no known water resource features located onsite. Before grading, a final approved WQMP will be required for the project, as well as coverage under the State's General Permit for Construction Activities, administered by the Santa Ana RWQCB consistent with the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan).

The Basin Plan, updated in June 2019, establishes water quality standards for groundwater and surface water in the basin and standards for both beneficial uses of specific water bodies and the water quality levels that must be maintained to protect those uses. The Basin Plan includes an implementation plan describing actions by the Santa Ana RWQCB and others needed to achieve and maintain the water quality standards. The Santa Ana RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface waters. The Basin Plan lists water quality problems for the region along with their causes where they are known. Plans for improving water quality are included for water bodies with quality below the levels needed to enable all the beneficial uses of the water.

Storm water management measures will be required to be implemented to effectively control erosion sedimentation and other construction-related pollutants during construction. Given compliance with all applicable local, state, and federal laws regulating surface water quality and the fact that the project will result in a net increase of surface water runoff but will have onsite filtration, the proposed project as designed is anticipated to result in a less than significant impact on the implementation of a water quality control plan on a direct, indirect, or cumulative basis.

Groundwater. The Sustainable Groundwater Management Act (SGMA) was passed into law in 2014 and requires that medium and high-priority groundwater basins designated by the Department of Water Resources (DWR) be managed by Groundwater Sustainability Agencies (GSAs). Regarding a sustainable groundwater management plan, the project site is in the far eastern portion of the San Bernardino – Riverside Basin Area South which was adjudicated in 1992 and is managed by the Riverside Basin Area Watermaster. However, groundwater is collected and supplied to the project area by the Riverside Public Utilities (RPU) in coordination with the Western Municipal Water District (WMWD). The City's RPU Urban Water Management Plan was last updated in 2020.

In addition, the previous analysis in Threshold 10. b concluded that the project site would not have a significant impact on groundwater quantity or quality. Therefore, the project will have less than significant impacts related to ongoing groundwater management planning efforts for this area, 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

For these reasons, the project would not conflict with or obstruct the implementation of a sustainable groundwater management plan or planning effort. Therefore, any impacts would be less than significant, and no mitigation is required.

11. LAND USE AND PLANNING:

Would the project:

a. Physically divide an established community?	☐	☐	☒	☐

11a. Response: (*Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers)*

Less Than Significant Impact. The project site contains a grove or orange trees and bordered by Victoria Avenue to the northwest followed by single-family residences, by Millsweet Place to the northeast followed by single-family residences, by single-family residences to the southeast, and by La Sierra Avenue to the southwest followed by single-family residences. The development of the site will provide additional sidewalks and multi-use trail connections along Victoria Avenue for existing surrounding residents as well as the new residents of the project. Once completed, the project will provide improved pedestrian connections throughout the entire neighborhood. Therefore, the project will ultimately not divide an established community. Impacts will be less than significant in this regard. No mitigation is required.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect?	☐	☐	☒	☐

11b. Response: *(Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, enter appropriate Specific Plan if one, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines)*

Less than Significant Impact. The project site currently has a General Plan land use designation of Low Density Residential (LDR) which allows a maximum of 4.1 units/acre. Based on the LDR designation, the site could have a maximum of 41 units (9.91 acres x 4.1 units/acre) = 40.63). The Project proposes 49 units based on the current state density bonus law, which would not require a General Plan Amendment and consistent with the General Plan. At present, the State Department of Finance estimates the City had a population of 314,818 persons and 94,540 households as of January 2022. Therefore, the Project represents a potential difference of +0.01% of the 2022 population and +0.01% increase in the 2022 number of households. That amount of change or increase is considered incremental and would not represent a significant difference relative to the City's current population and housing stock (households). These small changes would also not represent a significant portion of the future population and housing projected by the Southern California Association of Governments (SCAG) in its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) program which is now referred to as "Connect SoCal". Table 11-1 shows the population, housing, and employment projections from SCAG for the City of Riverside from 2020 to 2040.

Table 11-1: SCAG Growth Projections -City of Riverside

City Characteristic	2020	2035	2040	Growth[1]
Population	336,300	384,100	386,600	+15.0%
Housing	101,200	117,700	118,600	+17.2%
Employment	157,900	195,900	200.500	+27.0%

Source: SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction

[1] percent increase from 2020 to 2040

As shown in Table 11-1, the change in City housing and population projections if the proposed project was built would not change the SCAG projections by any demonstrable amount for 2035 or 2040. Therefore, the direct increases in population

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

as a result of the project would be within the general magnitude of the growth assumptions estimated by SCAG in its regional planning program (i.e., Connect SoCal) for the City of Riverside General Plan.

In addition, the General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the General Plan 2025 Typical Growth scenario would not have significant population growth impacts. Because the proposed project is consistent with the General Plan 2025 Typical Growth scenario and population growth impacts were previously evaluated in the GP 2025 FPEIR, the project does not result in new impacts beyond those previously evaluated in the GP 2025 FPEIR. Therefore, the impacts will be less than significant on a direct, indirect, or cumulative basis.

With respect to other land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect, the analysis in this Initial Study, included, but was not limited to, the following:

- City of Riverside General Plan 2025City of Riverside General Plan 2025 Final Program Environmental Impact Report (FPEIR)
- City of Riverside Municipal Code, Title 19, Zoning Code
- City of Riverside Municipal Code, Title 20, Cultural Resources
- City of Riverside 2020 2020 Urban Water Management Plan (UWMP)
- City of Riverside Local Hazard Mitigation Plan
- City of Riverside Economic Prosperity Action Plan and Climate Action Plan (CAP)
- County of Riverside General Plan 2015, various elements
- County of Riverside, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
- Santa Ana Regional Water Quality Control Board, Water Quality Control Plan for the Santa Ana River Basin
- Southern California Association of Governments, Connect SoCal (RTP/SCS)

Based on this analysis, the proposed Project will not conflict with any local or regional land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Project impacts will be less than significant on a direct, indirect, or cumulative basis. No mitigation is required.

12. MINERAL RESOURCES: Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

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

No Impact. The project does not involve the extraction of mineral resources. The project site is located in Mineral Resource Zone MRZ-3 which indicates that the area contains known or inferred mineral occurrences of undetermined mineral resource significance. However, no mineral resources have been identified or found to be associated with the project site, and there is no historical use of the site or surrounding area for mineral extraction purposes. The closest area with identified mineral resources is the Santa Ana River channel to the north which contains significant sand and gravel (aggregate) resources, but which is not extensively mined due to its important flood control function. The project site is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the General Plan 2025, specific plan, or other land use plan. Therefore, the project will have no impact on mineral resources on a direct, indirect, or cumulative basis.

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?	☐	☐	☐	☒

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

No Impact. The GP 2025 FPEIR determined that there are no specific areas within the City or the City Sphere Area that have locally important mineral resource recovery sites and that the implementation of the General Plan 2025 would not

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
significantly preclude the ability to extract state-designated resources. The proposed project is consistent with the General Plan 2025. Therefore, there is no impact on a direct, indirect, or cumulative basis and no mitigation is required.				
13. NOISE: Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐

13a. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Noise Existing Conditions Report, Title 7 – Noise Code, and CEQA Noise Report, Single Family Residences at La Sierra and Victoria, Riverside, California, prepared by Veneklasen Associates, April 25, 2024 (Noise Study, Appendix H)***

Less than Significant with Mitigation Incorporated.

Noise Description: Sound is a pressure wave created by a moving or vibrating source that travels through a medium, such as air, and is capable of being detected by a receiving mechanism, such as the human ear. Noise is defined as unwanted or objectionable sound, whether it is loud, unpleasant, unexpected, or otherwise undesirable. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and in extreme circumstances, hearing impairment. Sound is measured in decibels a logarithmic scale, which quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3-dBA decrease.

Ambient Noise Levels and Sensitive Receptors. Traffic along La Sierra Avenue and Victoria Avenue is the primary source of noise affecting the Project site and surrounding area. To assess the existing noise level environment short-term noise measurements (4 -hours in length) were obtained from 4 locations in the Project study area. Table 7 – *Existing Ambient Monitored Noise Levels* in the Noise Study indicates the average sound levels (Leq) in the project area range from 54 to 68 dBA while the estimated CNEL range from 54 to 70 dBA. The highest noise levels were measured near the La Sierra Avenue/Victoria Avenue intersection (northwest corner) closest to the highest amount of vehicular traffic, while the lowest levels were measured at the southeast corner furthest away from the two roadways.

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Sensitive receptor locations are generally identified as facilities where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptors because employees typically are present for shorter periods, such as eight hours. Residences, schools, hospitals, guest lodging, libraries, churches, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks are considered noise sensitive. The Noise Study determined that the closest sensitive receptors to the Project site in all directions around the site ranged from 60 to 176 feet although the closest receptors were approximately 60 feet from the eastern boundary of the site along Millsweet Place.

Construction Noise. Construction activities that would create noise include site preparation, grading, utility installation, foundation and slab pouring, paving, and building construction. Noise levels associated with the construction will vary with the different types of construction equipment, the duration of the activity, and the distance from the source. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing levels within the Project vicinity. Potential construction noise and vibration levels were estimated for worst-case equipment operations in proximity to existing residences adjacent to the northeast, east, and southeast of the site. Table 13-1, Construction Noise Levels, shows the estimated range of noise expected around the project site during various construction activities. The City does not have an established

threshold for daytime construction hours (i.e., Leq noise impacts), so the current National Institute of Occupational Safety and Health (NIOSH) standard of 80 dBA was used which is the standard Riverside County uses in these instances. According to the equipment list provided by the developer, Table 13-1 indicates the construction noise level will range between 69 to 83 dBA at the nearest receptors.

Table 13-1: Construction Noise Levels

Activity	Ambient Noise (dBA)	Noise Range Away from Project Noise (Leq in dBA)				Potentially Significant? [1]
		North	South	East	West	
Site Clearance	54-68	77	76-80	80-82	78-80	Yes
Grading	54-68	72	71-75	77-78	72-75	No
Utilities	54-68	76	76-80	83	77-78	Yes
Foundation and Slab Pouring	54-68	73	73-77	79-80	74-76	No
Paving	54-68	74	73-77	79-81	75-77	No
Building Construction	54-68	70	69-73	75-76	70-73	No

2 Source: Figure 6 and Tables 7 and 11, Noise Study 20. NIOSH standard of 80 dBA Leq

The analysis from the Project's Noise Study as indicated in Table 13-1 confirms that the NIOSH threshold is met at all closest receiver locations except for those along the east side of the site during site clearance and utility trenching activities which could exceed the NIOSH threshold by up to 3 decibels. This level of exceedance is barely perceptible to the human ear, so project construction noise is generally less than significant. However, to ensure construction noise impacts remain at less than significant levels for all sensitive receptors, especially those along the east side of the site, the project will implement Mitigation Measure NOI-1.

Mitigation Measure

NOI-1 Construction Limits. During all project construction activities, the following actions shall be implemented:

- Limit construction activities to those outlined in Municipal Code Section 7.35.020 subsection (G) which states…construction activities may not occur between 7:00 PM and 7:00 AM on weekdays, between 5:00 PM and 8:00 AM on Saturdays, or at any time on Sunday or a federal holiday.
- Schedule the highest construction noise-generating activities away from noise-sensitive uses away from the east and south and more toward the north and west (i.e., toward the larger adjacent roads).
- Prohibit and post signs prohibiting unnecessary idling of internal combustion engines (more than 3 minutes).
- Locate all stationary noise-generating equipment such as air compressors and portable generators as far as practicable from noise-sensitive land uses.
- Utilize "quiet" air compressors and other stationary equipment where feasible and available.
- Designate a noise disturbance coordinator who would respond to neighborhood complaints about construction noise by determining the cause of the noise complaints and requiring the implementation of reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site.

Occupancy/Operational Noise.

Offsite Traffic Noise Impacts: Once constructed, the proposed project would generate noise from vehicular traffic on surrounding roadways. The computer model used in the Noise Study estimated how the noise environment would change

due to project traffic once the project was occupied. Vehicle noise is a combination of the noises produced by the engine, exhaust, and tires. The primary source of noise generated by the Project will be the vehicle traffic generated by the vehicle ingress and egress to the Project site. Under existing conditions, the site does not generate any traffic noise that impacts the surrounding area. According to the Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, the level of roadway traffic noise depends on three things: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of the traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater numbers of trucks. These factors are discussed below.

- *The Volume of the Traffic*

Upon buildout, the proposed Project is expected to generate approximately 490 average daily vehicle trips (ADT) during the weekdays (see Section 17. a). Traffic counts were obtained by the Riverside Transportation Department which showed an average daily traffic (ADT) volume of 25,457 vehicles on La Sierra Avenue and 5,857 ADT on Victoria Avenue. According to Caltrans, the human ear can begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.[8] A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable. Implementation of the Project will increase traffic volumes in the area occurring along Garretson Avenue but not to the extent that traffic volumes will be doubled creating a +3dBA noise increase or result in a perceivable noise increase. Therefore, operational noise impacts would be less than significant.

- *The Speed of Traffic*

Victoria Avenue is a 2-lane road with a posted speed limit of 45 mph. According to the Center for Environmental Excellence by the American Association of State Highway and Transportation Officials (AASHTO) traffic moving at a speed of 60 mph will sound twice as loud as traffic at 30 mph. Lower speed limits such as the 35-mph speed limit on Garretson Avenue produce a lower noise level due to decreases in engine and tire generated noise. [9]

- *The Number of Trucks in the Flow of the Traffic*

The Project is a residential development in a residential area. The residential land use will not routinely generate noise from large trucks.

The Noise Study determined that the anticipated traffic flow resulting from the proposed project would be unlikely to cause significant noise impacts relative to the ambient noise levels in neighboring areas. A barely perceptible change will need an increment of at least 3 dBA and such a change in sound level will require doubling the volume of traffic in the area. Since the project would only result in a daily traffic volume of 490 vehicles, the project noise impacts from vehicular traffic would be less than significant, and no mitigation is required.

Onsite Residential Activity Noise Impacts:

In addition to the offsite traffic noise impacts, the Noise Study predicted mechanical equipment noise levels at the nearest sensitive receiver would be 42 dBA.

Typical operational sound levels generated by single-family residential activities include normal outdoor conversations, air conditioner units, and lawn care equipment with levels as indicated below:

- Normal conversation, air conditioner - 60 dBA
- Gas-powered lawnmowers and leaf blowers – 80 to 85 dBA.[10]

[8] Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

[9] American Association of State Highway and Transportation Officials, https://environment.transportation.org/education/environmental-topics/traffic-noise/traffic-noise-overview/. Accessed May 9, 2024.

[10] Center for Disease Control, "*Loud Noised Can Cause Hearing Loss*". ,https://www.cdc.gov/nceh/hearing_loss/default.html, accessed in May 2024.

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

Noise generated from air conditioners and lawn care equipment is not at constant and consistent levels throughout the day. Lawn care is performed during daylight hours for short durations and although air conditioners are operating both day and night they are cycling on/off with windows closed conditions. Stationary noise levels would be attenuated as with mobile noise sources with standard building construction and windows closed by approximately 25 dBA.

The USEPA identifies noise levels affecting health and welfare as exposure levels over 70 dBA over 24 hours. Noise levels for various levels are identified according to the use of the area. Levels of 45 dbA are associated with indoor residential areas, hospitals, and schools, whereas 55 dBA is identified for outdoor areas where typical residential human activity takes place. According to the USEPA levels of 55 dbA outdoors and 45 dbA indoors are identified as levels of noise considered to permit spoken conversation and other activities such as sleeping, working, and recreation, which are part of the daily human condition.[11] Levels exceeding 55 dbA in a residential setting are normally short and not significant in affecting the health and welfare of residents.

These levels comply with Riverside's Noise Standards for day and nighttime hours. Therefore, this impact is less than significant, and no mitigation is required.

Based on the results of the noise study, project construction or operation will not expose persons to or generate noise levels above standards established in the local general plan or noise ordinance, or applicable agency standards with the implementation of Mitigation Measure NOI-1. With mitigation, impacts are considered to be less than significant on a direct, indirect, or cumulative basis.

b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

13b. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours (delete figures that do not apply to your project), FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G –and CEQA Noise Report, Single Family Residences at La Sierra and Victoria, Riverside, California, prepared by Veneklasen Associates, April 25, 2024 (****Noise Study,*** ***Appendix G)***

Less Than Significant Impact. According to the Noise Study, vibrational construction activities could take place as close as approximately 100 feet from the nearest structure, which is an industrial land use south of the Project site. The use of a vibratory roller at this distance would have the potential to generate worst-case ground-borne vibration levels of approximately 0.015 in/sec PPV, which would be slightly perceptible per the transient Caltrans criteria. The range of potential vibration impacts during construction is shown in Table 13-2, Construction Vibration Impacts. All other equipment operating would not be perceptible and at no point during construction would project equipment generate ground-borne vibration that has the potential to damage the structural integrity of any buildings in its proximity. All other receptors are further away and therefore would be exposed to lower ground-borne vibration noise levels than those received south of the site. Since the proposed project would not generate vibration that would be perceptible to receptors for a prolonged amount of time, nor would it generate ground-borne vibration levels that would damage structures, it would not generate excessive ground-borne vibration or ground-borne noise levels. The proposed project would also not result in excessive operational vibration levels because it does not involve the use of large or vibration-inducing equipment near off-site structures during occupancy.

