CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT **PLANNING DIVISION**

DRAFT NEGATIVE DECLARATION

WARD: 2

1. **Case Number:** PR-2021-000958 (Parcel Map, Design Review)

2. **Project Title:** Old 215 Business Park Project

3. **Hearing Date:** July 28,2021

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

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

6. **Project Location:** The project site is located east of the I-215 Freeway, west of the Old 215 Frontage Road, and north of Cottonwood Avenue in the City of Riverside (see Exhibit 1 - Project Location Map and Exhibit 2 - Project Area). The site is located at latitude 33º 55' 31" North and longitude 117º 17' 16" West.

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

FB 215 LLC
552 Walnut Avenue, Suite 110
Tustin, California 92780

8. **General Plan Designation:** B/OP – Business/Office Park

9. **Zoning:** BMP -SP– Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones

10. **Description of Project:** The applicant is proposing to construct 118,580 square feet of industrial warehouse/ business park-related uses in three (3) buildings on 8.12 acres in the City of Riverside (City). The project site is a triangular-shaped property is located east of the I-215 Freeway, west of the Old 215 Frontage Road, and north of Cottonwood Avenue (see attached site plan). The site comprises five (5) parcels (Assessor Parcel Numbers 263-070-048-2, -059-2 and 263-080-016-4, -018-6, and -020-7) in the City of Riverside. At its closest point to March Joint Air Reserve Base (MJARB), the site is 1.95 miles (10,317 feet north-northwest of the MJARB runway). The site slopes down at 1.4 percent to the southwest from an elevation of 1,538 feet at the north corner down to 1,518 feet at the southwest corner.

The site is within the Sycamore Canyon Business Park Specific Plan (SCBPSP), which designates the property for industrial uses. The proposed warehouse and office uses are consistent with the City's General Plan Land Use Map designation of Business/Office Park (B/OP), the SCBPSP, and the City **Zoning Map**

designation as Business and Manufacturing Park Zone (BMP). The proposed project is consistent with the General Plan and Zoning designations for the property.

The applicant is requesting a Design Review and Tentative Parcel Map for an industrial/business park development. The proposed Site Plan is shown in Exhibit 3 – Site Plan.

The Design Review application is for the development of three (3) industrial warehouse buildings consisting of 104,580 square feet of warehouse and 14,000 square feet of office use on three (3) parcels. In addition, an onsite runoff detention basin and a utility easement (30-inch gas line) are located in Parcel A in the southwest corner of the site (total 0.72-acre). A summary of project development characteristics is shown in Table 1 below. Buildings 1 and 2 are proposed with a maximum (parapet) height of 34 feet while Building 3 will be 28 feet in height. The maximum building height allowed under the Specific Plan is 45 feet. The site plan shows 171 auto parking spaces provided versus 163 spaces required (no truck parking spaces are proposed at this time). Truck and auto access to the site would be from 3 driveways on Old 215 Frontage Road and one driveway on the Cottonwood Avenue cul-de-sac. All of the driveways are 35-feet in width and will provide emergency access to all portions of the site as needed. An 8-foot tall metal fence is proposed along the southern boundary of the site and a screen wall is proposed along the western boundary of the site adjacent to the I-215 Freeway, which is consistent with Caltrans screening requirements.

The Tentative Parcel Map will consolidate the existing 5 parcels into 4 parcels, one for each proposed new building and one for the detention basin as described above. A 30-inch buried gas line is located near the southern boundary in the southwest corner of the site in Parcel A (total 0.72 acre).

Table 1: Project Characteristics

Characteristic	Building 1	Building 2	Building 3	Parcel A	Total
Site Area					
Acres	2.40	3.71	1.29	0.72	8.12
Square Feet	104,493	161,579	56,128	31,523	353,723
Building Area (square feet)					
Office	4,000	8,000	2,000	--	14,000
Warehouse	32,534	53,032	19,014	--	104,580
Total	36,534	61,032	21,014	--	118,580
Floor Area Ratio (FAR)[1]	0.35	0.38	0.37	--	0.34
Building Height (feet)	34	34	28	--	28-34
Parking (Auto Only)					
Required[2]	49	86	28	--	163
Provided	57	86	28	--	171
Difference	+8	0	0	--	+8

Source: Scheme 4, October 19, 2020, HPA Architecture

1 ratio of building area to site area, similar to percent coverage

2 auto parking required for both office and warehouse uses (9' x 18' spaces)

The proposed project would include grading of the 8.12-acre project site and the construction of the proposed warehouse facility with associated landscaping and parking.

A culvert currently conveys runoff from the residential areas to the east under Old 215 Frontage Road onto the project site. Runoff enters the site near the southeast corner and flows west then ponds in the southwest portion of the site. This area (identified as Parcel A) is planned for a detention basin as part of the project to retain onsite runoff. The offsite runoff currently entering the Project site would be contained in an underground pipe along the same general alignment as the surface drainage at present, except it would then flow through the planned detention basin (without mingling flows) and continue offsite to the southwest then south in an improved open storm drain channel along the east side of the I-215 Freeway. These improvements are being made at the direction of the Riverside County Flood Control and Water Conservation District. The

District has already approved the design and has indicated it will approve the final plans as soon as the CEQA document is approved.

The proposed project is anticipated to be constructed in late 2022 and be fully operational by Spring 2023.

11. **Surrounding land uses and setting:** The project site is triangular in shape, currently vacant, and appears to have been regularly disked for weed abatement/fire protection. The site supports approximately a dozen eucalyptus trees scattered along the eastern boundary (i.e., west side of Old 215 Frontage Road). In addition, a culvert currently conveys runoff from the residential areas to the east under Old 215 Frontage Road onto the project site.

The site is bounded by Old 215 Frontage Road, a public arterial road to the east (total width is 100 feet with 4 lanes and a painted median), the I-215 Freeway and a railroad line to the west, and the western terminus of Cottonwood Avenue to the south. Land uses to the east are in the City of Moreno Valley and include scattered residences, rural industrial uses mixed with vacant parcels, and industrial buildings. To the south, across Cottonwood Avenue, and to the west across the I-215 Freeway are warehouses.

The sensitive receptors for this project are scattered residences east of the site across Old 215 Frontage Road. The closest single-family residence to the project site boundary is 175 feet on the eastside of Old 215 Frontage Road in the City of Moreno Valley. The loading docks are proposed on the west side of Buildings 1 and 2 and the north side of Building 3. There is also an existing multi-family structure approximately 100 feet east of the loading docks for Building 3. The surrounding land uses are shown in Exhibit 2 and described in more detail in Table 2 below. In addition, photographs of the project site and surrounding area are shown in Exhibits 4 and 5.

Table 2: Surrounding Land Uses

Area/ Direction	Existing Land Use/ Jurisdiction	General Plan Designation	Zoning Designation
Project Site	Vacant (City of Riverside)	B/OP – Business/Office Park	BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
North	Scattered vacant with single family homes and mixed uses along Old 215 Frontage Road (City of Moreno Valley)	R/O - Residential/Office with small amount of C - Commercial	R15 - Residential 15,000 SF Lots, R 4500 – Residential 4500 SF Lots, OC – Office Commercial, C – Commercial, and CC – Community Commercial
East	Mixed vacant, commercial, and residential uses along Old 215 Frontage Road (City of Moreno Valley)	BP – Business Park/Light Industrial	BP – Business Park and BP with Planned Unit Development (PUD) Overlay
South	Scattered vacant, light industrial, and residential uses (City of Riverside)	B/OP – Business/Office Park	BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
West	I-215 Freeway, railroad line, and Industrial warehousing (City of Riverside)	B/OP – Business/Office Park	BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones

SF – square feet

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

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

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

Three tribes requested consultation (Rincon Band of Luiseño, Pechanga Band of Luiseño and Agua Caliente Band of Cahuilla Indians) pursuant to AB 52, and one tribe (San Manuel Band of Mission Indians) requested monitoring on the site but no consultation. Consultation with Rincon Band of Luiseño was held on August 24, 2020 and concluded on October 27, 2020. Consultation with Agua Caliente Band of Cahuilla Indians was held on August 24, 2020 and concluded on September 1, 2020. Consultation with Pechanga Band of Luiseño was held on September 22, 2020. Pechanga indicated that the project site is located within the Traditional Cultural Property (TCP) and requested an easement for potential reburial on-site. The conservation easement for reburial is depicted on Parcel 3 of the proposed Parcel Map. Consultation was concluded on May 4, 2021. Standard mitigation measures were established and agreed upon by the tribes.

14. **Other Environmental Reviews Incorporated by Reference in this Review:**

    a. Sycamore Canyon Business Park Specific Plan (SCBPSP) EIR
    b. General Plan 2025
    c. City of Riverside General Plan 2025 Final Program Environmental Impact Report (FPEIR)
    d. Title 19, Zoning Code
    e. Title 20, Cultural Resources
    f. Moreno Valley 2006 General Plan EIR

15. List of Exhibits

    a. Exhibit 1 – Project Location Map
    b. Exhibit 2 – Project Area
    c. Exhibit 3 –Site Plan
    d. Exhibit 4 – Site Photograph Key
    e. Exhibit 5 – Site Photographs
    f. Exhibit 6 – TAC Exposure Contours
    g. Exhibit 7 – Onsite Drainages
    h. Exhibit 8 – Noise Monitoring Locations
    i. Exhibit 9 – Traffic Study Intersection Locations

16. List of Appendices

    a. Appendix A – Air Quality and Health Risk Assessment Impact Analysis - MIG 4-6-2021
    b. Appendix A2 – Greenhouse Gas Emissions and Energy – MIG 12-16-2020
    c. Appendix B – Biological Resources Assessment – Helix 3-17-2021
    d. Appendix C – Phase I Archaeological/Paleo Resources Survey – MIG 1-22-2020
    e. Appendix D – Geotechnical Investigation – NorCal Engineering 5-8-2019
    f. Appendix E – Phase I ESA hazmat report – EARSI 5-13-2019

g. Appendix F – Noise Impact Analysis – MIG – 4-7-2021
h. Appendix G1 – Traffic Impact Assessment – Urban Crossroads 11-3-2020
i. Appendix G2 – VMT Memorandum – Urban Crossroads 6-4-2021
j. Appendix H1 – Hydrology Study – 10-2-2020
k. Appendix H2 - Water Quality Management Plan – 4-22-2020

17. **Acronyms**

AICUZ	Air Installation Compatible Use Zone Study
AQMP	Air Quality Management Plan
AUSD	Alvord Unified School District
CEQA	California Environmental Quality Act
CMP	Congestion Management Plan
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
FEMA	Federal Emergency Management Agency
FPEIR	GP 2025 Final Programmatic Environmental Impact Report
GIS	Geographic Information System
GHG	Green House Gas
GP 2025	General Plan 2025
IS	Initial Study
LHMP	Local Hazard Mitigation Plan
MARB/MIP	March Air Reserve Base/March Inland Port
MJPA-JLUS	March Joint Powers Authority - Joint Land Use Study
MSHCP	Multiple-Species Habitat Conservation Plan
MVUSD	Moreno Valley Unified School District
NCCP	Natural Communities Conservation Plan
OEM	Office of Emergency Services
OPR	Office of Planning & Research, State
PEIR	Program Environmental Impact Report
PW	Public Works, Riverside
RCALUC	Riverside County Airport Land Use Commission
RCALUCP	Riverside County Airport Land Use Compatibility Plan
RCP	Regional Comprehensive Plan
RCTC	Riverside County Transportation Commission
RMC	Riverside Municipal Code
RPD	Riverside Police Department
RPU	Riverside Public Utilities
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RUSD	Riverside Unified School District
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SKR-HCP	Stephens' Kangaroo Rat - Habitat Conservation Plan
SWPPP	Storm Water Pollution Prevention Plan
USGS	United States Geologic Survey
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature _____ Date _____

Printed Name & Title Judy Eguez /Associate Planner For City of Riverside

ENVIRONMENTAL INITIAL STUDY

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a. **Earlier Analysis Used.** Identify and state where they are available for review.

   b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were with in 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.

