Crestview Apartments

Draft Environmental Impact Report (DEIR)

Appendix A – Initial Study, Notice of Preparation (NOP), NOP Comment Letters



Community & Economic Development Department

Planning Division

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov

NOTICE OF PREPARATION

FROM LEAD AGENCY: Candice Assadzadeh, Senior Planner

City of Riverside

Community & Economic Development

Department Planning Division 3900 Main Street, 3rd floor Riverside, California 92522

DATE: June 30, 2020

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Crestview

Apartments Project

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed residential project known as the Crestview Apartments Project (Project). The City is requesting input from you or your agency or organization as to the scope and content of the environmental information that is relevant to your agency or organization's statutory responsibilities or interests in connection with the proposed Project.

This Notice of Preparation (NOP) identifies the Project applicant, contains the proposed Project description including Project setting and location, and identifies the potential environmental effects of the proposed Project. A vicinity map is included in this NOP.

Due to time limits mandated by State law, your response must be received at the earliest possible date, **but not later than 30 days** after receipt of this NOP. The public comment period for this NOP begins on June 30, 2020 and is set to close at 5:00 p.m. on July 30, 2020.

Please send written responses to Candice Assadzadeh at the address shown above or via e-mail at cassadzadeh@riversideca.gov. Please include the name and contact person in your agency.

DOCUMENT AVAILABILITY: The Initial Study is available on the City's website at https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents or contact Candice Assadzadeh at 951-826-5667 or via e-mail at cassadzadeh@riversideca.gov to obtain a PDF of the Initial Study.

PROJECT TITLE: Crestview Apartments - Planning Cases P19-0775 (General Plan Amendment), P19-0776 (Zoning Code Amendment), P19-0777 (Design Review), P19-0905 (Environmental Impact Report), P20-0307 (Variance), P20-0308 (Grading Exception), P20-0309 (Grading Exception), and P20-0310 (Summary Vacation)

PROJECT APPLICANT: Ken Assi, KA Enterprises.

PROJECT LOCATION: The project site is situated at the northwest corner of Central Avenue and Sycamore Canyon Boulevard in the City of Riverside. The project site is comprised of the following single parcel: 256-050-012.

PROJECT SETTING: The approximately 9.44-acre project site is currently vacant. The property to the north of the project, across Sycamore Canyon Boulevard and State Route 60, is vacant. Land use to the east, across Sycamore Canyon Boulevard, is a recently approved commercial development. Property to the south of the project site, across Central Avenue, is also vacant. Land use to the west of the project site is the City of Riverside's Quail Run Open Space Park.

PROJECT GENERAL PLAN AND ZONING DESIGNATIONS: The project site currently has a General Plan Land Use designation of C - Commercial. It is zoned CG - Commercial General.

PROJECT DESCRIPTION: The proposed project includes a total of 237 one-, two-, and three-bedroom residential apartment units in seven buildings, consisting of five 3-story buildings and two 2-4 split story-buildings. A total of 94 units are proposed to be one-bedroom, 126 are proposed to be two-bedroom, and 17 are proposed to be three-bedroom units. The proposed project includes the following amenities: onsite leasing office, garages, carports, mail lounge, putting green, outdoor resort style pool and spa, dog run area with a dog wash station, fitness center, clubhouse, shade structures with barbecues and tables, and a walking perimeter loop trail (1/2 mile loop) with learning or exercise stations.

Primary and secondary access to the site is provided from Sycamore Canyon Boulevard on the eastern boundary of the site. The driveway on the northern boundary of the site on Sycamore Canyon Boulevard will be used for egress by future residents and as an emergency access. Both driveways will be gate controlled. Construction is anticipated to take approximately 18 months to be completed. It will begin around October 2021 and end around April 2023. The project is anticipated to be operational in 2023.

Project Alternatives: Identification of potential alternatives to the Crestview Apartments will be addressed as part of the EIR. Analysis of a "No Project" alternative is required by law. In addition to the "No Project" Alternative, at least two additional alternatives will be evaluated. The evaluation of alternatives will provide a comparative analysis of alternatives to the proposed development.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with the development of the Crestview Apartments project, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with the City and Applicant's goals and objectives.

Cumulative Impact Analysis: The EIR will include a discussion of the potentially significant cumulative impacts of the Crestview Apartments project when considered with other past, present, and reasonably foreseeable future projects in the area.

Other Required Sections: The EIR will also include other information typically required for an EIR. These other sections include the following: 1) Introduction; 2) Project Description; 3) Effects Found Not to Be Significant; 4) Environmental Impact Analysis; 5) Growth-Inducing

Impacts; 6) Significant Unavoidable Environmental Effects; 7) Significant Irreversible Changes; 8) Consistency with Regional Plans; 9) Discussion and Analysis of Energy Conservation based on Appendix F and G of CEQA Guidelines; 10) Mitigation Measures; 11) References; and 12) List of Preparers.

Based on the analysis contained in the Initial Study and Appendices, the following topics have been determined to have no impact or a less than significant impact and therefore will not be analyzed further in the forthcoming EIR:

- Agriculture & Forest Resources
- Hazards & Hazardous Materials (except for wildland hazards, which will be analyzed in the Wildfire section of the EIR)
- Hydrology / Water Quality
- Mineral Resources
- Population/Housing
- Public Services (except for Fire Protection, which will be analyzed in the EIR)
- Recreation

And based on the analysis contained in the Initial Study, the following topics have been determined to have a potentially significant impact and will be addressed in the forthcoming EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/ Soils
- Greenhouse Gas Emissions
- Land Use/Planning
- Noise
- Fire Protection (from Public Services)
- Transportation
- Tribal Cultural Resources

- Utilities/ Service Systems
- Wildfire

Relevant technical reports will be provided as EIR appendices.

SCOPING MEETING: A virtual scoping meeting will be held about this project.

Meeting Information: Wednesday, July 22, 2020

6:00 – 8:00 p.m. (Pacific Standard Time) View the virtual meeting live webcast at:

https://event.webinarjam.com/channel/Crestview

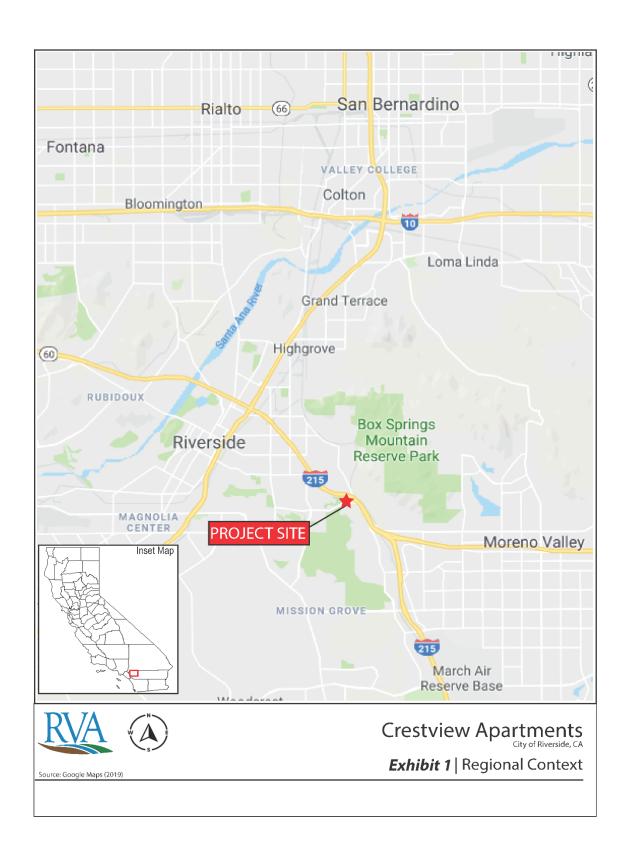
Note: No pre-registration is required. Entering the web address above will directly take you to the broadcast room sign-in. First name and email address are required to enter the broadcast room to keep track of attendees. Questions and comments will be received using the chat feature and addressed by the presenters.

SIGNATURE: OWNER ASSOCIATION.

TITLE: Candice Assadzadeh, Senior Planner – City of Riverside

TELEPHONE: <u>951-826-5667</u>

DATE: 06-30-2020









Crestview Apartments
City of Riverside, CA

Exhibit 2 | Project Site Map



Source: Google Maps (2019)



COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT

PLANNING DIVISION

WARD: 2

1. Case Numbers: P19-0775 (General Plan Amendment), P19-0776 (Zoning Code Amendment),

P19-0777 (Design Review), P19-0905 (Environmental Impact Report), P20-0307 (Variance), P20-0308 (Grading Exception), P20-0309 (Grading Exception), and

P20-0310 (Summary Vacation)

2. Project Title: Crestview Apartments

3. Lead Agency: City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street, 3rd Floor Riverside, CA 92522

4. **Contact Person:** Candice Assadzadeh, Senior Planner

Phone Number: (951) 826-5667

5. Project Location: The Project site is situated at the northwest corner of Central Avenue, and

Sycamore Canyon Boulevard. (Refer to Exhibit 1, *Regional Context* and Exhibit 2, *Project Site Map*) The Project site consists of 9.44 vacant acres. Assessor Parcel Number (APN) 256-050-012. The Summary Vacation would result in a net

increase of 0.44 acre, for a total development acreage of 9.88.

6. Project Applicant/Project Sponsor's Name and Address:

Ken Assi

KA Enterprises

5820 Oberlin Drive, Suite 201

San Diego, CA 92121 (619) 820-6180

7. General Plan Designation: C - Commercial

8. **Zoning:** CG - Commercial General Zone

9. **Description of Project:**

The proposed Project includes a total of 237 one-, two-, and three-bedroom residential apartment units in seven buildings, consisting of five 3-story buildings and two 2-4 split story-buildings. A total of 94 units are proposed to be one-bedroom, 126 are proposed to be two-bedroom, and 17 are proposed to be three-bedroom units. The project includes the following amenities: onsite leasing office, garages, carports, mail lounge, putting green, outdoor resort style pool and spa, dog run area with a dog wash station, fitness center, clubhouse, shade structures with barbecues

and tables, and a walking perimeter loop trail (1/2 mile loop) with learning or exercise stations. (Refer to Table 1, *Residential Unit Details*)

Table 1: Residential Unit Details

Unit Types	Number of Units	Percentage of Total Unit Unit Count (Square	
1-bedroom	94	40%	760-777
2-bedroom	126	53%	1,097-1,241
3-bedroom	17	7%	1,398
Total	237	100%	Average: 1,067

Based on the parking ratio of 1.5 parking spaces for every one-bedroom unit and 2.0 parking spaces for each two-, and three-bedroom unit, a minimum of 427 parking spaces are required and 428 parking spaces are proposed. Of the 428 parking spaces provided, 110 are in garages, 211 in a carport, 11 are tandem spaces and 96 are open stall spaces. (Refer to Table 2, *Residential Unit Parking Provided*) Primary and emergency access to the site is provided from Sycamore Canyon Boulevard on the eastern boundary of the site. Future residents will also exit the site from a driveway on the northern boundary of the site on Sycamore Canyon Boulevard. Both driveways will be gate controlled.

Table 2: Residential Unit Parking Provided

Total Parking Provided	Quantity	Percent
Total Garage	110	26%
Total Carport	211	49%
Total Tandem	11	3%
Total Open Stall	96	22%

Construction is anticipated to begin around October 2021, take approximately 18 months to complete, completed around April 2023. The project is anticipated to be operational in 2023.

The following entitlements are required for the proposed project:

- General Plan Amendment (GPA) to amend approximately 9.44 acres of the proposed project area from C
 Commercial to VHDR Very High Density Residential; Planning Case P19-0775.
- Zoning Code Amendment (RZ) to rezone approximately 9.44 acres of the proposed project area from CG Commercial General to R-4 Multiple Family Residential Zone; Planning Case P19-0776.
- Design Review (DR) for the proposed site design and building elevations; Planning Case P19-0777.
- Environmental Impact Report (EIR) for the preparation of an Environmental Impact Report for the proposed Project, Planning Case P19-0905.
- Variance (VR) − 1) .to allow solid walls within the front yard setback that are higher than permitted by the Zoning Code; and 2) to allow improvements with front yard setback, where the Zoning Code requires a fully landscaped front yard setback; Planning Case P20-0307
- Grading Exception (GE) to allow retaining walls higher than permitted by the Grading Code; Planning Case P20-0308
- Grading Exception (GE) to allow slopes greater in height than permitted by the Grading Code; Planning Case P20-0309
- Summary Vacation (VC-S) for the acquisition of excess City right-of-way, totaling 19,199 square feet, along Sycamore Canyon Boulevard and Central Avenue; Planning Case P20-0310.

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

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant Land	C - Commercial	CG - Commercial General Zone
North (across Sycamore Canyon Blvd and State Route 60)	Vacant, undeveloped	HR - Hillside Residential	RC – Residential Conservation Zone
East (across Sycamore Canyon Blvd)	Recently Approved Commercial Cacross ycamore Canyon C - Commercial C - Commercial C - Commercial C - Commercial Development (across Sycamore Canyon Boulevard)		CG - Commercial General Zone
South (across Central Avenue)	(across Central P - Public Park (City of Riverside Sphere of Influence)		C-P-S- Scenic Highway Commercial (Riverside County)
West	City of Riverside's Quail Run Open Space Park	OS – Open Spaces / Natural Resources	RC – Residential Conservation Zone

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

- a. California State Water Resources Control Board to obtain coverage under the General Construction Storm Water Permit (Water Quality Order 2009-0009-DWQ) regulating storm water runoff from construction sites 1 acre in size and greater.
- b. Western Riverside County Regional Conservation Authority (WRC RCA) for Joint Project Review (JPR) as the project site is located in Criteria Cell #721 of the Multiple Species Habitat Conservation Plan (MSHCP).

12. 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.?

The City of Riverside sent out AB 52 consultation notices to tribes to initiate consultation in January 2020. The following California Native American tribes have requested consultation with the City of Riverside pursuant to Public Resources Code 21080.3.1:

- Agua Caliente Band of Cahuilla Indians
- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians

SB 18 consultation notices were also sent out in January 2020, and Soboba is the only tribe thus far that has requested consultation in accordance with the SB 18 guidelines. The results of the consultations will be included in the forthcoming EIR.

13. Other Environmental Reviews Incorporated by Reference in this Review:

- City of Riverside, General Plan 2025
- b. City of Riverside, GP 2025 FPEIR
- c. Title 19, Zoning Code
- d. Title 20, Cultural Resources
- e. Title 17, Grading Code

14. Acronyms

ALUC	Airport Land Use Commission
APN	Accessor Parcel Number
AQMP	Air Quality Management Plan
BMPs	Best Management Practices

CAPCOA California Air Pollution Control Officers Association

CARB California Air Resource Board

CCM Circulation and Community Mobility Element

CCR California Code of Regulations Council on Environmental Quality CEO **CEQA** California Environmental Quality Act

March Air Reserve Base/March Inland Port Comprehensive Land Use Plan **CLUP**

DDC Deep Dynamic Compaction EIC **Eastern Information Center EIR Environmental Impact Report**

Final Programmatic Environmental Impact Report **FPEIR**

GHG Greenhouse gasses

Geographic Information System GIS **HCP** Habitat Conservation Rat High Density Residential HDR **JLUS** Joint Land Use Study

Light duty autos

LID Low Impact Development

LDAs

LOS Level of service

LU Land use

MARB/MIP March Air Reserve Base/March Inland Port

MLD Most Likely Descendant
MM Mitigation Measure
MRZ Mineral Resource Zones

MSHCP Western Riverside County Multiple Species Habitat Plan

msl mean seal level

N Noise

NAHC Native American Heritage Commission

OS Open Space PEIR Program EIR

PR Park and Recreation Element
PRC Public Resource Code

PS Public Safety

RIC Rapid Impact Compaction RTP Regional Transportation Plan RUSD Riverside Unified School District

SCAG Southern California Association of Governments SCAQMD South Coast Air Quality Management District