[11] USEPA "EPA Identifies Noise Levels Affecting Health and Welfare" https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html accessed May 2024.

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

Table 13-2: Construction Vibration Impacts

Activity[1]	Range of Construction Vibration Levels (PPV)	Range of Construction Vibration levels (VdB)	Potentially Significant?[2]
Site Clearance	0.003 – 0.015	–9 - 71	No
Grading	0.0003 – 0.001	–4 - 46	No
Utilities	0.003 – 0.015	–0 - 71	No
Foundation & Slab Pouring	0.003 – 0.015	–9 - 71	No
Paving	0.0003 – 0.001	–4 - 40	No

Source: Table 13, Noise Study, 2024

[1] Building Construction activities not included as they mainly use hand tools which do not generate much vibration.

[2] Based on Federal Transit Administration Vibration Thresholds (2006) of 0.12 PPV and 80 VdB for residences and infrequent events.

Based on the preceding analysis, the project will have **a less than significant impact** on the exposure of persons to the generation of excessive ground-borne vibration or ground-borne noise levels on a direct, indirect, or cumulative basis, and no mitigation is required.

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?	☐	☐	☐	☒

13c. Response: (*Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUCP, March Air Reserve Base/March inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005), and CEQA Noise Report, Single Family Residences at La Sierra and Victoria, Riverside, California, prepared by Veneklasen Associates, April 25, 2024 (Noise Study, Appendix G)*

No Impact. According to *Map My County* and the *Noise Study*, the proposed project is not located within two miles of a public airport or public-use airport. Therefore, there is **no impact**.

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 the extension of roads or other infrastructure)?	☐	☐	☒	☐

14a. Response: (*Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections– 2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG's RCP and RTP)*

Less Than Significant Impact. The project site currently has a General Plan land use designation of Low Density Residential (LDR) which allows a maximum of 4.1 units/acre. Based on the LDR designation, the site would have a maximum of 41 units (9.91 acres x 4.1 units/acre). The applicant has requested a density bonus of 8 units over that allowed under the General Plan based on the current state density bonus law allowance. These additional units may be eligible for the City's affordable housing program and may count towards the City's Regional Housing Needs Assessment (RHNA) affordable housing allocation.

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

The difference between the project and what would be allowed under the General Plan is + 8 units or + 25 persons. At present, the State Department of Finance estimates the City had a population of 314,818 persons and 94,540 households as of January 2022. Therefore, the project represents a potential difference of +0.01% of the 2022 population and +0.01% increase in the 2022 number of households. That amount of change or increase is considered incremental and would not represent a significant difference relative to the City's current population and housing stock (households). These small changes would also not represent a significant portion of the future population and housing projected by the Southern California Association of Governments (SCAG) in its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) program which is now referred to as "Connect SoCal". Table 14-1 shows the population, housing, and employment projections from SCAG for the City of Riverside from 2020 to 2040.

Table 14-1: SCAG Growth Projections -City of Riverside

City Characteristic	2020	2035	2040	Growth[1]
Population	336,300	384,100	386,600	+15.0%
Housing	101,200	117,700	118,600	+17.2%
Employment	157,900	195,900	200.500	+27.0%

Source: SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction

[1] percent increase from 2020 to 2040

Any direct increases in population as a result of the project are insignificant as they are considered within the growth assumptions estimated by SCAG for the City of Riverside General Plan. No new expanded infrastructure is proposed that could accommodate additional growth in the area that is not already possible with existing infrastructure. Therefore, the project will not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure).

The General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the General Plan 2025 Typical Growth scenario would not have significant population growth impacts. Because the proposed project is consistent with the General Plan 2025 Typical Growth scenario and population growth impacts were previously evaluated in the GP 2025 FPEIR, the project does not result in new impacts beyond those previously evaluated in the GP 2025 FPEIR. Therefore, the impacts will be less than significant on a direct, indirect, or cumulative basis. No mitigation is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

14b. Response: (*Source: CADME Land Use 2003 Layer, photos from site visit, aerial imaging)*

No Impact. The project will not displace existing housing, necessitating the construction of replacement housing elsewhere because the project site is vacant land that has no existing housing that will be removed or affected by the proposed project. Therefore, there will be no impact on existing housing on a direct, indirect, or cumulative basis. No mitigation is required.

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

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

15a. Response: (*Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1, and City of Riverside Fire Department Website*)

Less than Significant Impact. The project area is served by the City of Riverside Fire Department (RFD). The project is residential and located in an urbanized area designated for residential uses. No industrial uses or hazardous material storage are proposed on the project site that would require additional fire capabilities beyond those already available to the project area. City of Riverside Fire Station #12, La Sierra South, is located at 10692 Indiana Avenue approximately 1.36 miles northeast of the project site (via streets). The response time from this station to the project site is approximately 2.3 minutes assuming an average speed of 35 miles per hour. This station provides fire services for the southeastern portion of the City of Riverside. With the implementation of fire suppression equipment and adherence to fire code standards, the Project would not result in the need for a new fire station or facilities. Therefore, the project will have a less than significant impact on the demand for additional fire facilities on a direct, indirect, or cumulative basis.

b. Police protection?	☐	☐	☒	☐

15b. Response: (*Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers, and City of Riverside Police Department (RPD) website https://www.riversideca.gov/rpd/)*

Less than Significant Impact. The project site is served by the City of Riverside Police Department (RPD) which maintains approximately 130 sworn officers, 24 Sergeants, 6 Lieutenant Watch Commanders, 1 Executive Lieutenant, 1 Traffic Lieutenant, and a civilian support staff (RPD 2024). Officers are assigned to one of three Neighborhood Policing Centers (NPC) and are accountable for their assigned area. Adequate police facilities and services are provided by the Magnolia Neighborhood Policing Center (MNPC) to serve the project area. The MNPC is located 2.15 miles north of the Project site. Response times to the project site would vary depending on the location of patrol units rather than the location of the local NPC but the RPD goal is to maintain an emergency call response time of three minutes or less. In addition, through the payment of Development Impact Fees, the City can ensure that adequate facilities are provided for police protection. Additionally, as part of the Project's Site Plan review process, the Police Department did not indicate that new facilities would be needed to service the Project site. Therefore, impacts would be less than significant. No mitigation is required.

c. Schools?	☐	☐	☒	☐

15c. Response: (*Source: FPEIR Figure 5.13-3 – AUSD Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Student By Education Level, Alvord Unified School District Website; and California Department of Education (CDE) website, School/District Profile Search https://www.cde.ca.gov/sdprofile/search.aspx)*

Less Than Significant Impact. School facilities and services to the eastern end of the City of Riverside are provided by the Alvord Unified School District (AUSD) for Kindergarten through the 12th grade. Residential uses are proposed for the project site which would generate students who would create additional demands on local schools. The project site would be served by the schools shown in Table 15-1, Local Schools. The project site is currently in the following school attendance areas; Lake Hills Elementary School (grades K-5);Arizona Middle School (grades 6-8), and Hillcrest High School (grades 9-12).

Table 15-1: Local Schools

School (grades)	Address	Distance/Direction from Project Site	2022-2023 Enrollment
Lake Hills Elementary (K-5)	16346 Village Meadows Drive, Arlington Mountain	4.1 miles southwest	637
Arizona Middle School (6-8)	3754 Harvill Lane, Riverside	2.5 miles west	1,262
Hillcrest High (9-12)	11800 Indiana Avenue, Riverside	1.7 mile west	1,824
Project Area Total (K-12)	--	--	3,723
Alvord USD Total (K-12)	--	--	17,106

Source: Alvord Unified School District Website, California Department of Education Website

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

The project is residential so each unit may generate new students are various grade levels that will attend the local schools shown in Table 15-1, Project Student Generation, based on current attendance boundary maps from the two districts. According to demographic data from the AUSD, the 49 single-family units of the proposed project would be expected to generate approximately 13 elementary, 3 middle school, and 4 high school students (20 students total) at full occupancy.

Table 15-2: Project Student Generation

Grade Levels	Elementary (K-5)	Middle School (6-8)	High School (9-12)	Total (K-12)
Rate[1]	0.26	0.06	0.08	0.40
Students[2]	13	3	4	20

Sources: AUSD website and developer fee report

[1] Developer Fee Justification Report, 2022

[2] Single-family Residential Unit Rates x 49 single-family units

A project that is consistent with the General Plan and zoning designations for its site is only subject to payment of school impact fees legally established by the serving school facilities according to Senate Bill 50. The current AUSD fee for new residential development is $4.79 per square foot, so the project could generate over $500,000 in developer fees to the AUSD based on a total of 49 new single-family units with a total building coverage of 22.4% on a 9.91-acre site. Payment of established school impact fees is a standard condition and is not considered unique mitigation under CEQA. With the implementation of General Plan 2025 policies, compliance with existing codes and standards, and payment of AUSD impact fees used to offset the impact of new development, there will be a less than significant impact on the demand for school facilities or services on a direct, indirect, or cumulative basis. No mitigation is required.

d. Parks?	☐	☐	☒	☐

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)*

Less than Significant Impact. The project is residential and would add 49 single-family housing units that would increase the City population and incrementally increase the demand for park facilities and services. The parks closest to the project site are shown in Table 15-3, Local Parks.

Table 15-3: Local Parks

Park Name/Address (Location)	Acreage – Facilities	Distance/Direction from Project Site
Victoria-Cross Park 10881 Victoria Avenue (City)	8 acres – undeveloped at present	0.1-mile northeast
Harrison Park 2851 Harrison Street (City)	7 acres – volleyball court, playground, picnic tables, BBQs	1.5 miles northeast
Arlington Height Sports Park 9401 Cleveland Avenue (City)	35 acres – walking trails, ballfields, multi-use fields, basketball court, playground, horseshoes, picnic tables, BBQs, restrooms	2.0 miles northeast
Lake Hills Reserve Park (County) 16310 Village Meadow Drive	2.8 acres – pool, grass fields, playground, picnic tables, BBQs	1.5 miles southwest
Sunlake Park (County) Lakepointe Drive	0.7-acre – basketball court, grass fields, volleyball court, picnic tables, BBQs	1.4 miles south
Lakepointe Park (County) 17784 Morning Rock Circle	1.0 acre – playground, grass field, picnic tables, BBQs	1.7 miles south

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

Greenleaf Park (County) 16325 Green Leaf Court	0.6-acre – playground, grass field, picnic tables, BBQ	1.6 miles west
California Citrus State Historic Park 9400 Dufferin Avenue (State)	+250 acres – historic orange grove and museum of citrus production history in Riverside	2.0 miles northeast

Source: Riverside City Parks Website, Riverside County Parks Website, Google Earth

The project proposes 1.24 acres of the site along Victoria Avenue as part of its historic landscaped parkway and is consistent with the Victoria Avenue Policy requirements. Therefore, the project will pay the pay applicable Local, Regional, Aquatic, and Trails Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department established by the City for new residential development. In this regard, the project will have less than significant impacts on the demand for additional park facilities or services on a direct, indirect, or cumulative basis. No mitigation is required.

e. Other public facilities?	☐	☐	☒	☐

15e. Response: (*Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)*

Less than Significant Impact. The project is in an urbanized area that proposes 49 new residences. The project would create an incremental increase in demand for public facilities such as libraries and community centers. Development of the project site with new homes is generally consistent with the growth projected by the General Plan 2025 and its EIR. The GP 2025 provides adequate public facilities for the growth anticipated throughout the project area. Therefore, this project will not result in the intensification of land use and there will be a less than significant impact on the demand for additional public facilities or services on a direct, indirect, or cumulative basis. No mitigation is required.

16. RECREATION:

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

16a. Response: *(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)*

Less than Significant Impact. The General Plan 2025 analyzed the development of the project site with residential consistent with the underlying General Plan Land Use designation of Low-Density Residential (4.1 du/ac max.). The project will incrementally increase the number of units expected on the site (49 v. 41). As evaluated in Threshold 15.d above, the project proposes 1.4 acres of the site along Victoria Avenue as part of its historic landscaped parkway and consistent with the Victoria Avenue Policy requirements. The project does not propose any other onsite park or open space improvements. Therefore, the project will be required to pay applicable Local, Regional, Aquatic, and Trails Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department. Therefore, this project will have a **less than significant impact** on a direct, indirect, or cumulative basis. No mitigation is required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

16b. Response: (*Source: Exhibit 3, Site Plan)*

Less than Significant Impact. Section 13.18 of the RMC requires that recreational trails within the City be developed according to approved standards and design elements as outlined in the Trails Master Plan. Trails in the City are designated

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to accommodate equestrian, bike, and pedestrian users. The project will construct a trail along the Victoria Avenue frontage. As evaluated in Threshold 15.d above, the project proposes 0.67 acres of the site along Victoria Avenue as part of its historic landscaped parkway and consistent with the Victoria Avenue Policy requirements. The project The project will construct a trail along the Victoria Avenue frontage. The project does not propose any other onsite park or open space improvements. Therefore, the project will be required to pay applicable Local, Regional, Aquatic, and Trails Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department. Therefore, the project will have a less than significant impact on a direct, indirect, or cumulative basis relative to recreational facilities. No mitigation is required.				
17. TRANSPORTATION: Would the project result in:				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

17a. Response: ***Appendix I - Scoping Agreement for LOS and VMT Impacts, Memorandum prepared by City of Riverside Public Works Department, March 13, 2024.***

Less than Significant Impact.

It should be noted that the primary CEQA thresholds of significance for transportation and traffic impacts have changed in recent years. In the past, the analysis focused on Level of Service (LOS) which measured congestion at local intersections and roadway segments. The emphasis of these past studies was to ensure that the street grid network functioned well and allowed for the efficient movement of vehicles. The current focus is to encourage active transportation (e.g., pedestrians, bicyclists, etc.) and transit, and to limit increases in Vehicle Miles Travelled (VMT, see Section 17. b below). Therefore, this part of the analysis is to determine if the project would conflict with the policies of the Circulation and Community Mobility Element of the General Plan that provides for transit, bicycle, and pedestrian facilities.

There are sidewalks on both sides of La Sierra Avenue and Victoria Avenue. There are also Class II bike lanes on La Sierra Avenue and Victoria Avenue in both directions of travel. The Riverside Transit Agency (RTA) operates several bus routes in the region but the closest routes to the project site are Routes 15 and 200 along Indiana Avenue which directly connect to the "Riverside-La Sierra" Metrolink Station at 10901 Indiana Avenue approximately 0.9-mile north of the project site. In addition, RTA Route 15 travels along La Sierra Avenue north of Indiana to serve other areas of the City.

The project proposes 49 single-family detached residential units which each typically generate 10 vehicular trips per day or a total of 490 trips per day. In addition, the City's approved Scoping Agreement indicates the project will generate 80 total peak hour trips with 34 AM peak hour trips and 46 PM peak hour trips. Per the City of Riverside Traffic Impact Analysis Guidelines (July 2020), any project generating less than 100 peak-hour trips is not expected to significantly affect traffic to the extent that the existing La Sierra Avenue and Victoria Avenue could not use the bicycle, pedestrian, or transit facilities described above.

Therefore, the project will not conflict with any program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts will be less than significant directly, indirectly, and cumulatively and no mitigation is required. No mitigation is required.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

17b. Response: ***Source: Appendix J- La Sierra and Victoria Vehicle Miles Traveled (VMT) Analysis prepared by TJW Engineering, Inc., May 1, 2024***

Less than Significant Impact. In June 2020, the City of Riverside City Council adopted analytical procedures, screening tools, and impact thresholds for VMT, which are documented in the City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (May 2020) (City Guidelines). To aid in the project-level VMT

screening process the City of Riverside utilizes the Western Riverside Council of Governments (WRCOG) VMT Screening Tool (Screening Tool). The web-based Screening Tool allows a user to select an assessor's parcel number (APN) to determine if a project's physical location meets one or more of the land use screening thresholds documented in the City Guidelines. These thresholds were obtained from the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). The focus of this evaluation is to assess each of the City's screening thresholds to determine if the proposed project would be expected to cause a less than significant impact on VMT without requiring a more detailed VMT analysis.

The City Guidelines provide step-by-step procedures to conduct a project-level VMT screening assessment to determine if a more detailed quantitative analysis is required. The screening procedures include the following three steps: Step 1: Transit Priority Area (TPA) Screening; Step 2: Low VMT Area Screening; and Step 3: Project Type Screening. A land use project must only meet one of the above screening thresholds to result in a less than significant impact. The Scoping Agreement indicated the proposed project did not meet any of these screening thresholds, therefore a detailed VMT analysis was prepared using the Riverside County Travel Demand Model (RIVCOM) as required by the City Guidelines. (Appendix I).

The project is located within the Traffic Analysis Zone (TAZ) 1956. The potential population generated by the project was calculated using a factor of 3.34 persons per household as noted in the County of Riverside General Plan – Socioeconomic Build-Out Assumptions and Methodology (2017).1 Based on this data, the proposed residential project would have a population of 164 people (49 dwelling units x 3.34 persons per household). The existing base socioeconomic data was moved from the project TAZ and added to adjacent TAZs. The project TAZ was then populated with the project population. VMT data for years between 2018 and 2045 can be extrapolated using linear interpolation between the 2018 and 2045 model outputs. The model was completed for the base year 2018 and plan year 2045 without and with project conditions (a total of four model runs). Based on the residential land use and as per City guidelines, project VMT/resident was compared to the County's VMT/capita threshold for the project opening year 2028. The results of the analysis are shown in Table 17/1 below.