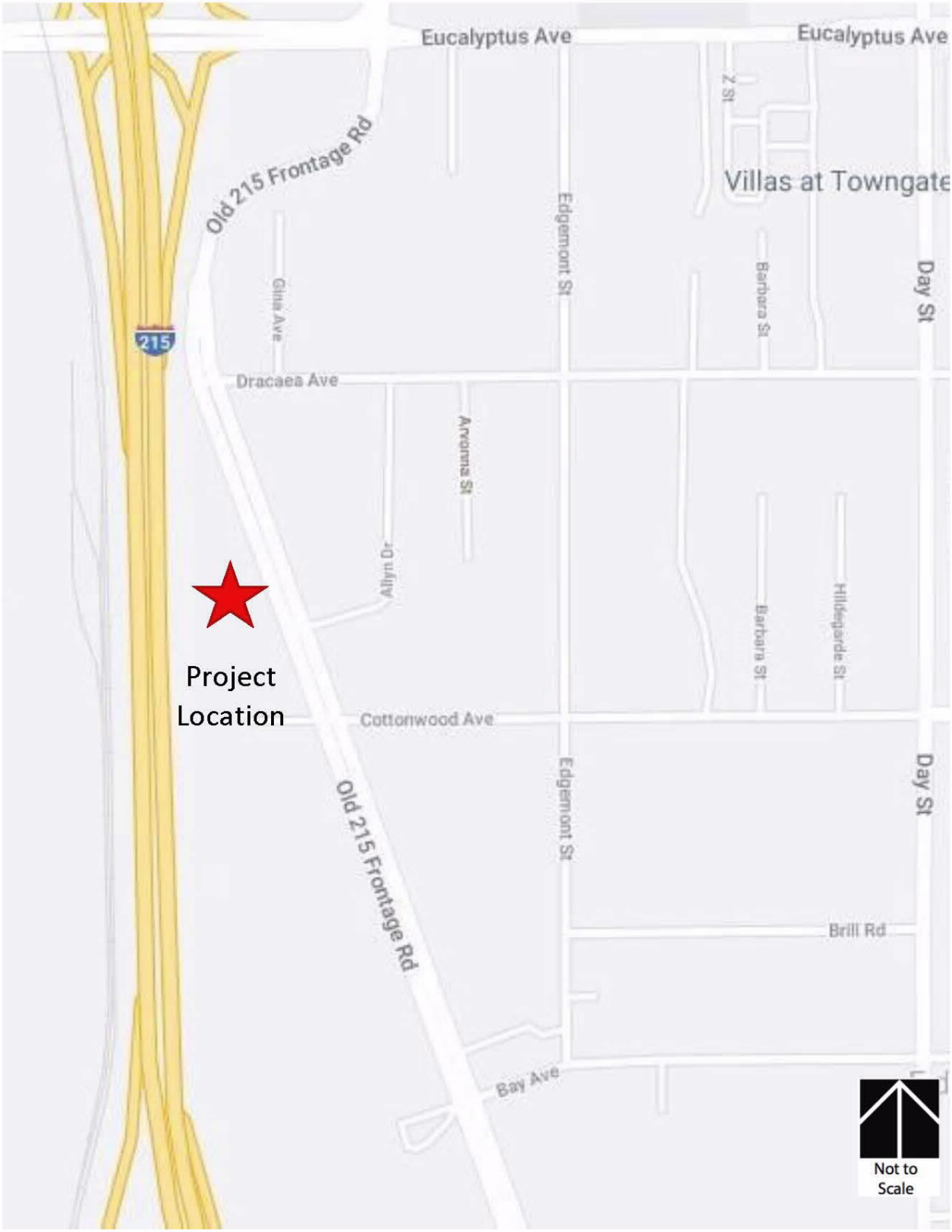

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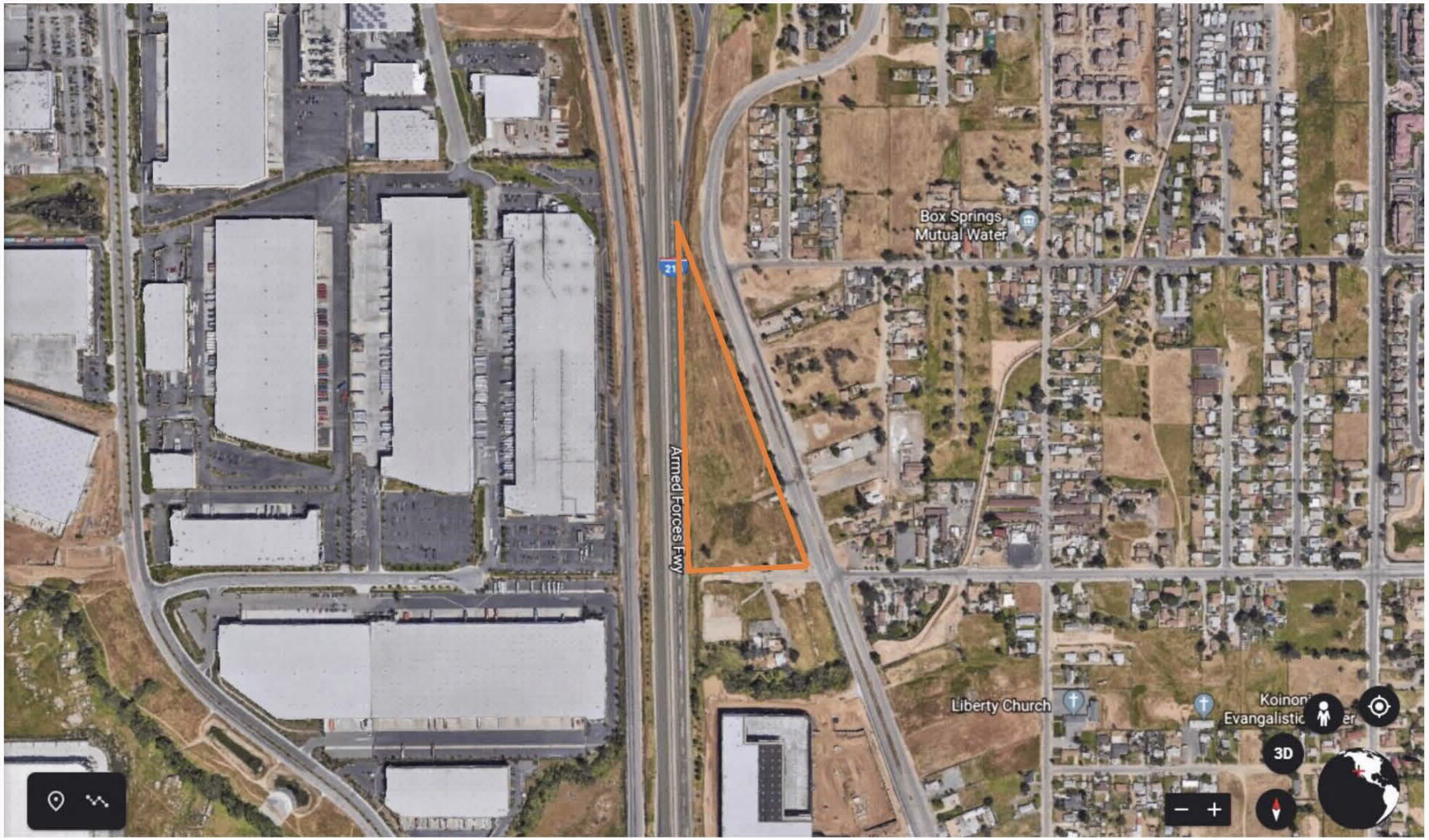
Exhibit 1 Project Location Map