SKR Stephen Kangaroo Rat

SWPPP Storm Water Pollution Prevention Plan

TAC Toxic Air Contaminants

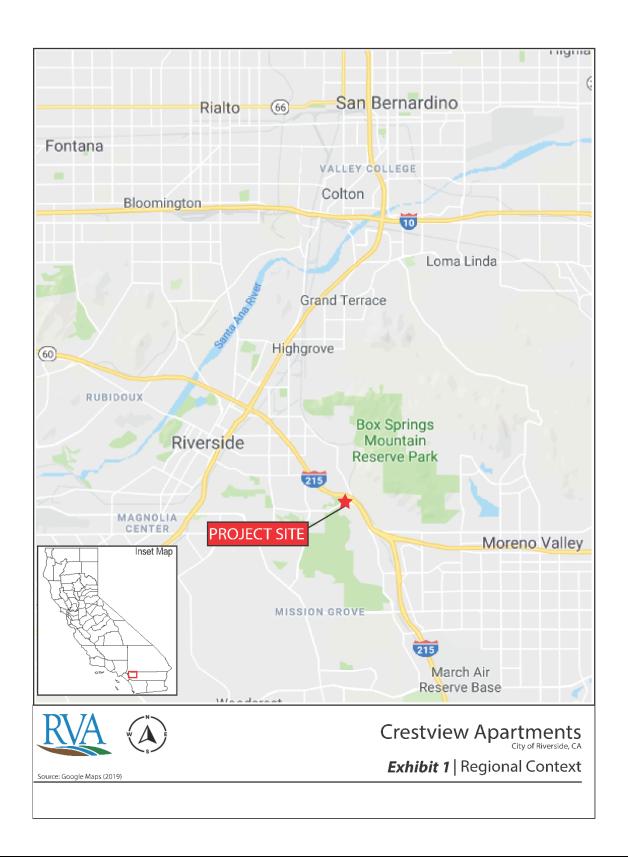
UCR/UNET UC Riverside Police Officer Association and University Neighborhood Enhancement Team

USGS United States Geological Survey
UST underground storage tanks
VHFSZ Very High Fire Safety Zone
VMT Vehicles Miles Traveled

WQMP Water Quality Management Plan

15. Appendix List

- a. Appendix A Phase I Environmental Site Assessment Prepared by Ardent Environmental Group, Inc.
- b. Appendix B Preliminary Project Specific Water Quality Management Plan prepared by Tory R. Walker Engineering, Inc.
- c. Appendix C Airport Land Use Commission Determination Letter
- d. Appendix D Federal Aviation Administration Determination Letters





16. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

that is a "Potentially Significant Impac	t" 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 Mate	erials			
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 complete	ed by the Lead Agency)					
On the basis of this initial evaluation recommended that:	which reflects the independent	judgment of the City of Riversid	e, it is			
The City of Riverside finds that the propose and a NEGATIVE DECLARATION will be		nificant effect on the environment,				
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 propo ENVIRONMENTAL IMPACT REPORT		effect on the environment, and an				
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 Canalle Association	dew.	Date <u>06/25/2020</u>				
Printed Name & Title <u>Candice Assadzadeh, Senior Planner</u> For <u>City of Riverside</u>						

The environmental factors checked below would be potentially affected by this project, involving at least one impact



COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT

PLANNING DIVISION

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 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.
- Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 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 measure 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	Less Than Significant Impact	No Impact
		Mitigation Incorporated		
 AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project: 				
a. Have a substantial adverse effect on a scenic vista?	\boxtimes			
1a. Response: (Source: General Plan 2025 Figure CCM-4 – M Figure 5.1-1 – Scenic and Special Boulevards and Parkways Table 5.1-B – Scenic Parkways)				
Potentially Significant Impact. The proposed project may affect s forthcoming Environmental Impact Report (EIR).	cenic vistas	and this impa	act will be and	alyzed in the
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, and General Plan 20)25 FPEIR)			
Potentially Significant Impact. The proposed project may affect see forthcoming EIR.	enic resource	es and this imp	pact will be an	alyzed in the
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, Guidelines)	5 FPEIR, Z	Coning Code,	Citywide Desi	ign and Sign
Potentially Significant Impact. The proposed project may affect the the site and this impact will be analyzed in the forthcoming EIR.	existing visu	al character o	r quality of pu	blic views of
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				
1d. Response: (Source: General Plan 2025, General Plan 2025) Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Cit				Lighting
Potentially Significant Impact. The proposed project will include n will be analyzed in the forthcoming EIR.	ew sources (of light at the 1	project site and	d this impact

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST 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 – Agric	cultural Sui	tability & Gen	eral Plan 202	5 FPEIR)
No Impact. A review of Figure OS-2 – Agricultural Suitability of the designated as Prime Farmland, Unique Farmland, or Farmland of States to any land classified as, Prime Farmland, Unique Farmland, or Farmland pursuant to the California Department of Conservation, Farm the project will have no impact directly, indirectly or cumulatively to	wide Importa rmland of S nland Mapp	ance, and is not Statewide Imp ing and Monit	t adjacent to or ortance. Figur	in proximity e OS-2 was
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
2b. Response: (Source: General Plan 2025 – Figure OS-3 - Willia – Figure 5.2-2 – Williamson Act Preserves)	amson Act I	Preserves and,	General Plan	2025 FPEIR
No Impact. A review of Figure OS-3 – Williamson Act Preserves of the Act Preserves of the General Plan 2025 FPEIR reveals that the project Williamson Act Preserve or under a Williamson Act Contract. Moreound is not next to land zoned for agricultural use; therefore, the pulliance of the property of the project of the	site is not lover, the pro	ocated within a pject site is not	an area that is to zoned for agi	affected by a ricultural use
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: GIS Map – Forest Data, General Plan 20	025 Open Sp	pace and Cons	ervation Elem	ient)
Less Than Significant Impact. Forest land, as defined in the Public support 10-percent native tree cover of any species, including hardw				

ISSUES (AND SUPPORTING
INFORMATION SOURCES):

Potentially Less Significant Sign Impact V Mit

Less Than
Significant
With
Mitigation
Incorporated

Less Than Significant Impact No Impact

recreation, and other public benefits. Timberland, as defined in the Public Resources Code section 4526, is land, other than land owned by the federal government, and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. The City does contain riparian vegetation, including scrub woodland, and forest subtypes that are associated with waterways and drainages throughout the City. The project site contains a drainage feature in the southwest corner of the site from where an existing culvert in Central Avenue conveys waterflows to the site. The drainage feature crosses the southwest corner of the site and continues off-site in a northwest direction. This drainage feature supports a willow forest plant community dominated by arroyo willow trees, a native species. Although the willow forest associated with the drainage feature is anticipated to meet the definition of forest land contained in the Public Resources Code it will not be impacted, but preserved in place, with the proposed development project. As the willow forest plant community associated with the drainage feature will be preserved in place, the project will have less than significant impacts to forest land.

The project site does not contain timberland, is not zoned for timberland production and is not next to land zoned for timberland. Therefore, **less than significant impacts** will occur from this project directly, indirectly or cumulatively.

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?			\boxtimes	
2d. Response: (Source: Geographic Information System (GIS) I and Conservation Element)	Map – Fore	st Data, Gene	ral Plan 2025	Open Space
Less Than Significant Impact. As outlined above in 2c, the willow southwest corner of the site is anticipated to meet the definition of the however, it will not be impacted, but preserved in place, with the proper to land with forest land and would not be expected to result in the significant impacts will occur from this project directly, indirectly or	forest land of osed developeration of the conversion of the conver	contained in the oment project. of any forest l	ne Public Reso The project si	ources Code, te is not next
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?			\boxtimes	
2e. Response: (Source: General Plan – Figure OS-2 – Agricultu Preserves, General Plan 2025 FPEIR)	ral Suitabili	ity, Figure OS	-3 – Williams	on Act
Farmland, Unique Farmland, and does not support agricultural resour conversion of designated farmland to non-agricultural uses. In additional including farmlands within proximity of the project site. As outlined drainage feature in the southwest corner of the site is anticipated to me Resources Code, however, it will not be impacted, but preserved in place less than significant impacts will occur from this project directly, indinon-agricultural use or to the loss of forest land.	on, there are a solution above in 2 et the definite, with the p	e no agriculture 2c, the willow tion of forest le proposed devel	ral resources of forest associated and contained lopment project	or operations, ated with the in the Public ct. Therefore,
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?	\boxtimes			
3a. Response: (Source: South Coast Air Quality Management Dis	strict's 2007	Air Quality M	Ianagement P	lan (AQMP))
Potentially Significant Impact. The proposed project may conflict w Quality Management District's AQMP and this impact will be analyze			tion of the Sou	uth Coast Air
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 (SCAQMD) CEQA Regional Significance Thresholds, South Quality Management Plan)		_	•	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Potentially Significant Impact. The proposed project may result in pollutant in which the project region is in non-attainment and this impact.				
c. Expose sensitive receptors to substantial pollutant concentrations?	\boxtimes			
3c. Response: (Source: General Plan 2025 FPEIR Table 5.3-B , South Coast Air Quality Management District's 2016 Air Qu			al Significanc	e Thresholds,
Potentially Significant Impact. The proposed project may expose sen and this impact will be analyzed in the forthcoming EIR.	sitive recept	ors to substant	ial pollutant co	oncentrations
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	\boxtimes			
Potentially Significant Impact. The proposed project may result in those leading to odors. This impact will be analyzed in the forthcoming		sions adversely	y affecting peo	ople, such as
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 – Step Habitat Conservation Plans (HCP), Figure OS-7 – Western F. (MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cel MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells & Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP MSHCP Burrowing Owl Survey Area) Potentially Significant Impact. The proposed project's potential t sensitive, or special status species in local or regional policies/regulations.	Riverside Mull Areas, Ge and Subuni Criteria Al	ultiple Species oneral Plan 20 t Areas, Figur rea Species Su affect species	Habitat Cons. 025 FPEIR F re 5.4-6 – MS urvey Area, Fl	ervation Plan igure 5.4-2 – HCP Narrow igure 5.4-8 – a candidate,
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 – Step Habitat Conservation Plans (HCP), Figure OS-7 – MSHCI Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP A Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic 1	P Cores and rea Plans, I	Linkages, Fi Figure 5.4-4 -	gure OS-8 – MSHCP Crite	MSHCP Cell eria Cells and

ISSU	JES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No
	ORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	Impact
	Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Area Protection of Species Associated with Riparian/Riverine Area		Owl Survey Ar	rea, MSHCP S	Section 6.1.2 -
natural	ially Significant Impact. The proposed project's potential to community identified in local or regional plans, policies, regular or U.S. Fish and Wildlife Service will be analyzed in the forth	ılations or b	y the Californ		
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 Quality of Riv	uad Map La	yer)		
but not	ially Significant Impact. The proposed project's potential to a limited to, marsh, vernal pool, coastal, etc.) through direct remainalyzed in the forthcoming EIR.				
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	S-7 – MSHC	CP Cores and I	Linkages)	
migrate	ially Significant Impact. The proposed project's potential tory wildlife species, to interfere with established native resident wildlife nursery sites, will be analyzed in the forthcoming EIR.				
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
Mitiga	sponse: (Source: MSHCP, Title 16 Section 16.72.040 – Es tion Fee, Title 16 Section 16.40.040 – Establishing a Threater Forest Tree Policy Manual)	_			-
	ially Significant Impact. The proposed project's potential to coloral resources, such as a tree preservation policy or ordinance w				es protecting
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 C and Other Habitat Conservation Plans (HCP), Stephens' Kan Multiple Species Habitat Conservation Plan and Natural Con Habitat Conservation Plan)	garoo Rat H	labitat Conser	vation Plan, L	ake Mathews

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Potentially Significant Impact. The proposed project's potential to Conservation Plan, Natural Community Conservation Plan, or other a plan and this impact will be analyzed in the forthcoming EIR.		ith the provisi		
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?				
 Sa. Response: (Source: GP 2025 FPEIR Table 5.5-A Historical Appendix D, Title 20 of the Riverside Municipal Code) Potentially Significant Impact. The proposed project's potential to caresource pursuant to § 15064.5 of the CEQA Guidelines will be analyzed. 	iuse an advei	rse change in t	he significance	
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?				
5b. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archa Cultural Resources Sensitivity)	eological Se	ensitivity and	Figure 5.5-2	- Prehistoric
Potentially Significant Impact. The proposed project's potential to archaeological resource pursuant to § 15064.5 of the CEQA Guideline				
c. Disturb any human remains, including those interred outside of formal cemeteries?				
5c. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archa Cultural Resources Sensitivity)	eological Se	ensitivity and	Figure 5.5-2	- Prehistoric
Potentially Significant Impact. The proposed project's potential to c forthcoming EIR.	ause to distu	rb human rem	ains will be an	alyzed in the
6. ENERGY Would the project:				

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
6a. Response:				
Potentially Significant Impact. The proposed project's potential to reduce to wasteful, inefficient, or unnecessary consumption of energy reduced be analyzed in the forthcoming EIR.				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	\boxtimes			
6b. Response: (Source: City of Riverside Public Utilities 2018 Inc	tegrated Res	source Plan)		
Potentially Significant Impact. The proposed project's potential trenewable energy or energy efficiency will be analyzed in the forthcor		vith or obstruc	et a state or le	ocal plan for
7. GEOLOGY AND SOILS. Would the project:				
 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
 7i. Response: (Source: General Plan 2025 Figure Public S 2025 FPEIR Appendix X – Geotechnical Report) Potentially Significant Impact. The proposed project's potential to closs, injury, or death involving rupture of a known earthquake fault with the control of the c	cause substa	ntial adverse e	ffects, includi	
ii. Strong seismic ground shaking?				
7ii. Response: (Source: General Plan 2025 FPEIR Appendi.	x X – Geote	chnical Repor	t)	
Potentially Significant Impact. The proposed project's potential to closs, injury, or death involving strong seismic ground shaking will be a				ng the risk of
iii. Seismic-related ground failure, including liquefaction?	\boxtimes			
7iii. Response: (Source: General Plan 2025 Figure PS-1 – Zones, General Plan 2025 FPEIR Figure PS-3 – Soils (2025 FPEIR Appendix X – Geotechnical Report)				
Potentially Significant Impact. The proposed project's potential to closs, injury, or death involving seismic related to ground failure will be				ng the risk of

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	Impact
iv. Landslides?				
7iv. Response: (Source: General Plan 2025 FPEIR Figure 5. 2025 FPEIR Appendix X – Geotechnical Report, Title 17. Potentially Significant Impact. The proposed project's potential to closs, injury, or death involving seismic related to landslides will be and	7 – <i>Grading</i> cause substar	Code)	ffects, includi	
b. Result in substantial soil erosion or the loss of topsoil?				
7b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-Soils, Table 5.6-B – Soil Types, Title 17 – Grading Code, Prel Plan prepared by Tony R. Walker Engineering, Inc. May 4, 2 Less Than Significant Impact. Erosion and loss of topsoil could requirements call for the preparation and implementation of a Storm Werosion and sediment controls for construction activities for compliant System (NPDES) regulations. In addition, with the erosion control stant the Grading Code (Title 17) also requires the implementation of meast Project includes landscaping of areas that are not hardscaped with bui soils from erosion. The Project is also required to implement the Wate design Best Management Practices (BMPs) to control storm water and the site to prevent on site and off site scouring, erosion, and sediment with State and Federal requirements as well as with the City Municipa topsoil will be less than significant impact directly, indirectly and currents.	occur as a Vater Pollution occur as a vater Poll	result of the on Prevention National Pollu ich all develop d to minimize ing lots, etc. wanagement Pla water runoff from the site of	project. State Plan (SWPPP) tant Discharge oment activity soil erosion. Thich will help in (WQMP) wom the site and r downstream.	and Federal establishing Elimination must comply The proposed establize the hich requires das it leaves Compliance
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 – Region General Plan 2025 FPEIR Figure PS-3 – Soils with High Ships by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types Potentially Significant Impact. The proposed project's potential to be would become unstable, resulting in on- or off-site landslide, lateral spanalyzed in the forthcoming EIR.	rink-Swell I s, and Apper se located on	Potential, Figu ndix X – Geote n a geologic un	re 5.6-1 - Are echnical Repo it or soil that:	eas Underlain rt) is unstable or
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				
7d. Response: (Source: General Plan 2025 FPEIR Section 5.6 of Soils, Table 5.6-B — Soil Types, Figure 5.6-5 — Soils Geotechnical Report, and California Building Code as adopte the Riverside Municipal Code) Potentially Significant Impact. The proposed project's potential to forthcoming EIR.	with High ted by the C	Shrink-Swell ity of Riversid	Potential, A le and set out	ppendix X – in Title 16 of

IS	SSUES (AND SUPPORTING Potential Significant Significant Protential Significant Protential Protenti	Potentially Significant	Less Than Significant	Less Than Significant	No Impact	
IN	F	ORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	impact
	e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				\boxtimes
	7e.	Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 Description)	– Soils, Tab	le 5.6-B – Soi	l Types, Proje	ct
		pact. The proposed project will be served by sewer infrastrutive waste water disposal systems. Therefore, the project will have			or require se	ptic tanks or
	f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	\boxtimes			
	tent	Response: (Source: General Plan 2025 Policy HP-1.3) ially Significant Impact. The proposed project's potential to dee or site or unique geologic feature will be analyzed in the forth			oy a unique pa	leontological
	~					
8.		REENHOUSE GAS EMISSIONS. build the project:				
	a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
	tent	Response: (Source: Project Description) ially Significant Impact. The proposed project will generate g by have a significant impact on the environment and this impact				
	b.	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?				
	8b.	Response: (Source: Project Description)				
age	ency	ially Significant Impact. The proposed project may conflict adopted for the purpose of reducing the emissions of greenlyming EIR.				
9.		AZARDS & HAZARDOUS MATERIALS. buld the project:				
	a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
		Response: (Source: General Plan 2025 Public Safety Eleme Code, Title 49 of the Code of Federal Regulations, Californ 2002 and Riverside Operational Area – Multi-Jurisdictional	ia Building LHMP, 200	Code, Riversid 4 Part 1, OEM	de Fire Depai I's Strategic I	rtment EOP, Plan)
		than Significant Impact. Potential hazardous materials, such	_	_		_

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
However, due to the limited quantities of these materials to be used by public at large. In accordance with the City's Hazardous Materials materials during the construction and operation of the site would be federal laws, including but not limited to Title 49 of the Code of Federa materials, and in cooperation with the County's Department of Enviror Safety Code Section 25507, a business shall establish and implement emergency response to a release or threatened release of a hazardous in the regulations adopted pursuant to Section 25503 if the business ha hazardous material that has a quantity, at any one time, above the three Furthermore, the proposed land use, as residential, would not entail the Compliance with all applicable local, State and federal laws would transport, use, or disposal of hazardous materials. As such, the project the transport, use, or disposal of any hazardous material either directly	Policy, the reconducted pal Regulation numental Hear a Hazardous material in a andles a hazardous the manufacture a lest will have a	transport, use, oursuant to all as for the safe talth. As requires Materials Bu accordance with ardous material ribed in Section uring or disposes than significal less than significant less	and storage of applicable loc transportation and by Californian siness Emerge the the standard of a mixture on 25507(a)(1) sal of hazardo ficant impact and impact applicant applicant impact applicant impact applicant impact applicant impact applicant applicant applicant impact applicant impact applicant impact applicant a	of hazardous al, State and of hazardous a Health and ency Plan for is prescribed containing a through (6). us materials. from routine

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

9b. Response: (Source: Phase I Environmental Site Assessment prepared by Ardent Environmental Group, Inc. on March 26, 2020 (Appendix A), Preliminary Geotechnical Evaluation – Proposes Crestview Apartment Complex prepared by NOVA on January 20, 2020, General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan)

Less Than Significant Impact. A Phase I Environmental Site Assessment (ESA) was prepared by Ardent Environmental Group, Inc. in March 2020. The following is a summary of the findings and opinions as outlined in the Phase I ESA report (page 24), from at least 1931 through the time of the report, the site has been vacant land. In recent years, it was reported that portions of the site underwent various earthwork activities including the removal of shallow bedrock to ready the site for redevelopment.