Table 17-1: VMT Analysis of Project Impact

Description	**2018**	**2045**	**2028**
Project VMT	2,494	2,513	2,498
Project Population	164	164	164
Project VMT/Resident	15.2	15.4	15.3
City of Riverside VMT	3,951,373	5,021,447	4,189,167
City Population	323,856	404,570	341,792
City VMT/Resident	12.2	12.4	12.3
City 15% VMT	10.4	10.6	10.4
VMT Threshold	**Project VMT/Resident**	**% Above/Below Threshold**	**Significant Impact?**
10.4	**15.3**	**46.15%**	**Yes**

As shown in Table 17-1, The City of Riverside outlines that for residential projects an impact would occur if the VMT per resident exceeds 15% below the citywide VMT per resident. The project exceeds the threshold by 4.9 VMT per resident (approximately 47% over the City threshold). To reduce the project VMT impacts, the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equality (December 2021) was considered. The CAPCOA VMT reduction measures proposed by the project are shown in Table 17-2.

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

Table 17-2: VMT Reduction Measures

Project Design Feature	% Reduction
T-1 – Increase Residential Density: The project proposes a density of 6.2 dwelling units per acre and the General Plan land use designation of 1-½ acre Single Dwelling is up to 2 dwelling units per acre.	30%
T-3 -Provide Transit-Oriented Development: Although the project is further than a 10-minute walk and 0.5 miles from a high-frequency transit station; the 91 freeway is highly congested and provides further incentive for users of the project to utilize a transit station. In addition, the nearby Metrolink station provides access to Los Angeles and Orange County, two major employment centers.	1.75%
T-4 – Integrate Affordable Housing: The project proposes 3 out of 49 units at affordable and below market rates.	6.93
T-15 Limited Residential Parking Supply: Limiting the amount of available parking, thus disincentivizing driving as a mode of transportation.	3.21%
T-18 – Pedestrian Network Improvement: There are approximately 1,288 linear feet of existing sidewalk along the eastern side of La Sierra Avenue between Cleveland Avenue and Victoria Avenue and the project would construct an additional 2,295 linear feet.	6.40%
Total VMT Decrease	**48.29%**

As shown in Table 17.2 above, these five measures result in a decrease in VMT of 48.29% which places the project under the City threshold by 2.14%. Impacts would be less than significant. No mitigation is required.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

17c. Response: (*Source: Project Site Plans, Lane Striping and Signing Plans and if required/recommended by the City's Traffic Engineer)*

Less Than Significant Impact. The project site is located at the southeast corner of La Sierra Avenue and Victoria Avenue in the far west end of the City of Riverside (La Sierra South neighborhood). Both streets are linear adjacent to the project site, so sight distances are not obstructed due to street alignment. However, it should be noted that Victoria Avenue has a center median with extensive landscaping and historic trees planted so sight distances along Victoria Avenue can be limited depending on the location of the viewer. The project site will take access from La Sierra Avenue in the southern portion of the site to maintain an adequate distance from the Victoria Avenue intersection for its safe operation. South of the project site La Sierra Avenue begins to curve east as it moves into the Temecula Hills to the south. However, there is sufficient distance with a linear alignment to the south so that sight distances would not be obstructed from the new project entrance.

The Plans show a 36-foot-wide roadway (Street A, curb-to-curb within a 46-foot right-of-way) providing access into the site from La Sierra Avenue with internal 36-wide streets and 26-foot-wide alleys that provide access to each residential lot. Consistent with the Victoria Avenue Policy requirements, the project has a 100-foot setback along its north side to provide enhanced landscaping along this portion of Victoria Avenue. The Plans call for as many of the existing citrus trees as possible to be preserved within this setback area, and a 10-foot-wide decomposed granite (DG) multi-purpose trail to be created along the south side of Victoria Avenue within the project boundaries.

As a condition of approval, the project will adhere to all applicable circulation, safety plans, and design guidelines. Therefore, this project will have a less than significant impact on increasing hazards through design or incompatible uses on a direct, indirect, or cumulative basis. No mitigation is required.

c. Result in inadequate emergency access?	☐	☐	☐	☒

17d. Response: (*Source: California Department of Transportation Highway Design Manual, Municipal Code, Traffic Impact Analysis prepared by Urban Crossroads on November 3, 2020)*

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

No Impact. The project site is located at the southeast corner of La Sierra Avenue and Victoria Avenue in the far west end of the City of Riverside (La Sierra South neighborhood). The project site will take access from La Sierra Avenue in the southern portion of the site to maintain an adequate distance from the Victoria Avenue intersection for its safe operation. The Plans show a 36-foot-wide roadway (Street A, curb-to-curb within a 46-foot right-of-way) providing access into the site from La Sierra Avenue with internal 36-wide streets and 26-foot-wide alleys that provide access to each residential lot. As a condition of approval, the project will adhere to all applicable circulation, safety plans, and design guidelines.

The project has been developed in compliance with Title 18, Section 18.210.030 (Streets) of the Subdivision Code, the City's Fire Code RMC Title 16, and Section 503 of the California Fire Code (2007). In addition, the project site will include internal roadway widths and access that would be reviewed by the City of Riverside emergency service providers to ensure emergency access is adequately provided. Emergency access vehicles will not be restricted in mobility by the site design of the proposed project in terms of blocking access ways, restricting access to the project site, or indirectly by providing a use on the project site that would restrict emergency access to adjacent uses. Therefore, there will be no impact on a direct, indirect, or cumulative basis to emergency access. No mitigation is required.

18. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐

18a. Response: ***(AB 52 Consultation)***

Less Than Significant Impact. As discussed in Section 3, Cultural Resources, of this Initial Study, a standard Phase I cultural resources survey for a proposed residential development project was conducted on the same parcel by McKenna in 2014. As a result of that study, a site of historical age was recorded that coincided with the entire project site. The resource was designated 33-023901 (CA-RIV-11736H) in the California Historical Resources Inventory and consisted of an orange grove that had been cultivated on the property since 1902 along with associated irrigation features and a wind machine. The 2014 study concluded that Site 33-023901 did not meet any of the established significance criteria and thus did not qualify as a "historical resource" under CEQA. In 2019, McKenna updated the 2014 study and again concluded that no significant cultural resources were present on the project site. Although there has been no change to the property since that time, the CRSU conducted supplemental research and field investigation to re-verify the results of the previous research on this site. Impacts would be less than significant. No mitigation is required.

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

18b. Response: ***(AB 52 Consultation)***

Less Than Significant with Mitigation Incorporated. Assembly Bill (AB 52) specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment.

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

AB 52 requires tribes interested in a development project within a traditionally and culturally affiliated geographic area to notify the tribe within 14 days of deeming a development application complete. On May 16, 2024, the City sent Assembly Bill (AB) 52 consultation notices to the following tribes to inquire if they wanted to initiate consultation: Gabrieleno Band of Mission Indians - Kizh Nation, Soboba Band of Luiseño Indians, Cahuilla Band of Indians, Pechanga Band of Luiseño Indians, Rincon Band of Luiseño Indians, San Manuel Band of Mission Indians, Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and San Gabriel Band of Mission Indians. The 30-day time period for tribes to request consultation ended on June 15, 2024. The Pechanga Band of Luiseño Indians, Soboba Band of Luiseño Indians, and Cahuilla Band of Indians requested a consultation according to Public Resources Code Section 21080.3.1. No other tribes requested consultation within the required period.

The tribes requested archeological and tribal monitoring, a monitoring report, and protocols for the discovery of cultural material and human remains. Mitigation Measures, MM CUL-1 through MM CUL-6, and a standard condition of approval for the discovery of human remains, as discussed in Section 5b, are to be implemented, and thus, there will be a less than significant impact with mitigation incorporated.

19. UTILITIES AND SYSTEM SERVICES: Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐

19a. Response: (Source: Project Plans and this Initial Study).

Less than Significant Impact With Mitigation Incorporated. The site currently drains to the northeast and the water quality management plan proposes a detention/infiltration basin in the northeast portion of the site along with a new onsite storm drainage system to collect surface runoff and channel it to the new basin. The project will connect to existing utility lines and services (water, sewer, electric power, etc.) in La Sierra Avenue and/or Victoria Avenue as appropriate. The installation of these utilities and service systems as proposed by the Project would result in physical environmental impacts. However, the Project's construction phase is evaluated throughout this Initial Study. In instances where significant impacts may have been identified for the Project's construction phase, the following mitigation measures are recommended in each applicable subsection of this Initial Study so the construction of these utilities and service systems would not result in any significant physical effects on the environment:

Biological Resource Mitigation Measures: and Standard Conditions:

- Standard Condition- Pre-Construction Burrowing Owl Clearance Survey.
- Standard Condition- Nesting Birds Survey

Cultural Resource Mitigation Measures:

- CUL-1 Notification of Project Changes
- CUL-2 Archaeological Monitoring.
- CUL-3 Native American Monitor.
- CUL-4 Treatment and Disposition of Cultural Resources.
- CUL-5 Cultural Sensitivity Training.
- CUL-6 Non-Disclosure
- Standard Condition-Discovery of Human Remains.

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Geology and Soils Mitigation Measures:

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
▪ GEO-1- Paleontological Resource Protection. Noise Mitigation Measures ▪ NOI-1-Construction Limits. Tribal Cultural Resources Mitigation Measures and Standard Conditions: ▪ CUL-1 Notification of Project Changes. ▪ CUL-2 Archaeological Monitoring: ▪ CUL-3 Native American Monitor: ▪ CUL-4 Treatment and Disposition of Cultural Resources ▪ CUL-5 Cultural Sensitivity Training ▪ CUL-6 Non-Disclosure. ▪ Standard Condition-Discovery of Human Remains.				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

19b. Response: ***(Source: RPU 2020 Urban Water Management Plan (UWMP).***

Less Than Significant Impact. The City's 2020 Urban Water Management Plan (UWMP) developed water demand projections considering variables such as climate, population growth, and customer behaviors. The UWMP used 2020 Census data, SCAG population growth projections, and updates to the City's General Plan to calculate future water demands within RPU's service area. The UWMP estimates water service reliability by calculating supply and demand for the following scenarios normal year supply, single dry year supply, and multiple dry year supply. These estimates are based on assumptions that 100 percent of RPU's groundwater and recycled water supplies would remain available during a single dry year and multiple dry years. The availability of imported water has been adjusted based on the reliability assessment by WMWD. Table 5.14-E, Water Service Supply and Demand1 below, shows estimated supply and demand calculated in the UWMP for future years. For all the scenarios (normal year, single dry year, and multiple dry year) the available water supply is greater than the anticipated demands. (UWMP, pp. III, 7-5, 7-6).

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

Table 19-1: Existing and Future Water Service Supply and Demand[1]

Scenario		2025	2030	2035	2040	2045
Normal Year	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Single Dry Year	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years **First Year**	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years **Second Year**	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years **Third Year**	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years **Fourth Year**	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years **Fifth Year**	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447

Source: UWMP, Tables 7-2 thru 7-4

Notes:

1. All Values are provided in Acre Feet.

As identified in Table 19-1 above, water supplies are estimated to accommodate demand projections through 2045 under normal and multiple dry-year conditions. As mentioned in Section 16 – Population and Housing of this Initial Study, implementation of the Project would result in the development of 49 housing units that will increase the population by approximately 162 residents lending to a permanent increase in demand for water supply. Per SB X7-7 water agencies are required to calculate their baseline water use for a 10-to-15-year period. As such RPU determined in their 2020 UMWP that the average base daily per-capita water use within the RPU service area was 266 gallons per capita per day (gpcd). (UWMP, pp. 5-1 - 5-2). Utilizing this information, the projects the anticipated water demand of the proposed Project would be 43,092 gpcd (166 persons X 266 gpcd = 43,092 gpcd = 48 Acre Feet per Year (AFY).

As reflected in Table 19-1 above, implementation of the proposed Project would increase water demands by approximately 48 AFY over existing and future conditions in normal, dry, and multiple dry years. This represents a range of increase in water demand of 0.03% to 0.04% as compared to the water demand of 114,923 AFY for 2025 and 129,693 AFY for 2045. Additionally, as identified in Table 19.1 above, RPU's supplies are larger than existing and projected demands. Thus, the increased demand resulting from the proposed Project would be accommodated. Therefore, the impacts would be less than significant. No mitigation is required.

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

19c. Response: ***(Source: General Plan 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, Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR; FPEIR Figure***

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

5.16-5 – Sewer Service Areas, Figure 5.16-6 – Sewer Infrastructure, and Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area)

Less Than Significant Impact. Based on the average daily wastewater flow identified in the City's Capital Improvement Program and Rate Development Study, the proposed single-family residential units would generate an average of 206 gallons per day (gpd) (CIP 2014). Therefore, the proposed 49 residence Project would result in an average daily flow of 10,094 gpd.

Wastewater generated at the project site is treated at the Riverside Regional Water Quality Treatment Plant (RRWQCP). The RWQCP currently treats approximately 28 million mgd of AAF with a hydraulic capacity of approximately 46 mgd AAF. The RWQCP has a projected daily influent flow of approximately 39 mgd through the year 2037 so the RWQCP can treat the 10,094 gpd flows of the proposed Project. Therefore, there would be adequate capacity to serve the project and impacts would be less than significant. No mitigation is required.

d. Generate solid waste in excess of State or local standards, or excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

19d. Response: ***(Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)***

Less than Significant Impact. The project proposes 49 single-family units that could have a population of 162 persons. The project could be expected to generate approximately 0.12 tons of solid waste per day based on data from the California Emissions Estimator Model (CalEEMod) per the Air Quality and GHG Technical Memorandum prepared for the Project (Appendix A).

The majority of waste from the City of Riverside goes to the nearby El Sobrante Landfill in the City of Corona. This landfill has a permitted daily capacity of 16,054 tons per day and a total capacity of 184,930,000 tons with a remaining capacity of 145,530,000 tons. This landfill is estimated to close in 2045. The project could generate up to 1,900 tons of waste per year or 1.9 tons per day which is 0.01 percent of the landfill's permitted daily capacity. Therefore, there is adequate landfill capacity in the region to accommodate project-generated waste. Considering the availability of landfill capacity and the relatively nominal amount of solid waste generation from the proposed project, project solid waste disposal needs can be adequately met without a significant impact on the capacity of the nearest and optional, more distant, landfills. Therefore, it is not expected that the proposed project would impact the City's compliance with state-mandated (AB 939) waste diversion requirements. Therefore, impacts will be less than significant relative to landfill capacity directly, indirectly, or cumulatively. No mitigation is required.

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

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

No Impact. The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. The City is currently achieving a 60% diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50% of non-hazardous construction and demolition debris for all projects and 100% of excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any Federal, State, or local regulations related to solid waste. Therefore, no impacts related to solid waste statutes will occur directly, indirectly, or cumulatively. No mitigation is required.

20.WILDFIRE:

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

20a. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, Riverside Fire Department Website https://riversideca.gov/fire/, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/)***

Less than Significant Impact. According to both the General Plan 2025 EIR and the City's Local Hazard Mitigation Plan, the proposed project site is not located within a designated very high fire severity or hazard zone. In addition, the project site is not classified as a Fire Responsibility Area by the California Department of Forestry and Fire Protection (CAL FIRE 2021). The project site is currently vacant but contains hundreds of orange trees from a former orchard operation. As such, under current conditions, the site does have an elevated risk of fire if it's trees or weedy vegetation catch fire from embers transported from some upwind regional wildfire, or a fire could start as a result of accidents or intentional human action.

The proposed project will replace the former orchard with single-family residences, an internal access street, and related improvements such as fire hydrants and improvements associated with a residential neighborhood. The project site has relatively good access to and from surrounding areas via La Sierra Avenue and Victoria Avenue, and the SR-91 Freeway is one mile north of the site off of La Sierra Avenue.

The Riverside Fire Department (RFD) provides fire protection and emergency services to the project area. According to their website, RFD responds to over 39,000 emergency calls annually. Operations employs 216 full-time firefighters, housed 24/7 in 14 strategically located fire stations spanning a primary response area of over 81 square miles (RFD 2024). The closest fire station to the project site is Station 12 (La Sierra South) located at 10692 Indiana Avenue approximately 1.4 (driving) miles north of the site. The station houses Engine 12, decon 12, and Brush 842 with four full-time staff. The response time from this station to the project site is estimated at 2.4 minutes based on an estimated travel speed of 35 miles per hour. When the onsite and adjacent offsite improvements are completed, emergency vehicles will have complete access within and around the site.

The City has standard conditions of approval (COAs) that require a project to comply with the City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on the review of tentative tract maps and plot plans. One of these requirements is to ensure that adequate emergency access is provided to proposed homes and other uses. These COAs are determined during the City's development review process, including CEQA. Compliance with standard COAs and current Fire Code requirements is considered regulatory compliance and is not unique mitigation under CEQA.