FB Old 215 Business Park
Riverside, California



FB 215 Business Park Project

= Site Boundary

Not to Scale

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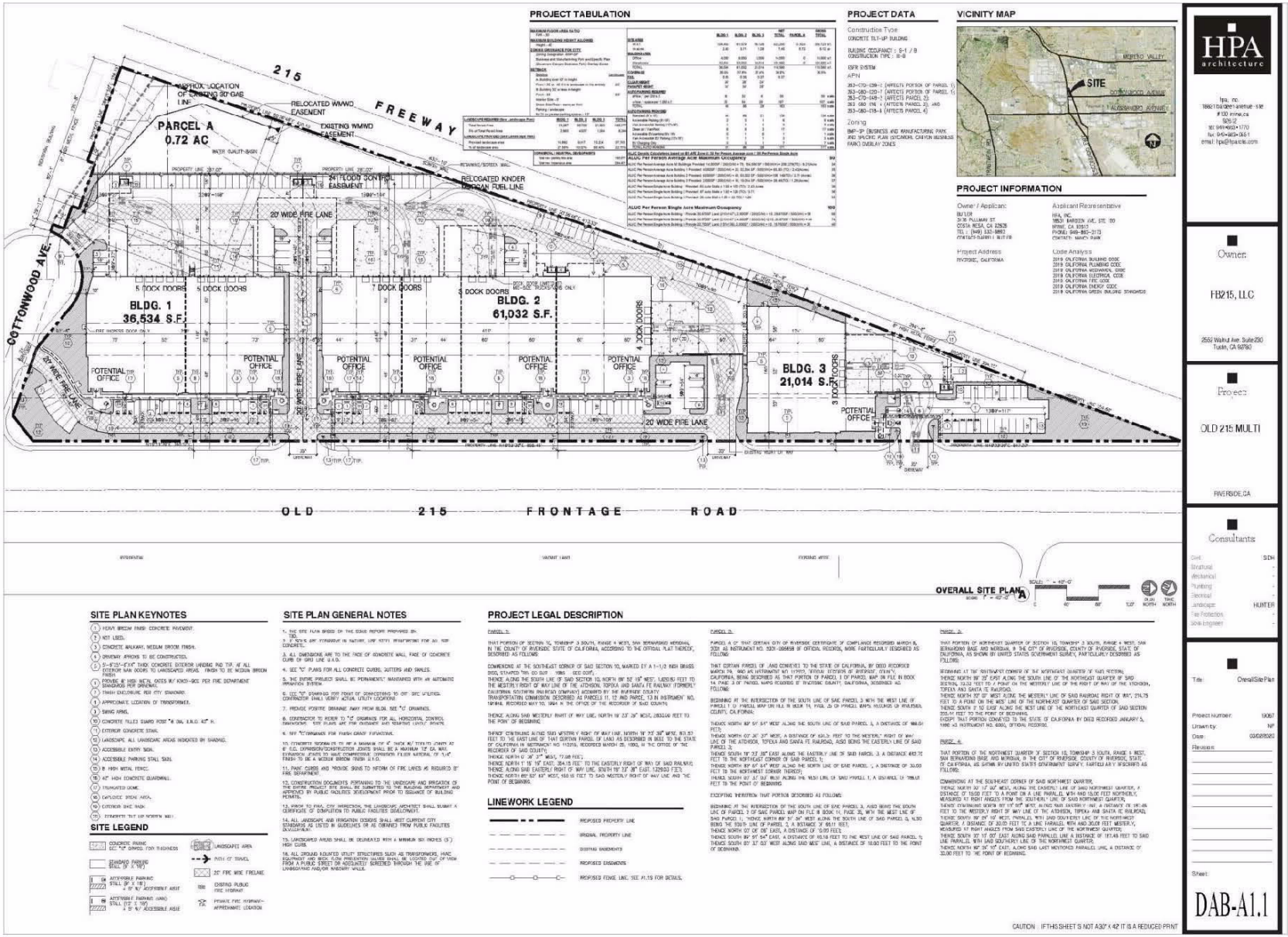
MIG

Exhibit 2 Project Area

FB Old 215 Business Park
Riverside, California



CAUTION - IF THIS SHEET IS NOT A30" x 42" IT IS A REDUCED PRINT

HPA architecture

hpa, inc.
18831 bardeen avenue - ste # 100 irvine,ca 92612
949.863.1770
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Owner:
FB215, LLC
2552 Walnut Ave Suite 250
Tustin, CA 92780

Project:
OLD 215 MULTI
RIVERSIDE,CA

Consultants

Civil:	SDH
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	HUNTER
Fire Protection:	-
Soils Engineer:	-

Title: Overall Site Plan
Project Number: 19067
Drawn by: NP
Date: 03/02/2020
Revisions:
Sheet:
DAB-A1.1

Exhibit 3 Conceptual Site Plan

FB Old 215 Business Park
Riverside, California

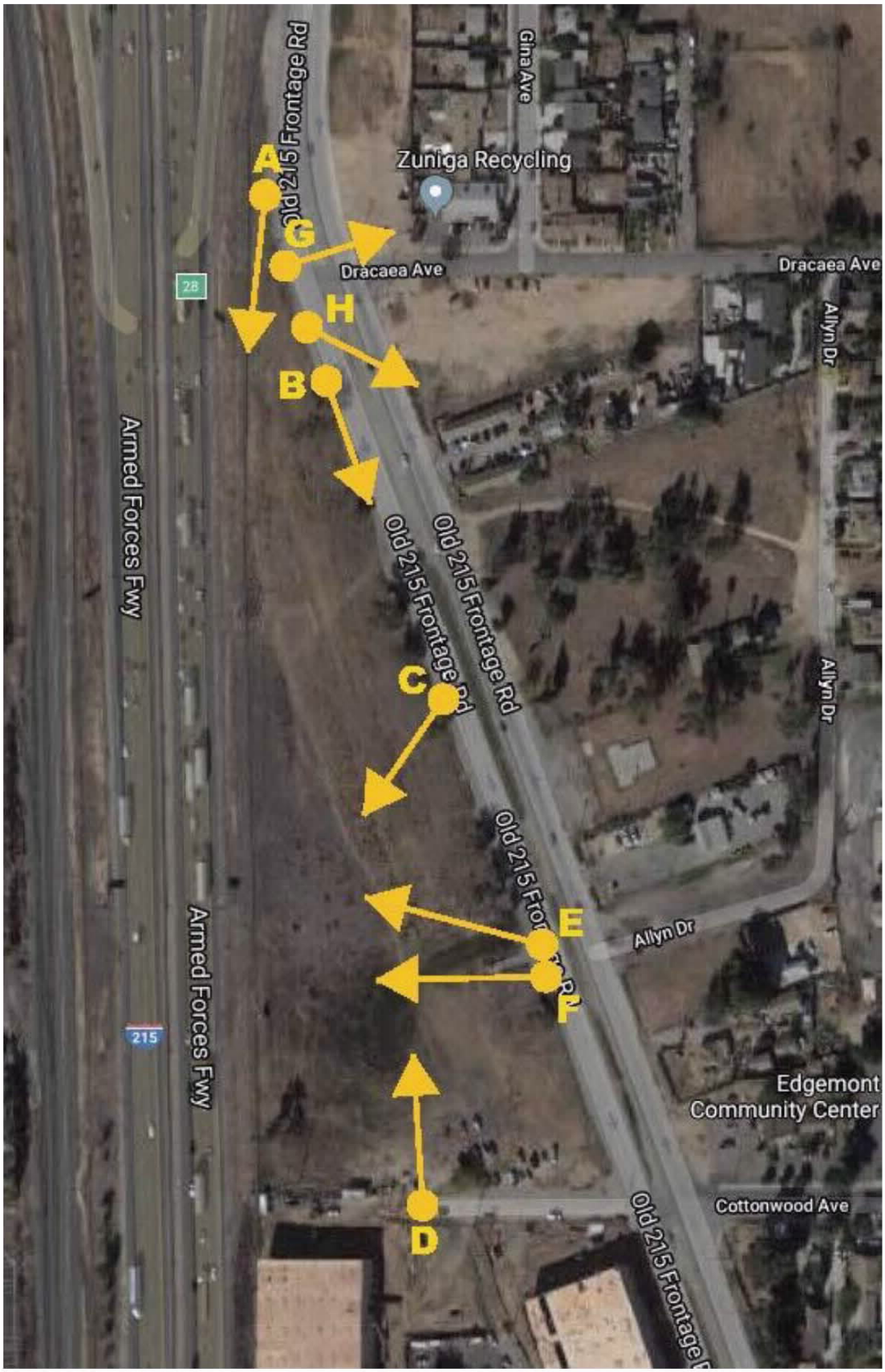

Exhibit 4 Site Photo Key

FB Old 215 Business Park
Riverside, California

A.

B.

C.

D.

E.

F.

G.

H.

