Community and Economic
Development Department, Planning Division

WEBB Associates
CEQA Scope of Services Proposal
For the Proposed Riverside Adventure Park and Mixed-Use Town Center Development

Updated May 27, 2025

CEQA Section 15183 Analysis

Albert A Webb Associates (WEBB) is pleased to submit this scope of services for the preparation and processing of a California Environmental Quality Act (CEQA) Section 15183 analysis and documentations of findings related to a CEQA Section 15183 exemption determination. This work will include all noticing requirements, pursuant to the requirements of Section 15183 as well as participation in and support of the public process in accordance with the CEQA as well as City of Riverside policies and procedures for the proposed Riverside Adventure Park and Mixed-Use Town Center Development described below.

The Project consists of approximately 126-acres of indoor/outdoor recreational facilities and a mixed-use town center development, consisting of residential, hotel, grocery store, and commercial retail including associated infrastructure improvements ("Project"). The entitlements expected include Minor Conditional Use Permit, Site Plan Review and/or Design Review, Development Agreement and other entitlements identified by the City.

The project site is located on the northeast corner of Main Street and Columbia Avenue, consisting of the former Riverside Golf Club located at 1011 North Orange Street in Riverside, CA. The site is approximately 126 acres and includes the following Assessor Parcel Numbers (APNs), subject to refinement, 246-060-011, 206-070-002, and 206-070-003. The project site was developed as golf course and includes an existing clubhouse and parking area along Orange Street. The site also includes existing Riverside Fire Station No. 6 within the Project boundary. However, the Project does not include changes or development to Fire Station No. 6 as part of the Project.

While the Project is not located within any Airport Land Use Compatibility Zones that would require review by the County of Riverside Airport Land Use Commission, the site does lie within

the March Air Reserve Base Federal Aviation Regulations (FAR) Part 77 Military Outer Horizontal Surface Limits which may require an review by Federal Aviation Administration to review height of any structures in conjunction with FAR Part 77 requirements. The proposed uses are assumed to be consistent with the uses allowable within their respective Planning Areas designated as Open Space, Parks & Trails (OS) and Northside Village Center (NVC) of the Northside Specific Plan. As such, a Specific Plan Amendment, General Plan Amendment, and Rezone are not anticipated to be required, and are not included in this scope of work. The following public hearings are expected: Planning Commission and City Council. The completion of the CEQA process is expected to take approximately 12 months, with target completion date of June 2026.

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 – "Projects Consistent with Community Plan or Zoning" provides an exemption process from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. The City adopted the Northside Specific Plan on November 17, 2020, which established land use regulations applicable to the subject site. As part of that approval, the City certified the Program EIR for the Northside Specific Plan. The proposed project is consistent with the Northside Specific Plan as it relates to the project sites.

Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) are peculiar to the project or the parcel(s) on which the project would be located; (2) were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (3) are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or (4) are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely based on that impact.

Considering the Proposed Adventure Park and Mixed Use Town Center Project (Project) is designed to be consistent with the Northside Specific Plan (NSP) which included an Environmental Impact Report (EIR) which was certified by the City in 2020, use of Section 15183 exemption could be the most prudent method to obtain CEQA compliance for the Project.

The anticipated scope of work using this exemption would be as follows:

WEBB shall prepare the following technical analysis to determine whether the environmental effects of the Project: (1) are peculiar to the project or the parcel(s) on which the project would

be located; or (2) were not analyzed as significant effects in a prior EIR on the zoning action including the Northside Specific Plan, general plan, or community plan, with which the project is consistent; (3) result in potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action including the Northside Specific Plan; or (4) are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

WEBB shall also determine whether there are any new significant environmental impacts that are not peculiar to the parcel or to the proposed project, or that have been addressed as a significant effect in the prior EIR, or that can be substantially mitigated by the imposition of uniformly applied development policies or standards. In this context, WEBB shall complete the following tasks:

Task 1: Project Set Up Coordination/Kick-Off Meeting

WEBB will work to coordinate with the City and Applicant on the setup of the Project; this task will include WEBB's efforts to ensure proper scope and tasks have been identified. WEBB will attend a kick-off meeting with City staff, the applicant, and other sub-consultants at Riverside City Hall to discuss the environmental analysis and CEQA 15183 Exemption process. WEBB will prepare an agenda for the kick-off meeting and a draft schedule (using Microsoft Project) for review. The kick-off meeting will include a discussion of the Project Description, baseline, objectives, and analysis for CEQA 15183 exemption process and analysis. WEBB will prepare meeting minutes and a revised schedule and distribute to the City and applicant team.