A limited potential exists for the project to temporarily interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the project will be limited to lateral utility connections (i.e., water and sewer) that will be limited to nominal potential traffic diversion. Control of access will ensure emergency access to the site and project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to mitigate any construction circulation impacts. The TCP is a standard condition and is not considered a unique mitigation under CEQA. Following construction, emergency access to the project site and area will remain as was before the proposed project and as anticipated in the City's emergency and evacuation plans.

Based on available information, the project will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, because no permanent public street or lane closures are proposed. Therefore, potential impacts would be less than significant, and no mitigation is required.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20b. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, Riverside Fire Department Website https://riversideca.gov/fire/, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/)*** **Less than Significant Impact.** As stated in Threshold 20. a, the proposed project site is not located within a high or very high fire hazard zone or a Fire Responsibility Area (CAL FIRE 2021). However, it is possible that the citrus trees or weedy vegetation onsite could catch fire from embers transported from some upwind regional wildfires, or a fire could start as a result of an accident or intentional human action. In addition, the entire region is subject to hot dry west-blowing winds known as Santa Ana Winds, especially during the fall. If vegetation onsite contributed to or exacerbated any wildfire conditions, local residents may be exposed to increased pollutant concentrations including smoke and ash. The City has standard conditions of approval (COAs) that require a project to comply with the City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on the review of tentative tract maps and plot plans. These COAs are determined during the City's development review process, including CEQA. Compliance with standard COAs is considered regulatory compliance and is not unique mitigation under CEQA. Additionally, the project will provide impervious surfaces, irrigated landscaping, structures built in compliance with fire codes, fire hydrants, and other measures that will help to reduce wildfire risks. Compliance with the Fire Code and COAs will reduce potential impacts related to long-term emergency response. Based on this information, the project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts will be less than significant, 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?	☐	☐	☒	☐
20c. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, Riverside Fire Department Website https://riversideca.gov/fire/, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/)*** **Less than Significant Impact.** The project plans do not indicate that the installation or maintenance of major infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities, would be required that could exacerbate fire risk or that could result in temporary or ongoing impacts to the environment. Removal of the onsite citrus trees and weedy vegetation and placement of new houses, streets, walls, and fire hydrants will lower the risk of wildfire on the site and surrounding area. New homes will also have smoke alarms to alert new residents to potential fire dangers. The City has standard conditions of approval (COAs) that require a project to comply with the City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on the review of tentative tract maps and plot plans. These COAs are determined during the City's development review process and may include the above-listed infrastructure. Compliance with standard COAs is considered regulatory compliance and is not unique mitigation under CEQA. Any impacts will be **less** than significant, 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?	☐	☐	☒	☐
20d. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/), Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019)***				

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

Less than Significant Impact. As stated in Threshold 20. a, the proposed project site is not located within a designated high fire hazard zone or a Fire Responsibility Area (CAL FIRE 2021). It is possible that citrus trees or weedy vegetation onsite could catch fire from embers transported from some upwind regional wildfire, or a fire could start in one or more of these areas as a result of an accident or intentional human action. If this site were to burn in a regional wildfire, it is unlikely that post-burn hazards or risks might occur on or adjacent to the site, including, landslides, rockfalls, or downstream flooding, due to the site being relatively level and an improved flood control channel is downstream of the site (i.e., north and northeast). For additional discussion on landslides, see Threshold 7. iv under Geology and Soils. For additional discussion of flooding and runoff, see Threshold 10. c under Hydrology and Water Quality.

The City has standard conditions of approval (COAs) that require a project to comply with the City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on a review of tentative tract maps and plot plans. These COAs are determined during the City's development review process, including CEQA. Compliance with standard COAs is considered regulatory compliance and is not unique mitigation under CEQA.

In addition, the project includes hardscape and landscape improvements that would serve to stabilize the built environment. Based on this information, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Any impacts would be less than significant, and no mitigation is required.

21. MANDATORY FINDINGS OF SIGNIFICANCE:

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

21a. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 – , Appendix B - Biological Resources Assessment (BRA), VCS Environmental, April 1, 2024, FPEIR 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, and site-specific Cultural Resources Survey Update by CRM Tech on April 15, 2024)***

Less Than Significant with Mitigation Incorporated. Potential impacts related to the habitat of fish or wildlife species were discussed in the Biological Resources Section of this Initial Study and were all found to be **less than significant with mitigation incorporated** (see below). Additionally, potential impacts to cultural, archaeological, and paleontological resources related to major periods of California and the City of Riverside's history or prehistory were discussed in the Cultural Resources Section of this Initial Study and were found to be less than significant with mitigation incorporated (see below).

<u>Biological Resources Mitigation Measures and Standard Conditions</u>

- Standard Condition- Pre-Construction Burrowing Owl Clearance Survey.
- Standard Condition- Nesting Birds Survey

<u>Cultural Resource Mitigation Measures and Standard Conditions</u>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
▪ CUL-1 -Native American Tribe Notification. ▪ CUL-2 -Archaeological Monitoring. ▪ CUL-3 -Native American Monitor. ▪ CUL-4 -Treatment and Disposition of Cultural Resources. ▪ CUL-5 -Cultural Sensitivity Training. ▪ CUL-6-Non-Disclosure. ▪ Standard Condition-Discovery of Human Remains. <u>Geology and Soils Mitigation Measures:</u> ▪ GEO-1- Paleontological Resource Protection. <u>Noise Mitigation Measures</u> ▪ NOI-1-Construction Limits. <u>Tribal Cultural Resources Mitigation Measures and Standard Conditions:</u> ▪ CUL-1 Native American Tribe Notification. ▪ CUL-2 Archaeological Monitoring. ▪ CUL-3 Native American Monitor. ▪ CUL-4 Treatment and Disposition of Cultural Resources. ▪ CUL-5 Cultural Sensitivity Training. ▪ CUL-6 Non-Disclosure. ▪ Standard Condition-Discovery of Human Remains.				
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

21b. Response: ***(Source: FPEIR Section 6 – Long-Term Effects/Cumulative Impacts for General Plan 2025 Program)***

Less Than Significant Impact. With Mitigation Incorporated. The cumulative impacts analysis provided here is consistent with Section 15130(a) of the CEQA Guidelines in which the analysis of the cumulative effects of a project is based on two determinations: Is the combined impact of this project and other projects significant? If so, is the project's incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant? The cumulative impact must be analyzed only if the combined impact is significant, and the project's incremental effect is found to be cumulatively considerable (CEQA Guidelines §15130(a)(2) and (3)).

The analysis of potential environmental impacts in Section 4.0, Environmental Analysis, of this Initial Study concluded that the Project would have no impact or a less than significant impact for all environmental topics, apart from Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), Noise (construction), Tribal Cultural Resources, and Utilities and Service Systems (installation of facilities that involves disturbance of previously undisturbed land). For these resources, Mitigation Measures are required to reduce impacts to less than significant levels as discussed below.

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

Biological Resources

As discussed in Section 4, Biological Resources, of this Initial Study, the conditions within the Project site are consistent with the 2014 and 2019 surveys. The site does not support riparian habitat or any other sensitive natural community, and no candidate or sensitive species or suitable habitat for such species was present on the Project site. The Project is in compliance with the MSHCP and the City's Urban Forest Tree Policy Manual. The Habitat Assessment and burrowing owl survey also confirm the findings of the previous habitat assessments and focused burrowing owl studies. Done in 2014 and 2019. Although all of the studies determined that there is no habitat or no signs of burrowing owls on the property, because the project site is located within the MSHCP burrowing owl survey area, a 30-day pre-construction survey is recommended prior to the commencement of project activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding grading activities. This is included as a Standard Condition of Approval: Pre-Construction Burrowing Owl Clearance Survey.

There are several large mature trees such as citrus, avocado, sycamore, jacaranda, and pine that could support nesting birds within the Project site. Therefore, a Standard Condition of Approval: Nesting Birds Survey is recommended.

Cultural Resources

As discussed in Section 5, Cultural Resources, of this Initial Study, no "historical resources" are known to be present within the project area. However, in light of the recent discovery of the isolated metate in the project area from uncertain provenience and the presence of previously recorded prehistoric sites, Mitigation Measures MM CUL-1 through MM CUL-5, and Standard Condition of Approval: Human Remains are required.

Geology and Soils (Paleontological Resources)

As discussed in Section7, Geology and Soils, of this Initial Study, according to the prior CEQA documents prepared in 2014 and 2019, the project site is in an area considered sensitive for paleontological resources at depths below five feet. Therefore, Mitigation Measure MM GEO-1 is required.

Tribal Cultural Resources

As discussed in Section 18, Tribal Cultural Resources, of this Initial Study, the construction and operation of the Project could potentially impact tribal cultural resources. Mitigation Measures MM CUL-1 through MM CUL-6 and Standard Condition of Approval: Discovery of Human Remains.

Utilities and Service Systems

As discussed in Section 19 Utilities and Service Systems, of this Initial Study, the installation and construction of infrastructure facilities would result in earth moving that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. Potential impacts to these resources are mitigated by Standard Condition of Approval: Pre-Construction Burrowing Owl Clearance Survey, Standard Condition of Approval: Nesting Birds Survey, Mitigation Measures MM CUL-1 through MM CUL-6 Standard Condition of Approval: Human Remains, and MM GEO-1.

Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.

c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

21c. Response: ***(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)***

Less Than Significant with Mitigation Incorporated. Effects on human beings were evaluated as part of the of this Initial Study. Based on the analysis, potentially significant direct and indirect impacts on human beings could result from construction noise generated by construction equipment, Therefore, the following mitigation measure is required: MM NOI-1: Construction Limits

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Based on the preceding analysis, the Project's impacts would not be cumulatively considerable.				

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal.App.3d 1337 (1990).

Mitigation Monitoring and Reporting Program

Project: Warmington 49 SFR La Sierra-Victoria/TTM 38921 ***Date: May 9, 2024***

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
Biological Resources	**Standard Condition of Approval: Burrowing Owl Survey.** Prior to the commencement of ground-disturbing activities (i.e., earthwork, clearing, and/or grubbing), Step II surveys shall be conducted to determine the presence or absence of BUOW on the project site. The surveys shall be conducted following the County's survey protocol (2006). If BUOW is not detected during the Step II surveys, a pre-construction survey shall be conducted on the project site within 30 days prior to ground disturbance to determine the presence of BUOW. If the preconstruction survey is negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence and no further mitigation is required. If BUOW is observed on the project site during the Step II surveys, a Determination of Biologically Equivalent or Superior Preservation (DBESP) assessment shall be completed to ensure that the proposed alternative provides for the replacement of any lost functions and values of habitat. At least 90 percent of the area with long-term conservation value and BUOW pairs shall be conserved on-site if the project site (including adjacent areas) supports three or more pairs of BUOWs; supports greater than 35 acres of suitable habitat; and is non-contiguous with MSHCP Conservation Area lands. If BUOW is observed during the Step II surveys or the pre-construction survey, active burrows shall be avoided by the project following the CDFW's Staff Report on BUOW Mitigation (2012) or CDFW's most recent	Pre-construction survey within 30 days before ground disturbance, if required.	Planning Division Project Biologist	Clearance letter submitted to the City

[12] All agencies are City of Riverside Departments/Divisions unless otherwise noted.

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	guidelines. The project proponent shall inform the RCA of BUOW observations. A BUOW Protection and Relocation Plan (plan) shall be prepared by a qualified biologist, which must be sent for approval by RCA prior to initiating ground disturbance. The RCA will coordinate directly with CDFW as needed to ensure that the plan is consistent with the MSHCP and CDFW guidelines. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur outside of the nesting season (September 1 through January 31).			
Biological Resources	**Standard Condition of Approval: Nesting Birds Survey.** To the extent feasible, (i.e., earthwork, clearing, and grubbing) shall occur outside of the general bird nesting season for migratory birds. The general nesting season is February 15 through August 31 for songbirds and January 15 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory birds and raptors (January 15 through August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of construction activities. If construction is inactive for more than seven days, an additional survey shall be conducted. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and	Prior to the commencement of ground-disturbing activities, during nesting season.	Planning Division Project Biologist	Submittal of Nesting Bird survey to the City.

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	the nest is confirmed to no longer be active, or as determined by the qualified biologist. The biological monitor may modify the buffer or propose other recommendations to minimize disturbance to nesting birds.			
Cultural Resources	**MM-CUL-1 Notification of Changes to Project Design.** 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 resources 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. **MM-CUL-2: Archaeological** At least 30 days prior to application for a grading permit and before any tree removal, 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	Prior to the issuance of a grading permit, if there are any changes to the project site design and/or proposed grades.	Planning Division Public Works Department	Consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation.

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a. Project grading and development scheduling; b. The development of a schedule in coordination with the developer/applicant, the project archaeologist, and for designated Native American Tribal Monitors from the consulting tribes for tree removal, grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and project archeologist and Native American Tribal Monitors' authority to stop and redirect grading activities; c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation; d. In conjunction with the Archeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. e. Treatment and final disposition of any archeological and cultural and paleontological resources, sacred sites, if discovered on the project site; and f. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-5.			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	MM-CUL-3: Native American Monitor: 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: a. The treatment of known cultural resources; b. The treatment and final disposition of any tribal cultural resources, sacred sites, human remains, or archaeological and cultural resources inadvertently discovered on the Project site; c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities. 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. **MM-CUL-4 Treatment and Disposition of Cultural Resources:** Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: **1. Notification to City and Consulting Tribes:**: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. Consulting			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. **2. Inadvertent Finds Assessment.** 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. c.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. 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. 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.			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	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. **3. Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site shall require the approval of the Consulting Tribes and all resources subject to such removal must be thoroughly inventoried with a tribal monitor from each consulting tribe to oversee the process; and **4. Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Preservation-In-Place of the cultural resources, if feasible as determined through coordination between the project archeologist, developer/applicant, and consulting tribal monitor(s). Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources in perpetuity; b. Accommodate the process for on-site reburial of the discovered items with the consulting Native			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	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, with an exception that sacred items, burial good and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains and grave goods. Any reburial process shall be culturally appropriate. List of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV report shall be prepared by the project archeologist and shall be filled with the City under a confidential cover and not subject to a Public Records Request; c. If reburial is not feasible, 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; and d. Phase IV Report 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			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	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. **MM-CUL-5: Cultural Sensitivity Training:** The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report. **MM-CUL-6: Non-Disclosure.** 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.			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	A STANDARD CONDITION OF APPROVAL WILL INCLUDE THE FOLLOWING – CONSISTENT WITH STATE LAW: **Discovery of Human Remains:** In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in			

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply, and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)). a.			
Geology and Soils	**MM GEO-1: Paleontological Resources Protection.** If one or more fossils are discovered during construction, all ground-disturbing activities within 50 feet of the area of the find shall be ceased and the applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology (SVP) qualifications standards for the Project Paleontologist to oversee the documentation of the extent and potential significance of the finds as well as recovery efforts. Ground-disturbing activities may resume in the area of the finds at the discretion of the Project Paleontologist. If the fossils are significant per SVPs 2010 criteria, then paleontological monitoring shall be conducted on an as-needed basis for further ground-disturbing activities in the Project area.			
Noise	**NOI-1: Construction Limits.** During all project construction activities, the following actions shall be implemented: • Limit construction activities to those outlined in Municipal Code Section 7.35.020 subsection (G) which states…construction activities may not occur between 7:00 PM and 7:00 AM on	During all construction activities	Applicant/Contractor will implement actions as appropriate depending on activities in progress	A daily construction log will be maintained by the general contractor and the site is subject to unannounced monitoring by City Inspectors

Impact Category	Mitigation Measures or Standard Condition of Approval	Implementation Timing	Responsible Monitoring Party[12]	Monitoring/ Reporting Method
	weekdays, between 5:00 PM and 8:00 AM on Saturdays, or at any time on Sunday or a federal holiday. • Schedule the highest construction noise-generating activities away from noise-sensitive uses away from the east and south and more toward the north and west (i.e., toward the larger adjacent roads). • Prohibit and post signs prohibiting unnecessary idling of internal combustion engines (more than 3 minutes). • Locate all stationary noise-generating equipment such as air compressors and portable generators as far as practicable from noise-sensitive land uses. • Utilize "quiet" air compressors and other stationary equipment where feasible and available. • Designate a noise disturbance coordinator who would respond to neighborhood complaints about construction noise by determining the cause of the noise complaints and requiring the implementation of reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site.			

KPC EHS Consultants, LLC

Technical Memorandum

Kevin P. Carr, MS.

Date: March 29, 2024 **Revised June 6, 2024**

Re: EPC 24-01 Riverside La Sierra & Victoria Residential Project – Air Quality and GHG Technical Memorandum

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1.0 Purpose

The purpose of this memorandum is to document the results of the air quality (AQ) and greenhouse gas (GHG) emissions assessment as it relates to the potential environmental impacts associated with the construction and operation of the proposed Residential Project on approximately 9.91 acres gross acres.

Project Location & Description

1.1 Project Location:

The proposed project site is located in the City of Riverside, Riverside County, California on the southeast corner of the intersection of La Sierra Avenue and Victoria Avenue and is referred to as APN: 136-220-016.

1.2 Description:

The Applicant is proposing a project that includes 49 single-family residential units, 3,687 square foot water quality basin, interior roadway, driveways, utilities, and landscaping on an approximately 9.91-acre parcel.