There was no readily available information regarding depth to groundwater for the site or on properties within the general site vicinity. Groundwater is expected to traverse through fractured bedrock at an unknown depth. Direction of flow is expected to follow surface topography away from the Box Springs Mountains in a southwesterly direction.

The project site is located immediately adjacent to the Moreno Valley Freeway [SR-60/I-215]. Due to the close proximity of the site to the freeway, aerially deposited lead from automobiles using leaded-gasoline may be present in shallow soil at the site. The possible presences of lead in shallow soil would be considered a possible recognized environmental condition (REC).

Based on Ardent's review of a recently completed preliminary geotechnical evaluation for the site on January 20, 2020, up to 35 feet of undocumented fill materials were reportedly located in a large portion of the site. Some of these materials were associated with the shallow bedrock removal, but the source of other fill materials is unknown. Although a representative familiar with the site indicated that no import soil was used for backfill, there was no documentation to support this statement. Therefore, the undocumented fill would be considered a possible REC.

The Phase I ESA identified two possible RECs, aerially deposited lead and undocumented fill. To further assess these possible concerns, Ardent excavated seven test pits at target locations throughout the site. Laboratory results of shall soils samples indicated no detectable to low concentrations of lead, below the state and federal screening levels for the protection of human health. Laboratory results of soil samples collected from the undocumented fill indicated no detectable

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
concentrations of total petroleum hydrocarbons carbon chain C_6 - C_{32} (TPHcc) and volatile organic compounds (VOCs), and no detectable to low concentrations of Title 22 metals, well below the state and federal screening levels for the protection of human health and background concentrations of arsenic. Based on this information, the aerially deposited lead and the undocumented fill would not be considered an REC.					
No other on- or off-site environmental concerns were identified in the than significant impact directly, indirectly or cumulatively for creatin through reasonably foreseeable upset and accident conditions invenvironment.	g a significa	nt hazard to the	e public or the	environment	
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 CalARP RMP Facilities in the Project Area, Figure 5.13-2 – Table 5.13-D RUSD Schools, California Health and Safety California Building Code)	Riverside U	nified School	District RUSL) Boundaries,	
No Impact. The proposed project does not involve any hazardous substances or waste within one-quarter mile of an existing school. The the nearest existing or proposed school (Riverside Stem Academy, 446 the Project will have no impact regarding emitting hazardous emitmaterials, substances, or waste within one-quarter mile of an existing of	Project site 6 Mt Vernor ssions or h	is located appr Ave, Riversicandling hazard	roximately 0.6 de, CA 92507) dous or acute	60 miles from). Therefore, ly hazardous	
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: Phase I Environmental Site Assessmen March 26, 2020, General Plan 2025 Figure PS-5 – Hazar CERCLIS Facility Information, Figure 5.7-B – Regulated EnviroStor Database Listed Sites)	dous Waste	Sites, GP 20	25 FPEIR To	ables 5.7-A -	
No Impact. As outlined in 9b above, a Phase I Environmental Site Group, Inc. on March 26, 2020. The Phase I ESA identified two possifill. To further assess these possible concerns, Ardent excavated se Laboratory results of soils samples indicated no detectable to low concelevels for the protection of human health. Laboratory results of soil sa no detectable concentrations of total petroleum hydrocarbons carbon of (VOCs), and no detectable to low concentrations of Title 22 metals, we protection of human health and background concentrations of arsenic. and the undocumented fill would not be considered an REC. No other on the Phase I ESA report.	tible RECs, a ven test pits entrations of mples collect hain C ₆ -C ₃₂ ell below the Based on th	erially deposits at target loc lead, below the ted from the u (TPHcc) and verstate and fedois information,	ted lead and unations through ations through a state and fede andocumented volatile organizeral screening, the aerially d	ndocumented nout the site. eral screening fill indicated c compounds levels for the eposited lead	
Further, a review of hazardous materials site lists compiled pursuant project site is not included on any such lists. Therefore, the project wo to the public or environment directly, indirectly or cumulatively.					

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			

9e. Response: (Source: General Plan 2025 Figure PS-6B – Airport Safety Zones and Influence Areas, and 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), – Airport Land Use Commission Determination Letter, April 30, 2020 (Appendix C), – Federal Aviation Administration Determination Letter, March 25, 2020 (Appendix D)

Less Than Significant Impact. The proposed project is located within Airport Land Use Compatibility Zone E – Other Airport Environs as depicted on Figure PS-6B of the General Plan 2025 for the March Air Reserve Base/March Inland Port (MARB/MIP) and in the March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (CLUP).

The project was reviewed by the Airport Land Use Commission (ALUC) to ensure that the project is consistent with the compatibility zone as well as in compliance with the land use standards in the Riverside County Airport Land Use Plan (RCALUP), in which the CLUP is included.

On April 30, 2020, ALUC found the proposed project to be consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUCP). ALUC determined residential densities are not restricted in Compatibility Zone E of the March ALUCP and deemed the project to be consistent with the March ALUCP, provided that the City of Riverside applies the following recommended conditions:

- 1. Any new outdoor lighting that is installed shall be hooded or shielded as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
- 2. The following uses/activities are not included in the proposed project and shall be prohibited at this site.
 - a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than FAA-approved navigational signal light or visual approach slope indicator.
 - b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
 - c. Any use which would generate smoke or water vapor, or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)
 - d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft: and/or aircraft instrumentation.
- 3. The attached notice shall be provided to all prospective purchasers of the property and tenants of the building.
- 4. Any new aboveground detention or water quality basins on the site shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.

The FAA determined, based on an aeronautical study, the residential building structures will not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any are met:

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
 Based on this evaluation, marking and lighting are not necess are accomplished on a voluntary basis, the FAA recommer circular 70/7460-1 L Change 2. 				
The FAA determination for the proposed Project expires on 9/25/2021	unless:			
 a) the construction is started (not necessarily completed) and F Alteration, is received by the office b) extended, revised, or terminated by the issuing office c) the construction is subject to the licensing authority of the I application for a construction permit has been filed, as required determination. In such case, the determination expires on construction, or the date the FCC denies the application. 	Federal Com	nmunications (FCC, within 6	Commission (FCC) and an edate of this
The anticipated start of construction date would be October 2021. Then determination, the applicant would file a request for extension. Because RCALUP and the FAA, impacts related to hazards or excessive noise frindirectly and cumulatively.	se the projec	t has been four	nd to be consis	stent with the
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 – Hazara EOP, 2002 and Riverside Operational Area – Multi-Jurisdict Plan)				
Less Than Significant Impact. The project will be served by existing, Canyon Boulevard. All streets have been designed to meet the Public Velosures are required during the project's construction. The propose emergency response or evacuation plan. Therefore, the project will have and cumulatively to an emergency response or evacuation plan.	Works and Fred Project v	ire Departmen would not into	ts' specification erfere or impe	ons. No street ede with any
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 2025 Figure PS-7 – Fire Riverside's EOP, 2002,,,,, Riverside Operational Area – NOEM's Strategic Plan, CAL FIRE's Fire Hazard Severity Zoprevention-planning-engineering/wildland-hazards-building	Multi-Jurisd nes Maps - h	ictional LĤM attps://osfm.fi	P, 2004 Part re.ca.gov/divis	1/Part 2 and ions/wildfire
Potentially Significant Impact. The proposed project's potential to exto a significant risk of loss, injury or death involving wildland fires wi				or indirectly,
10. HYDROLOGY AND WATER QUALITY. Would the project:				

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With	Impact	Ппрасс
,		Mitigation Incorporated		
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 – Benefic Specific Water Quality Management Plan prepared by Tony B))				
Less Than Significant Impact. The project site is currently undeveloped disturbed/compacted soils and existing granitic bedrock. Upon construation and drive aisles, the permeable area of the project site will disturbed on-site storm drain inlets, landscape/outdoor pesticide use, refu	uction of the lecrease. Ex	project, inclu pected polluta	ding: resident nt sources from	ial buildings, m the project
Prior to issuance of a grading permit, a final approved WQMP will be State's General Permit for Construction Activities, administered by measures identified in a Storm Water Pollution Prevention Plan (SWP control erosion and sedimentation and other construction-related pollut Project Specific Water Quality Management Plan (WQMP) inches Development (LID) Principles (page 10):	the Santa A PPP) will be a tants for the	Ana RWQCB. required to be duration of con	Storm water implemented instruction. The	management to effectively e Preliminary
 The existing drainage patterns have been identified as southwork will be preserved at the existing site drainage discharge location the site's existing hydrologic response. The proposed landscaping will improve upon existing vegetation. The proposed impervious area has been limited to provide for footprint, parking, sidewalk, ADA compliance, etc.). Paved we vehicular traffic required by the proposed project. Proposed rooftop downspouts will disperse runoff to adjacent to disperse runoff to adjacent pervious areas throughout the proposed project. 	ons. Pollutar on condition essential pro parking and pervious are	nt and flow cons s with native, opposed function drive aisles an	ntrol practices drought-toleranns and safety (re necessary to	will maintain nt vegetation. (i.e., building o support the
The Preliminary Project Specific WQMP outlines the LID Best Manag water quality standards and reduce storm water runoff and include thre the site, two of the bioretention basins are composed of separate con Principles and LID BMPs have been incorporated into the site desig storm water runoff volumes.	e bioretention	on/biotreatmen at are hydrauli	t basins locate cally connected	ed throughout ed. The LID
With compliance with all applicable local, state, and federal laws regulof the project specific SWPPP and WQMP, the proposed project is addirectly, indirectly or cumulatively to any water quality standards or w	nticipated to	result in a les	ss than signifi	
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 – RPU P PF-2 – RPU Projected Water Demand, Table PF-3, and Prel Plan prepared by Tony R. Walker Engineering, Inc. on May Less Than Significant Impact. The project will be served by River	iminary Pro 4, 2020, (Ap	ject Specific V ppendix B))	Vater Quality	Management

project's potential to decrease groundwater supplies will be analyzed in the forthcoming EIR in the Utilities and Services Systems section, specifically under the following threshold, "Will the project have sufficient water supplies available to serve

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact	
		Incorporated			
the project and reasonably foreseeable future development during normal, dry, and multiple dry years?" (Utilities threshold 19.b below).					
As outlined in the Preliminary Project Specific WQMP (page 10), natural infiltration capacity is not present as the site is barren rockland and does not percolate per the geotechnical report. Therefore, development of the site would not impede groundwater recharge because it does not currently provide for groundwater recharge of stormwater at the site. Also, per the WQMP (page 10), the existing drainage pattern at the site is in a southwesterly overland flow. The proposed drainage patterns will be preserved at the existing site drainage discharge locations. Pollutant and flow control BMPs will maintain the site's existing hydrologic response. Therefore, development of the project would not significantly alter the volume of stormwater runoff leaving the site or the point of discharge from the site and would not in turn alter groundwater management of downstream receiving water bodies, including the basin. Therefore, there will be less than significant impacts related to groundwater recharge either directly, indirectly or cumulatively.					
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?			\boxtimes		
10i Response: (Source: Preliminary grading plan, and Preliminary Project Specific Water Quality Management					

10i Response: (Source: Preliminary grading plan, and Preliminary Project Specific Water Quality Management Plan prepared by Tony R. Walker Engineering, Inc. on May 4, 2020, (Appendix B))

Less Than Significant Impact. The project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) for the prevention of runoff during construction. Erosion, siltation and other possible pollutants associated with long-term implementation of projects are addressed as part of the Water Quality Management Plan (WQMP) and grading permit process. Storm water management measures identified in a Storm Water Pollution Prevention Plan (SWPPP) will be required to be implemented to effectively control erosion and sedimentation and other construction-related pollutants for the duration of construction.

The Preliminary Project Specific Water Quality Management Plan (WQMP) includes the following post-construction Low Impact Development (LID) Principles (page 10):

- The existing drainage patterns have been identified as southwesterly overland flow. The proposed drainage patterns will be preserved at the existing site drainage discharge locations. Pollutant and flow control practices will maintain the site's existing hydrologic response.
- The proposed landscaping will improve upon existing vegetation conditions with native, drought-tolerant vegetation.
- The proposed impervious area has been limited to provide for essential proposed functions and safety (i.e., building footprint, parking, sidewalk, ADA compliance, etc.). Paved parking and drive aisles are necessary to support the vehicular traffic required by the proposed project.
- Proposed rooftop downspouts will disperse runoff to adjacent pervious areas. In addition, sidewalks will be graded to disperse runoff to adjacent pervious areas throughout the project site.

The Preliminary Project Specific WQMP outlines the LID Best Management Practices (BMPs) required to adequately meet water quality standards and reduce storm water runoff and include three bioretention/biotreatment basins located throughout the site, two of the bioretention basins are composed of separate components that are hydraulically connected. The LID Principles and LID BMPs have been incorporated into the site design to fully address all expected pollutant sources and storm water runoff volumes from the project site.