Objectives of the kick-off meeting are as follows:

- Outline Project Description
- Explore community concerns regarding the proposed uses
- Establish lines and preferred methods of communication between WEBB, the City, and the applicant
- Identify stakeholders (City departments, governmental agencies, and other parties) whose involvement in the CEQA process will be vital to successfully complete the EIR
- Discuss the scope of the CEQA Exemption analysis and identify areas of potential controversy.
- Obtain relevant schedules, plans, applicant-provided technical reports, and studies applicable to the proposed projects.
- Finalize the preliminary project schedule and discuss review periods and key milestones

Task 1 – Deliverables

- Kick-off Meeting – Virtual or In Person at City Hall (Scheduled by the City)
- Electronic copies (MS Word and Adobe PDF) of Meeting Agenda and Draft Project Schedule
- Electronic copies (MS Word and Adobe PDF) of Meeting Minutes and Revised Project Schedule (in Adobe PDF)

Task 2: Preparation of Project Description

WEBB will prepare a comprehensive project description that reflects the current plans (grading plans, site plan, elevations, fencing plan, landscape plans, etc.), off-site infrastructure improvements (i.e. traffic signals, water and sewer pipeline extensions, power pole relocations), construction description and schedule, hours of operations, if a spec building, anticipated number of employees, etc., and required discretionary approvals. Exhibits will be prepared to illustrate the information above. The project description, based on the current plans listed above provided by the Applicant will be provided to the City and Applicant for review and comment. WEBB will revise the project description to address all City and applicant comments using tracked changes.

Task 2 – Deliverables

- Electronic copies (MS Word and Adobe PDF) of the draft, revised, and final Project Description
- Electronic copies (Adobe PDF) of pertinent exhibits

Task 3: Technical Studies

Subtask 3.1: Cultural Resources Report

South Environmental will prepare a cultural resources report; the report will summarize the results of the records search, background research, survey, historic significance evaluations, and results. The report will also discuss the proposed project description, regulatory framework, all sources consulted, recommendations for appropriate management, and analysis of the proposed project's potential to impact historical and archaeological resources under CEQA Guidelines Section 15064.5. We assume no hard copies are required. Details of the report components are provided below:

3.1.1: Historic Built Environment Resources

In accordance with MM-CUL-1, a "qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) shall record and evaluate any properties over 45 years old that have not been previously evaluated or require evaluation updates due to the passage of time or changes to baseline conditions." Based on a review of the Cultural Resources section of the Northside Specific Plan Program EIR (specifically Subareas 8 and

9) and a cursory review of historic aerial photographs, two resources over 45 years old have the potential to be impacted by the proposed project: the former Spring Brook Golf Club property and Reid Park, both of which were developed in the 1960s and identified as requiring additional study in the EIR. The following will be completed:

- **Built Environment Survey:** two qualified architectural historians will survey the former golf course property and Reid Park, taking detailed notes and photographs of all buildings, structures, and landscaping elements. The survey will take no more than one day to complete.
- **Property Evaluations:** a qualified architectural historian will review the results of the California Historical Resources Information System (CHRIS) records search; applicable records at local libraries, archives, and historical societies; all available building permits and construction documents to determine the nature and extent of alterations made to the properties over time; and will also review all applicable local planning documents. The properties will be recorded and evaluated on the required State of California Department of Parks and Recreation Series 523 Forms (DPR forms). All DPR forms will be included as an appendix to the cultural resources report. We assume no more than two drafts and one final version of the report will be required. It is assumed that no more than two properties will require evaluation for historical significance. Should additional property evaluations be required, we will work with you to augment this scope of work and costs.

3.1.2: Archaeological Resources

In accordance with MM-CUL-4, "A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall record and evaluate archaeological resources that have not been previously evaluated, or require evaluation updates due to the passage of time or changes to site conditions; this mitigation measure also applies to any archaeological resource discovered as a result of project ground-disturbance activities." Based on a review of the Cultural Resources section of the Northside Specific Plan Program EIR (specifically Subareas 8 and 9), the following will be completed:

- **CHRIS Records Search:** South Environmental will complete an updated CHRIS records search of the project site and a 0.25-mile radius at the South Coastal Information Center (SCIC), which houses cultural records for Riverside County. The purpose of a records search is to identify any previously recorded cultural resources; review historical maps of the project site; review the Archaeological Determinations of Eligibility lists; and gather information on ethnographies. In addition, South Environmental will review the lists for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and the lists of California State Historical Landmarks, and California Points of Historical Interest. We assume the direct costs associated with the records search will not exceed $500.
- **Native American Scoping:** South Environmental will contact the California Native American Heritage Commission (NAHC) for a review of their Sacred Lands File. The

NAHC will determine if any NAHC-listed Native American Sacred Lands are located within or adjacent to the project site. In addition, the NAHC will provide a list of Native American contacts for the project who should be contacted for additional information. If requested by the City, South Environmental will prepare and email a letter to each of the NAHC-listed contacts, requesting that they contact us if they know of any Native American cultural resources within or immediately adjacent to the project site. Assistance Assembly Bill 52 of 2014 government-to-government consultation is not included in this scope of work but can be provided if desired.