2.0 Air Quality & Greenhouse Gas (GHG) Assessment

2.1 Determination of Significance:

The criteria used to determine the significance related to potential Project related air quality and greenhouse gas emission impacts is based on the California Environmental Quality Act (CEQA) Environmental Checklist, Appendix G Thresholds:

2.1.1 Air Quality / GHG Impacts:

Would the Project: Conflict with or obstruct implementation of the applicable air quality plan?

Would the Project: 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?

Would the Project: Expose sensitive receptors to substantial pollutant concentrations?

Would the Project: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Would the Project: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Would the Project: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

2.1.2 Air Quality Thresholds:

South Coast Air Quality Management District (SCAQMD) was created by the state legislature to facilitate compliance with the federal Clean Air Act and to implement the state air quality program. Toward that end, SCAQMD develops regulations designed to achieve these public health standards by reducing emissions from business and industry. The Project site is located within the South Coast Air Basin (SCAB) which is under the jurisdiction of the SCAQMD. Table 2.1-1 describes the regional significance thresholds established by the SCAQMD to meet national and state air quality standards.

Table 2.1-1: South Coast Air Quality Management District Regional Significance Thresholds

Pollutant	Emissions (Construction) (pounds/day)	Emissions (Operational) (pounds/day)
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550

Source: South Coast Air Quality Management District CEQA Air Quality Significance Thresholds, March 2015.

2.1.3 GHG Thresholds:

The City of Riverside adopted a Climate Action Plan (CAP) as part of the Restorative Growthprint Economic Prosperity Action Plan and Climate Action Plan in 2016, referred to as the Riverside Restorative Growthprint or RRG. The RRG represents 3 separate but integrated planning efforts including: Western Riverside Council of Governments (WRCOG) subregional Climate Action Plan (Subregional CAP), RRG – Economic Prosperity Action Plan (RRG-EPAP), and RRG – Climate Action Plan (RRG-CAP).

The City has adopted 2020 and 2035 emissions reduction targets with a 2020 target of a 15% reduction and 2035 target of 49% reduction form the 2010 baseline. To achieve the proposed targets the City developed local reduction measures. The local reduction measures in the RRG-CAP are organized into four major sectors:

- Energy (including electricity and natural gas consumption)
- Transportation and Land Use
- Water
- Solid Waste

The City however has not adopted aa qualitative significance threshold for determining a project's GHG emissions impacts. Therefore, the *SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plan*s proposed a screening level of 3,000 Metric Tons CO2 equivalent per year (MTCO2e/yr) for residential and commercial projects which has been accepted and used within the City of Riverside, the County of Riverside, and many cities within the South Coast Air Basin.

3.0 Environmental Impacts:

This section analyzes the proposed Project's potential Air Quality and GHG impacts for construction, operations, plan consistency, and cumulative effects.

3.1 Construction Emissions:

Construction emissions for the Project were estimated by using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.22, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the SCAQMD. Construction emissions are summarized in Table 3.1-1.

Construction emissions were based on CalEEMod Land Use for development of a 49 Single-Family dwelling unit Project. Construction was estimated for a 300-day construction schedule, with default values used for the schedule. Default values were used for each construction phase including site preparation, grading, building construction, paving, and architectural coating as well as defaults for off-road construction equipment. Peak emissions represent the highest value from the summer and winter modeling. SCAQMD significance thresholds were used for determining the project's impacts. All construction emissions are below the SCAQMD thresholds.

Table 3.1-1 - Summary of Peak Construction Emissions (No Mitigation)

Year/Season	Emissions (lbs/day)					
	ROG	NOX	CO	SOX	PM10	PM2.5
Construction 2024 (Summer)	3.74	36.0	34.4	0.10	9.49	5.47
Construction 2024 (Winter)	1.29	11.5	14.3	0.02	0.78	0.53
Construction 2025 (Summer)	30.0	10.7	14.5	0.02	0.71	0.47
Construction 2025 (Winter)	1.20	10.7	14.1	0.02	0.71	0.47
Maximum Daily Emissions	**30.0**	**36.0**	**34.4**	**0.10**	**9.49**	**5.47**
SCAQMD Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod 2022.1.1.22 Datasheets. (Appendix A).

3.2 Operational Emissions:

Operational emissions for the Project were estimated by using the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the SCAQMD. Operations emissions include stationary (residence emissions), mobile (transportation emissions), and area (on-going architectural coatings, consumer product use, landscaping maintenance emissions), default values were used . SCAQMD significance thresholds were used for determining the project's impacts Operation emissions are summarized in Table 2.3-1 for Summer Emissions and Table 2.3-2 for Winter Emissions. All operations emissions are below the SCAQMD thresholds.

3.2.1 Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using CalEEMod.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on assumptions provided in CalEEMod. In the case of the commercial uses proposed by the Project, no substantive on-site use of consumer products is anticipated.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

3.2.2 Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the air basin, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using CalEEMod.

3.2.3 MOBILE SOURCE EMISSIONS

Vehicles

Project-related operational air quality impacts derive primarily from vehicle trips generated by the Project. CalEEMod Version 2022.1.1.22 default values were used for the projects trip characteristics for operational truck and passenger vehicle totals.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates. The emissions estimates for travel on paved roads were calculated using CalEEMod.

Table 3.2-1 - Summary of Peak Operational Summer Emissions

Source	Emissions (lbs/day)					
	VOC/ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Source	1.85	1.56	14.4	0.03	3.06	0.79
Area Source	2.46	0.03	2.78	<0.005	<0.005	<0.005
Energy Source	0.03	0.44	0.19	<0.005	0.04	0.04
Total Maximum Daily Emissions	**4.33**	**2.03**	**17.3**	**0.04**	**3.10**	**0.83**
SCAQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod 2022.1.1.22 Datasheets. (Appendix A).

Table 3.2-2 - Summary of Peak Operational Winter Emissions

Source	Emissions (lbs/day)					
	VOC/ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Source	1.73	1.56	12.2	0.03	3.06	0.79
Area Source	2.21	-	-	-	-	-
Energy Source	0.03	0.44	0.19	<0.005	0.04	0.04
Total Maximum Daily Emissions	**3.96**	**2.12**	**12.4**	**0.04**	**3.10**	**0.83**
SCAQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod 2022.1.1.22 Datasheets. (Appendix A).

3.3 Greenhouse Gas Emissions (GHG):

GHG emissions for the Project were estimated by using the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the SCAQMD. As previously discussed, the SCAQMD significance threshold of 3,000 $MTCO_2e$/Year was used for determining the project's GHG emissions impacts. Construction and operation emissions are presented in Table 3.3-1 and summarized in Table 3.3-2. The GHG emissions for both construction and operations of the Project are estimated to below the 3,000 $MTCO_2e$/Year threshold.

Table 3.3-1 - Project Greenhouse Gas Emissions

Source		GHG Emissions MT/yr		
	N2O	CO2	CH4	CO2e
Mobile Sources	0.03	549	0.03	559
Area	< 0.005	0.84	< 0.005	0.85
Energy	< 0.005	186	0.02	186
Water/Wastewater	< 0.005	15.4	0.07	17.6
Solid Waste	0.000	4.00	0.40	14.0
Refrigerant				0.11
30-year Amortized Construction GHG				15.23
TOTAL			*Metric Tons / Year*	***792.79***
SCAQMD Threshold			[1]	**3,000**
Exceed Threshold?				**NO**

Source: CalEEMod 2022.1.1.19 Datasheets. (Appendix A).

Table 3.3-2 - Project Greenhouse Gas Emissions Summary

GHG Emissions Source	Annual Emissions Metric Tons	Annual Threshold Tons/Metric Tons	Exceeds Threshold?
Construction 2024	246	**3,000**	**NO**
Construction 2025	211	**3,000**	**NO**
Operations	777.56	**3,000**	**NO**

Source: CalEEMod 2022.1.1.19 Datasheets. (Appendix A).

3.4 Objectionable Odors:

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not propose any of the above-described uses. Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses.

[1] CalEEMod GHG Emissions for GHG CO2e is calculated in Metric Tons (MT) per year.

The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Additionally, the Project is required to comply with the provisions of SCAQMD Rule 402 "Nuisance" which was established to reduce odorous emissions into the atmosphere. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

3.5 Sensitive Receptors:

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as the following are land uses (sensitive sites) where sensitive receptors are typically located:

- Schools, playgrounds, and childcare centers
- Long-term health care facilities
- Rehabilitation centers
- Convalescent centers
- Hospitals
- Retirement homes
- Residences

Sensitive receptor locations are generally identified as facilities where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees typically are present for shorter periods of time, such as eight hours.

The closest sensitive receptors to the Project site are include residential uses around the Project site, as indicated in Table 3.5-1

Table 3.5-1 – Sensitive Receptor Locations

Closest Receptor	Distance from Project Site Boundary (feet)	Distance from Project Construction Center (feet)
Residence Southeast	75	425
Residence Northeast across Millsweet Pl	60	370
Residence – North across Victoria Ave.	175	500
Residential Southwest across La Sierra Ave.	115	450

Source: Google Earth Pro, March 25, 2024

The properties around the Project site are existing residential uses and as such the Project would be compatible with surrounding land uses and would not adversely impact sensitive receptors during operations.

Whenever a project would require use of chemical compounds that have been identified in SCAQMD Rule 1401; placed on CARB's air toxics list pursuant to Assembly Bill 1807 (AB 1807), Air Contaminant Identification and Control Act (1983); or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment (HRA) is required by the SCAQMD. Residential, commercial, and office uses do not use substantial quantities of TACs.

Guidance for conducting a Health risk Assessments (HRA), typically includes the following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet; and,
- A gasoline dispensing facility within 300 feet.

The Project is a residential development and does not produce toxic air emissions such as those generated by industrial manufacturing uses or uses that generate heavy-duty diesel truck emissions.

3.6 Localized Air Quality Impacts

The South Coast Air Quality Management District has established Localized Significance Thresholds (LST) which are used to determine whether a project may generate significant adverse localized air quality impacts for both construction and on-site operations. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be to be a receptor such as residential, hospital, convalescent facility where it is possible that an individual could remain for 24 hours If the calculated emissions for the proposed construction or operational activities are below the LST emission thresholds then the proposed construction or operation activity is not significant for air quality. (SCAQMD) The nearest sensitive receptors are residential homes located approximately 60 feet from the Project site boundary, 370 feet from the center of the site to the north of the project site.

The Project site is located in Source Receptor Area (SRA) #23 – Metropolitan Riverside County. The total daily disturbed acreage used for the Project is approximately 5-acres (this is the maximum acreage to be graded/disturbed per day) with the closest receptor at 25 meters (82 feet).

Table 3.6-1 identifies the maximum daily localized emissions thresholds that are applicable to the Project.

Table 3.6-1: Maximum Daily Localized Emissions Thresholds

Pollutant	Construction	Operations
Localized Thresholds (pounds per day)		
NO_X	270	270
CO	1,577	1,577
PM_{10}	13	4
$PM_{2.5}$	8	2

Source: Localized Thresholds presented in this table are based on the SCAQMD Final Localized Significance Threshold Methodology, July 2008.

Localized Construction Emissions

As shown in Table 3.6-2, using the CalEEMod Mitigated Construction Emissions which incorporates Rule 403 dust control measures, the localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions for construction activities with Rule 403 measures applied to the Project, including watering site 2 times per day, reducing speed on site, and street sweeping. Thus, a less than significant impact would occur for Project-related construction-source localized emissions and no mitigation is required.

Table 3.6-2: Summary of Localized Significance Construction Emissions

Grading Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	36.0	34.4	9.49	5.47
SCAQMD Localized Threshold	**270**	**1,577**	**13**	**8**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: Air Quality Assessment, (Appendix A).

Localized On-Site Operational Emissions

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes substantive stationary sources of emissions, or uses that attract mobile sources that may spend long periods queuing and idling at the site (e.g., industrial uses, transfer facilities, and warehouses). The Project does not propose or require uses that would constitute substantive stationary sources of emissions; or uses that attract mobile emissions sources that may spend long periods queuing and idling at the site. Accordingly, no operational-source emissions LST analysis is required.

3.7 CO "Hotspot" Analysis:

As discussed below, the Project would not result in potentially adverse CO concentrations or "hotspots." Further, detailed modeling of Project-specific carbon monoxide (CO) "hot spots" is not needed to reach this conclusion.

The SSAB is designated attainment under the CAAQS and NAAQS for CO. An adverse CO hotspot would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour

standard of 9 ppm were to occur.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. Due to changing regulations vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in Basin have steadily declined.

The SCAQMD, as part of their 2003 AQMP, conducted modeling for CO Hotspot Analysis at multiple congested intersections in their South Coast Air Basin, including the intersection of Wilshire Boulevard and Veteran Avenue, considered one of the most congested intersections in Southern California with an ADT of approximately 100,000 vehicles. The CO concentrations modeled by the SCAQMD's analysis identified all traffic induced CO levels below Federal and State thresholds. As the CO hotspots were not modeled at an intersection that accommodates over 100,000 vehicles per day, it can be reasonably deduced that CO hotspots would not be experienced at any intersections in the vicinity of the proposed project.

Given the extremely low level of CO concentrations in the project area and no project-traffic related impacts at any intersections, project-related vehicle emissions are not expected to result in the CO concentrations exceeding the State or federal CO standards.

3.8 Cumulative Impacts:

The project area is designated as a non-attainment area for ozone and a non-attainment area for PM2.5 and PM10. The Project would comply with the mandatory requirements of SCAQMD's Rule 403 (fugitive dust control) during construction, as well as all other adopted AQMP emissions control measures. The project also is required to comply with California Code of Regulations Title 13, Division 3, and specifically its Chapter 1, Article 4.5, Section 2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles" and its Chapter 10, Article 1, Section 2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling." Per SCAQMD rules and mandates, and California Code of Regulation requirements, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements are imposed on all projects in the South Coast Air Basin.

In determining whether the project would 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors), the non-attainment pollutants of concern for this impact are ozone and PM10. In developing the thresholds of significance for air pollutants disclosed above the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As shown in Tables 3.1-1, 3.2-1, 3.2-2, 3.3-1, 3.3-2, and 3.6-2 above, the project does not exceed the identified significance thresholds, as such, emissions would not be cumulatively considerable.

3.9 Conformity and Consistency:

The following analysis is consistent with the preferred analysis approach recommended by the SCAQMD *CEQA Air Quality Handbook.*

3.9.1 Conformity with Air Quality Management Plans: The Project is located within the SCAB and under the jurisdiction of the SCAQMD. Under the Federal Clean Air Act, the SCAQMD has adopted a variety of attainment plans (i.e., "Air Quality Management Plans") for a variety of non-attainment pollutants. A complete list of the various air quality management plans is available from the SCAQMD on their website at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

The SCAQMD is responsible for maintaining and ensuring compliance with the various Air Quality Management Plans. Conformity is determined based on the following criteria:

- A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).
- A project is conforming if it complies with all applicable SCAQMD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

3.9.2 Consistency with Emission Thresholds*:* As shown in Tables 3.1-1, 3.2-1, 3.2-2, 3.3-1, 3.3-2, and 3.6-2 the Project would not exceed SCAQMD significance thresholds for any criteria pollutant during construction or during long-term operation. Accordingly, the Project's air quality emissions are less than significant.

3.9.3 Consistency with Control Measures: The construction contractors are required to comply with rules, regulations, and control measures including but not limited to controlling Fugitive Dust (Rule 403), Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources (Rule 403.1), and the application of architectural coatings during building construction (Rule 1113).

3.9.4 Consistency with Growth Forecasts: The Project site's land use is designated as Low Density Residential (LDR), with a zoning of Single-Family Residential (R-1-1/2) with a maximum dwelling unit per acre of 2 du/ac. The R-1-1/2 zone would provide for development on the 8.81-acre site a maximum of 18 dwelling units. The Project will require a General Plan Amendment (GPA) and Change of Zone (CZ) which increases the number of units and estimated population growth as compared to the current land use land use designation and zoning. Therefore, the Project must be evaluated to determine if the Project's impacts would exceed the assumptions in the 2022 AQMP.

The projections in the AQMP for growth assumptions are based on the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is updated every four years with the current adopted plan being the 2020-2045 RTP/SCS. According to the 2020-2045 RTP/SCS the forecast for the City's population growth is estimated to at 19,000 residents and additional households at 5,500. The proposed Project would include the development of 49 single family dwelling units. According to the State of California Department of Fina*nce E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023* the City has an estimated 3.05 persons per household.[2] The project would therefore increase the current population by approximately 150 residents. The increase of 150 residents is well within the estimated 5,500 projected increase in residents and as such the Project would be consistent with the growth assumptions from the 2020-2045 RTP/SCS used in the SCAQMD plans.

4.0 Conclusion

Based on the assessment in Section 3.0 all estimated Project emissions for construction and operations are below the SCAQMD significance threshold levels and as such impacts to the environment for Air Quality and Greenhouse Gases are less than significant. Additionally, the proposed Project will not conflict with any air quality or GHG plans.