On-site storm water runoff and erosion would be minimized through site development, including buildings, parking and paved areas and storm drain infrastructure. Storm drain infrastructure planned for the site includes various size storm drains (8, 12, 18, and 24-inch), inlet catch basin, 24 x 24-inch drain box, underground detention system, 12-inch landscape catch basin with atrium grate, and 12-inch diameter angular rip rap at two storm drain outlets along the western development

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact			
boundary. As outlined in the Preliminary Project Specific WQMP (page 24) the volume and time of concentration of storm water runoff for the post-development condition is not significantly different from the pre-development conditions for a 2-year return frequency storm (a difference of 5% or less is considered insignificant). Therefore, the project would not result in storm water runoff from the site that would result in erosion or siltation off-site.						
nch culvert the project site na northwest eserved in platrainage disch	at crosses und is clear and fl t direction. The ace, with impleated with impleating	er Central Avo owing freely. is drainage fea ementation of s. Pollutant and	enue conveys The drainage ture supports the proposed I flow control			
a flood haza to adequatel s located thr nnected. Th m water runo th site developlanned for the	rd area. The Py meet water question the sie LID BMPs he ff volumes. opment, include the site include etention system.	reliminary Pro juality standard ite: two of the nave been inco ling buildings, es various size m, 12-inch lan	oject Specific ds and reduce bioretention orporated into parking and storm drains dscape catch			
ervious build reloped condi- tern (HCOC) is not signifi- ss is consider ated volume ase in the pos- n flooding of	ling footprints, ition. As outling Analysis because antly differently discharge of 4 st-project conditions. There were also because the st-project conditions are the st-project conditions.	, sidewalks, dramed in the WQ nuse the volument from the prent). In the exis 41,269 cubic flition. Therefowill be less that	rive aisles and MP (page 24) ne and time of development ting condition eet and in the re, the project an significant			
	Cific Water O	Quality Manag	ement Plan			
dia tithicdo _ji	Significant Impact age 24) the verification off-site. In significant attion off-site. It westerly ownch culvert the project site in a northwest eserved in plantanage discharge in the project of the project site in a northwest eserved in plantanage discharge in the project of	Significant With Mitigation Incorporated age 24) the volume and time different from the pre-development. Therefore, the ation off-site. The strong overland flow to the project site is clear and flow and an anorthwest direction. The eserved in place, with implificationage discharge locations ore, the project will have a left of the project will be planned for the site included and another of the planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be planned for the site included and the project will be proje	Significant Impact Significant With Mitigation Incorporated age 24) the volume and time of concentral different from the pre-development conditionsignificant). Therefore, the project work attention off-site. The project site is clear and flowing freely. In a northwest direction. This drainage feat eserved in place, with implementation of drainage discharge locations. Pollutant and one, the project will have a less than significant prepared by Tony R. Walker Engineer in a flood hazard area. The Preliminary Profit to adequately meet water quality standard in prepared by Tony R. Walker Engineer in the project will have a less than significant prepared by Tony R. Walker Engineer in a flood hazard area. The Preliminary Profit to adequately meet water quality standard in prepared by Tony R. Walker Engineer in a flood hazard area. The Preliminary Profit to adequately meet water quality standard in solocated throughout the site: two of the onnected. The LID BMPs have been income water runoff volumes. The site development, including buildings, planned for the site includes various size in derground detention system, 12-inch land to storm drain outlets along the western even studied and is required to be attenuated very building footprints, sidewalks, drawledged condition. As outlined in the WQ term (HCOC) Analysis because the volument is not significantly different from the preference in the post-project condition. Therefore in flooding off-site. There will be less that face runoff in a manner which would restricted to be a manner			

Less Than Significant Impact. As outlined in response 10.a above, the project site is currently undeveloped with a small percent of impervious surface due to disturbed/ compacted soils and existing granitic bedrock. Upon construction of the project, including residential buildings, amenities and drive aisles, the permeable area of the project site will decrease. Expected pollutant sources from the project include on-site storm drain inlets, landscape/outdoor pesticide use, refuse areas, plazas, sidewalks, and parking lots.

Prior to issuance of a grading permit, 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 identified in a Storm Water Pollution Prevention Plan (SWPPP) will be required to be implemented to effectively control erosion and sedimentation and other construction-related pollutants for the duration of construction. The Preliminary Project Specific Water Quality Management Plan (WQMP) includes the following post-construction Low Impact Development (LID) Principles (page 10):

- The existing drainage patterns have been identified as southwesterly overland flow. The proposed drainage patterns will be preserved at the existing site drainage discharge locations. Pollutant and flow control practices will maintain the site's existing hydrologic response.
- The proposed landscaping will improve upon existing vegetation conditions with native, drought-tolerant vegetation.
- The proposed impervious area has been limited to provide for essential proposed functions and safety (i.e., building footprint, parking, sidewalk, ADA compliance, etc.). Paved parking and drive aisles are necessary to support the vehicular traffic required by the proposed project.
- Proposed rooftop downspouts will disperse runoff to adjacent pervious areas. In addition, sidewalks will be graded to disperse runoff to adjacent pervious areas throughout the project site.

The Preliminary Project Specific WQMP outlines the LID Best Management Practices (BMPs) required to adequately meet water quality standards and reduce storm water runoff and include three bioretention/biotreatment basins located throughout the site: two of the bioretention basins are composed of separate components that are hydraulically connected. The LID Principles and LID BMPs have been incorporated into the site design to fully address all expected pollutant sources and storm water runoff volumes. As outlined in the WQPM (page 24), in the existing condition the stormwater runoff (2 year – 24-hour storm) at the southwest corner of the site has an estimated volume discharge of 41,269 cubic feet and in the post-project condition an estimated 39,445 cubic feet, with a 4% decrease in the post-project condition. Therefore, there will be no net increase in storm water off-site.

With compliance with all applicable local, state, and federal laws regulating surface water quality including implementation of the project specific SWPPP and WQMP, the proposed project will not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and there will be a **less than significant impact** directly, indirectly or cumulatively.

be a less than significant impact directly, indirectly of cumulativery.		
iv. Impede or redirect flood flows?		
10c.iv Response: (Source: General Plan 2025 Figure PS- Specific Water Quality Management Plan prepared by (Appendix B))		

Less Than Significant Impact. The proposed project site is not located within a flood hazard area. The storm water drainage system will be installed concurrently with the construction of this project and will be adequately sized to accommodate the drainage created by this project. On-site storm water and non-stormwater runoff will be treated with onsite BMPs identified in the Preliminary Project Specific WQMP and then discharged to the existing drainage courses within the site where they extend off-site, retaining the overall drainage pattern of the site. As outlined in 10.c.i above, the drainage feature that crosses the southwest corner of the site and continues off-site in a northwest direction will not be impacted, but preserved in place, with implementation of the proposed Project. Therefore, the proposed project will not impede or redirect flood flows and there will be a less than significant impact directly, indirectly or cumulatively.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact			
pollutants due to project inundation? 10d. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality, GP 2025 FPEIR Figure 5.8.3 – Flood Area Zones and Google Earth)						
No Impact. Tsunamis are large tidal waves that occur in coastal areas and the Project site is not located in a coastal area and would not be susceptible to tsunamis. A seiche is a to-and-fro vibration of a waterbody that is similar to the slopping of water in a basin. Once initiated, oscillation within the waterbody can continue independently. Seiches are often triggered by earthquakes. The most likely areas that could be subject to a seiche are the areas surrounding lakes. The Project site is not within proximity to Lake Mathews (10 miles), Lake Evans (4.5 miles), or the Santa Ana River (4.7 miles). The project site is also not located within a flood zone area or a dam inundation area as seen on Figure 5.8-2 in the GP FPEIR. Therefore, no impact potential for seiche or mudflow exists either directly, indirectly or cumulatively.						
a Ana water River Basin f solutions. It und and surfoth the benefites. The down Canyon, Bonce of a gradal Permit for in a Storm Vedimentation (QMP outling ce storm was small basin a ing 7. The I tant sources surface water conflict with	rshed and in the (Region 6), at is also the base face waters of the ficial uses of synstream received Springs Danding permit, at the Construction water Pollution and other contest the LID Better runoff and at Building 4, of LID Principles and storm were quality inclusion of the property of the contest of the LID Principles and storm were quality inclusions.	e Tequesquite s amended, in sis for the Regithe region. The pecific waterboying waters, as n, Santa Ana R final approved Activities, admarker the region on the pecific water best Management on the period on the period and LID BMI ater runoff voing implement.	Arroyo sub- icludes water ional Board's e term "water odies and the sidentified in River Reach3, I WQMP will ministered by lan (SWPPP) ted pollutants ent Practices es of thirteen area between Ps have been olumes. With intation of the			
	od Hazard Area Zones and the Projof a waterbetinue indeperent of a waterbetinue indeperent of the Sant is seen on Fictly or cumulates a Ana water River Basin a Solutions. It and and surfit the benefites. The down Canyon, Bonce of a gradal Permit for in a Storm Volumentation (QMP outlines surface water conflict with the send that is a storm of the storm o	Significant Impact With Mitigation Incorporated Od Hazard Areas, GP 20 Area Zones and Google End and the Project site is not lead to a waterbody that is simulatinue independently. Seice the areas surrounding late, or the Santa Ana River (as seen on Figure 5.8-2 in ctly or cumulatively. In the Management Plan proceed to the Santa Ana watershed and in the River Basin (Region 6), as solutions. It is also the base and and surface waters of the the beneficial uses of spees. The downstream received Canyon, Box Springs Dana and Permit for Construction in a Storm Water Pollution dimentation and other conformal basin at Building 4, cong 7. The LID Principles and sources and storm was surface water quality inclusions.	Significant Impact With Mitigation Incorporated Incorporated Mitigation Incorporated Mitigat			

capacity is not present at the site and does not percolate per the geotechnical report. Therefore, development of the site would not impede groundwater recharge because it does not currently provide for groundwater recharge of stormwater at the site. Also, per the WQMP (page 10), the existing drainage pattern at the site is in a southwesterly overland flow. The proposed drainage patterns will be preserved at the existing site drainage discharge locations. Pollutant and flow control BMPs will maintain the site's existing hydrologic response. Therefore, development of the project would not significantly alter the volume of stormwater runoff leaving the site that would conflict with or obstruct implementation of a sustainable groundwater

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
management plan. Therefore, there will be less than significant impacts of a water quality control plan or sustainable groundwater management					
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) Potentially Significant Impact. The proposed project's potential to affect and physically divide an established community will be analyzed in the forthcoming EIR. 					
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?					
Potentially Significant Impact. The proposed project's potential to cause impacts due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect community will be analyzed in the forthcoming EIR. 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?			\boxtimes		
12a. Response: (Source: California Department of Conservation –Mineral Land Classification Map of Plate 7.13 Riverside East, and General Plan 2025, General Plan 2025 Figure OS-1 – Mineral Resources) Less Than Significant Impact. State-classified Mineral Resource Zones (MRZ) are shown in Mineral Land Classification Map prepared by California Department of Conservation and is also shown in the General Plan 2025 Open Space/Conservation Element. Per the General Plan 2025, Figure OS-1 Mineral Resources, the Project site is located in an MRZ-3 Zone. The MRZ-3 designation is for areas that have been determined by the California Department of Conservation to contain "known or inferred mineral occurrences of undetermined mineral resource significance." The Project site is not within or adjacent to areas of known mineral resources that would be of value to the region or the state.					
The Phase I Environmental Site Assessment (ESA) did not identify are no current mining operations surrounding the project site, as land to SR-60/I-215) and land to the south (across Central Avenue) is current Boulevard) is also currently vacant, but a commercial development was the City's Quail Run Open Space Park. Zoning for lands surrounding the to the west and north, Commercial General Zone to the east, Scenic Hand surrounding areas are not designated for mineral resources or Therefore, development of the Project site is not anticipated to result in	o the north (ly vacant. Last recently as ne project sith lighway Commining or a	across Sycam and to the east pproved for th e include: Res mmercial to th llow for these	ore Canyon Be (across Sycar at area. Land tidential Conse e south. There e types of use	oulevard and more Canyon to the west is rvation Zone efore, the site es/operations.	

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With	Impact	Impact
,		Mitigation Incorporated		
of value to the region and the residents of the state. The proposed pro-	oject would		impacts to kn	own mineral
resources, directly, indirectly and cumulatively.				
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 – Min	neral Resou	rces)		
No Impact. The GP 2025 FPEIR determined that there are no specific of Influence Area which have locally-important mineral resource reco Plan 2025 would not significantly preclude the ability to extract state from implementation of the proposed Project.	very sites ar	d that the imp	lementation of	f the General
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?				
 2025 Railroad Noise, Figure N-9 – March ARB Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Interior and Exterior Noise Standards, Appendix X – Noise I Potentially Significant Impact. The proposed project may affect the ein ambient noise levels in the vicinity of the project in excess of sta ordinance, or applicable standards of other agencies and this will be an 	Future Noi. Existing Con environment ndards estab	se Contour Conditions Report through temporalished in the	omparison, To t, Title 7 – No orary or perma local general p	able 5.11-E – ise Code) nent increase
b. Generation of excessive groundborne vibration or groundborne noise levels?				
13b. Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-9 – March ARB Noise Conto For Construction Equipment, Appendix X – Noise Existing Contours Significant Impact. The proposed project may affect groundborne vibration or groundborne noise levels and this will be analysis.	ise, Figure I fours, FPEIR Conditions I	N-6 – 2025 Fr Table 5.11-G Report)	eeway Noise, - Vibration S h generation	Figure N-7 – Source Levels
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: Figure N-9 – March ARB Noise Contou. Criteria, RCALUP, March Air Reserve Base/March inland Installation Compatible Use Zone Study for March Air Reserve	d Port Com	prehensive L	and Use Plai	ı (1999), Air

ISSUES (AND SUPPORTING INFORMATION SOURCES):

Potentially Significant Impact Less Than
Significant
With
Mitigation
Incorporated

Less Than Significant Impact No Impact

Determination Letter, April 30, 2020 (Appendix C), Federal Aviation Administration Determination Letters, March 25, 2020 (Appendix D))

Less Than Significant Impact. The project site is not located within two miles of an airport. The nearest airports are March Air Reserve Base (4.8 miles), Flabob Airport (6 miles), and Riverside Municipal Airport (7 miles). A review of Figure N-9 – March ARB Noise Contour was conducted, and it was determined that the project site is located outside of the noise contour. However, the proposed project is located within Airport Land Use Compatibility Zone E – Other Airport Environs as depicted on Figure PS-6B of the General Plan 2025 for the March Air Reserve Base/March Inland Port (MARB/MIP).

The project was considered by the Airport Land Use Commission (ALUC) to ensure that the project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUP. On April 30, 2020, ALUC determined residential densities are not restricted in Compatibility Zone E of the March ALUCP and deemed the project to be consistent with the March ALUCP, provided that the City of Riverside applies the following recommended conditions:

- 1. Any new outdoor lighting that is installed shall be hooded or shielded as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
- 2. The following uses/activities are not included in the proposed project and shall be prohibited at this site.
 - a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than FAA-approved navigational signal light or visual approach slope indicator.
 - b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
 - c. Any use which would generate smoke or water vapor, or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)
 - d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft: and/or aircraft instrumentation.
- 3. The attached notice shall be provided to all prospective purchasers of the property and tenants of the building.
- 4. Any new aboveground detention or water quality basins on the site shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.

The FAA determined, based on an aeronautical study, the residential building structures will not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any are met:

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting
are accomplished on a voluntary basis, the FAA recommend it be installed in accordance with FAA Advisory
circular 70/7460-1 L Change 2.

The FAA determination for the proposed Project expires on 9/25/2021 unless:

- a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office
- b) extended, revised, or terminated by the issuing office

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
c) the construction is subject to the licensing authority of the lapplication for a construction permit has been filed, as requidetermination. In such case, the determination expires on construction, or the date the FCC denies the application.	ired by the I	munications (FCC, within 6	months of the	e date of this		
The anticipated start of construction date would be October 2021. The determination, the applicant would file a request for extension. For this residing or working in the project area to excessive noise levels related significant directly, indirectly and cumulatively on people residing or	s reason, the I to airport n	project is not oise. Therefore	expected to e e, impacts will	xpose people be less than		
14. POPULATION AND HOUSING. Would the project:						
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?						
14a. Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – 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, SCAG Profile of the City of Riverside, May 2019)						
Less Than Significant Impact. According to the City's General Plan estimates, population is projected to increase under the typical development scenario to 346,867 within the City limits by 2025. However, the City's General Plan EIR has a projected population of 383,077 with a maximum population projection scenario of 444,308 persons in 2025. This section's analysis used the projected population of 383,077 from the City's General Plan EIR. The proposed Project includes a General Plan Amendment from C – Commercial to VHDR - Very High Density Residential to allow for the multi-family development. Based on the CalEEMod results, the estimated population growth from the Project would be 753 persons. In 2018, the City of Riverside had 325,860 residents per the Southern California Association of Governments (SCAG) Profile of the City. Thus, the General Plan 2025 EIR population projection of 383,077 equates to a population increase of 52,217 from the 2018 SCAG Profile of the City population. Therefore, the Project is anticipated to contribute approximately one percent of the 52,217 total anticipated population growth.						
The General Plan 2025 was designed to accommodate anticipated providing adequate services, access and infrastructure. The Project infrastructure and the Project would only require minor extensions or latthe Project would result in a very small incremental increase in popular anticipated under the typical growth scenario. Thus, the Project is with Project's estimated 753 persons to the total population would be a min Moreover, per the City's General Plan EIR, the maximum population	area is currenterals from nation growth, in the City's uscule increase.	ently served benearby roads as approximately anticipated 2 mental increas	y existing roand utilities to the control of the control of the anticipal	ds and other the site. Also, of what was ojection. The pated growth.		