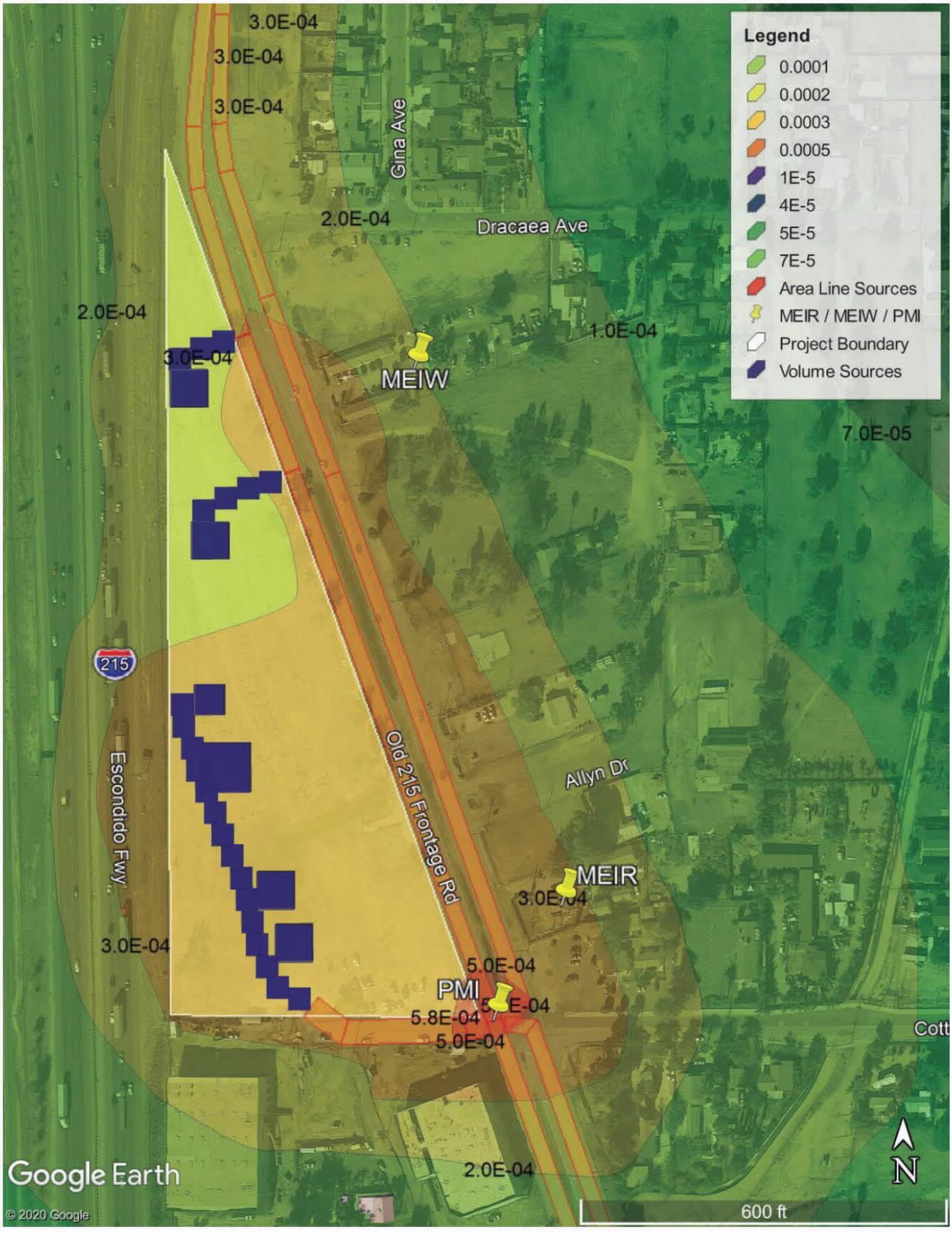

Exhibit 6 TAC Exposure Contours

FB Old 215 Business Park Project
Riverside, California

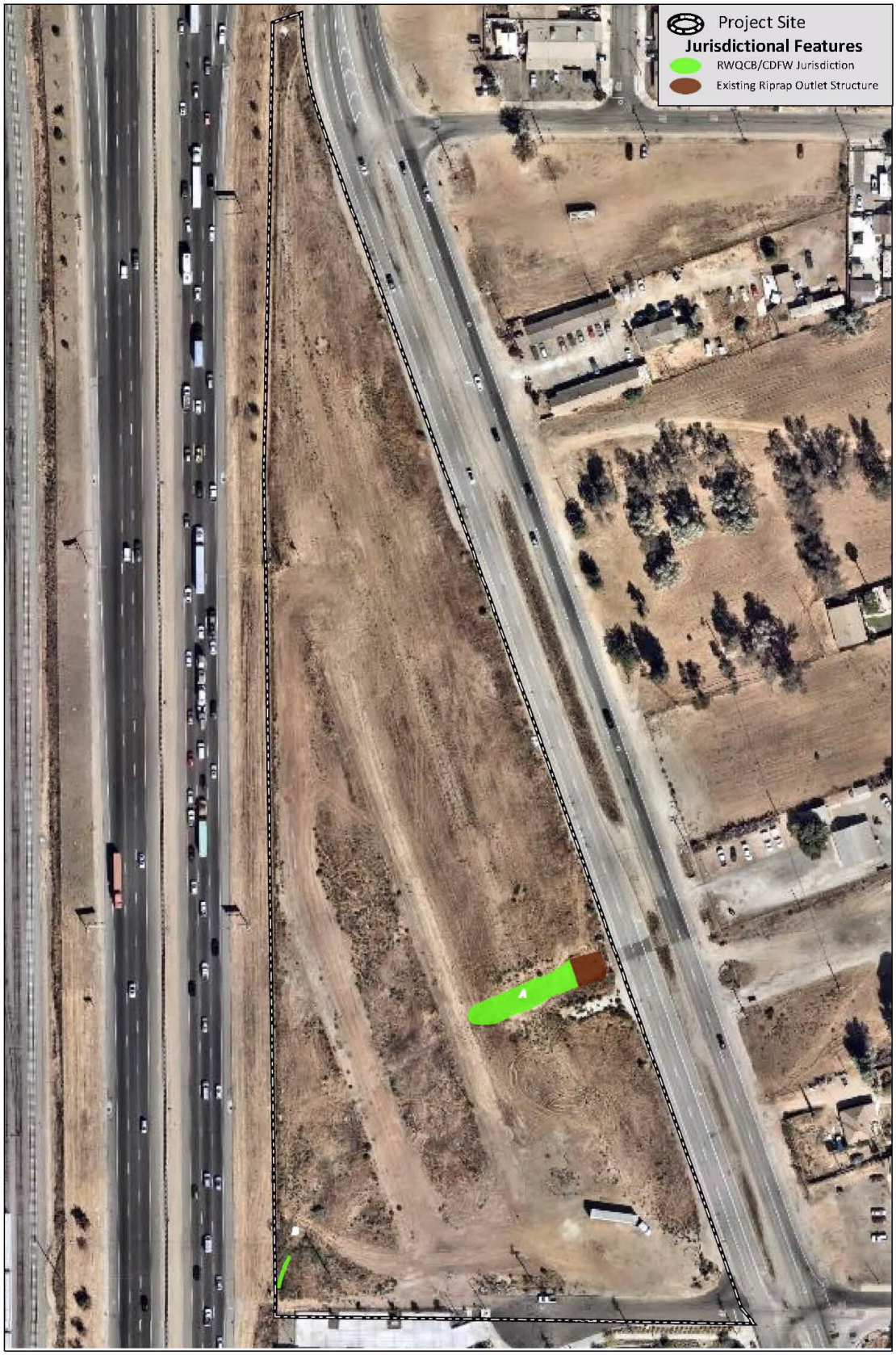

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Exhibit 7 Onsite Drainages

FB Old 215 Business Park Project

Riverside, California

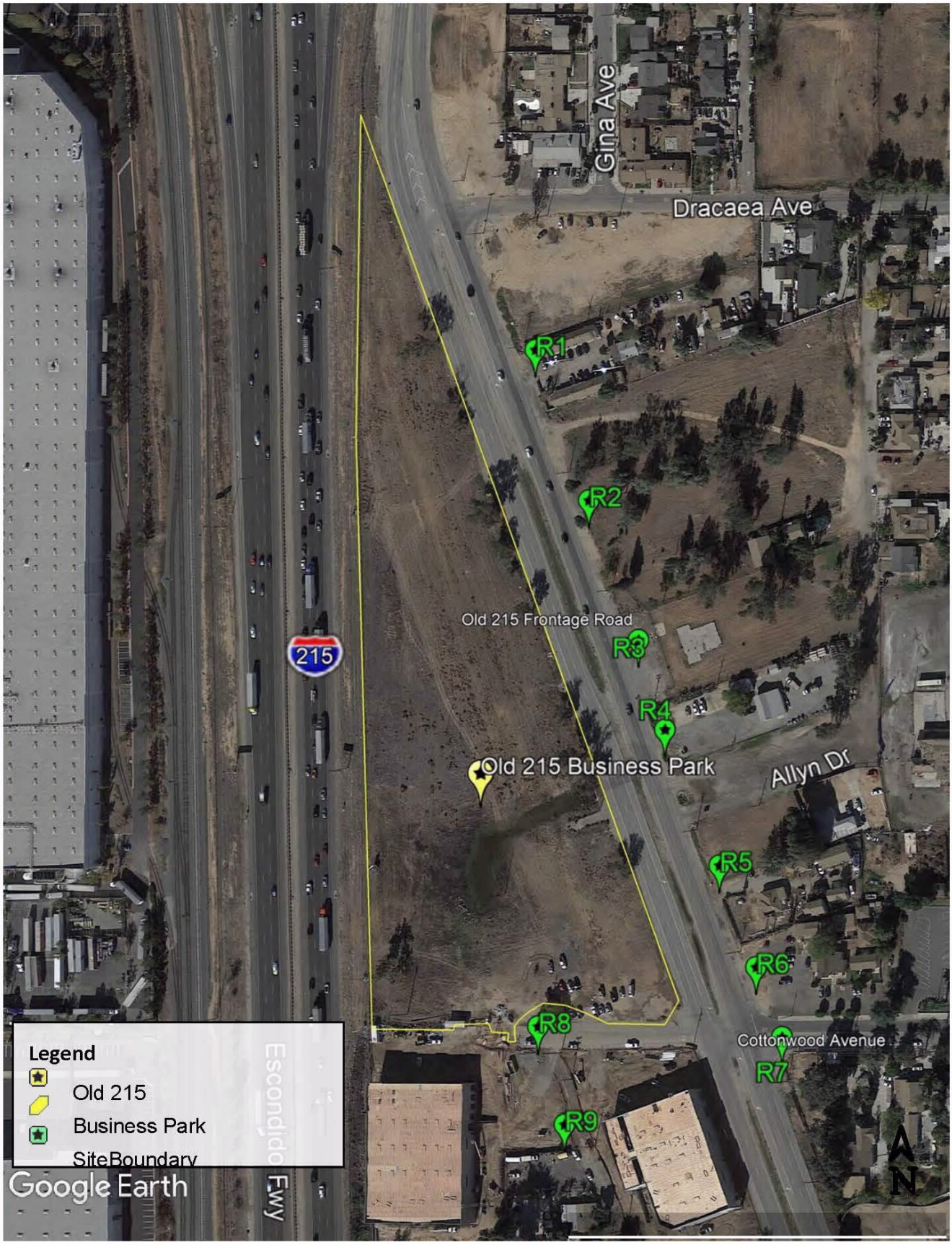

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Exhibit 8 Noise Monitoring Locations

FB Old 215 Business Park Project
Riverside, California

MIG

LEGEND:

= EXISTING INTERSECT/ON ANALYSIS LOCATION

Not to Scale

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Exhibit 9 Traffic Study Intersection Locations

FB Old 215 Business Park Project

Riverside, California

MIG

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

1a. Response: (*Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways), Moreno Valley 2006 General Plan, Conservation Element, Section 7.7, Scenic Resources (page 7-12) and Policy 7.7.4)*

Less than Significant Impact. The proposed use will be situated in an existing industrial area on a vacant parcel of land. The proposed project is a new development and will include three warehouse buildings with a maximum height of 34 feet. The project site is on an 8.12-acre parcel of vacant land located just west of Old 215 Frontage Road in the City of Riverside, California south of the Box Springs Mountain foothills approximately two miles north of the site north of the SR-60 Freeway. These uplands are considered scenic resources by the City of Moreno Valley which is immediately east of the project site across Old 215 Frontage Road. The area immediately surrounding the project site is completely urbanized with industrial and commercial land uses and residential uses to the east within the City of Moreno Valley. The City of Riverside General Plan 2025 EIR does not identify Old 215 Frontage Road as a scenic boulevard, special boulevard, parkway or roadway of scenic significance. The closest such designated roadway is Alessandro Boulevard a half mile south of the site which is designated a scenic boulevard (GP Figure 5.1-1). The Riverside City General Plan does not designate any scenic resources or vistas in the vicinity of the project site.

The proposed project consists of an infill industrial project within an urbanized area surrounded by a scattered mix of uses. Buildings 1 and 2 will be 34 feet tall while Building 3 (northern-most) will be 28 feet tall. Views from public roadways as well as from private residences are to the north toward the Box Springs Mountain uplands. There are a few residences and a small public roadway but no public use areas south of the project site, but views from this area are currently limited by two existing warehouse buildings just south of the project site so development of the project would not substantially block public views of Box Spring Mountain uplands. Northbound travelers on the I-215 Freeway may have their daytime views of the uplands blocked for a few seconds by the proposed warehouse buildings. However, impacts will be limited and will be less than significant.