[2] California Department of Finance E-5 Spreadsheet, accessed: https://dof.ca.gov/forecasting/Demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/

APPENDIX A

La Sierra and Victoria Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	La Sierra and Victoria
Construction Start Date	7/2/2024
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.20
Precipitation (days)	19.2
Location	33.88781647329854, -117.46277661097534
County	Riverside-South Coast
City	Riverside
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5461
EDFZ	11
Electric Utility	City of Riverside
Gas Utility	Southern California Gas
App Version	2022.1.1.22

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Single Family Housing	49.0	Dwelling Unit	8.81	95,550	573,930	—	158	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.44	30.0	36.0	34.4	0.10	1.60	7.89	9.49	1.47	3.99	5.47	—	13,834	13,834	0.32	1.75	23.4	14,387
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.54	1.29	11.5	14.3	0.02	0.50	0.28	0.78	0.46	0.07	0.53	—	2,794	2,794	0.11	0.05	0.04	2,812
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.66	2.20	5.16	6.58	0.01	0.21	0.59	0.80	0.19	0.24	0.43	—	1,511	1,511	0.05	0.11	0.70	1,545
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.12	0.40	0.94	1.20	< 0.005	0.04	0.11	0.15	0.04	0.04	0.08	—	250	250	0.01	0.02	0.12	256
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	No

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.44	3.74	36.0	34.4	0.10	1.60	7.89	9.49	1.47	3.99	5.47	—	13,834	13,834	0.32	1.75	23.4	14,387
2025	1.45	30.0	10.7	14.5	0.02	0.43	0.28	0.71	0.40	0.07	0.47	—	2,807	2,807	0.11	0.05	1.37	2,826
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.54	1.29	11.5	14.3	0.02	0.50	0.28	0.78	0.46	0.07	0.53	—	2,794	2,794	0.11	0.05	0.04	2,812
2025	1.44	1.20	10.7	14.1	0.02	0.43	0.28	0.71	0.40	0.07	0.47	—	2,787	2,787	0.11	0.05	0.04	2,805
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.60	0.50	5.16	5.27	0.01	0.21	0.59	0.80	0.19	0.24	0.43	—	1,511	1,511	0.05	0.11	0.70	1,545
2025	0.66	2.20	4.93	6.58	0.01	0.20	0.13	0.33	0.19	0.03	0.22	—	1,266	1,266	0.05	0.02	0.27	1,275
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.11	0.09	0.94	0.96	< 0.005	0.04	0.11	0.15	0.04	0.04	0.08	—	250	250	0.01	0.02	0.12	256

2025	0.12	0.40	0.90	1.20	< 0.005	0.04	0.02	0.06	0.03	0.01	0.04	—	210	210	0.01	< 0.005	0.04	211

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.31	4.33	2.03	17.3	0.04	0.06	3.03	3.10	0.06	0.77	0.83	28.0	4,796	4,824	3.05	0.18	13.1	4,966
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.93	3.96	2.12	12.4	0.04	0.06	3.03	3.10	0.06	0.77	0.83	28.0	4,573	4,601	3.06	0.18	1.01	4,733
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.05	4.08	2.13	14.4	0.04	0.06	2.93	2.99	0.06	0.74	0.80	28.0	4,533	4,561	3.05	0.18	5.91	4,697
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.37	0.74	0.39	2.63	0.01	0.01	0.53	0.55	0.01	0.14	0.15	4.63	751	755	0.51	0.03	0.98	778
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.00	1.85	1.56	14.4	0.03	0.03	3.03	3.06	0.02	0.77	0.79	—	3,577	3,577	0.15	0.16	12.4	3,642
Area	0.26	2.46	0.03	2.78	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.43	7.43	< 0.005	< 0.005	—	7.46
Energy	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,122	1,122	0.09	0.01	—	1,126
Water	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106
Waste	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Total	2.31	4.33	2.03	17.3	0.04	0.06	3.03	3.10	0.06	0.77	0.83	28.0	4,796	4,824	3.05	0.18	13.1	4,966
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.88	1.73	1.68	12.2	0.03	0.03	3.03	3.06	0.02	0.77	0.79	—	3,361	3,361	0.16	0.17	0.32	3,415
Area	—	2.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,122	1,122	0.09	0.01	—	1,126
Water	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106
Waste	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Total	1.93	3.96	2.12	12.4	0.04	0.06	3.03	3.10	0.06	0.77	0.83	28.0	4,573	4,601	3.06	0.18	1.01	4,733

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.82	1.68	1.67	12.3	0.03	0.03	2.93	2.96	0.02	0.74	0.77	—	3,317	3,317	0.15	0.16	5.23	3,375
Area	0.18	2.38	0.02	1.90	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.09	5.09	< 0.005	< 0.005	—	5.11
Energy	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,122	1,122	0.09	0.01	—	1,126
Water	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106
Waste	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Total	2.05	4.08	2.13	14.4	0.04	0.06	2.93	2.99	0.06	0.74	0.80	28.0	4,533	4,561	3.05	0.18	5.91	4,697
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.33	0.31	0.30	2.25	0.01	< 0.005	0.53	0.54	< 0.005	0.14	0.14	—	549	549	0.03	0.03	0.87	559
Area	0.03	0.43	< 0.005	0.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.84	0.84	< 0.005	< 0.005	—	0.85
Energy	0.01	< 0.005	0.08	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	186
Water	—	—	—	—	—	—	—	—	—	—	—	0.63	14.8	15.4	0.07	< 0.005	—	17.6
Waste	—	—	—	—	—	—	—	—	—	—	—	4.00	0.00	4.00	0.40	0.00	—	14.0
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.11	0.11
Total	0.37	0.74	0.39	2.63	0.01	0.01	0.53	0.55	0.01	0.14	0.15	4.63	751	755	0.51	0.03	0.98	778

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314

Dust From Material Movemen	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.99	0.90	< 0.005	0.04	—	0.04	0.04	—	0.04	—	145	145	0.01	< 0.005	—	146
Dust From Material Movemen	—	—	—	—	—	—	0.21	0.21	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movemen	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.08	1.46	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	252	252	0.01	0.01	1.00	256
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.42	6.42	< 0.005	< 0.005	0.01	6.51
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.06	1.06	< 0.005	< 0.005	< 0.005	1.08
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	2.78	2.78	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	1.00	1.03	< 0.005	0.05	—	0.05	0.04	—	0.04	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.15	0.15	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.07	1.25	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	216	216	0.01	0.01	0.86	219
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.44	0.17	12.0	2.90	0.07	0.20	2.75	2.96	0.20	0.77	0.97	—	10,660	10,660	0.19	1.72	22.6	11,199
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.0	11.0	< 0.005	< 0.005	0.02	11.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.02	0.01	0.69	0.16	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	584	584	0.01	0.09	0.53	613
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.82	1.82	< 0.005	< 0.005	< 0.005	1.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.13	0.03	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	96.7	96.7	< 0.005	0.02	0.09	102

3.5. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	0.26	2.42	2.82	0.01	0.11	—	0.11	0.10	—	0.10	—	516	516	0.02	< 0.005	—	518
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.06	0.05	0.44	0.52	< 0.005	0.02	—	0.02	0.02	—	0.02	—	85.5	85.5	< 0.005	< 0.005	—	85.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.47	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	254	254	0.01	0.01	1.01	258
Vendor	0.01	< 0.005	0.18	0.06	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	163	163	< 0.005	0.02	0.46	170
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	1.11	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	233	233	0.01	0.01	0.03	236
Vendor	0.01	< 0.005	0.19	0.06	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	163	163	< 0.005	0.02	0.01	170
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.25	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	50.9	50.9	< 0.005	< 0.005	0.09	51.6
Vendor	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.0	35.0	< 0.005	0.01	0.04	36.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.42	8.42	< 0.005	< 0.005	0.02	8.54
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	0.01	6.07
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.35	5.44	0.01	0.18	—	0.18	0.17	—	0.17	—	999	999	0.04	0.01	—	1,003
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.79	0.99	< 0.005	0.03	—	0.03	0.03	—	0.03	—	165	165	0.01	< 0.005	—	166
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.08	1.36	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	249	249	0.01	0.01	0.91	252
Vendor	0.01	< 0.005	0.18	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	160	160	< 0.005	0.02	0.45	168
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	1.03	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	229	229	0.01	0.01	0.02	231
Vendor	0.01	< 0.005	0.18	0.06	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	160	160	< 0.005	0.02	0.01	168
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.04	0.45	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	96.5	96.5	< 0.005	< 0.005	0.16	97.8
Vendor	< 0.005	< 0.005	0.08	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	66.8	66.8	< 0.005	0.01	0.08	70.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.0	16.0	< 0.005	< 0.005	0.03	16.2
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.1	11.1	< 0.005	< 0.005	0.01	11.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.95	0.80	7.45	9.98	0.01	0.35	—	0.35	0.32	—	0.32	—	1,511	1,511	0.06	0.01	—	1,517
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.41	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	1.16	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.79	1.79	< 0.005	< 0.005	< 0.005	1.81
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	29.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	—	1.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	—	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	49.7	49.7	< 0.005	< 0.005	0.18	50.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.54	2.54	< 0.005	< 0.005	< 0.005	2.57
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.42	0.42	< 0.005	< 0.005	< 0.005	0.43
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	2.00	1.85	1.56	14.4	0.03	0.03	3.03	3.06	0.02	0.77	0.79	—	3,577	3,577	0.15	0.16	12.4	3,642
Total	2.00	1.85	1.56	14.4	0.03	0.03	3.03	3.06	0.02	0.77	0.79	—	3,577	3,577	0.15	0.16	12.4	3,642
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.88	1.73	1.68	12.2	0.03	0.03	3.03	3.06	0.02	0.77	0.79	—	3,361	3,361	0.16	0.17	0.32	3,415
Total	1.88	1.73	1.68	12.2	0.03	0.03	3.03	3.06	0.02	0.77	0.79	—	3,361	3,361	0.16	0.17	0.32	3,415
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.33	0.31	0.30	2.25	0.01	< 0.005	0.53	0.54	< 0.005	0.14	0.14	—	549	549	0.03	0.03	0.87	559
Total	0.33	0.31	0.30	2.25	0.01	< 0.005	0.53	0.54	< 0.005	0.14	0.14	—	549	549	0.03	0.03	0.87	559

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	563	563	0.04	0.01	—	566
Total	—	—	—	—	—	—	—	—	—	—	—	—	563	563	0.04	0.01	—	566
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	563	563	0.04	0.01	—	566
Total	—	—	—	—	—	—	—	—	—	—	—	—	563	563	0.04	0.01	—	566
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	93.3	93.3	0.01	< 0.005	—	93.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	93.3	93.3	0.01	< 0.005	—	93.7

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	558	558	0.05	< 0.005	—	560
Total	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	558	558	0.05	< 0.005	—	560
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	558	558	0.05	< 0.005	—	560
Total	0.05	0.03	0.44	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	558	558	0.05	< 0.005	—	560
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	< 0.005	0.08	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7
Total	0.01	< 0.005	0.08	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.5	92.5	0.01	< 0.005	—	92.7

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	2.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.26	0.25	0.03	2.78	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.43	7.43	< 0.005	< 0.005	—	7.46
Total	0.26	2.46	0.03	2.78	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.43	7.43	< 0.005	< 0.005	—	7.46
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer	—	2.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	2.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.03	0.03	< 0.005	0.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.84	0.84	< 0.005	< 0.005	—	0.85
Total	0.03	0.43	< 0.005	0.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.84	0.84	< 0.005	< 0.005	—	0.85

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106
Total	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106
Total	—	—	—	—	—	—	—	—	—	—	—	3.82	89.4	93.2	0.40	0.01	—	106
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.63	14.8	15.4	0.07	< 0.005	—	17.6
Total	—	—	—	—	—	—	—	—	—	—	—	0.63	14.8	15.4	0.07	< 0.005	—	17.6

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5
Total	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5
Total	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.5

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.00	0.00	4.00	0.40	0.00	—	14.0
Total	—	—	—	—	—	—	—	—	—	—	—	4.00	0.00	4.00	0.40	0.00	—	14.0

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.68	0.68
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.11	0.11
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.11	0.11

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	7/31/2024	8/14/2024	5.00	10.0	—
Grading	Grading	8/15/2024	9/12/2024	5.00	20.0	—
Building Construction	Building Construction	9/13/2024	8/1/2025	5.00	230	—
Paving	Paving	8/2/2025	8/30/2025	5.00	20.0	—
Architectural Coating	Architectural Coating	8/31/2025	9/28/2025	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45

Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	152	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	17.6	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	5.24	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT

Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	3.53	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	193,489	64,496	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	15.0	0.00	—
Grading	24,346	0.00	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	0.54

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction

Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	0.54	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	787	0.03	< 0.005
2025	0.00	600	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	463	467	419	166,816	4,237	4,282	3,838	1,528,042

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

193488.75	64,496	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	457,623	449	0.0330	0.0040	1,742,651

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	1,993,015	11,122,306

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	44.8	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

8. User Changes to Default Data

Screen	Justification
Land Use	Acreage per Riverside County Parcel Report Generated 3/23/24
Construction: Construction Phases	No demolition phase required
Operations: Hearths	No fireplaces or wood burning stove to be installed

VCS Environmental
EXPERTS IN STRATEGIC SOLUTIONS

April 1, 2024

To: Matthew Esquivel

From: Wade Caffrey

Subject: La Sierra and Victoria Project Biological Resources Assessment

This memo provides the results of a biological site visit conducted on March 22, 2024, by VCS biologist Vanessa Tucker within the approximately 8.8-acre La Sierra & Victoria Project located in the County of Riverside and confirms the results of the biological resources survey previously completed in 2014 by Victor M. Horchar and the burrowing owl survey conducted in 2019 by Gonzales Environmental Consulting, LLC. While general biological resources are discussed, the focus of this assessment is on those resources considered to be sensitive and to determine any changes in conditions from the prior studies. This letter report was prepared based upon the results of a literature review and field visit on March 22, 2024.

Project Information

The Project site is in the City of Riverside, Riverside County, California. The Project site is regionally accessible from State Route 91 (SR-91). Cross streets are Victoria Avenue (Ave) and La Sierra Ave. A Regional and Aerial Map are included as Figures 1 and 2, respectively. The Project site is located within Township 3 South, Range 6 West, and Section 25 of the United States Geological Survey (USGS) Topographic Map, 7.5 Minute Series, Riverside West Quadrangle, Assessor's Parcel Number 136-220-016.

The Project site is approximately 8.8 acres and sits on relatively topographically flat land, with elevations ranging from 820 feet above mean sea level (MSL) to 843 feet MSL. Previous land uses include agricultural purposes. A majority of the site contains orange groves with remnants of a modular office and an old playground structure. The site is surrounded by single-family residences to the north and west across Victoria Avenue and La Sierra Avenue respectively, as well as to the east and south. The Project is located approximately 2.8 miles northwest of Lake Mathews and approximately one mile northwest of undeveloped open space that is adjacent to Lake Mathews Estelle Mountain Reserve.

Past Biological Survey Efforts

The Environmental Checklist in the City of Riverside Planning Commission Memorandum for P19-0380 and P19-0480 (July 25, 2019) described the previous onsite biological resources as follows:

> *"Original Project: Less than Significant Impact / No Impact. The Original Project site is within the boundary of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); however, it is not within a Criteria Cell; is not classified as Public/ Quasi-Public (P/ QP) land; and it not within an identified Linkage. The Original Project site is within the MSHCP survey area for burrowing owl. As part of the 2014 Initial Study, a project-specific habitat assessment and focused burrowing owl study was prepared. The findings of these studies concluded that the Original Project was in compliance with the MSHCP and no candidate species, sensitive species, species of concern, or special status species or suitable habitat for such species were present on the Original Project site. Additionally, the Original Project site did not support riparian habitat or any other sensitive natural community. For these reasons, the 2014 Initial Study concluded that implementation of the Original Project would result in no impact with regard to candidate, sensitive or special status species; riparian habitat; the movement of native or migratory species; or conflict with the provisions of the MSHCP. The 2014 Initial Study concluded that due to the Original Project site being located within an urban built-up area and having a long history of severe site disturbance, implementation of the Original Project would not have a substantial effect on federally protected wetlands; therefore impacts would be less than significant. The 2014 Initial Study also concluded that impacts with regard to local policies protecting trees would be less than significant because the planting and maintenance of street trees proposed as part of the Original Project will be in compliance with the City's Urban Forest Tree Policy Manual.*
>
> *Revised Project: No Substantial Change from Previous Analysis. As with the Original Project, the Revised Project must be consistent with and comply with the provisions of the MSHCP and the City's Urban Forest Tree Policy Manual. Gonzales Environmental Consultant, LLC, conducted a burrowing owl survey in March 20192 (the 2019 survey) to determine if site conditions had changed since the 2014 surveys conducted for the Original Project. The results of the 2019 survey confirm the findings of the 2014 surveys; specifically, there is no suitable burrowing owl habitat; no owl burrows or burrowing owls present on the site or in adjacent areas. Additionally, there are no stock piles of material or areas that burrowing owls would be found. Thus, the 2019 survey concurred with the findings of the 2014 surveys. Because the 2019 survey confirmed the results of the earlier surveys and the Revised Project will comply with the MSHCP and City's Urban Forest Tree Policy Manual, the Revised Project will result in the same impacts as the Original Project."*

Survey Methods

Prior to the field visit, the following available literature and databases were reviewed to identify sensitive habitats and special status wildlife species, specifically burrowing owls (BUOW), in the vicinity of the study area:

- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) for special-status wildlife, sensitive plant communities and special status plants within a two-mile radius of the Project site.