result in the Project's generated residents of 753 person to be approximately 0.6 percent of the maximum population growth in 2025. The approximately one percent incremental increase is anticipated to be a less than significant increase and would not exceed both the estimated projection and the maximum projection of the City's General Plan 2025 EIR growth

projections. Therefore, the project would have a less than significant impact, both directly and indirectly.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?					
14b. Response: (Source: CADME Land Use 2003 Layer, Google No Impact. The Project will not displace existing people or housing, a elsewhere because the Project site is proposed on vacant land or that has by the proposed Project. Therefore, there will be no impact on existing	necessitating	g housing that	will be remove	ed or affected	
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?	\boxtimes				
Less Than Significant Impact. Fire protection services are provided b potential to impact fire protection services will be analyzed in the forth				Γhe Project's	
b. Police protection?			\boxtimes		
b. Police protection? 15b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers, FPEIR Section 5.13 – Public Services, Title 16 – Buildings and Construction Code) Less Than Significant Impact. The Riverside Police Department (RPD) provides police protection services to the City and the Project site. The closest RPD station is located at 8181 Lincoln Avenue, approximately 7 miles southwest of the Project site. The Project site is located in an urbanized area served by the RPD. The Project entails the construction of a multi-family residential development, consisting of 237 residential apartment units, located in 7 buildings. The City has reconsidered the RPD's centralized form of organization, and the RPD has implemented a decentralized, Neighborhood Policing Center model in an effort to provide more equitable and responsive services across the current and future City. Additionally, The RPD does not use a formula for calculating the number of officers per capita. Instead, staffing for the Department is based on the business and residential growth and evaluated on a project-by-project basis. RPD has recognized that it wants to decentralize its policing centers and provide "satellite" policing centers distributed throughout the City, thereby, putting police services closer to residents over a more widespread geographical area. Residential staffing is based on dwellings per development and business staffing is based on square footage of the business, type of business and type of police service required. The Project would result in a very small increase in population growth, approximately one percent, within what was anticipated under the typical growth scenario as mentioned previously in Section 14a. An approximate one percent incremental increase of the projected 2025 population growth is anticipated to be a less than significant increase.					
The 237-unit residential apartments would cause a minuscule incremer in a generally urbanized area already served by the RPD. Also, any ir offset from revenue generated for the City from the Project's property to	ncremental in	mpacts on the	level of polic		

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		1
Therefore, the Project would have less than significant impact on the directly, indirectly or cumulatively.	lemand for a	dditional polic	e facilities of s	ervices either
c. Schools?				
 Map, FPEIR Table 5.13-G – Student Generation for RUSD General Plan Final Program EIR, 5.13 Public Services and U Less Than Significant. The Project site is located within the Moreno 29 schools including elementary (19), middle (6), and high schools (4) Seneca Elementary (11615 Wordsworth Road, Moreno Valley Box Springs Elementary (11900 Athens Drive, Moreno Valley Edgemont Elementary (21790 Eucalyptus Avenue, Moreno Vista Heights Middle School (23049 Old Lake Drive, Moreno Sunnymead Middle School (23996 Eucalyptus Avenue, Moreno Moreno Valley Highschool (23300 Cottonwood Avenue, Moreno Canyon Springs Highschool (23100 Cougar Canyon Road, Moreno Canyon Springs Highschool (23100 Cougar Canyon Road) 	Valley Unif D. The school V. CA 92557 V. CA 92557 V. CA 92557 Valley, CA 92 Valley, CA no Valley, C eno Valley, Oreno Valley	le 16 – Buildin ied School Dis s serving the I) 553) 92557) A 92553) CA 92553) c, CA 92557)	ngs and Constr strict (MVUSE Project area are	D), which has e as follows:
The proposed Project includes 237 residential apartment units which wand high schoolers to be served by the schools identified above. Using generation rate is available on MVUSD's website), the proposed Prelementary, middle school, and high school students, as outlined in TaPlan Table 5.13-2 – Moreno Valley Unified School District Schools, the estimated projected enrollment is 34,162 students. Based on this dat students. Thus, the school district would remain under the capacity give	the RUSD S roject would able 3 below the capacity a, the MVUS	tudent General generate a to Per the City of enrollment SD has capacit	tion formula (a otal of approx of Moreno Va was 39,001 st ty for several the	as no student kimately 166 alley General udents while housand new
Table 3: RUSD Student General	tion for Pro	ject		

School Type	Grades Served	Student Generation Rates (per dwelling unit)	Number of Students Generated by Project
Elementary	K-6	.38	90
Middle	7-8	.11	26
High School	9-12	.21	50
Overall	K-12	.70	166

Pursuant to City of Moreno Valley Municipal Code, school impact fees shall be paid prior to the issuance of building permits for residential development. Although the Project potentially increases the population of school age children in the area, the required school impact fees of \$6.9400/ per square foot of residential development would offset the incremental impact to school facilities from new development projects. Therefore, the Project would have a **less than significant impacts** on the demand for school facilities or services either directly, indirectly or cumulatively.

d. Parks?			\boxtimes	
15d. Response: (Source: General Plan 2025 Figure PR-1 – Pa Recreation Facilities, Parks Master Plan 2003, GP 2025 Types, and Table 5.14-C – Park and Recreation Facilities F – Buildings and Construction Code)	FPEIR Table	e 5.14-A – Pa	rk and Recre	ation Facility

	Potentially Significant Impact		Less Than Significant Impact	No Impact
		Incorporated		

Less Than Significant Impact. The City has many different types of parks, including population-based parks (neighborhood and community), resource-based parks that include natural or man-made resources intended to serve the citywide population, and open space parks that allow public access to undeveloped natural spaces. According to the General Plan 2025, Table PR-1 Park and Recreation Facilities, there are 30 City Owned Neighborhood Parks, 15 Community Parks, 11 Citywide/Special Use Parks, 6 Reserve/Open Space Parks, 13 Community Centers and 6 Non-City Owned/Maintained Regional Parks and Facilities. There is approximately 2,806 acres of total City owned and recreational facilities within the city boundaries and an additional 12,854 acres of non-City owned regional parks and facilities in the local area

The Project includes the following recreational amenities for its residents: putting green, outdoor resort style pool and spa, dog run area and dog wash station, fitness center, clubhouse, shade structure with barbeques and tables, and a walking perimeter loop trail (1/2 mile loop) with learning or exercise stations. Immediately west of the Project site is the City's Quail Run Open Space Park (27 acres). The City's Sycamore Canyon Wilderness Park (1,423 acres) is located southwest of the Project, with a trail head/staging area located approximately 0.5 mile southwest of the Project site off of Central Avenue. Additionally, neighborhood parks including Sycamore Highlands (10.5 acres with playground, picnic area, barbeques, ballfield, butterfly garden, and water spray feature), located southeast, and Islander Park (20.5 acres with community pool, parking and undeveloped park), located to the north, are within a 2 mile radius of the Project site. Community parks including Andulka (36 acres with lighted baseball fields, picnic area, playground, tennis courts & pro shop, jogging path, restrooms and parking), Bordwell Park & Stratton Community Center (23 acres with lighted softball field and basketball court, community center, senior activity area, childcare center, playground, picnic tables and barbeques), and Castleview Park (31 acres with playground and picnic tables) are all located within a 3-mile radius of the Project.

The Project would be required to pay impact fees, including the Trail Development Fee, Local Park Development Fee, Aquatic Facility Fee, and Regional Parks and Reserve Parks Development Fee, per the Riverside Municipal Code Chapters (RMC) 16.44, 16.60, and 16.76. As detailed in RMC Chapter 16.44 and 16.76, the trail and regional park fees would be used solely for the acquisition of new parkland or trails. Local park fees could be used to purchase new parkland and for maintaining and upgrading existing neighborhood and community park facilities.

The proposed Project would incrementally increase use of existing City parks and recreational facilities, from its estimated population growth of 753 persons (assuming all residents of the Project were new to the City). However, the Project includes onsite recreational amenities for its residents that would supplement existing facilities and is located adjacent to the Quail Run Open Space Park and near the Sycamore Canyon Wilderness Park, with a trail head/staging area within walking distance, approximately 0.5 mile southwest of the Project site. Also, there are two neighborhood parks within a 2-mile radius, and three community parks within a 3-mile radius of the Project. Payment of applicable park development impact fees would mitigate impacts to parks from its associated population increase. With payment of Park Development Impact Fees (local, aquatic, regional/reserve and trail fees) per Title 16, Chapters 16.60, 16.44 and 16.76 of the Municipal Code, with the Project's onsite recreational amenities, and the number and size of available parks within 3 miles of the Project, there will be **less than significant impacts** on the demand for additional park facilities or services either directly, indirectly or cumulatively.

e.	Other public facilities?		

15e. Response: (Source: General Plan 2025 Figure PF-3 – Recreational Centers and Table PF-5 – Recreational Centers in Riverside Community/ Senior/ Social Service Centers, FPEIR Section 5.13 – Public Services, 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. As discussed in Section 14, *Population and Housing*, the estimated population growth from the Project would be 753 persons, which would permanently increase the population, thereby increasing the demand for public services in the City. However, the Riverside library system includes five neighborhood libraries that provide books, multimedia, sound recordings, magazine subscriptions, internet access and other resources. The Riverside library system also includes two cybraries (cyber-libraries) that provide a collection of "virtual" materials and educational resources.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The SPC. Jesus S. Duran Eastside Library (4033-C Chicago Avenue, Rinorthwest of the Project site. The SPC. Jesus S. Duran Eastside Library services provided at this branch are focused on technology access as programming, and adult literacy.	encompass	es approximat	ely 10,816 sqı	are feet. The
The City of Riverside currently funds the operation of nine communit centers. As part of the Riverside Renaissance Initiative, the Bobby B Community Center and the Bordwell Childcare Center were opened. King Boulevard, Riverside, CA 92507) consists of 12,617 square feet as site.	onds Youth The Stratton	Opportunity Community C	Center, the Or Center (2008 N	ange Terrace Martin Luther
The General Plan 2025 was designed to accommodate anticipated providing adequate services, access and infrastructure. The Project population growth (1%) beyond what was anticipated under the typic anticipated to have a significant increase in use of public facilit accommodate the Project's residents, without resulting in substantial a for new facilities. The Project would have less than significant imp services either directly, indirectly or cumulatively.	would result al growth sc ies. These dverse phys	in a very sm enario. A 1% community fa ical impacts to	all incremental incremental in acilities are a these facilities	al increase in acrease is not acrease is not acrease is not acrease is not acrease is not acrease is not
	Γ	Γ		
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 – Pa and Recreation Facilities, Figure CCM-6 – Master plan of FPEIR Table 5.14-A – Park and Recreation Facility Types, a Funded in the Riverside Renaissance Initiative, Table 5.14 Riverside Municipal Code Chapter 16.60 - Local Park Develo of Riverside Comprehensive Park, Recreation & Community Title 16 – Buildings and Construction Code)	f Trails and and Table 5. -D – Invent opment Fees	Bikeways, Po 14-C – Park a tory of Existin s, Bicycle Mas	arks Master I nd Recreation ng Communit ter Plan May	Plan 2003, Facilities y Centers, 2007, City

Less than Significant. The Project site is private property and development of the proposed Project will not directly impact any existing active or passive public Park facilities. The Project site is located adjacent to the City of Riverside's Quail Run Open Space Park; however, the proposed Project and associated improvements will not encroach into the City's park property. Per the City of Riverside Comprehensive Park, Recreation & Community Services Master Plan, there are no existing or planned trails that cross the Project site, although the plan does identify an existing bikeway and proposed trail on Central Avenue south of the Project site, and a proposed bikeway on Sycamore Canyon Boulevard east and north of the Project site. There are no existing or planned passive recreation for the site including trail connections to nearby sites, Quail Run Open Space Park to the west, or Sycamore Canyon Wilderness Park to the southwest. In addition, the Project site has a steep cut slope exposing granitic bedrock located in the northwest corner of the site and a steep slope down in the southwest corner of the site. Due to the topography of the site, and geographically, trail connections to offsite locations are not feasible.

As outlined in response 15d above, The City has many different types of parks, including population-based parks (neighborhood and community), resource-based parks that include natural or man-made resources intended to serve the citywide population, and open space parks that allow public access to undeveloped natural spaces. According to the General Plan 2025, Table PR-1 Park and Recreation Facilities, there are 30 City Owned Neighborhood Parks, 15 Community Parks, 11 Citywide/Special Use Parks, 6 Reserve/Open Space Parks, 13 Community Centers and 6 Non-City Owned/Maintained

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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
Regional Parks and Facilities. There is approximately 2,806 acres city boundaries and an additional 12,854 acres of non-City owned				
The Project includes the following recreational amenities that would in the area: putting green, outdoor resort style pool and spa, dog shade structure with barbeques and tables, and walking perimeter le In addition, the Quail Run Open Space Park is located immediately Park is located southwest of the Project, with a trail head/staging are site off of Central Avenue.	run area and do oop trail (1/2 mi west of the Proj	g wash station le loop) with le lect and the Sy	, fitness cente earning or exer camore Canyo	r, clubhouse cise station n Wildernes
The Project would be required to pay impact fees, including the Aquatic Facility Fee, and Regional Parks and Reserve Parks Deve (RMC) 16.44, 16.60, and 16.76. As detailed in RMC Chapter 16.44 solely for the acquisition of new parkland or trails. Local park maintaining and upgrading existing neighborhood and community	elopment Fee, pe 4 and 16.76, the fees could be	r the Riverside trail and region	e Municipal C nal park fees w	ode Chapter ould be use
The proposed Project would incrementally increase use of exist facilities, from its estimated population growth of 753 persons (as However, the Project includes onsite recreational amenities for its located in close proximity to Quail Run Open Space Park and Sneighborhood parks within a 2-mile radius, and three community applicable park development impact fees would mitigate impact population increase. With payment of Park Development Impact Fe 16, Chapters 16.60, 16.44 and 16.76 of the Municipal Code, with the and size of available parks within 3 miles of the Project, there walditional park facilities or services either directly, indirectly or current.	suming all residents that we sycamore Canyon parks within a set to parks and a sets (local, aquation he Project's onswill be less than	ents of the Provould supplement on Wilderness 3-mile radius recreational fac, regional/resite recreationa	pject were new ent existing fa Park. Also, t of the Project icilities from i erve and trail f l amenities, an	to the City cilities and there are two Payment of ts associate (ees) per Title d the number

16b. Response: (Source: Project Description and Site Plan, Title 16 - Buildings and Construction Code)

construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant. The Project includes the following recreational amenities that would supplement the existing parks and recreational facilities in the area: putting green, outdoor resort style pool and spa, dog run area and dog wash station, fitness center, clubhouse, shade structure with barbeques and tables, and walking perimeter loop trail (1/2 mile loop) with learning or exercise stations. In addition, the Quail Run Open Space Park is located immediately west of the Project and the Sycamore Canyon Wilderness Park is located southwest of the Project, with a trail head/staging area located approximately 0.5 mile southwest of the Project site off of Central Avenue. Also, as outlined in response to 15d above, there are two neighborhood parks within a 2-mile radius, and three community parks within a 3-mile radius of the Project.

Although the proposed Project would incrementally increase use of existing neighborhood and regional parks and recreational facilities, from its estimated population growth of 753 persons (assuming all residents of the Project were new to the City), the onsite recreational amenities and the nearby neighborhood, community and regional parks are anticipated to accommodate the Project's residents without requiring the construction or expansion of recreational facilities. Payment of applicable park development impact fees would mitigate impacts to parks and recreational facilities from its associated population increase. With payment of Park Development Impact Fees (local, aquatic, regional/reserve and trail fees) per Title 16, Chapters 16.60, 16.44 and 16.76 of the Municipal Code, with the Project's onsite recreational amenities, and the number and size of available parks within 3 miles of the Project, the Project would not require the construction or expansion of recreational facilities which might have an adverse effect on the environment. Potential impacts are **less than significant** directly, indirectly or cumulatively.

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact	
INFORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	Impact	
17 TO ANCHORTATION					
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: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15K – Freeway Analysis Proposed General Plan, Appendix X – Circulation Element Traffic Study and Traffic Study Appendix, and SCAG's RTP)					
Potentially Significant Impact. The proposed Project may conflict the circulation system, including transit, roadway, bicycle, and perforthcoming EIR.					
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	\boxtimes				
17b. Response: (Source: Project Description)					
Potentially Significant Impact. The proposed Project may conflict 15064.3, subdivision (b) and this will be analyzed in the forthcoming I		onsistent with	CEQA Guide	lines section	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?					
17c. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, and 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), Airport Land Use Commission Determination Letter, April 30, 2020 (Appendix C), Federal Aviation Administration Determination Letter, March 25, 2020 (Appendix D)). Less Than Significant Impact. The proposed Project is located within Safety and/or Airport Compatibility Zone E – Other Airport Environs as depicted in Figure PS-6B of the General Plan 2025 for the March Air Reserve Base/March Inland Port (MARB/MIP). However, the Project site is not located within Approach or Departure Zones, Flight Corridor or Buffer Compatibility Zones.					
The Project was considered by the Airport Land Use Commission (ALUC) to ensure that the Project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUP. On April 30, 2020, ALUC determined residential densities are not restricted in Compatibility Zone E of the March ALUCP and deemed the Project to be consistent with the March ALUCP, provided that the City of Riverside applies the following recommended conditions: 1. Any new outdoor lighting that is installed shall be hooded or shielded as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing. 2. The following uses/activities are not included in the proposed Project and shall be prohibited at this site.					
 Any use which would direct a steady light or flashing with airport operations toward an aircraft engaged in 					

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
an aircraft engaged in a straight final approach toward a landing at an airport, other than FAA-approved navigational signal light or visual approach slope indicator. b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. c. Any use which would generate smoke or water vapor, or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.) d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft: and/or aircraft instrumentation. 3. The attached notice shall be provided to all prospective purchasers of the property and tenants of the building. 4. Any new aboveground detention or water quality basins on the site shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in Project landscaping.					
 The FAA determined, based on an aeronautical study the residential building structures will not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any are met: Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, the FAA recommend it be installed in accordance with FAA Advisory circular 70/7460-1 L Change 2. 					
This determination for the proposed Project expires on 9/25/2021 unless: a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office b) extended, revised, or terminated by the issuing office c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.					
The anticipated start of construction date would be October 2021. Therefore, at least 15 days prior to the potential expiration determination, the applicant would file a request for extension. The Project will not result in a change in air traffic patterns and potential impacts related to safety risks are less than significant impacts directly, indirectly and cumulatively.					
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?					
17d. Response: (Source: Project Site Plan, Project Description) Less Than Significant Impact. The Project will be served by existing improved streets. Central Avenue and Sycamore.					