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

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

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

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

The project site is relatively flat and the proposed development would not substantially change natural contours or the topography of the site, so the project is consistent with Policy OS-2.3. The project would also not block public views of the scenic Box Springs Mountain uplands to the north, so it is consistent with Policy OS-2.4. The project will also not modify any ridgelines or hillsides, nor will it significantly block any public views of the scenic resources of the Box Springs Mountain uplands to the north. It should also be noted the Sycamore Canyon Business Park Specific Plan (SCBPSP) contains guidelines on the design and appearance of industrial buildings, and the project will be consistent with the SCBPSP requirements as well as applicable portions of the City's Zoning Code relative to the design and appearance of industrial buildings. For these reasons, the project will have **less than significant** direct, indirect and cumulative impacts on scenic vistas and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

1b. Response: (*Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, and Title 20 – Cultural Resources), Caltrans Scenic Highways Program website at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, Moreno Valley 2006 General Plan, Conservation Element, Section 7.7, Scenic Resources (page 7-12) and Policy 7.7.4, and Sycamore Canyon Business Park Specific Plan (SCBPSP) and EIR.)*

No Impact. The project consists of construction of three new tilt-up warehouse buildings (max parapet height 34 feet v. 45-foot maximum for zone) and associated parking area on vacant land just east of the I-215 Freeway. There are approximately a dozen eucalyptus trees on the project site along the west side of Old 215 Frontage Road, but they are in generally poor health and not particularly scenic (see Exhibit 5, Site Photographs). The project site contains no scenic resources such as rock outcroppings or historic buildings, and no such resources are within view of the proposed project. According to the state Department of Transportation (Caltrans) website, no officially designated State scenic highways or any eligible State scenic highways traverse the City or its Sphere of Influence, including the I-215 Freeway adjacent to the site. The proposed project is not located along or within view of a scenic boulevard, parkway or special boulevard as designated by the City of Riverside's General Plan 2025 in the Circulation & Community Mobility Element for roadways designated as Scenic Highways or Parkways. In addition, Old 215 Frontage Road is not listed as a "local scenic road" in the Moreno Valley General Plan. Therefore, the project will have **no impact** on scenic resources within a scenic highway or roadway and no mitigation is required.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

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

1c. Response: (*Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines, Sycamore Canyon Business Park Specific Plan), Moreno Valley 2006 General Plan, Conservation Element, Section 7.7, Scenic Resources (page 7-12) and Policy 7.7.4)*

Less than Significant Impact. The proposed project is a new development and will include three warehouse buildings with a maximum height of 34 feet. The Box Springs Mountain and associated uplands are located two miles to the north of the project site within the City of Moreno Valley and Riverside County. This area is considered a scenic resource in the City of Moreno Valley's General Plan Conservation Element but is not specifically identified in the City of Riverside's General Plan as a scenic resource. Views from the project area are north toward these uplands, and the proposed project is west of existing residential and commercial uses within the City of Moreno Valley (i.e., east of Old 215 Frontage Road) so the project will not block views of the uplands from established land uses. Northbound travelers on the I-215 Freeway may have their daytime views of the uplands blocked for a few seconds by the proposed warehouse buildings. However, impacts in this regard will be limited and will be less than significant and no mitigation is required.

Lastly, the City's Sycamore Canyon Business Park Specific Plan (SCBPSP) regulates land uses, building setbacks, building heights, landscaping, parking and other development standards for use and development of all properties within the SCBPSP including the project site. Where the SCBPSP does not address a particular planning issue, the City's Zoning Code applies. The proposed project would be visually screened by landscaping along its eastern boundary (i.e, the west side of Old 215 Frontage Road) and there would be an eight-foot metal screen wall along the southern boundary of the site off the extension of Cottonwood Avenue to visually reduce the impact of the project on the homes to the east of the project site within the City of Moreno Valley. The proposed building will be in compliance with the SCBPSP height requirement which are consistent with the City's Zoning Code and will not block views from public locations within the City of Riverside or from public locations and land uses and residences within Moreno Valley to the east. It will also be consistent with the Citywide Design and Sign Guidelines. For these reasons, the project will have **less than significant** direct, indirect or cumulative impacts on visual character or quality and no mitigation is required.

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

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

Less than Significant Impact. Impacts from lighting may occur because of excessive or inappropriate directed lighting which can adversely impact night-time views by reducing the ability to see the night sky and stars. The project would not result in a new source of substantial light or glare which would adversely affect day or nighttime views as the project consists of the establishment of a use within an existing developed area where adequate levels of lighting currently exist. New lighting is proposed for the project however exterior building materials are proposed that would not contribute to daytime glare impacts.

In addition, Sycamore Canyon Business Park Specific Plan (SCBPSP) requires that the proposed project: (1) restrict exterior lighting to use for security and safety, parking, loading and access to the site; (2) all lighting will be shielded to keep light spread within the site boundaries; and (3) the pole light fixtures proposed would not exceed 25 feet in height and would not produce undo lighting on the nearby residences. The proposed warehouse facilities would be operational in the Spring of 2023 and provide logistics services that would not impose any use that would provide excessive or inappropriate directed lighting. However, implementation of the following Standard Condition of Approval (COA) is recommended to assure the project will not significantly increase nighttime lighting levels in the project area.

COA: Photometric/Lighting Plan: An exterior lighting plan shall be submitted with building permit plans review and approval. A photometric study and manufacturer's cut sheets of all exterior lighting shall be submitted with the exterior lighting plan. All on-site lighting shall provide a minimum intensity of one foot-candle and a maximum intensity of ten foot-candles at ground level throughout the areas serving the public and used for parking, with a ratio of average light to

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

minimum light of four to one (4:1). The light sources shall be shielded to minimize offsite glare, shall not direct light skyward and shall be directed away from adjacent properties and public rights-of-way. If lights are proposed to be mounted on buildings, down-lights shall be utilized. Light poles shall not exceed twenty (20) feet in height, including the height of any concrete or other base material. Light poles located within 50 feet of residentially zoned property shall not exceed 14 feet in height.

With the lighting limits outlined in the SCBPSP and implementation of the recommended Condition of Approval the project will have **less than significant** direct, indirect or cumulative impacts related to light, glare, or day or nighttime views and no mitigation is required.

2. AGRICULTURE AND 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 – Agricultural Suitability & General Plan. Farmland Mapping and Monitoring Program (FMMP), state base map last updated 12/19/17 and located on the state website at https://www.conservation.ca.gov/dlrp/fmmp)*

Less Than Significant Impact. The Project is located within a largely developed urbanized area. Figure OS-2 – Agricultural Suitability of the General Plan 2025 indicates the project site is not designated as agricultural land and is not adjacent to or in proximity to any land classified as, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation. While it is mapped as "Farmland of Local Importance" (FMMP 2017), all of the land surrounding the site is classified as "Urban and Built Up" land so the agricultural value of this property would be negligible and its of its loss would have no impact on agricultural resources in this area and no mitigation is required.

Agricultural lands are areas where land planted with row crops, field crops, horticulture, nursery greenhouses, orchards and vineyards occur. Fallow agricultural lands refer to lands where agriculture was cultivated within the previous 5 years. The project site has not been in agricultural use since at least as far back as 1994 and would not be classified as agricultural or fallow agricultural lands. Additionally, the site is identified as vacant land and in Figure 5.2-1 of the General Plan 2025 EIR. The project site is not in any state Farmland designation and does not support agricultural resources or operations. There are no agricultural resources or operations, including farmlands within proximity of the subject site. Therefore, the project will have a **less than significant impact** on a direct, indirect, or cumulative basis on Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Farmland) and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

2b. Response: (*Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)*

No Impact. A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR reveals that the project site is within a built environment and not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Moreover, the project site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the project will have **no impact** on a direct, indirect, or cumulative basis and no mitigation is required.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

2c. Response: (*Source: County GIS Map – Forest Data, CalFire FRAP mapping at https://frap.fire.ca.gov/)*

No Impact. The City of Riverside has no forest land that supports 10 percent native tree cover nor does it have any timberland, including the project site and surrounding area. In addition, the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) assesses the amount and extent of California's forests and rangelands, analyzes their condition, and identifies alternative management and policy guidelines. The most current FRAP map from the CalFire website indicates the project site and surrounding area do not contain any designated forest resources. Therefore, **no impact** will occur from this project on a direct, indirect or cumulative basis on zoning for forest land and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

2d. Response: (*Source: County GIS Map – Forest Data, CalFire FRAP mapping at https://frap.fire.ca.gov/)*

No Impact. The dozen or so eucalyptus trees on the project site are not timber species and cover less than one percent of the site. The City of Riverside has no forest land that can support 10 percent native tree cover nor does it have any designated timberland and no forest resources occur on the site. Therefore, **no impact** will occur on a direct, indirect, or cumulative basis on forest resources as a result of the project and no mitigation is required.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

2e. Response: (Source: General Plan – Figure OS-2 – ***Agricultural Suitability, Figure OS-3 – Williamson Act Preserves*****, General Plan 2025 FPEIR –** ***Appendix I – Designated Farmland Table (use only if your property on this table), Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data)***

No Impact. For the purposes of this analysis, Farmland and agricultural land considered under this threshold include Farmland of Local Importance, Land subject to Proposition R and Measure C, land under Williamson Act Contract, as well as any other land being used for agricultural uses as non-conforming uses. The project is located in an urbanized area of the City of Riverside in an existing industrial development area of the Sycamore Canyon Business Park Specific Plan. Additionally, the site and surrounding areas are identified as urban/built out land and do not support agricultural resources or operations. The project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. The City of Riverside has no forest land that can support 10 percent native tree cover. Therefore, **no impact** will occur from this project on a direct, indirect, or cumulative basis related to conversion of farmland to non-agricultural use or to the loss of forest land and no mitigation is required.

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

3a. Response: (*Source: South Coast Air Quality Management District's 2016 Air Quality Management Plan (AQMP CalEEMod Model, and Air Quality Analysis prepared by MIG. in December 2020).*

Less than Significant Impact. The project is located within the City of Riverside, within the South Coast Air Basin. The project site is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) designate air basins where ambient air quality standards are exceeded as nonattainment areas. A significant impact would occur if the proposed project conflicts with or obstructs implementation of the South Coast Air Basin 2016 Basin Air Quality Management Plan (AQMP). The Air Quality Element of the City of Riverside General Plan includes the following objectives:

Objective AQ-1: Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.