- The Riverside Conservation Authority Multiple Species Habitat Conservation Plan (MSHCP) Online Mapper.
- City of Riverside, California Code of Ordinances Regarding the Removal of Trees on Private Property, Chapter 13.06 Vegetation Maintenance.

The field visit was conducted on March 22, 2024, by VCS biologist Vanessa Tucker. During the survey, the biologist walked the entirety of the Project site paying special attention to those areas that could host sensitive vegetation communities or had the potential to provide suitable habitat for special status plant species. Plant species were identified using plant field and taxonomical guides, such as The Jepson Manual: Vascular Plants of California, second edition (Baldwin et al. 2012).

The vegetation communities and habitat conditions were inspected to confirm the presence and habitat quality of the vegetation found onsite. Where appropriate, descriptions of vegetation communities from the Manual of California Vegetation (Sawyer et al. 2008) were also utilized. Any deviations from standard vegetation classifications were made on best professional judgment when areas did not fit into a specific habitat description provided by the Manual.

During the survey, VCS paid special attention to those habitat areas that appeared to provide suitable habitat for burrowing owls (*Athene cunicularia hypugaea*, BUOW). The methods used to detect and identify BUOW included direct sighting of BUOW and observation of key signs such as scat, tracks, burrows, nests, and calls.

Onsite soil conditions, topography, vegetative communities, and habitat quality were documented during the field surveys. All wildlife species encountered visually or audibly during the field survey were identified and recorded in field notes. Binoculars were used to aid in the identification of observed wildlife. Photographs were taken to document existing conditions within the study area. Photo pages are attached (Appendix A).

Results

Vegetation

The Project site is surrounded by single-family residences to the north and west across Victoria Avenue and La Sierra Avenue respectively, as well as to the east and south. A majority of the site contains orange groves with remnants of a modular office, an old playground structure, and undeveloped land in the southeast corner of the site. There are several large mature trees such as citrus, avocado, sycamore, jacaranda, and pine that could support nesting birds within the Project site. The vegetation observed within the Project site include:

- Citrus tree (*Citrus* sp.)
- Avocado tree (*Persea* sp.)
- Western Sycamore tree (*Platanus racemosa*)
- Jacaranda tree (*Jacaranda mimosifolia*)
- Pine tree (*Pinus* sp.)
- Red brome grass (*Bromus* sp.)

Jurisdictional Waters

During the field visit, no jurisdictional waters or water features were observed within the Project site. The results of the March 2024 survey confirm that the site conditions have not changed since the 2014 and 2019 surveys. The site does not support riparian habitat or any other sensitive natural community, and no candidate or sensitive species or suitable habitat for such species was present on the Project site.

Wildlife

CNDDB occurrences for coastal California gnatcatcher (CAGN, *Polioptila californica californica,* federally threatened, MSHCP covered), occur approximately 0.6 miles south of the site (CDFW 2024). However, no suitable habitat was observed within the Project site. Therefore, no focus surveys are required. In addition, CNDDB occurrences for Stephen's kangaroo rat (SKR, *Dipodomys stephensi*, MSHCP covered and federally threatened) occur approximately 0.5 miles southwest of the site (CDFW 2024). However, no suitable habitat was observed within the Project site. Riverside County Habitat Conservation Agency (RCHCA) requires a SKR mitigation fee because the Project site falls within Riverside County's SKR Plan Fee.

During the field visit, the following birds were observed/detected:

- Red-shouldered hawk (*Buteo lineatus*)
- House finch (*Haemorhous mexicanus*)
- Mourning dove (*Zenaida macroura*)
- Song sparrow (*Melospiza melodia*)
- White-crowned sparrow (*Zonotrichia leucophrys*)
- European starling (*Sturnus vulgaris*)
- House sparrow (*Passer domesticus*)
- Anna's hummingbird (*Calypte anna*)
- American crow (*Corvus brachyrhynchos*)

Burrowing Owl

No BUOW or active signs thereof (whitewash, pellets, etc.) were observed within the Project site. The results of the March 2024 survey confirm the findings of the habitat assessment and focused burrowing owl study conducted in 2014 by Victor M. Horchar and the burrowing owl survey conducted in 2019 by Gonzales Environmental Consulting, LLC, which reported no suitable burrowing owl habitat or evidence thereof is present within the Project site or surrounding areas.

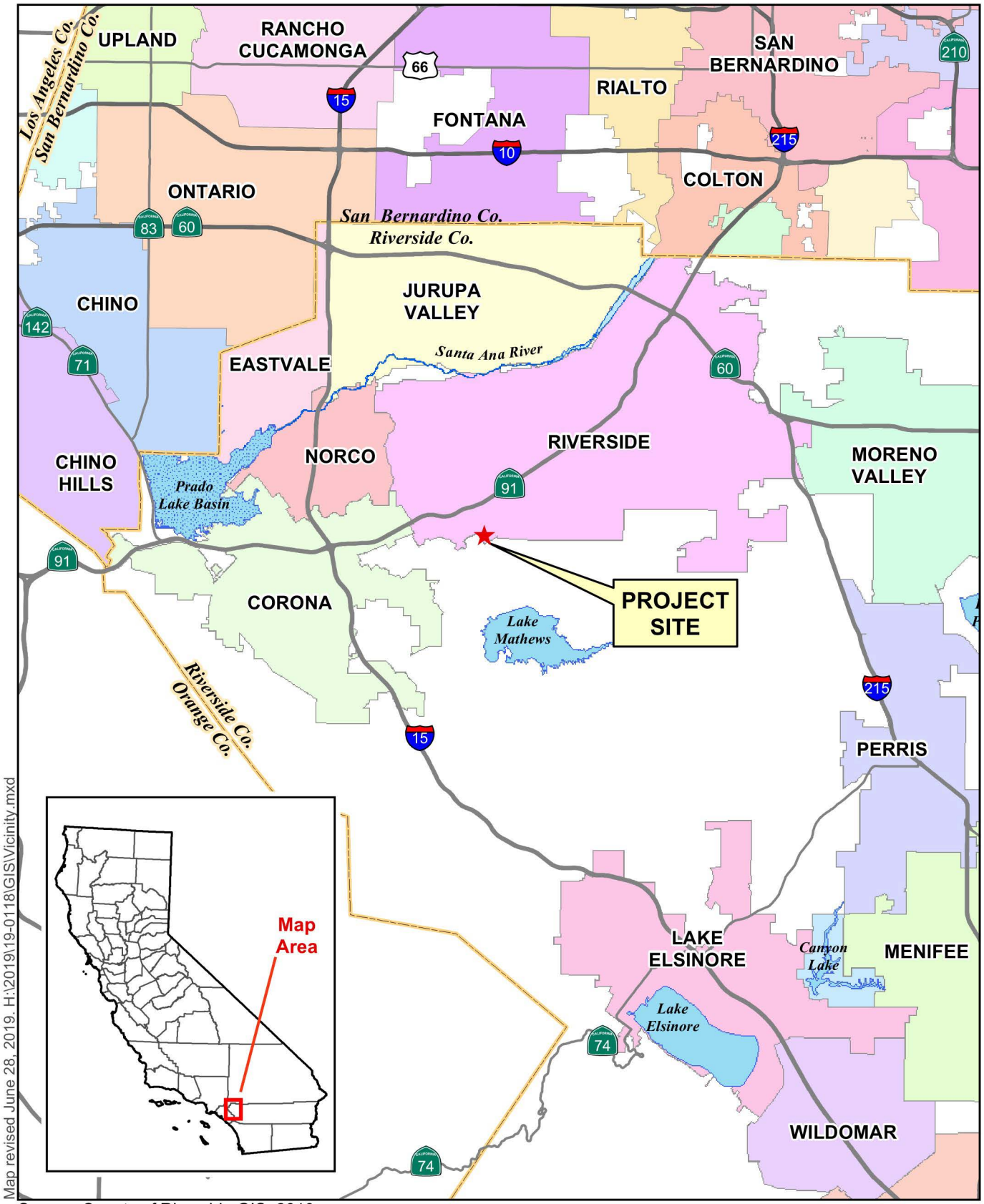
Conclusion

The conditions within the Project site are consistent with the 2014 and 2019 surveys. The VCS Habitat Assessment and burrowing owl survey confirms the findings of the previous habitat assessments and focused burrowing owl studies. A 30-day preconstruction survey is required pursuant to the MSHCP.

Additionally, we recommend a pre-construction nesting bird survey be conducted 3-days before the start of the Project if project clearing/grubbing and/or grading is initiated between February 15 and September 15 to avoid impacts to nesting birds, pursuant to the federal Migratory Bird Treaty Act (MBTA).

The site does not support riparian habitat or any other sensitive natural community, and no candidate or sensitive species or suitable habitat for such species was present on the Project site. The Project is in compliance with the MSHCP and the City's Urban Forest Tree Policy Manual.

Please do not hesitate to contact me with any questions at WCaffrey@vcsenvironmental.com or 949.234.6076.



Map revised June 28, 2019. H:\2019\19-0118\GIS\Vicinity.mxd

Source: County of Riverside GIS, 2019

Figure 1 – Regional Map

P19-0380 (TTM 37764)/P19-480 (VR)

0 2 4 6 Miles

ALBERT A. WEBB ASSOCIATES

Sources: Riverside Co. GIS, 2019;
USDA NAIP, 2016.

Figure 2 - Aerial Map

P19-0380 (TTM 37764)/P19-480 (VR)

0 250 500 750 Feet

ALBERT A. WEBB ASSOCIATES

Photo 1: West-facing view of the northern portion of the survey area off Millsweet Place.

Photo 2: Southwest-facing view of the southern portion of the Project site.

Appendix A

Photo 3. West-facing view of the middle portion of the Project site.

Photo 4. North-facing view of middle portion of the Project site depicting the citrus orchard in the background.

Appendix A

Photo 5. North-facing view of middle portion of the Project site depicting developed land and large pine trees.

Photo 6. East-facing view of citrus trees on the southeast corner of the Project site.

CRM TECH
1016 E. Cooley Drive, Suite A/B
Colton, CA 92324

April 15, 2024

Matthew Esquivel, Senior Project Manager
Warmington Residential, Southern California Division
3090 Pullman Street, Costa Mesa, CA 92626

Re: Update to Cultural Resources Survey
Tentative Tract Map No. 37764, Assessor's Parcel No. 136-220-016
City of Riverside, Riverside County, California
CRM TECH Contract No. 4101

Dear Mr. Esquivel:

At your request, CRM TECH has completed an update to a previously completed cultural resources survey on approximately 8.8 acres of agricultural and former agricultural land in the City of Riverside, Riverside County, California. The subject property of the study, Tentative Tract Map No. 37764, consists of what is currently Assessor's Parcel No. 136-220-016, located on the easterly corner of La Sierra Avenue and Victoria Avenue, in a portion of the El Sobrante de San Jacinto land grant lying within T3S R6W, San Bernardino Baseline and Meridian (Figs. 1, 2).

The study is part of the environmental review process for the proposed subdivision of the property for single-family residential development. The City of Riverside, as the lead agency for the project, required the study pursuant to the California Environmental Quality Act (CEQA; PRC §21000, et seq.) and the City's Cultural Resources Ordinance (Title 20, Riverside Municipal Code). The purpose of the study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA (PRC §5020.1(j); Title 14 CCR §15064.5(a)(1)-(3)), that may exist in the project area.

Background

In 2014, McKenna et al. of Whittier, California, conducted a standard Phase I cultural resources survey for a proposed residential development project on the same parcel (McKenna 2014; see Attachment A). As a result of that study, a site of historical age was recorded that coincided with the entire project area. Designated 33-023901 (CA-RIV-11736H) in the California Historical Resources Inventory, the site represented an orange grove that had been cultivated on the property since 1902, along with associated irrigation features and a wind machine (*ibid.*:18-21). At the end of the 2014 study, McKenna (*ibid.*:28-39) concluded that Site 33-023901 did not meet any of the established significance criteria and thus did not qualify as a "historical resource" under CEQA. In 2019, McKenna et al. updated the 2014 study and again concluded that no significant cultural resources were present in the project area (McKenna 2019; see Attachment B). Since there had been no change to the property, however, no supplemental research or field investigations were performed at the time (*ibid.*).

Tel: 909 824 6400 Fax: 909 824 6405

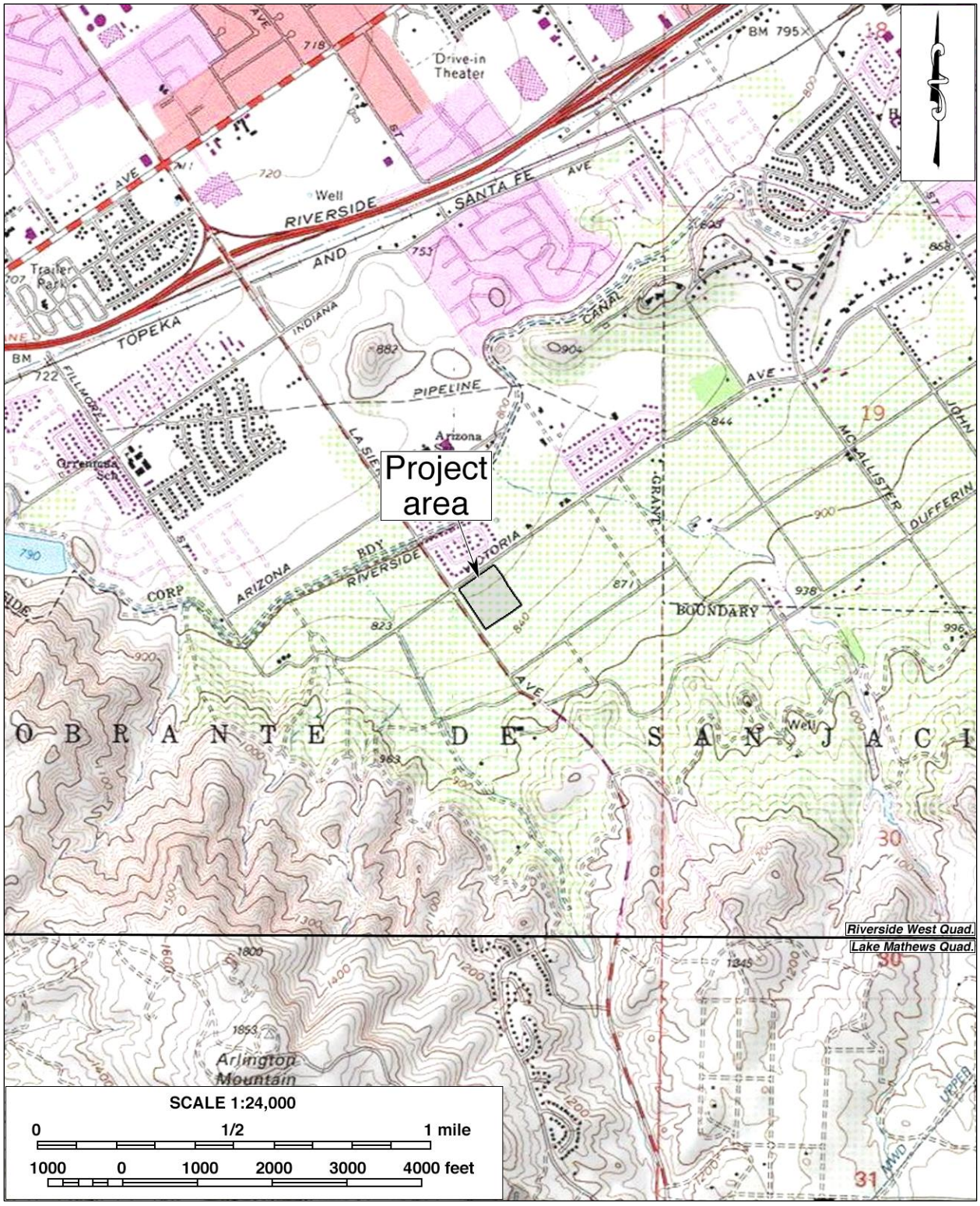


Figure 1. Project location. (Based on USGS Riverside West and Lake Mathews, Calif., 7.5' quadrangles)