Less Than Significant Impact. The Project will be served by existing, improved streets, Central Avenue and Sycamore Canyon Boulevard. The Project will include construction of sidewalk improvements along Sycamore Canyon Boulevard and modifications to existing curb and gutter to accommodate the Project's two driveways, as well as construct Central Avenue from the Project's western boundary to Sycamore Canyon Boulevard at its ultimate half-section width as an arterial, in compliance with applicable City of Riverside General Plan standards. A bus turnout with ADA compliant connected sidewalk will also be constructed along Central Avenue for the Riverside Transit Agency. The Project's internal drive aisles and two

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact		
INFORMATION SOURCES):	Impact With		Impact	Impact		
in (1 of the 111 of the 20).		Mitigation				
curb cuts along of Sycamore Canyon Boulevard will be designed to meet the Public Works and Fire Departments' specifications. All of the proposed Project's improvements to Central Avenue and Sycamore Canyon Boulevard will be in compliance with applicable City of Riverside General Plan Circulation Element and City design standards and thus will not cause any incompatible use or additional or any hazards to the surrounding area or general public. The Project will have a less than significant impact on increasing hazards through design or incompatible uses either directly, indirectly or cumulatively.						
e. Result in inadequate emergency access?			\boxtimes			
17e. Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code, Project Description and Site Plan)						
Less Than Significant Impact. The Project will be served by existing, fully improved streets, Central Avenue and Sycamore Canyon Boulevard. The Project's internal drive aisles and two curb cuts along Sycamore Canyon Boulevard will be designed to meet the Public Works and Fire Departments' specifications. No street closures are required during the Project's construction. For these reasons, the proposed Project is not anticipated to result in inadequate emergency access and potential impacts are less than significant impact on increasing hazards through design or incompatible uses either directly, indirectly or cumulatively.						
18. TRIBAL CULTURAL RESOURCES.						
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or						
18a. Response: (Source: AB52 Consultation)						
Potentially Significant Impact. The proposed Project may affect tribal cultural resources, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and this potential impact will be analyzed in the forthcoming EIR.						
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: (Source: AB52 Consultation)						
Potentially Significant Impact. The proposed Project may affect tribal cultural resources, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope						

ISSUES (AND SUPPORTING Pote Signi		Less Than Significant	Less Than Significant	No Impact		
INFORMATION SOURCES):	Impact With Mitigation Incorporate		Impact	impact		
of the landscape, sacred place, or object with cultural value to a California Native American tribe and this potential impact will be analyzed in the forthcoming EIR.						
19. UTILITIES AND SYSTEM SERVICES. Would the project:						
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?						
19a. Response: (Source: General Plan 2025 Table PF-1 – RPU Table PF-2 – RPU Projected Water Demand, Table PF-3 – Water Demand for RPU Including Water Reliability for 2025	RPU, FPEIF 5)	R Table 5.16-0	G – General P	lan Projected		
Potentially Significant Impact. The Project's potential to require a expanded utility facilities, and this issue will be analyzed in the forthcome.		the relocation	or construction	on of new or		
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?						
19b. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, Table 5.16-H – Current and Projected Domestic Water Supply (acre-ft/year)						
Potentially Significant Impact. The Project site is served by Riverside Public Utilities (RPU), which supplied 74,928 acrefeet (24,415 million gallons of water to 295,000 people within its service area in 2015). The RPU Department's 2015 Urban Water Management Plan plans on supplying 124,703 acre-feet (40,634 million gallons) of water by 2040 to meet increasing demand under anticipated buildout from GP 2025. The RPU's ability to provide sufficient water supplies to the proposed Project will be analyzed in the forthcoming EIR.						
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?						
19c. Response: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 - Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area)						
Potentially Significant Impact. The Project's potential to generate wastewater in excess of the Riverside Regional Water Quality Control Plant's capacity will be analyzed in the forthcoming EIR.						
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?						
19d. Response: (Source: FPEIR Table 5.16-A – Existing Landfil Generation from the Planning Area)	ls and Table	2 5.16-M – Est	timated Futur	e Solid Waste		

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ISSUES (AND SUPPORTING Po		Less Than Significant	Less Than Significant	No Impact		
INFORMATION SOURCES):	Significant Impact	With Mitigation Incorporated	Impact	ппрасс		
Potentially Significant Impact. The Project's potential to generate solid waste in excess of State or local standards will be analyzed in the forthcoming EIR.						
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?						
19e. Response: (Source: California Integrated Waste Manageme	ent Board 20	002 Landfill F	acility Compli	iance 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.						
20. WILDFIRE						
If located in or near state responsibility areas or lands classified as very	high fire ha	zard severity z	zones, would t	he project:		
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	\boxtimes					
 20a. Response: (Source: General Plan 2025 FPEIR Figure 5.7-3 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, General Plan 2025 Figure PS 8.1 Evacuation Routes, Project Site Plan, Project Description) Potentially Significant Impact. The proposed Project's potential to substantially impair an adopted emergency response plan or emergency evacuation plan will be analyzed in the forthcoming EIR. 						
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?						
 20b. Response: (Source: General Plan 2025 Parks and Recreation Element, General Plan 2025 FPEIR Section 5.3 Air Quality, General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002,, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM's Strategic Plan, CAL FIRE's Fire Hazard Severity Zones Maps - https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/) Potentially Significant Impact. The proposed Project's potential to expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, exacerbate wildfire risks will be analyzed in the forthcoming EIR. 						
<u> </u>						
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 FPEIR Figure 5.7-2010)	3 – Fire Ha	zard Areas, G	IS Map Layer	VHFSZ		

SSUES (AND SUPPORTING Potentiall Significant		Less Than Significant	Less Than Significant	No Impact			
INFORMATION SOURCES):	Impact	With Impact Mitigation Incorporated		Impact			
Potentially Significant Impact. The proposed Project's potential to 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 will be analyzed in the forthcoming EIR.							
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 FPEIR Figure 5.7-2010)	3 – Fire Ha	zard Areas, G	IS Map Layer	VHFSZ			
Potentially Significant Impact. The proposed Project's potential expedownslope or downstream flooding or landslides, as a result of runoff, analyzed in the forthcoming EIR.							
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?		D + (6)					
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 5.4-4 - 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 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and FPEIR Figure 5.5-1 - Archaeological Sensitivity, and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix X)							
Potentially Significant Impact. The proposed Project's 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 will be analyzed in the forthcoming EIR.							
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?							
21b. Response: (Source: FPEIR Section 6 - Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)							
Potentially Significant Impact. The proposed Project's potential cumforthcoming EIR.	ulatively co	nsiderable imp	oacts will be an	alyzed in the			

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	With Mitigation	Less Than Significant Impact	No Impact	
		Incorporated			
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?					
21c. Response: (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program) Potentially Significant Impact. The proposed Project's potential substantial adverse effects on human beings will be analyzed in the forthcoming EIR.					

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).

From: <u>Markwardt, Nancy</u>
To: <u>Assadzadeh, Candice</u>

Subject: [External] Response from the Cabazon Band of Mission Indias regarding the draft Environmental Impact Report

for the Crestview Apartments Project

Date: Monday, July 06, 2020 1:24:02 PM

Greetings!

Thank you for reaching out directly to the Cabazon Band of Mission Indians. There is no presence of Native American resources that may be impacted by your future project in preparation for the EIR for the Crestview Apartments Project in Riverside County, CA.

Good luck with your future project.

Nancy Markwardt Recording Administrator/Office Manager Cabazon Band of Mission Indians 84-245 Indio Springs Parkway Indio, Ca 92203

Office: (760) 342-2593 Fax: (760) 347-7880

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This message contains information which may be confidential and privileged. Unless you are the intended addressee (or authorized to receive for the intended addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender at Cabazon Band of Mission Indians or reply to nmarkwardt@cabazonindians-nsn.gov and delete the message. Thank you and have a nice day.



July 30, 2020

Candace Assadzadeh, Senior Planner City of Riverside 3900 Main Street Riverside, CA 92522

Re: Crestview Apartments Project: Notice of Preparation

Dear City of Riverside:

This letter is submitted on behalf of Friends of Riverside's Hills in connection with the proposed Crestview Apartments Project ("Project").

The EIR should also address the following issues:

- All phases of development, as well as related developments in the area;
- An adequate discussion of the impacts associated with the Project, including a comprehensive analysis of the following impacts:
 - o Construction traffic impacts;
 - Biological Resource impacts, including its proximity to nearby open space and the need for effective wildlife corridors;
 - Aesthetic and view impacts, including its proximity to a nearby park;
 - o Cultural Resource impacts;
 - o Energy impacts;
 - Geology and soils impacts, including the substantial amount of grading involved in the Project;
 - Land use and planning impacts, including compliance with Measure C and Proposition R;
 - o Recreation impacts;
 - o Traffic impacts, including nearby streets and intersections impacts;
 - o Noise impacts;
 - o Light impacts;
 - Water quality impacts, including impacts to on-site and nearby riparian areas;
 - o Air quality impacts;
 - Water supply impacts;
 - Public services impacts;
 - Wildfire impacts;
 - Utilities and services impacts;
 - Cumulative impacts; and
 - Climate Change impacts;

City of Riverside July 30, 2020 Page 2 of 2

- A reasonable range of alternatives to the Project; and
- Adequate and verifiable mitigation for impacts associated with the Project, including compliance with mitigation required by General Plan 2025 Final PEIR.

Please contact me if you have questions or need additional information. Additionally, please ensure I am promptly provided a copy of the draft EIR and any notice regarding the Project.

Thank you for your consideration of the above.

Sincerely,

Everett DeLano

From: <u>Dori Mccall</u>

To: <u>Assadzadeh, Candice</u>

Subject: [External] Crestview Apartments Project
Date: Monday, July 27, 2020 10:40:10 PM

July 27, 2020

Dear Candice Assadzadeh,

My name is Dori McCall and I have lived at 20288 Harvard Way, Riverside, CA 92507 for 34 years. I am writing about the proposed project called Crestview Apartments to be built across Central Avenue from my home. Although I am vehemently opposed to the gas station with convenience store, carwash and drive-thru restaurant to be built next to the apartment project, I am writing instead to offer several hopeful and constructive opinions and observations about the Crestview Apartment Project.

First, this project will exacerbate the already hellish traffic patterns in this area. Central Avenue is often backed up at the freeway onramps. Sycamore Canyon Boulevard is a two-lane road and can only siphon off a small number of vehicles. It makes me so mad that a company from San Diego can come into Riverside and plan a huge project at one of our most traffic-sensitive intersections. They do not have to drive here, but I do. My house is across Central Avenue from this project and I often cannot get through the Central Avenue and Sycamore Canyon intersection to get home, without waiting in traffic, backed up, trying to get to the freeway. So, I would like to suggest that the entrance and exit be placed on the north side of this project, onto Sycamore Canyon Boulevard. This will funnel traffic onto two-lane Sycamore Canyon Boulevard and ease congestion at the Central/Sycamore Canyon/freeway intersection. This will also protect me and my neighbors from the sights and sounds of the apartment dwellers going into and out of the project, specifically at night.

Second, this area has a wide variety of wild animals that live in the numerous parks and open spaces surrounding Box Springs Mountain. This area is unlike any other in Riverside and must be preserved. It goes without saying that once these habitats are destroyed, they will never come back. I would like to suggest that the garages and carports be built backing up against the street to reduce the lights, cars and people interacting with the wildlife. It is my understanding that this company has previously agreed to limiting lighting and building a higher wall on the gas station project specifically to protect the wildlife here. I am asking for the same concessions on the apartment project. By building the carports and garages to back up to Central Avenue this will minimize the restrictions to the animals' access to the parks and the mountains.

Lastly, when I purchased my home in 1986 it was partly because of the spectacular views. This project will not only create more traffic, noise, lights and overall disruption and upheaval to my physical discomfort but will impact me monetarily. The views in this neighborhood are part of the appeal of home ownership and an apartment complex four stories high will destroy my view. Please take into consideration the destruction of my views and therefore the diminished monetary value of my property when making any decisions.

From: GAIL Collard

To: Assadzadeh, Candice

Subject: [External] Apartment complex

Date: Tuesday, July 21, 2020 9:32:08 PM

Hello,

I am a resident in the Sycamore Highlands neighborhood. I am writing in concern of the apartment complex that is being considered for development at Central and Sycamore Canyon.

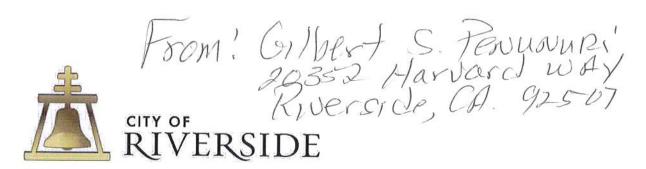
There has been so much construction in the area, our wildlife is running out of space to live. I see coyotes running through the neighborhood in daylight hours. The last few days residents have been startled as they walk their tiny dogs. This is wrong. All this has started with the land in the area being filled with warehouses and apartment complexes.

I understand that people need places to live and to work. Unfortunately we are losing the natural beauty of Riverside by allowing so many warehouses and apartment complexes. By allowing another large complex, we are endangering our natural wildlife as well as making our city less family friendly.

Please do not allow the land at Central and Sycamore Canyon to be developed into an apartment complex.

Thank you, Gail Collard

Sent from my iPhone



Community & Economic Development Department

Planning Division

RECEIVE Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov

JUL - 9 2020

NOTICE OF PREPARATION

Community & Economic
Development Department

FROM LEAD AGENCY:

Candice Assadzadeh, Senior Planner

City of Riverside

Community & Economic Development

Department Planning Division 3900 Main Street, 3rd floor Riverside, California 92522

DATE: June 30, 2020

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Crestview

Apartments Project

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed residential project known as the Crestview Apartments Project (Project). The City is requesting input from you or your agency or organization as to the scope and content of the environmental information that is relevant to your agency or organization's statutory responsibilities or interests in connection with the proposed Project.

This Notice of Preparation (NOP) identifies the Project applicant, contains the proposed Project description including Project setting and location, and identifies the potential environmental effects of the proposed Project. A vicinity map is included in this NOP.

Due to time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this NOP. The public comment period for this NOP begins on June 30, 2020 and is set to close at 5:00 p.m. on July 30, 2020.

Please send written responses to Candice Assadzadeh at the address shown above or via e-mail at cassadzadeh@riversideca.gov. Please include the name and contact person in your agency.

DOCUMENT AVAILABILITY: The Initial Study is available on the City's website at https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents or contact Candice Assadzadeh at 951-826-5667 or via e-mail at cassadzadeh@riversideca.gov to obtain a PDF of the Initial Study.

PROJECT TITLE: Crestview Apartments - Planning Cases P19-0775 (General Plan Amendment), P19-0776 (Zoning Code Amendment), P19-0777 (Design Review), P19-0905 (Environmental Impact Report), P20-0307 (Variance), P20-0308 (Grading Exception), P20-0309 (Grading Exception), and P20-0310 (Summary Vacation)

PROJECT APPLICANT: Ken Assi, KA Enterprises.

PROJECT LOCATION: The project site is situated at the northwest corner of Central Avenue and Sycamore Canyon Boulevard in the City of Riverside. The project site is comprised of the following single parcel: 256-050-012.

PROJECT SETTING: The approximately 9.44-acre project site is currently vacant. The property to the north of the project, across Sycamore Canyon Boulevard and State Route 60, is vacant. Land use to the east, across Sycamore Canyon Boulevard, is a recently approved commercial development. Property to the south of the project site, across Central Avenue, is also vacant. Land use to the west of the project site is the City of Riverside's Quail Run Open Space Park.