Objective AQ-2: Reduce air pollution by reducing emissions from mobile sources.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Objective AQ-3: Prevent and reduce pollution from stationary sources, including point sources (such as power plants and refinery boilers) and area sources (including small emission sources such as residential water heaters and architectural coatings). **Objective AQ-4:** Reduce particulate matter, as defined by the Environmental Protection Agency (EPA), as either airborne photochemical precipitates or windborne dust. **Objective AQ-5:** Increase energy efficiency and conservation in an effort to reduce air pollution. **Objective AQ-6:** Develop a public education program committed to educating the general public on the issues of air pollution and mitigation measures that can be undertaken by businesses and residents to improve air quality. **Objective AQ-7:** Support a regional approach to improving air quality through multi-jurisdictional cooperation. **Objective AQ-8:** Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards. Conflicts and obstructions that hinder implementation of the AQMP can delay efforts to meet attainment deadlines for criteria pollutants and maintaining existing compliance with applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, consistency with the South Coast Air Basin 2016 AQMP is affirmed if the Project: (1) Is consistent with the growth assumptions in the AQMP; and (2) Does not increase the frequency or severity of an air quality standards violation or cause a new one. Consistency Criterion 1 refers to the growth forecasts and associated assumptions included in the 2016 AQMP. The 2016 AQMP was designed to achieve attainment for all criteria air pollutants within the Basin while still accommodating growth in the region. Projects that are consistent with the AQMP growth assumptions would not interfere with attainment of air quality standards, because this growth is included in the projections used to formulate the AQMP. The proposed project would create approximately 130 new jobs, which would be well within the SCAG 2016 RTP/SCS growth projections for the City of Riverside. The proposed project is consistent with the General Plan and Zoning designations, which form the basis for growth assumption accounted for in the SCAG 2016 RTP/SCS (SCAG, 2016). Therefore, the proposed Project would not exceed the growth assumptions contained in the AQMP. Consistency Criterion 2 refers to the California Ambient Air Quality Standards (CAAQS). In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable (SCAQMD, 2003; page D-3). As described below in Section3.b, the proposed Project would not generate construction or operational emissions in excess of SCAQMD criteria air pollutant thresholds. Projects that are consistent with the projections of employment and population forecasts identified by the Southern California Association of Governments (SCAG) are considered consistent with the AQMP growth projections, since these forecast numbers were used by SCAG's modeling section to forecast travel demand and air quality for planning activities such as the Regional Transportation Plan (RTP), the SCAQMD's AQMP, Regional Transportation Improvement Program (TRIP), and the Regional Housing Plan. This project is consistent with the projections of employment and population forecasts identified by the Southern California Association of Governments (SCAG) that are consistent with the General Plan 2025 "Typical Growth Scenario." Since the project is consistent with the General Plan 2025, it is also consistent with the AQMP. The project will have a less than significant impact directly, indirectly and cumulatively to the implementation of an air quality plan. Therefore, the proposed project would not conflict with the SCAQMD 2016 AQMP. Impacts are **less than significant** and no mitigation is required.				
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

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

**3b. Response: (*Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 AQMP, CalEEMod, Model and Air Quality Analysis prepared by MIG in December 2020.*

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

Per General Plan 2025 EIR MM Air 1 and 7, a CalEEMod computer model was required to analyze both short-term construction-related and long-term operational impacts for the proposed project. The results of the CalEEMod model, as shown in Tables 3 and 4, determined that the proposed project would result in the following emission levels for both short-term construction activities and long-term operational activities:

Table 3: Short-Term (Construction) Air Quality Impacts

Activity	Daily Emissions (lbs./day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Daily Project Construction Emissions	58.1	65.3	38.2	0.1	13.2	8.2
SCAQMD Daily Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Table 4-14, Air Quality Assessment, MIG, December 2020

Table 4: Long-Term (Operation) Air Quality Impacts

Activity	Daily Emissions (lbs./day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Daily Project Operational Emissions	3.6	7.0	14.8	0.1	5.1	1.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Table 4-15, Air Quality Assessment, MIG, December 2020

Based on the air quality modeling contained in the Air Quality Analysis prepared for the project (Appendix A), short-term

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. The Air Quality Analysis also found that long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance. The project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP. The above tables compare the project emissions (short-term and long-term) to the SCAQMD daily thresholds and shows that project-related emissions will not exceed established significance thresholds. Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NOx and ROG, both ozone precursors, PM_{10}, $PM_{2.5}$ and CO. Long -term emissions are not expected to exceed SCAQMD thresholds. The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM_{10} and $PM_{2.5}$ under State standards, and as a non-attainment area for ozone, carbon monoxide, PM_{10}, and $PM_{2.5}$ under Federal standards. Because the proposed project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. As demonstrated in Tables 3 and 4 above, project-related emissions during both construction and operation would not exceed established SCAQMD standards and therefore would be less than significant. The proposed project does not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 EIR. Therefore, the project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts will be **less than significant** and no mitigation is required				
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐

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

3d. Response: (*Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, CalEEMod Air Quality Analysis prepared by MIG in December 2020).*

Less Than Significant Impact with Mitigation Incorporated. Sensitive receptors are those segments of the population that are most susceptible to poor air quality such as children, the elderly, the sick, and athletes who perform outdoors. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours. The closest sensitive receptors to the Project site are multi-family residential structures approximately 120 feet east of the site (at their closest point so this would be considered the "worst case" condition).

Localized Significance Thresholds (LSTs)

Construction. The proposed Project's maximum daily construction emissions are compared against the SCAQMD's-recommended LSTs in Table 5. The LSTs are for SRA 23 (Metropolitan Riverside County) in which the proposed project is located. Construction emissions were estimated against the SCAQMD's thresholds for a 5-acre project size. A receptor distance of 25 meters (82 feet) was used to evaluate impacts at sensitive residential receptor locations for construction activities. This is considered to be a conservative approach as 1) the project would involve grading / site disturbance of approximately 7.4 acres, which is more than 5 acres, and 2) the nearest sensitive receptor property (i.e., east of Building 1) is approximately 35 meters (110 feet) from the Project site.

Table 5: Construction Emissions LST Analysis

	Maximum Onsite Pollutant Emissions (lbs./day)[1]			
Construction Activity	**NOx**	**CO**	**PM10**	**PM2.5**
Site Preparation	40.5	21.2	9.1	5.8
Grading	24.7	15.9	3.7	2.4
Building Construction	17.1	15.5	0.9	0.9
Paving	12.9	14.7	0.7	0.6
Architectural Coating	1.5	1.8	0.1	0.1
SCAQMD LST Threshold	270	1,577	13	8
Threshold Exceeded?	No	No	No	No

Source: Table 4-16, Air Quality Assessment, MIG, December 2020

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

Operation. The proposed project's maximum daily operational emissions are compared against the SCAQMD's-recommended LSTs in Table 6. The LSTs are for SRA 23 (Metropolitan Riverside County) in which the proposed Project is located. The operational emissions from on-site area, mobile, and off-road emissions sources were estimated against the SCAQMD's thresholds for a 5-acre project size. A receptor distance of 25 meters (82 feet) was used to evaluate impacts at sensitive receptor locations for operational activities (even though the closest receptor is approximately 120 feet away).

Table 6: Operation Emissions LST Analysis

	Maximum Onsite Pollutant Emissions (lbs./day)[1]			
Operational Source	**NOx**	**CO**	**PM10**	**PM2.5**
Area[2]	0.0	0.0	0.0	0.0
Mobile	0.8	1.9	0.7	0.2
Off-Road	1.6	1.7	0.1	0.1
Total Onsite Emissions	2.4	3.7	0.8	0.3
SCAQMD LST Threshold	270	1,577	4	2
Threshold Exceeded?	No	No	No	No

Source: Table 4-17, Air Quality Assessment, MIG, December 2020

1 Emissions presented are worst-case emissions and may reflect summer or winter emissions levels. In general, due to rounding,

there is no difference between summer and winter emissions levels for the purposes of this table.
2 0.0 does not mean zero but rather greater than zero but less than 0.05.
3 Mobile source emissions are from the mobile emissions portion of Table 3 (MIG AQ Study 2020). Total on-site mobile source emissions were presumed to be equal to 15% of total mobile emissions estimates.

CO "Hot Spots". The proposed project would add approximately 400 new vehicle trips or 432 passenger car equivalent (PCE) trips to the local roadway infrastructure per day, with 71 and 65 PCE trips added to the Cottonwood Avenue / Old 215 Frontage Road intersection during the AM and PM peak hours, respectively (Urban Crossroad 2020a).[1] Under the opening year with project traffic volumes, the Cottonwood Avenue / Old 215 Frontage Road would have approximately 1,201 and 967 PCE trips passing through it during the AM and PM peak hours, respectively. The segment of Old 215 Frontage Road that runs along the eastern portion of the site would have an annual daily traffic rate of approximately 8,200 PCE trips. These volumes are well below the BAAQMD screening threshold (i.e., 44,000 vehicles per hour), and surrounding roadway segments would not have traffic volumes exceeding 100,000 vehicles per day. The proposed project would not cause intersection volumes to exceed any daily (100,000) or hourly (44,000) screening vehicle volumes maintained by the SCAQMD and other regional air districts and, therefore, would not result in significant CO concentrations.

Toxic Air Contaminants

As described above, sensitive receptors are located east of the project site. Project-related construction activities would emit PM_{10} from equipment exhaust. The operation of trucks during operation of the proposed Project would also generate PM_{10} from equipment exhaust during idling and truck operation.

Individual Cancer Risk from Exposure to DPM. The predicted locations of the annual, unmitigated point of maximum impact (PMI), the maximally exposed individual resident (MEIR), and maximum exposed individual worker (MEIW) receptor for DPM exposure during construction are shown in Table 7 along with contours of pollutant concentrations in proximity of the project site in Exhibit 6. The predicted PMI is located in the southbound lane of Old 215 Frontage Road, east of Building 1. Since the PMI for DPM exposure is located on land that is not occupied by a receptor on a permanent basis, lifetime excess cancer risks and chronic non-cancer health hazards, which are based on exposure to annual average pollutant concentrations, were not estimated for the modeled PMI location.

Accordingly, health risks were assessed at the modeled residential MEIR location, which is located east of the Project site at the westernmost residence at 13474 Old 215 Frontage Road. The HRA for residential receptors evaluated worst-case carcinogenic and non-carcinogenic risks to child (3rd trimester, 0-2 years, and 2-16 years) and adult (16-30 years and 30-70 years) receptors. Potential health risks were also assessed for residents of the multi-family structure east of Building 3. As shown in Table 7, the calculated, maximum unmitigated risks would be approximately 41.2 excess cancers in a million, which corresponds to child receptors that are less than two years old at the start of construction activities.

In addition to construction activities, the proposed Project would also generate DPM once operational from diesel truck trips to and from the site, as well as their on-site idling. An operational HRA was conducted to evaluate the potential health risks posed by these activities. Whereas construction activities would only last approximately one year, the proposed Project's operational activities would continue to occur year after year until the Project site is redeveloped or utilized for purposes other than a business park. Health risks from operational activities are also presented in Exhibit 6 for the MEIR and MEIW.