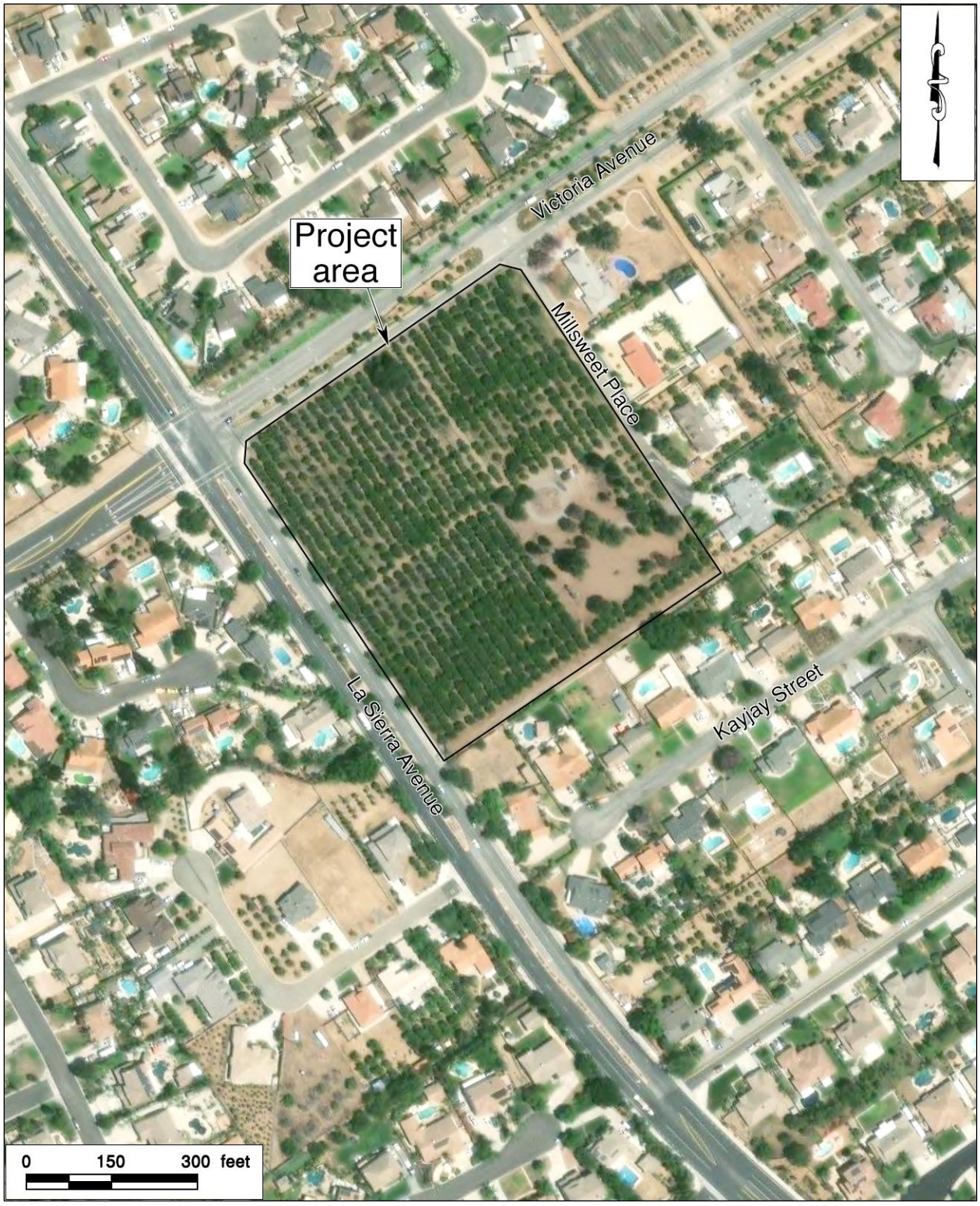


Figure 2. Recent satellite image of the project area.

As 10 years have passed since the last known fieldwork on this property, the present study was designed and implemented to update the findings of the 2014 study. Research procedures completed during this study included an update to the historical/archaeological resources records search, a Sacred Lands File search, supplemental historical background research, and a field inspection of the project area. A summary of the methods and results of these procedures is presented below, along with the final conclusion of the study.

Historical/Archaeological Resources Records Search

On February 8, 2024, CRM TECH archaeologist Nina Gallardo, B.A., completed the records search at the Eastern Information Center (EIC), University of California, Riverside. The results of the records search indicate that the 2014 McKenna et al. survey remains the only systematic cultural resources study within the project area (Fig. 3). Since the completion of that survey, the only study that has involved the project location or any of the adjacent properties is a linear survey along a water pipeline alignment within the La Sierra Avenue right-of-way, which also took place in 2014 (Fig. 3).

The records search further indicates that no additional cultural resources have been identified within or adjacent to the project area since 2014. Within a one-mile radius, the records search identified a total of 24 previously recorded cultural resources, an increase of 10 from the 14 resources reported in the 2014 McKenna et al. survey. None of these localities was found in the immediate vicinity of the project area, and thus none of them requires further consideration during this study.

Sacred Lands File Search

On February 7, 2024, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for an update to the Sacred Lands File search completed on the project vicinity during the 2014 study. In response, the NAHC stated in a letter dated February 28 that the Sacred Lands File identified no Native American tribal cultural resources in or near the project area. The NAHC recommended that local Native American groups be consulted for further information and provided a referral list of potential contacts for that purpose. The NAHC's reply is attached to this report in Attachment C for reference by the City of Riverside in future government-to-government consultations with the pertinent tribal groups, if necessary.

Historical Research

As a part of this study, CRM TECH archaeologist Hunter O'Donnell, B.A., pursued additional historical background research using sources not referenced in the 2014 study, primarily aerial and satellite photographs of the project area. Taken between 1931 and 2023, the aerial and satellite photographs are available from the Nationwide Environmental Title Research (NETR) Online website, the Google Earth software, and the Geospatial Collection of the University of California, Santa Barbara (UCSB).

The 2014 study established that the project area was used for horticulture at least by 1900-1902, and it found no evidence of any residential use of the property from historical maps or census data (McKenna 2014:11-13). Early aerial photographs of the property, however, show what appear to

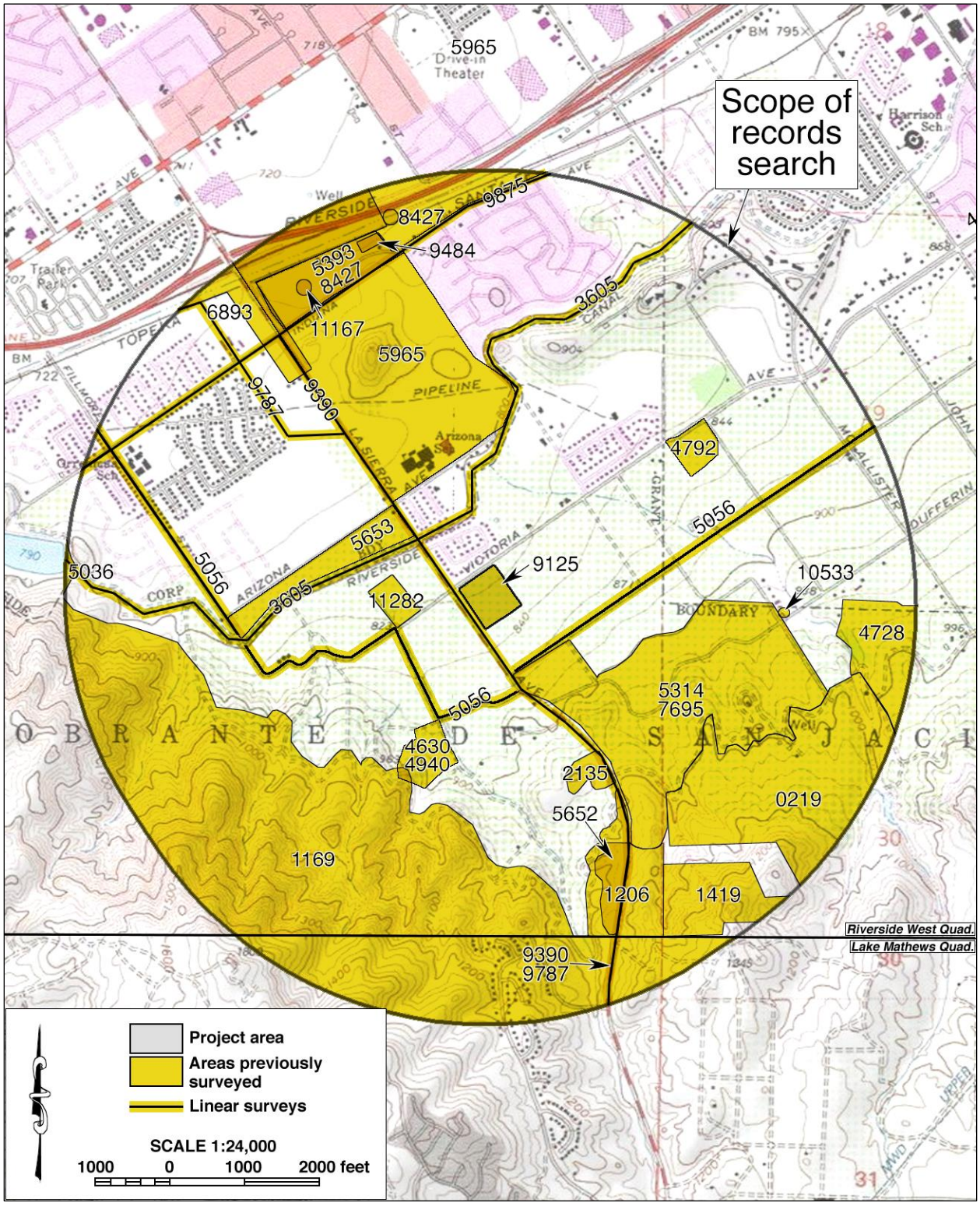


Figure 3. Previous cultural resources studies in the vicinity of the project area, listed by EIC file number. Locations of historical/archaeological resources are not shown as a protective measure.

have been a residence and an ancillary building near the western corner of the property in 1931 and 1938, just to the east of the intersection of La Sierra Avenue (historically Taylor Street) and Victoria Avenue (UCSB 1931; 1938). By 1948, both of these buildings had been removed, and trees had been planted in their place (NETR Online 1948).

After that, the project area was completely covered by the citrus grove until sometime between 1998 and 2002, when some of the trees in the easternmost portion of the parcel were removed (NETR Online 1948-2002; UCSB 1962; Google Earth 1994-2002). All of the built-environment features observed in that area during the 2014 survey, such as the play area and the paved driveway with a circular turnaround at the end, were built or installed over the next few years, along with a few sheds and what appear to have been trailers (NETR Online 2002-2009; Google Earth 2002-2009). Since then, most of the structures have been gradually removed (NETR Online 2009-2020; Google Earth 2009-2024).

Field Inspection

On March 13, 2024, Hunter O'Donnell carried out the field inspection of the project area. The survey was conducted at an intensive level by walking between the rows of orange trees in a series of parallel northwest-southeast transects spaced approximately 15 meters (50 feet) apart. Ground visibility was generally poor throughout the project area due to the accumulation of fallen leaves and areas of dense, low-lying vegetation growth (Fig. 4). Considering the extent of past ground disturbance in the project area, however, the ground visibility was deemed not to be a major hindrance to the survey efforts.

During the field inspection, a prehistoric (i.e., Native American) isolate was found adjacent to a concrete irrigation head in the citrus grove, consisting of a large portable granitic metate with two milling slicks on the surface (Fig. 5). The metate measures 60.7 x 38.5 x 21.2 centimeters, with one slick measuring 30.8 x 15.9 centimeters and the other 21.6 x 15.4 centimeters. Both slicks exhibit a moderate amount of polish with the high points noticeably worn down. At some point a cement mix was splashed on the artifact, probably during construction of the nearby irrigation line, resulting in more than 17 pieces of hardened concrete affixed to its surface, including within one of the slicks. Given the clear evidence of past disturbances to the ground nearby, the artifact is unlikely to be *in situ*. The isolate was recorded into the California Historical Resources Inventory under the temporary designation of 4101-1, pending assignment of a permanent identification number by the EIC (see Attachment D).

Site 33-023901 was found to be largely in the same condition as originally recorded in 2014, although the orange grove and its trees appeared to show signs of neglect, while the modern features in the eastern portion of the site, such as the driveway and the sheds, had fallen into disrepair. A notable discrepancy from the 2014 site record is the location of the master valve bearing the "SNOW MFG. CO., LA CAL" steel gate stamp. The site record indicates that it was found along Victoria Avenue, but the master valve encountered during the survey, which bears the same steel gate stamp and matches photographs in the 2014 documentation (Fig. 6), is located in the eastern corner of the property, 110 feet southeast of the end of Millsweet Place and 630 feet southeast of Victoria Avenue. It is possible that a second master valve was once located along Victoria Avenue but has since been removed, but it seems unlikely. An update to the 2014 site record is presented in Attachment D.

Figure 4. Current condition of the project area. (Photograph taken on March 13, 2022; view to the southeast)

Figure 5. Granitic metate recorded as Isolate 4101-1. (Photograph taken on March 13, 2024)

Figure 6. Master valve at the eastern end of Site 33-023901. (Photograph taken on March 13, 2024; view to the west)

No other cultural resources were encountered within the project boundaries during the field inspection, and no remnants of the buildings observed in the 1930s aerial photographs were found at their former locations. Scattered modern refuse was noted across the project area, but none of the items was of any historical/archaeological interest.

Conclusion and Recommendations

In summary of the research results presented above, Site 33-023901, consisting of the entire citrus grove in the project area and associated features, and Isolate 4101-1, consisting of a granitic metate, were the only cultural resources identified within the project area during this study. Site 33-023901 was previously determined not to be eligible for listing in the National Register of Historic Places or the California Register of Historical Resources or for local designation by the City of Riverside (McKenna 2014:28-39), and this study has not discovered any new information that would necessitate revisiting that conclusion. Therefore, the site does not appear to constitute a "historical resource" under CEQA provisions. Isolate 4101-1, a locality with fewer than three artifacts, by definition does not qualify as an archaeological site due to the lack of contextual integrity. As such, it does not meet the threshold of a potential "historical resource" and requires no further consideration in the CEQA compliance process.

Based on these considerations, the present study concludes that no "historical resources" are known to be present within the project area. Therefore, the final conclusion of the 2014 study that no known "historical resources" would be affected by the development of the property (McKenna 2014:39) remains valid and appropriate. However, in light of the recent discovery of the isolated metate in the project area from uncertain provenience and the presence of previously recorded prehistoric sites nearby (see McKenna 2014:16), CRM TECH recommends that all grubbing, grading, trenching, excavations, and other earth-moving activities reaching beyond the disturbed surface soil, generally speaking up to two feet in depth, be monitored by a qualified archaeologist to ensure the timely identification and, if necessary, protection of any buried deposits of prehistoric cultural remains. The monitoring program should be coordinated with the local Native American groups, who may wish to participate. Under this condition, CRM TECH further recommends that the proposed project may be cleared to proceed in compliance with the cultural resource provisions.

Thank you for this opportunity to be of service. Should you have any questions or need additional information, please feel free to contact our office.

Sincerely,

Daniel Ballester

Daniel Ballester, M.S.
Field Director, CRM TECH

References Cited

McKenna, A. Jeanette
2014 A Cultural Resources Investigation of Assessor Parcel No. 136-220-016, TTM 36317, Located in the City of Riverside, Riverside Co., California. On file, Eastern Information Center, University of California, Riverside. (See Attachment A)
2019 TTM No. 36317 @ La Sierra and Victoria, Riverside, Riverside Co., California. On file, Eastern Information Center, University of California, Riverside. (See Attachment B)

Google Earth
1994-2024 Aerial photographs of the project vicinity; taken in 1994, 2002, 2003-2006, 2009, 2011-2014, 2016-2020, and 2022-2024. Available through the Google Earth software.

NETR (Nationwide Environmental Title Research) Online
1948-2020 Aerial photographs of the project vicinity; taken in 1948, 1959, 1966, 1967, 1980, 1985, 1994, 1998, 2002, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020. http://www.historicaerials.com.

UCSB (University of California, Santa Barbara)
1931-1962 Aerial photographs of the project vicinity; taken in 1931, 1938, and 1962. https://mil.library.ucsb.edu/ap_indexes/FrameFinder/.

ATTACHMENT A

2014 CULTURAL RESOURCES STUDY

RI-9125

A CULTURAL RESOURCES INVESTIGATION OF ASSESSOR PARCEL NO. 136-220-016, TTM 36317, LOCATED IN THE CITY OF RIVERSIDE, RIVERSIDE CO., CALIFORNIA

Prepared for:

ADKAN Engineers
Attn: Charissa Leach
6879 Airport Drive
Riverside, California 92504

Prepared by:

McKENNA et al.
6008 Friends Avenue
Whittier, California 90601-3724
(562) 696-3852
jeanette.mckennaetal@gmail.com

Author and Principal Investigator: Jeanette A. McKenna, MA/RPA

August 1, 2014 FINAL
Job No. 01-14-08-1657

INFORMATION CENTER DATA

Title: A Cultural Resources Investigation of Assessor Parcel No. 136-220-016, TTM 36137, Located in the City of Riverside, Riverside Co., California

Authors: Jeanette A. McKenna, Principal

Consulting Firm: McKenna et al.
6008 Friends Avenue
Whittier, California 90601-3724
(562) 696-3852
jeanette.mckennaetal@gmail.com

Date: August 1, 2014

For Submittal to: City of Riverside
Community Development Department, Historic Preservation, Neighborhoods and Urban Design Division
3900 Main Street
Riverside, California 92501
(951) 826-5557

Prepared for: Adkan Engineers
Attn: Bryan Ingersoll
6879 Airport Drive
Riverside, California 92504
(951) 688-0241

USGS Quadrangle: Riverside West (1980)

Project Size: 8.8 Acres

Keywords: Riverside; Victoria Avenue; La Sierra Avenue; Moulton and Praed Subdivision; Arlington Heights; Orange Groves; Gage Canal; Windmills; Gabrielino; Luiseno; Cahuilla, Serrano

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