PROJECT GENERAL PLAN AND ZONING DESIGNATIONS: The project site currently has a General Plan Land Use designation of C - Commercial. It is zoned CG - Commercial General.

PROJECT DESCRIPTION: The proposed project includes a total of 237 one-, two-, and three-bedroom residential apartment units in seven buildings, consisting of five 3-story buildings and two 2-4 split story-buildings. A total of 94 units are proposed to be one-bedroom, 126 are proposed to be two-bedroom, and 17 are proposed to be three-bedroom units. The proposed project includes the following amenities: onsite leasing office, garages, carports, mail lounge, putting green, outdoor resort style pool and spa, dog run area with a dog wash station, fitness center, clubhouse, shade structures with barbecues and tables, and a walking perimeter loop trail (1/2 mile loop) with learning or exercise stations.

Primary and secondary access to the site is provided from Sycamore Canyon Boulevard on the eastern boundary of the site. The driveway on the northern boundary of the site on Sycamore Canyon Boulevard will be used for egress by future residents and as an emergency access. Both driveways will be gate controlled. Construction is anticipated to take approximately 18 months to be completed. It will begin around October 2021 and end around April 2023. The project is anticipated to be operational in 2023.

Project Alternatives: Identification of potential alternatives to the Crestview Apartments will be addressed as part of the EIR. Analysis of a "No Project" alternative is required by law. In addition to the "No Project" Alternative, at least two additional alternatives will be evaluated. The evaluation of alternatives will provide a comparative analysis of alternatives to the proposed development.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with the development of the Crestview Apartments project, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with the City and Applicant's goals and objectives.

Cumulative Impact Analysis: The EIR will include a discussion of the potentially significant cumulative impacts of the Crestview Apartments project when considered with other past, present, and reasonably foreseeable future projects in the area.

Other Required Sections: The EIR will also include other information typically required for an EIR. These other sections include the following: 1) Introduction; 2) Project Description; 3) Effects Found Not to Be Significant; 4) Environmental Impact Analysis; 5) Growth-Inducing

Impacts; 6) Significant Unavoidable Environmental Effects; 7) Significant Irreversible Changes; 8) Consistency with Regional Plans; 9) Discussion and Analysis of Energy Conservation based on Appendix F and G of CEQA Guidelines; 10) Mitigation Measures; 11) References; and 12) List of Preparers.

Based on the analysis contained in the Initial Study and Appendices, the following topics have been determined to have no impact or a less than significant impact and therefore will not be analyzed further in the forthcoming EIR:

- Agriculture & Forest Resources
- Hazards & Hazardous Materials (except for wildland hazards, which will be analyzed in the Wildfire section of the EIR)
- Hydrology / Water Quality
- Mineral Resources
- Population/Housing
- Public Services (except for Fire Protection, which will be analyzed in the EIR)
- Recreation

And based on the analysis contained in the Initial Study, the following topics have been determined to have a potentially significant impact and will be addressed in the forthcoming EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/ Soils
- Greenhouse Gas Emissions
- Land Use/Planning
- Noise
- Fire Protection (from Public Services)
- Transportation
- Tribal Cultural Resources

- Utilities/ Service Systems
- Wildfire

Relevant technical reports will be provided as EIR appendices.

SCOPING MEETING: A virtual scoping meeting will be held about this project.

Meeting Information:

Wednesday, July 22, 2020

6:00 – 8:00 p.m. (Pacific Standard Time) View the virtual meeting live webcast at:

https://event.webinarjam.com/channel/Crestview

Note: No pre-registration is required. Entering the web address above will directly take you to the broadcast room sign-in. First name and email address are required to enter the broadcast room to keep track of attendees. Questions and comments will be received using the chat feature and addressed by the presenters.

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TITLE:

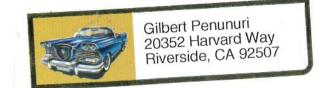
Candice Assadzadeh, Senior Planner - City of Riverside

TELEPHONE:

951-826-5667

DATE:

06-30-2020



SH BERNARDINO CA 924



Planning Dept. 3900 Main St. 3rd Floor Riverside, CA. 91522

From: Inma/Ernest Martinez
To: Assadzadeh, Candice

Subject: [External] Crestview apartments

Date: Sunday, July 19, 2020 1:01:18 PM

Good morning,

We read the proposal of this development and several neighbors around this area think it's a great mistake to put apartments in this area, due to several reasons; one of them is the environmental factor, this area is a corridor of wild life.

Also, it's extremely close to the freeways and it would be extremely noisy for tenants and would make traffic conditions worse. This area

is already packed with cars during rush hours.

It would also eliminate the beautiful view of Riverside.

Thank you for the information you provide about the upcoming meeting. Sincerely,

Inma Martinez

From: Jennifer Becker

To: Assadzadeh, Candice

Cc: Melendrez, Andy

Subject: [External] Crestview Apartments; public comment

Date: Monday, July 20, 2020 9:21:41 AM

Dear Ms. Assadzadeh,

I am writing to express my opposition to the construction of 237 luxury apartments at the corner of the Central Avenue and Sycamore Canyon Blvd. This project will destroy a portion of one of the few remaining blue line streams in the City of Riverside. Construction of such a project will require the issuance of costly CEQA mandated mitigation credits that invariably result in the net loss of natural open space in exchange for ineffective and temporary improvements to existing open space.

Permanent destruction of natural open space can only be justified when it results in a net benefit to the community. Riverside has a dire need for increased inventory of affordable apartment housing, but this project which includes a putting green, luxury pool and dog wash station clearly is not intended as affordable housing. The median income in Riverside is approximately \$55,000 and the average income around \$22,000. Someone earning \$55,000 per year can afford an apartment costing \$1300/month. Will this project offer apartments affordable to Riverside residents?

We do not need more projects that attract commuters to Orange and LA Counties. We need affordable housing for people who live and work in Riverside and nearby communities.

Respectfully, Jennifer Becker Riverside

To Whom It May Concern:

I am writing to express concerns regarding the proposed Crestview Apartments Project. Firstly, I was born and raised in the Inland Empire but left for military service in 2008. Upon my return in 2014, I was shocked to see how much development had taken place in my absence. I have since witnessed problems arise and worsen with the never-ending developing of our region. This project impacts me directly as I purchased a condominium located in Sonata at Canyon Crest two months ago. One of the things that appealed to me was the area—sense of seclusion from State Route 60 (SR-60). Now that there is a gas station planned along with a possible apartment complex, I am very concerned.

I am concerned with the habitat that will be destroyed for this project. I am a second-year Ph.D. student at the University of California, Riverside and I study plant-pollinator interactions in Riverside County. As a result, I am very familiar with the local coastal sage scrub and chaparral ecosystems which provide habitat for rare and native bees, butterflies, and plants. One of the largest threats to these ecosystems is urban development. Driving by the proposed site, I can identify many native plant species that native bees and butterflies rely on for nectar and pollen. Additionally, the existing rock formations should not be destroyed as these geologic features are irreplaceable.

Further, in 2018, the American Lung Association named the Inland Empire as having the worst air quality in the country and our status has remained at the top of numerous bad air quality lists in subsequent years. Greenhouse gas emissions, due largely to automobiles, is a leading contributor to this problem which has resulted in high rates of asthma in children as well as increased rates of other respiratory diseases and cancer in adults. Building an apartment complex immediately adjacent to an already heavily trafficked stretch of SR-60 will only exacerbate the problems those of us residing in the area already live with. I avoid SR-60 at all costs due to existing traffic problems and the problem will surely worsen not only on SR-60, but on Watkins Dr-Central Ave which is a popular alternative route for Canyon Crest residents.

Overall, the surrounding area would be negatively impacted by any further automobile traffic and our native ecosystems desperately need to be preserved, so please do not proceed with the project. Thank you for your time and please feel free to contact me at (909) 835-8382 or saldivar.jolene@yahoo.com with any questions or concerns.

Sincerely,

Johne Saldivar

Jo lene Antonette Saldivar



FACILITIES PLANNING &
DEVELOPMENT
25634 Alessandro Blvd.
Moreno Valley, CA 92553
951-571-7500
www.mvusd.net

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The mission of Moreno Valley Unified School District is to ensure all students graduate high school prepared to successfully enter into higher education and/or pursue a viable career path.

July 30, 2020

Candace Assadzadeh
Senior Planner
City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd floor
Riverside, CA 92522

Email: cassadzadeh@riversideca.gov

Project: Crestview Apartments Project, APN 256-050-012

Subject: Comments to the Notice of Preparation (NOA) of a Draft Environmental Impact Report (DEIR) dated June 30, 2020

Dear Ms. Assadzadeh,

The Moreno Valley Unified School District (District) appreciates the opportunity to review the Crestview Apartment Project NOA of a Draft Environmental Impact Report (DEIR) dated June 20, 2020.

The District's focus continues to be the health and well-being of our students and staff, specifically to air pollution and increase in traffic that may negatively impact the School District.

Additionally, it should be noted that there will be developer impact fees associated with this project, payable to the Moreno Valley Unified School District. Those fees are currently \$4.64 per square foot for residential. If there is a community building/offices associated with this project, that fee is currently \$.66 per square foot. These fees are subject to change and prior contact should be made with our Facilities and Planning Department's Demographics Technician, Cheryl Acevedo (cacevedo@mvusd.net) for processing a certificate of compliance and payment of fees.

Please keep us informed as to the City's progress in this matter, and any notifications relating to this project.

Sincerely,

Samer Alzubaidi Director

Facilities Planning & Development salzubaidi@mvusd.net



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nahc@nahc.ca.gov
NAHC.ca.gov

NATIVE AMERICAN HERITAGE COMMISSION

RECEIVED

June 30, 2020

Candice Assadzadeh City of Riverside 3900 Main Street, 3rd Floor, Planning Division Riverside, CA 92522 JUL - 6 2020

Community & Economic

Development Department

Re: 2020069047, Crestview Apartments Project, Riverside County

Dear Ms. Assadzadeh:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18), (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov, Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. <u>Mandatory Topics of Consultation if Requested by a Tribe</u>: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. <u>Discretionary Topics of Consultation</u>: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - **b.** Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency, (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- **6.** <u>Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:</u> If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. <u>Conclusion of Consultation</u>: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - **a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - **b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- **10.** Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - **b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - **c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - **e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - **f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - **a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - **b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - **c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09-14-05-updated-Guidelines-922.pdf.

Some of SB 18's provisions include:

- 1. <u>Tribal Consultation</u>: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).
- 2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
- 3. <u>Confidentiality</u>: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
- 4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - **a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - **b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

- 1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - **a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - **b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

- 3. Contact the NAHC for:
 - **a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - **b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- **4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - **a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - **b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - **c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Cultural Resources Analyst

andrew Green

cc: State Clearinghouse



1995 MARKET STREET RIVERSIDE, CA 92501 951.955.1200 FAX 951.788.9965 www.rcflood.org

232322

July 17, 2020

City of Riverside Planning Department 3900 Main Street Riverside, CA 92522

Attention: Candice Assadzadeh

Re: P19-0775, 19-0776, 19-0777, 19-0905.

P20-0307, 20-0308, 20-0309 and 20-0310

APN 256-050-012

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received June 29, 2020. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
This project involves District proposed Master Drainage Plan facilities, namely,
This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
This project is located within the limits of the District's Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid by cashier's check or money order only to the Flood

City of Riverside

Re: P19-0775, 19-0776, 19-0777, 19-0905,

P20-0307, 20-0308, 20-0309 and 20-0310

APN 256-050-012

232322

Control District or City prior to issuance of grading or building permits.	Fees to be paid should
be at the rate in effect at the time of issuance of the actual permit.	1

An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, ______. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

☐ The District's previous comments are still valid.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

DEBORAH DE CHAMBEAU Engineering Project Manager

Deborah de Chambeau

c: Riverside County Planning Department Attn: John Hildebrand

SLJ:blm





Santa Ana Regional Water Quality Control Board

July 23, 2020

Candice Assadzadeh, Senior Planner
City of Riverside Community and Economic Development
Department Planning Division
3900 Main St., 3rd Floor
Riverside, CA 92522

cassadzadeh@riversideca.gov

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, CRESTVIEW APARTMENTS PROJECT – CENTRAL AVE AT SYCAMORE CANYON BLVD/STATE ROUTE 60, CITY OF RIVERSIDE

Dear Ms. Assadzadeh:

Staff of the Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the proposed Crestview Apartments Project in northeastern Riverside (Project; formerly the Alexan Cityscape site). The Project would be located on a disturbed 9.44-acre hilltop, along the northern side of Central Avenue where it meets the Sycamore Canyon Boulevard offramp from eastbound State Route 60. A total of 237 one- to three-bedroom apartment units would be constructed among seven buildings, with garages and outdoor recreational amenities. The NOP states that at least two construction alternatives will be analyzed in the DEIR.

Santa Ana Water Board staff recommends that the NOP incorporate the following comments in order for the Project to best protect water quality standards (water quality objectives, beneficial uses, and antidegradation policy), as defined in the Water Quality Control Plan for the Santa Ana River Basin (i.e., Basin Plan):

1. The City of Riverside's Quail Run Open Space Park, a rocky conservation area, borders the Project site on the west on the same northern side of Central Avenue. A robustly vegetated natural drainage originates on the opposite side of Central Avenue and crosses beneath it, then crosses the southwestern corner of the Project site and continues into the Park. We request that DEIR alternatives avoid this drainage and incorporate it into site aesthetics.

During our reviews of earlier Project iterations, it has not been clear whether Project runoff would first flow directly into the drainage or to the existing Central Avenue

WILLIAM RUH, CHAIR | HOPE SMYTHE, EXECUTIVE OFFICER

stormdrain. A study of Hydraulic Conditions of Concern in the DEIR should include potential hydromodification of the drainage. Onsite Best Management Practices (BMPs) must regulate the Project's stormwater volume and quality. Further, we understand that a 100-foot setback between the open-space vegetation and the buildings is required by the Riverside Fire Department for defensible space. If so, a setback would be relevant toward separating development from the drainage.

2. If construction avoidance of the drainage is not feasible, then the DEIR must explain the reasons and include a Jurisdictional Delineation (JD) determining the acreage of waters of the state and/or the United States to be impacted, of the total such acreage that exists onsite and downstream of the Project. We understand that during previous site planning, waters of the state jurisdictional to the Santa Ana Water Board and the California Department of Fish and Wildlife may have been delineated. However, we are unaware of a JD to date.

Impacts to waters of the state combined with those to waters of the U.S. would require issuance of Waste Discharge Requirements (WDRs) from our office. Impacts to waters of the U.S. alone would require our issuance of a Clean Water Act Section 401 Water Quality Standards Certification (Certification), as a prerequisite to a Clean Water Act Section 404 Permit issued by the U.S. Army Corps of Engineers. Mitigation in compliance with the California Environmental Quality Act, and germane to drainage impacts, should be initially proposed in the DEIR. This mitigation may be discussed with our staff and subsequently proposed in the same application for either WDRs or a Certification, as found on our website: https://www.waterboards.ca.gov/santaana/water_issues/programs/401_certification/

If you have any questions, please contact Glenn Robertson at (951) 782-3259 and <u>Glenn.Robertson@waterboards.ca.gov</u>, or me at (951) 782-4995 and <u>Terri.Reeder@waterboards.ca.gov</u>

Sincerely,

Terri S. Reeder, PG, CEG, CHG Supervisor, Coastal Waters Planning and CEQA Section

Cc:

California Department of Fish and Wildlife, Ontario office – Kim Freeburn - Kim.Freeburn@wildlife.ca.gov

U.S. Army Corps of Engineers, Los Angeles office - Stephanie J. Hall - <u>Stephanie.J.Hall@usace.army.mil</u>

SENT VIA E-MAIL:

July 23, 2020

cassadzadeh@riversideca.gov
 Candice Assadzadeh, Senior Planner
 City of Riverside, Community & Economic Development Department
 3900 Main Street, Third Floor
 Riverside, CA 92522

Notice of Preparation of a Draft Environmental Impact Report for the Crestview Apartments Project¹

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion and public release. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files². These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

CEQA Air Quality Analysis

South Coast AQMD adopted its CEQA Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. It is recommended that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to

¹ The Proposed Project consists of construction of 237 residential units totaling 253,170 square feet on 9.44 acres.

² Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

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South Coast AQMD's CEQA regional pollutant emissions significance thresholds ³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity to sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse health risk impacts using its best efforts to find out and a good-faith effort at full disclosure in the CEQA document. Based on reviews of Exhibit 1, *Regional Context*, and aerial photographs, South Coast AQMD staff found that the Proposed Project will be located immediately south of State Route 60 (SR-60) and west of Interstate 215 (I-215). Residents at the Proposed Project would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen. Since future residences of the Proposed Project would be exposed to DPM emissions, South Coast AQMD staff recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)⁶ in the CEQA document to disclose the potential health risks to the residents⁷. This will

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.