Construction activities would emit a far greater amount of DPM and, therefore, be the primary driver of health risks when combining construction and operational related emissions. Therefore, for the purposes of this analysis, health risks are

[1] PCE trips reflect the impact of large trucks, buses, and recreational vehicles on traffic flow. By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and slow down is much longer than for passenger cars and varies depending on the type of vehicle and number of axles. A PCE factor of 2.0 was applied to the 2-, 3-, and 4-axle trucks associated with the proposed Project (Urban Crossroads 2020).

presented for the project's overall MEIR and MEIW locations (i.e., the combined risks from construction and operational activities).[2]

As shown in Table 7, the maximum combined unmitigated health risk for the MEIR location would be approximately 41.4 excess cancers in a million, which would exceed the SCAQMD cancer risk threshold of 10 in a million. The potential health risks are almost entirely attributable to DPM emission generated during project construction. Therefore, implementation of **Mitigation Measure AIR-1** is required.

Table 7: Project Cancer Risk (Unmitigated)

Receptor (Exhibit 6)	UTM Location		Annual Average DPM Concentration ($\mu g/m^3$)		Excess Cancer Risk (per million population)		
	East	North	Construction	Operation	Construction	Operation	Total
PMI[1]	473496.02	3753841.77	0.41184	0.00058	--	--	--
MEIR	473546.02	3753841.77	0.29516	0.00037	41.2	0.2	**41.4**
MEIW[2]	473477.53	3754111.26	0.13166	0.00021	0.3	0.0	0.3
						SCAQMD Significance Threshold	10.0

Source: Table 4-18, MIG, 2020 (see Appendix A) **Bold** = exceeds SCAQMD cancer risk threshold of 10 in a million

1 The PMI is located in a public roadway and is not an occupied receptor location.
2 0.0 does not mean zero but rather greater than zero but less than 0.05.

Mitigation Measures

AIR-1 **Reduce DPM Emissions.** To reduce potential short-term adverse health risks associated with PM_{10} exhaust emissions, including emissions of diesel particulate matter (DPM), generated during project construction activities, the Applicant and their contractors personnel shall implement the following construction equipment restrictions for the project:

1. Electric-powered and liquefied or compressed natural gas equipment (including generators) shall be employed instead of diesel-powered equipment to the maximum extent feasible.
2. All construction equipment with a rated power-output of 50 horsepower or greater shall meet U.S. EPA and CARB Tier IV Final Emission Standards for PM_{10}. This may be achieved via the use of equipment with engines that have been certified to meet Tier IV emission standards, or through the use of equipment that has been retrofitted with a CARB-verified diesel emission control strategy (e.g., oxidation catalyst, particulate filter) capable of reducing exhaust PM_{10} emissions to levels that meet Tier IV standards.

As an alternative to using equipment that meets Tier IV Final Emissions Standards for off-road equipment with a rated power-output of 50 horsepower or greater, the Applicant may prepare and submit a refined construction health risk assessment to the City once additional Project-specific construction information is known (e.g., specific construction equipment type, quantity, engine tier, and runtime by phase). The refined health risk assessment shall demonstrate and identify any measures necessary such that the proposed Project's incremental cancerogenic health risk at nearby sensitive receptor locations is below the applicable SCAQMD threshold of 10 cancers in a million.

[2] The operational HRA has a different PMI, MEIR, and MEIW, but the cancer burden posed by operational activities is far less than that associated with the construction HRA.

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

Implementation of Mitigation Measure AIR-1 would reduce PM_{10} exhaust emissions by approximately 86.84%, as accounted for in the CalEEMod emissions modeling (see Appendix A). As shown in Table 8, with the implementation of Mitigation Measure AIR-1, potential excess cancer risk from project activities at the MEIR location would be reduced to approximately 7.8 excess cancer cases in a million which is less than the SCAQMD's threshold of 10 in a million. Impacts to sensitive receptors would therefore be reduced to **less than significant levels with implementation of Mitigation Measure AIR-1**.

Table 8: Project Cancer Risk (Mitigated)

Receptor	UTM Location		Annual Average DPM Concentration (µg/m³)		Excess Cancer Risk (per million population)		
	East	North	Construction	Operation	Construction	Operation	Total
PMI[1]	473496.02	3753841.77	0.07565	0.00058	--	--	--
MEIR	473546.02	3753841.77	0.0545	0.00037	7.6	0.2	7.8
MEIW[2]	473477.53	3754111.26	0.02449	0.00021	0.1	<0.0	0.1
						SCAQMD Significance Threshold	10.0

Source: Table 4-19, MIG, 2020 (see Appendix A)

1 The PMI is located in a public roadway and is not an occupied receptor location.
2 0.0 does not mean zero but rather greater than zero but less than 0.05.

Average Cancer Burden. The average cancer risk based on the lifetime exposure scenario (70 years), when taking into account Mitigation Measure AIR-1 to address construction risks, is 2.17E-06 (approximately 2.17 cases per million people). The product of cancer risk and the estimated population (561) is 0.00121 and does not exceed the SCAQMD threshold of 0.5 excess cancer cases.

Non-Cancer Risk. The maximum annual average DPM concentration at any receptor location under mitigated conditions would be approximately 0.0545 µg/m³, which would occur at the MEIR location. Based on the chronic inhalation REL for DPM (5 µg/m³), the calculated chronic hazard quotient during the maximum exposure to DPM concentration would be 0.0109, which is below the SCAQMD's non-cancer hazard index threshold value of 1.0.

Summary of Air Quality Impacts. Due to the size and nature of the Project, criteria pollutant emissions during both construction and operation will be less than significant both on a project level and on a cumulative basis. The Project will not exceed the SCAQMD's Localized Significance Thresholds (LSTs), and emissions of Diesel Particulate Matter will not exceed established thresholds for cancer health risks with implementation of Mitigation Measure AIR-1. Therefore, impacts will be **less than significant with mitigation incorporated**.

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

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

3d. Response: (*Source: Air Quality Analysis prepared by MIG in December 2020).*

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed Project would result in the construction of a new industrial uses that could generate odors related to equipment use (e.g., oils, lubricants, fuel vapors); however, these activities would generally be located on the western side of project structures and would be located across the road from the nearest sensitive receptors, giving potentially odorous compounds time and space to disperse. The activities proposed as part of the project would not generate sustained odors that would affect substantial numbers of people, nor nearby sensitive receptors. Through compliance with SCAQMD Rule 402 to control dust, the proposed Project is not anticipated to cause objectionable odors affecting a substantial number of people and **less than significant** impacts on a direct, indirect, or cumulative basis will occur.

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

4a. Response: (*Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area), General Biological Resources Assessment (GBRA),* Helix, March 17, 2021, and *Dry/Wet Season Fairy Shrimp Survey Results*, Helix, May 14, 2021 *(Appendix B).*

Less than Significant Impact with Mitigation Incorporated. A general and focused biological survey was conducted on the project site (GBRA 2021). The project site does not support any native vegetation communities and mainly supports non-native annual vegetation such Russian thistle (*Salsola tragus*) and short-pod mustard (*Hirschfeldia incana*) although there are scattered native species present. There are also disturbed areas throughout the project site which support little to no vegetation. There is no critical habitat for listed species on the project site and the closest critical habitat to the project site is for coastal California gnatcatcher (*Polioptila californica californica*) approximately 6.5 miles north of the site.

MSCHP

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

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

distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California.

Under CEQA, impacts analyses are mandatory for List 1 and 2 species, but not for all List 3 and 4 species as some do not meet the definitions of the Federal Native Plant Protection Act or the CESA; however, List 3 and 4 impacts to these species are generally considered in most CEQA analyses and are recommended by CNPS. Plants that are Rank 1A, 1B, and 2 of the CNPS Inventory consist of plants that may qualify for listing, by the California Department of Fish and Wildlife (CDFW) as well as other state agencies (e.g., California Department of Forestry and Fire Protection). As part of the CEQA process, such species should be fully considered, as they meet the definition of threatened or endangered under the NPPA and Sections 2062 and 2067 of the California Fish and Game Code. California Rare Plant Rank 3 and 4 species are considered to be plants about which more information is needed or are uncommon enough that their status should be regularly monitored. Such plants may be eligible or may become eligible for state listing, and CNPS and CDFW) recommend that these species be evaluated for consideration during the preparation of CEQA documents.

The project site is located within the Lake Mathews/Woodcrest Area Plan and is not located within or adjacent to an MSHCP Criteria Area; therefore, the project site is not subject to special conservation requirements that apply to cells and is not required to undergo the HANS process. The nearest criteria cell to the project site is Cell 721, which is approximately 2.1 miles to the northwest. The project site is not located within or directly adjacent to any MSHCP Conservation Areas. The site is located approximately 0.7 mile to the east of Existing Core D but existing development separates the project site from MSHCP Conservation Area. Since the project site is not located within or adjacent to an MSHCP Criteria Area, the project site is not subject to special conservation requirements that apply to cells and is not required to undergo the Habitat Acquisition and Negotiation Strategy (HANS) process.

Sensitive Vegetation Communities/Habitats

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

Rare Plant Species

Rare plant species are those listed or candidate listed as federally threatened or endangered by the U.S. Fish and Wildlife Service (USFWS), State listed as threatened or endangered or considered sensitive by the CDFW, and/or are on the CNPS California Rare Plant Rank (CRPR) List 1A, 1B, 2A, 2B, or 3 species, as recognized in the CNPS's Inventory of Rare and Endangered Vascular Plants of California and consistent with the CEQA Guidelines. Nine rare plant species were recorded within the Riverside East quadrangle database search conducted on California Natural Diversity Data Base (CNDDB) and CNPS. Of these, eight species were not considered to have a potential to occur based on geographic range, elevation range, and/or lack of suitable habitat. There is potential suitable habitat onsite for the smooth tarplant (*Centromadia pungens ssp. laevis*) based on the presence of disturbed habitat and depressional areas on the project site. However, the species was not observed onsite at a time when it could be detected if present. In addition, this species is conditionally covered under the MSHCP and focused surveys are only required if a project site is located within a Criteria Area Species Survey Area (CASSA) designated for this species.

Sensitive Animal Species

Sensitive wildlife species are those listed or candidate listed as federally threatened or endangered by USFWS; and/or State listed as threated or endangered or considered species of special concern (SSC) by CDFW. Twenty-five (25) sensitive animal species were recorded within the Riverside East quadrangle based on a database search conducted on CNDDB. Of these, 19 species were considered to have no potential to occur on the project site due to lack of suitable habitat.