- **Archaeological Survey:** Three qualified archaeologists will conduct a pedestrian using parallel transects spaced no more than 10 meters apart. We assume the archaeological survey can be completed within one day and that it will be negative for archaeological resources (i.e., no newly discovered archaeological resources will be encountered, and no previously recorded resources will require updates). No artifacts, samples, or specimens will be collected during the survey. Should any archaeological resources be identified as a result of the records search or survey requiring recordation or collecting, we will work with you to augment this scope of work and associated costs.

Task 3.1 – Deliverables

- Draft and Final versions of the Cultural Resources Report (Adobe PDF).

Task 4: Technical Study – Peer Review

Our understanding is that the Applicant will contract directly the technical studies needed for the CEQA document. The following studies will be provided to WEBB in PDF and WORD versions; WEBB will provide comments/request edits via Track Changes in WORD. Any resource spatial data requested by WEBB shall be provided in usable, accurate Shapefiles. Extended coordination between WEBB and Applicant's subconsultants is not included the costs included herein.

Subtask 4.1: Peer Review – Biological/MSHCP Studies

WEBB will peer review the following biological resources studies expected to be prepared for the Project:

- Biological Resources Assessment (BRA)/MSHCP Compliance Report
- Focused Burrowing Owl Surveys
- Crotch's Bumble bee Surveys
- Jurisdictional Delineation
- DBESP
- Narrow Endemic Plant Survey Report (If determined needed by BRA)
- Riparian Bird Surveys Report (If determined needed by BRA)
- Fairy Shrimp Survey Reports (if determined needed by BRA)

Subtask 4.2 – Peer Review – Vehicular Miles Traveled Analysis

WEBB understands the Applicant will contract directly for the preparation of the VMT full analysis needed to support the CEQA documentation. Our scope assumes the report received will clearly outline methodologies, assumptions and report data in the terms of the City's approved VMT Guidelines. The Applicant's consultant shall provide their report to WEBB in a full PDF format along with a WORD document. WEBB will provide comments/required edits via Track Change feature in the WORD document. Extended coordination to obtain the requested information from the Applicant's subconsultant is not included in the budgets provided herein.

Task 4 – Deliverables

- Electronic copies (MS Word) of comments and edits as applicable to each study.

Task 5: Supporting Document for CEQA Section 15183

In order to support the findings for Section 15183 for the Project, WEBB would prepare a Supporting Document that would address each issue area and document how the Project does not create a "peculiar" effect or change the significance determinations in the NSP EIR. The format of this document is proposed to be similar to an initial study where each issue area will be evaluated against the previous NSP EIR analysis and with the use of technical studies where appropriate, documentation as to how the Project fulfills the findings of Section 15183 will be documented. This task includes one Administrative Draft and one Draft "final" Supporting Document. Edits will be provided by the City and Applicant teams in one combined document utilizing Track Changes feature. Multiple document versions coming from all the reviewing entities could result in the need for additional budget authorizations.

Task 5 – Deliverables

- Electronic copies (MS Word and/or Adobe PDF) of the Final Supporting Document

Task 6: Public Hearings

WEBB will attend public hearings held for the proposed Project. These hearings are anticipated to include one (1) Planning Commission meeting, and up to one (1) City Council meeting. The WEBB Project Manager will be prepared to answer technical questions related to the CEQA document and relevant comments on the CEQA document raised during the public hearing meetings. We have included budget for five (5) hours per WEBB team member for pre-meetings to coordinate responses to potential questions with City Team, Consultant's Team, and Applicant's Team.

Task 6 – Deliverables

- Attendance at up to two (2) Project hearings (Planning Commission and City Council)
- Attend one (1) meeting with the City/applicant team before each public hearing

Task 7: CEQA Determination Notice

WEBB will prepare appropriate CEQA determination notice to meet CEQA and the City's requirements. WEBB will address City comments on the CEQA determination notice and will provide the City with the final versions. WEBB will incorporate 1 round of comments to the satisfaction of the City. In the event the City's comments/requested revisions are not addressed, then the round of review does not count. WEBB will file the CEQA determination notice with the County Clerk and LUCI and provide proof of filing to the City. The City shall provide the CEQA notice and receipt of filing fees.

Task 7 – Deliverables

- Electronic copies (MS Word and/or Adobe PDF) of the draft and final versions of notice
- File CEQA determination notice with County Clerk.

Task 8: Project Management and Coordination

Subtask 8.1: Project Management and Coordination

WEBB will coordinate with the City and applicant, technical staff, and support staff, toward the timely completion of the CEQA 151583 exemption. WEBB will participate in bi-weekly conference calls with the City and applicant for the duration of completing Tasks 1-8 and provide status updates as needed, assumes 12 months. If the CEQA process schedule extends beyond 12 months, additional budget will likely be required.