⁴ Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

⁵ Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

⁶ South Coast AQMD. Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

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facilitate the purpose and goal of CEQA on public disclosure and enable decision-makers with meaningful information to make an informed decision on project approval. This will also foster informed public participation by providing the public with useful information that is needed to understand the potential health risks from living in a close proximity to SR-60 and I-215.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance⁸ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD'S CEQA Air Quality
 Handbook. South Coast AQMD's CEQA web pages available here:

 http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures and-control-efficiencies
- South Coast AQMD's Rule 403 Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- California Air Pollution Control Officers Association (CAPCOA)'s Quantifying Greenhouse Gas
 Mitigation Measures available here:
 http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Health Risks Reduction Strategies

As stated above, the Proposed Project is located in close proximity to SR-60 and I-215. Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

⁷ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁸ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

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Enhanced filtration systems have limitations. South Coast AQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that South Coast AQMD conducted to investigate filters⁹, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents at the Proposed Project are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Because of the limitations, to ensure that enhanced filters are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing inspection, maintenance, and monitoring of filters in the environmental analysis. To facilitate a good faith effort at full disclosure and provide useful information to people who will live at the Proposed Project, the CEQA document should include the following information, at a minimum:

- Disclose the potential health impacts to prospective residents from living in close proximity of freeways and the reduced effectiveness of air filtration system when windows are open and/or when residents are outdoor (e.g., in the common and open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are inspected regularly;
- Provide information to residents on where the MERV filers can be purchased;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units to prospective residents;
- Identify the responsible entity such as residents themselves, Homeowner's Association, or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents at the Proposed Project will be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose any ongoing cost sharing strategies, if any, for the purchase and replacement of the enhanced filtration units;
- Set City-wide or Project-specific criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a City-wide or Project-specific process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

⁹ This study evaluated filters rated MERV 13 or better. Accessed at: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013. Also see 2012 Peer Review Journal article by South Coast AQMD: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.

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South Coast AQMD Permits

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. For more information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2001 or at South Coast AQMD's website at: http://www.aqmd.gov.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D. Program Supervisor, CEQA IGR Planning, Rule Development & Area Sources

LS RVC200708-19 Control Number Preparation of EIR for Crestview Apartments.

Response July 4, 2020

To Candice Assadzadeh

While issues of animal habitat and increased crime will come, my number one concern is **traffic**. I commute through the intersections of Central Ave/Sycamore Canyon, and Central Ave/R60-215, every day and the backup there can stretch one mile on some non-Covid mornings and evenings. A current survey would not the problem justice due to temporary decreased traffic.

One mile, 30+ minutes to get through two traffic lights.

What are you, the City, going to do to mitigate unbelievable congestion at times through the area? And now you want to add 281 apartments, a gas station, a car wash, and a fast food restaurant, all on the same corner. Bad planning!

In addition, during peak congestion, it is nearly impossible to turn right from westbound Sycamore Canyon to northbound Central. Freeway onramp traffic backs up and stops traffic to Lochmoor nearly one mile away south, and to Fair Isle nearly one mile east on Sycamore Canyon.

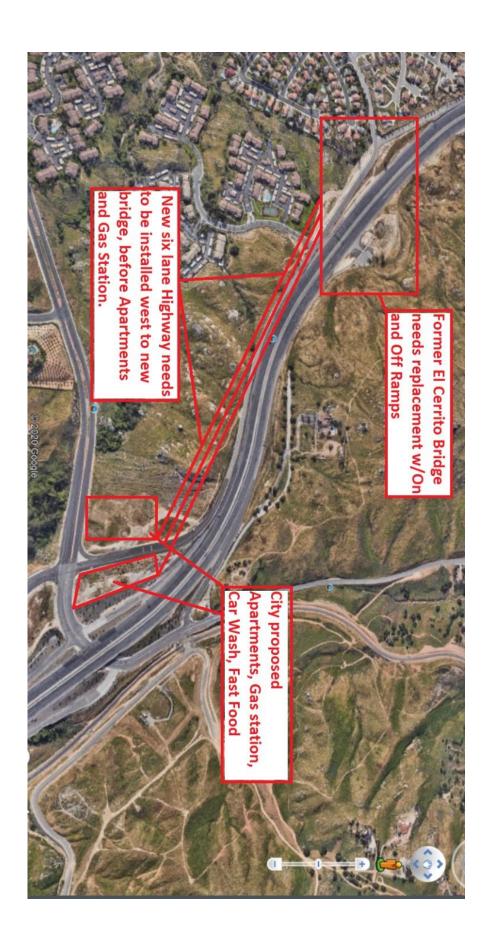
My assumption is the City of Riverside does not care because east and north of the apartment location is unincorporated county area and state-owned areas. So why should the City care? Just absolute isolated selfish thinking on the part of the City of Riverside.

<u>You need to install a New Six Lane Highway</u> in the City area running West from Central to funnel traffic to where the El Cerrito overpass was demolished a few years ago, and work with CalTrans to <u>replace the El Cerrito bridge with on/off ramps to dilute the traffic</u>.

Scott Anderson, Local Resident and Local Worker

909.245.1383 Email: sandson@att.net

Image attached, Page 2





Transmission Technical Services Department

9400 Oakdale Ave Chatsworth, CA 91311 SC9314

July 9, 2020

Candice Assadzadeh City of Riverside CAssadzadeh@riversideca.gov

Subject: DCF: 1157-20NC / Notice of EIR for the Crestview Apartments Projects

DCF: 1157-20NC

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

SCGSERegionRedlandsUtilityRequest@semprautilities.com

Best Regards,

SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com





Community & Economic Development Department

Planning Division

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov

NOTICE OF PREPARATION

FROM LEAD AGENCY:

Candice Assadzadeh, Senior Planner

City of Riverside

Community & Economic Development

Department Planning Division 3900 Main Street, 3rd floor Riverside, California 92522

DATE: June 30, 2020

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Crestview

Apartments Project

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed residential project known as the Crestview Apartments Project (Project). The City is requesting input from you or your agency or organization as to the scope and content of the environmental information that is relevant to your agency or organization's statutory responsibilities or interests in connection with the proposed Project.

This Notice of Preparation (NOP) identifies the Project applicant, contains the proposed Project description including Project setting and location, and identifies the potential environmental effects of the proposed Project. A vicinity map is included in this NOP.

Due to time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this NOP. The public comment period for this NOP begins on June 30, 2020 and is set to close at 5:00 p.m. on July 30, 2020.

Please send written responses to Candice Assadzadeh at the address shown above or via e-mail at cassadzadeh@riversideca.gov. Please include the name and contact person in your agency.

DOCUMENT AVAILABILITY: The Initial Study is available on the City's website at https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents or contact Candice Assadzadeh at 951-826-5667 or via e-mail at cassadzadeh@riversideca.gov to obtain a PDF of the Initial Study.

PROJECT TITLE: Crestview Apartments - Planning Cases P19-0775 (General Plan Amendment), P19-0776 (Zoning Code Amendment), P19-0777 (Design Review), P19-0905 (Environmental Impact Report), P20-0307 (Variance), P20-0308 (Grading Exception), P20-0309 (Grading Exception), and P20-0310 (Summary Vacation)

PROJECT APPLICANT: Ken Assi, KA Enterprises.

PROJECT LOCATION: The project site is situated at the northwest corner of Central Avenue and Sycamore Canyon Boulevard in the City of Riverside. The project site is comprised of the following single parcel: 256-050-012.

PROJECT SETTING: The approximately 9.44-acre project site is currently vacant. The property to the north of the project, across Sycamore Canyon Boulevard and State Route 60, is vacant. Land use to the east, across Sycamore Canyon Boulevard, is a recently approved commercial development. Property to the south of the project site, across Central Avenue, is also vacant. Land use to the west of the project site is the City of Riverside's Quail Run Open Space Park.

PROJECT GENERAL PLAN AND ZONING DESIGNATIONS: The project site currently has a General Plan Land Use designation of C - Commercial. It is zoned CG - Commercial General.

PROJECT DESCRIPTION: The proposed project includes a total of 237 one-, two-, and three-bedroom residential apartment units in seven buildings, consisting of five 3-story buildings and two 2-4 split story-buildings. A total of 94 units are proposed to be one-bedroom, 126 are proposed to be two-bedroom, and 17 are proposed to be three-bedroom units. The proposed project includes the following amenities: onsite leasing office, garages, carports, mail lounge, putting green, outdoor resort style pool and spa, dog run area with a dog wash station, fitness center, clubhouse, shade structures with barbecues and tables, and a walking perimeter loop trail (1/2 mile loop) with learning or exercise stations.

Primary and secondary access to the site is provided from Sycamore Canyon Boulevard on the eastern boundary of the site. The driveway on the northern boundary of the site on Sycamore Canyon Boulevard will be used for egress by future residents and as an emergency access. Both driveways will be gate controlled. Construction is anticipated to take approximately 18 months to be completed. It will begin around October 2021 and end around April 2023. The project is anticipated to be operational in 2023.

Project Alternatives: Identification of potential alternatives to the Crestview Apartments will be addressed as part of the EIR. Analysis of a "No Project" alternative is required by law. In addition to the "No Project" Alternative, at least two additional alternatives will be evaluated. The evaluation of alternatives will provide a comparative analysis of alternatives to the proposed development.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with the development of the Crestview Apartments project, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with the City and Applicant's goals and objectives.

Cumulative Impact Analysis: The EIR will include a discussion of the potentially significant cumulative impacts of the Crestview Apartments project when considered with other past, present, and reasonably foreseeable future projects in the area.

Other Required Sections: The EIR will also include other information typically required for an EIR. These other sections include the following: 1) Introduction; 2) Project Description; 3) Effects Found Not to Be Significant; 4) Environmental Impact Analysis; 5) Growth-Inducing

Impacts; 6) Significant Unavoidable Environmental Effects; 7) Significant Irreversible Changes; 8) Consistency with Regional Plans; 9) Discussion and Analysis of Energy Conservation based on Appendix F and G of CEQA Guidelines; 10) Mitigation Measures; 11) References; and 12) List of Preparers.

Based on the analysis contained in the Initial Study and Appendices, the following topics have been determined to have no impact or a less than significant impact and therefore will not be analyzed further in the forthcoming EIR:

- Agriculture & Forest Resources
- Hazards & Hazardous Materials (except for wildland hazards, which will be analyzed in the Wildfire section of the EIR)
- Hydrology / Water Quality
- Mineral Resources
- Population/Housing
- Public Services (except for Fire Protection, which will be analyzed in the EIR)
- Recreation

And based on the analysis contained in the Initial Study, the following topics have been determined to have a potentially significant impact and will be addressed in the forthcoming EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/ Soils
- Greenhouse Gas Emissions
- Land Use/Planning
- Noise
- Fire Protection (from Public Services)
- Transportation
- Tribal Cultural Resources

- Utilities/ Service Systems
- Wildfire

Relevant technical reports will be provided as EIR appendices.

SCOPING MEETING: A virtual scoping meeting will be held about this project.

Meeting Information:

Wednesday, July 22, 2020

6:00 – 8:00 p.m. (Pacific Standard Time) View the virtual meeting live webcast at:

https://event.webinarjam.com/channel/Crestview

Note: No pre-registration is required. Entering the web address above will directly take you to the broadcast room sign-in. First name and email address are required to enter the broadcast room to keep track of attendees. Questions and comments will be received using the chat feature and addressed by the presenters.

SIGNATURE:

Candette associationaletu.

TITLE:

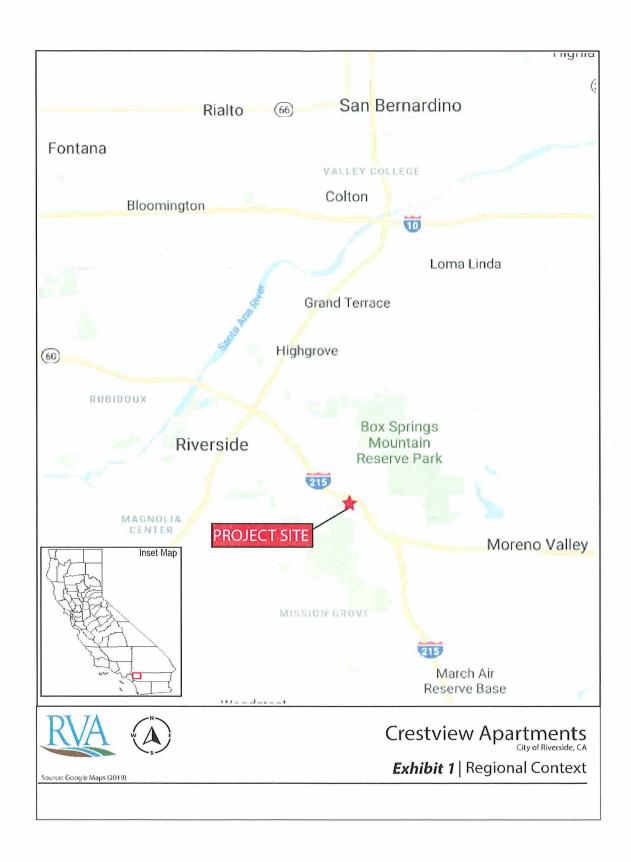
Candice Assadzadeh, Senior Planner - City of Riverside

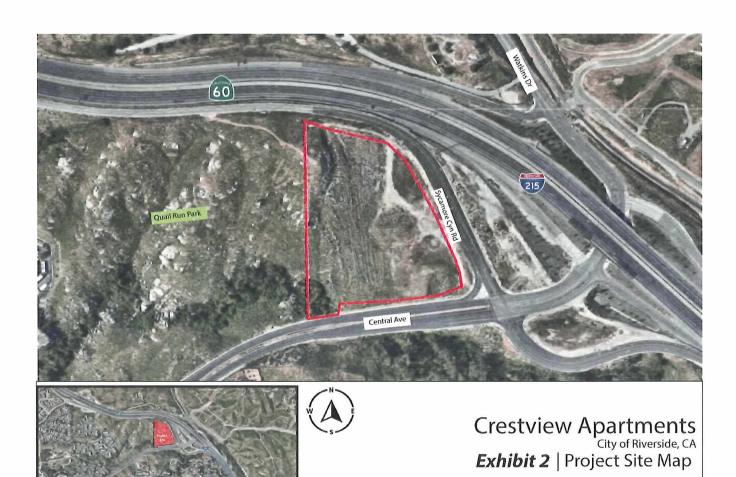
TELEPHONE:

951-826-5667

DATE:

06-30-2020





Planning, Design & Construction

UC RIVERSIDE

1223 University Avenue, Suite 240 Riverside, CA 92507

July 27, 2020

Candice Assadzadeh, Senior Planner City of Riverside Community & Economic Development Department Planning Division 3900 Main Street, 3rd Floor Riverside, California 92522

Transmitted via Email: cassadzadeh@riversideca.gov

Re: Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Crestview Apartments Project

Thank you for the opportunity to review and comment on the Initial Study/Notice of Preparation (IS/NOP) for the City of Riverside's proposed Crestview Apartments Project (proposed Project) – Planning Cases P19-0775 (General Plan Amendment), P19-0776 (Zoning Code Amendment), P19-0777 (Design Review), P19-0905 (Environmental Impact Report), P20-0307 (Variance), P20-0308 (Grading Exception), P20-0309 (Grading Exception), and P20-0310 (Summary Vacation).

It is the University of California, Riverside's (UCR's) understanding that the proposed Project includes the development of 237 one-, two-, and three-bedroom residential apartment units in seven buildings, consisting of five 3-story buildings and two 2-4 split story-buildings. A total of 94 units are proposed to be one-bedroom, 126 are proposed to be two-bedroom, and 17 are proposed to be three-bedroom units. Onsite amenities for the proposed Project includes a leasing office, garages, carports, mail lounge, putting green, outdoor resort style pool and spa, dog run area with a dog wash station, fitness center, clubhouse, shade structures with barbecues and tables, and a walking perimeter loop trail with learning or exercise stations. The proposed 9.44-acre Project site is located at the northwest corner of Central Avenue and Sycamore Canyon Boulevard in the City of Riverside, California.

The following UCR comments on the IS/NOP is provided below:

Be sure to include UCR's 2021 Long Range Development Plan (LRDP) in the Project EIR's Cumulative Impact Analysis. Please refer to the following website for information related to the projected number of students, staff/faculty, and development square footage for the proposed 2021 LRDP: https://pdc.ucr.edu/environmental-planning-ceqa.

In addition to hard copy notices, please provide an electronic copy of future Agency/CEQA notices to <u>stephanie.tang@ucr.edu</u>. The University appreciates your consideration of the comments provided in this letter. Thank you.

Sincerely.

Stephanie Tang

Campus Environmental Planner

Stephanie Tang