Subtask 8.2: Bi-Weekly Progress Conference Calls

WEBB will coordinate with the City and applicant, technical staff, and support staff, toward the timely completion of the CEQA 15183 exemption documents. WEBB will participate in bi-weekly conference calls with the City for the duration of completing scope of work outlined herein, assumes 12 months.

WEBB will prepare agendas and memorandums of meeting minutes for the bi-weekly calls. WEBB will provide monthly invoices which include the itemized task list contained herein. The monthly invoices will be detailed and include the current months charges, invoiced to date, unbilled/remaining budgets, and percentage complete for each task identified herein.

Task 8 – Deliverables

- Bi-weekly conference calls with the City and applicant
- Preparation of agendas and memorandums of meeting minutes for bi-weekly calls
- Monthly invoices with itemized task list, as described above
- Status updates as needed (assuming timeline of 12 months)

Task 9: Regulatory Permitting (Optional Task)

WEBB shall only complete this task if directed to do so, in writing, by the City.

If the JD Report determines there are impacts to Waters of the State or Waters of the US, then WEBB will prepare the corresponding regulatory permits using the Applicant's consultant prepared JD and DBESP. WEBB will facilitate finding compensatory mitigation options to be included in the regulatory permits. The fulfilment of any compensatory mitigation will be that the responsibility of the Applicant to obtain prior to construction in the areas affected by the regulatory permits.

The anticipated scope of work for the regulatory permits includes the following:

- California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreement (1600 Permit)
- U.S. Army Corps of Engineers – 404 Permit (if Waters of the US are impacted)
- Regional Water Quality Control Board – Santa Ana Region (RWQCB) 401 Water Certification or Waste Discharge Permit (or, individual Dredge and Fill (WDR) Permit for impacts to non-federal Waters of the State)

Task 9 – Deliverables

- 1600 Application and Submission via EPIMS
- 401 Certification or WDR Permit Application and Submission (which permit depends on whether Waters of the US are being impact – TBD by JD)
- Army Corps 404 Permit (depends on whether any features meeting the definition of Waters of the US under current regulatory interpretation at the time of the JD) Application preparation and Submission

Assumptions

- CEQA document preparation effort will commence with completion of a project description (based on a current site plans) that has been reviewed and approved by the City and applicant. The final Project Description shall be provided to WEBB by July 2025 to keep the anticipated 12- month schedule. If the project description for the project changes after preparation of technical studies or preparation of the CEQA documents has started, additional effort and associated budget may be required.
- It is assumed applicant's civil engineer will provide all engineering support, such as engineering drawings and assistance with preparation of any required comprehensive project design descriptions (i.e. grading, right-of-way, hydrology, drainage). This information will be required to be provided in final form (i.e. City reviewed and conceptually approved) to WEBB by July 2025 in order to keep a 12-month schedule. Delays in providing this information, or changes to this information after July 2025 will result in delays to the anticipated schedule.

- City will provide WEBB with a copy of Northside Specific Plan EIR Notice of Determination (NOD) and its associated California Fish and Game Receipt for CEQA filing fees.
- This proposal is based on the level of effort anticipated to be needed based on experience on recent projects and with the current federal and state laws, policies, and requirements in place at the time of this proposal. If new laws or policies are enacted after the preparation of this proposal, additional effort and associated budget may be required.

Cost Proposal

Tasks	Fees
Task 1: Project Set Up Coordination/Kick-Off Meeting	$7,460
Task 2: Preparation of Project Description	$8,952
Task 3: Technical Studies	
Subtask 3.1: Cultural Resource Report	$25,179
Task 4: Peer Review	
Subtask 4.1: Peer Review – Biological Reports	$12,008
Subtask 4.2 Peer Review – VMT Analysis	$4,826
Task 5: Supporting Document Section 15183	
Subtask 5.1: Administrative Draft 15183 Document	$91,217
Subtask 5.2: Revised Administrative Draft 15183 Document	$36,968
Task 6: Public Hearings	$9,698
Task 7: CEQA Determination Notice (filing fees not included)	$2,950
Task 8: Project Management and Coordination	
Subtask 8.1: Project Management and Coordination	$63,100
Subtask 8.2: Bi-Weekly Progress Conference Calls (20 meetings)	$24,714
Subtotal for 15183 Analysis *	***$287,072***
Task 9: Regulatory Permitting (Optional)	$12,420
Subtotal with Future/Optional Tasks	***$299,492***
40% Contingency Amount	$114,829
Grand Total w/Contingency	**$414,321**

*Includes $1,150 in expenses; basis for contingency calculation