The remaining six species were determined to have a low potential occur on the project site, including BUOW, coastal whiptail (*Aspidoscelis tigris stejnegeri*), Riverside fairy shrimp, San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), Stephens' kangaroo rat (*Dipodomys stephensi*; SKR), and western spadefoot (Spea hammondii). Four of these

species (coastal whiptail, San Diego black-tailed jackrabbit, SKR, and western spadefoot) are fully covered species under the MSHCP. With payment of the MSHCP Local Development Mitigation Fee (LDMF), no additional mitigation is required for potential impacts to these species. The project site is within the SKR HCP but is not located within any of the core reserves. Therefore, the project is required to pay a SKR mitigation fee for incidental take authorization under the SKR HCP.

The LDMF and SKR HCP mitigation fee are discussed further under Adopted Habitat Conservation Plans in Section 4.f below. Riverside fairy shrimp and BUOW are conditionally covered species under the MSHCP. Riverside fairy shrimp Step II BUOW surveys were completed in spring 2021 (see below), In addition, the site may support nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) so mitigation is needed to protect any of these species if they are present on the site at the time clearing or grading begin (see Mitigation Measure BIO-2).

Riverside Fairy Shrimp

Riverside fairy shrimp (RFS)(*Streptocephalus woottoni*) is a federally endangered species and conditionally covered under the MSHCP. RFS was recorded in CNDDB in 2009 approximately 1.8 miles southeast of the project site. This species has a potential to occur due to depressions like those observed on the project site. Dry season surveys for federally listed shrimp species were completed between October and November 2020 which were negative. A report documenting the dry season survey results was prepared in December 2020 and submitted to USFWS in January 2021. Wet season surveys were completed in May 2021 and results were issued in a focused report on May 14, 2021 which will be submitted to USFWS. The results of the dry and wet season surveys were negative so there will be no impacts to this species and no mitigation is required.

Burrowing Owl (BUOW)

BUOW is a state SSC and conditionally covered under the MSHCP. This species inhabits dry, low-growing, sparse vegetation, such as the disturbed and non-native vegetation habitats that occurs on the project site. BUOW was recorded in CNDDB in 2007 approximately 2.2 miles southwest of the project site. Suitable BUOW habitat was observed on the project site during the Step I survey and a Step II Focused Burrow and BUOW survey will be conducted in Spring/Summer 2021. The focused surveys will be conducted in accordance with the County's survey protocols and a report summarizing the surveys will be prepared following completion of the Step II surveys. Mitigation is needed to protect this species if it is present on the site at the time clearing or grading begin (see Mitigation Measure BIO-1).

General Plan Policies

The project would be in compliance with the following City of Riverside General Plan policies:

Policy LU-7.4: Continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Policy LU-7.2: Design new development adjacent and in close proximity to native wildlife in a manner which protects and preserves habitat.

Policy OS-5.3: Continue to participate in the Stephen's Kangaroo Rate conservation plan mitigation fees.

Policy OS-5.3: Continue with efforts to establish a wildlife movement corridor between Sycamore Canyon Wilderness Park.

Summary of Impacts

Based on the findings from the General Plan 2025 FPEIR, CNDDB search results, CNPS search results, Soil Maps and National Wetlands Inventory (NWI) (Appendix B Biological Resources), , the project will have potentially significant impacts on a direct, indirect, or cumulative basis on habitat modifications, species identified as a candidate, sensitive, or special status species in local or regional plans, and policies or regulations of the California Department of Fish and Game

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

or U.S. Fish and Wildlife Service. However, the conversion of vacant land to developed may impact burrowing owl and nesting birds. However, implementation of the recommended **Mitigation Measures BIO-1 and BIO-2** will reduce these potential impacts to less than significant levels.

Mitigation Measures

BIO-1 **Burrowing Owl (BUOW).** Prior to commencement of ground-disturbing activities (i.e., earthwork, clearing, and/or grubbing), Step II surveys shall be conducted to determine the presence or absence of BUOW on the project site. The surveys shall be conducted in accordance with the County's survey protocol (2006). If BUOW is not detected during the Step II surveys, a pre-construction survey shall be conducted on the project site within 30 days prior to ground disturbance to determine presence of BUOW. If the preconstruction survey is negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence and no further mitigation is required.

If BUOW is observed on the project site during the Step II surveys, a DBESP assessment shall be completed to ensure that the proposed alternative provides for replacement of any lost functions and values of habitat. At least 90 percent of the area with long-term conservation value and BUOW pairs shall be conserved on-site if the project site (including adjacent areas) supports three or more pairs BUOWs; supports greater than 35 acres of suitable habitat; and is non-contiguous with MSHCP Conservation Area lands. If BUOW is observed during the Step II surveys or the pre-construction survey, active burrows shall be avoided by the project in accordance with the CDFW's Staff Report on BUOW Mitigation (2012) or CDFW's most recent guidelines. The project proponent shall inform the RCA of BUOW observations. A BUOW Protection and Relocation Plan (plan) shall be prepared by a qualified biologist, which must be sent for approval by RCA prior to initiating ground disturbance. The RCA will coordinate directly with CDFW as needed to ensure that the plan is consistent with the MSHCP and CDFW guidelines. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur outside of the nesting season (September 1 through January 31).

BIO-2 **Nesting Birds.** To the extent feasible, (i.e., earthwork, clearing, and grubbing) shall occur outside of the general bird nesting season for migratory birds. The general nesting season is February 15 through August 31 for songbirds and January 15 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory birds and raptors (January 15 through August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of construction activities. If construction is inactive for more than seven days, an additional survey shall be conducted. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

4b. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP***

Criteria Area Species Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), and General Biological Resources Assessment (GBRA), **Helix, March 17, 2021** ***(Appendix B).***

Less than Significant with Mitigation Incorporated. A general and focused biological survey, including a jurisdictional delineation, was conducted on the project site (GBRA 2021). The jurisdictional delineation conducted in September 2020 determined the site contained two drainage features (Drainages A and B) as shown in Exhibit 7 and described as follows:

Drainage A is a small, isolated drainage feature that begins near the eastern boundary of the project site and conveys runoff from a storm drain outlet and riprap pad recently installed beneath the Old 215 Frontage Road. The outlet appears to have been constructed around 2016 and drains a relatively small off-site watershed of approximately 30 acres. In 2016, the pipe culvert was constructed beneath the Old 215 Frontage Road, extending from Allyn Drive and discharging along the eastern boundary of the site. The outlet was installed by the Riverside County Flood Control and Water Conservation District around 2016. From the pipe culvert, a short reach of man-made channel appears to have been excavated as part of the storm drain outlet, which drains into a man-made depressional area near the southerly portion of the site with no outlet. No indicators of flow were observed downstream of the man-made depressional area. Drainage A extends approximately 160 linear feet to the southwest and terminates on-site within the man-made depression. The downstream portion of Drainage A appears to pond during rain events. The drainage does not support native vegetation and no special aquatic sites, such as wetlands or vernal pools, were observed. Drainage A supports approximately 0.10 acre of non-wetland waters of the State under the jurisdiction of RWQCB and CDFW.

Drainage B is a small drainage feature that begins in the southwestern corner of the project site and conveys sheetflow from the southwest portion of the property. It extends approximately 35 linear feet before exiting the site at the southwestern corner via a corrugated metal pipe. Approximately 425 feet to the south of the project site it joins Sycamore Creek which drains to the Santa Ana River roughly 15 miles northwest of the project site (and ultimately empties into the Pacific Ocean). Drainage B does not support native vegetation and no special aquatic sites, such as wetlands or vernal pools, were observed. Drainage B supports less than 0.01 acre of non-wetland waters of the State under the jurisdiction of RWQCB and CDFW.

In total, the project site supports approximately 0.10 acre of non-wetland waters of the State regulated by the Regional Water Quality Control (RWQCB) and CDFW. Based on the new Navigable Waters Protection Rule initiated by the USACE, ephemeral streams are no longer regulated under the Clean Water Act Section 404. Therefore, Drainages A and B are not likely to be considered waters of the U.S., and no special aquatic features were observed on the project site.

In accordance with the MSHCP, a Riparian/Riverine and Vernal Pool habitat assessment was conducted in September 2020 concurrently with the jurisdictional delineation. Two MSHCP Riverine Areas (Drainage A and B) were identified within the project site, which are consistent with limits of waters of the State. These are only considered Riverine Areas since riparian vegetation was not present and wetland indicators were not observed. The projects site supports approximately 0.10 acre of Riverine Areas including 0.10 acre within Drainage A and less than 0.01 acre within Drainage B.

The MSHCP lists 23 rare plant species that have a potential to occur in Riparian/Riverine and Vernal Pool habitats within the MSHCP Plan Area (Table 6, MSHCP Riparian/Riverine and Vernal Pool Plant Species). Of the 23 species, 22 species were determined to have no potential to occur on the project site based on geographic range, elevation range, preferred habitat, and/or nearby occurrence records. Only smooth tarplant was determined to have a potential to occur based on the presence of disturbed habitat and depressions on the project site. However, this species was not detected on the project site at a time when it would have been visible if present (September).

The MSHCP lists 12 sensitive animal species that have a potential to occur in Riparian/Riverine and/or Vernal Pool habitats within the MSHCP Plan Area (Table 7, MSHCP Riparian/Riverine and Vernal Pool Animal Species). The MSHCP requires focused surveys to be conducted for projects that propose impacts to three invertebrate and three bird species. The project site supports suitable habitat for Riverside fairy shrimp. Based on known populations within the Plan Area, Santa Rosa Plateau fairy shrimp and vernal pool fairy shrimp are not expected to occur on the project site. Dry season surveys for

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

federally listed shrimp species were completed between October and November 2020, which were negative. Wet season surveys were conducted in Spring 2021 and were also negative (see related discussion in Section 4.a). The Project site does not support suitable habitat for any other animal species in the Riparian/Riverine and/or Vernal Pool habitats.

Through regulatory compliance with MSHCP Section 6.1.2 (Riparian/Riverine Areas and Vernal Pools, see Section 4.f below) and implementation of **Mitigation Measures BIO-3 and BIO-4**, impacts to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services are found to have a **less than significant impact** on a direct, indirect, or cumulative basis.

Mitigation Measures

BIO-3 **Jurisdictional Resources.** Prior to grading permit issuance, the Project Applicant shall obtain regulatory permits from the RWQCB and/or CDFW. Compensatory mitigation for permanent impacts to jurisdiction shall be required as part of subsequent permitting requirements. Permanent impacts to jurisdiction shall be mitigated through purchase of streambed rehabilitation credits at a ratio no less than 2:1 within an agency approved mitigation bank or in-lieu fee program.

BIO-4 **Construction Limits.** During ground disturbing activities, the following minimization measures shall be implemented during construction:

- The work limits shall be clearly marked with flags and/or fencing prior to the initiation of construction activities.
- A biological monitor shall be present during vegetation clearing and trimming to limit removals to the lowest practicable amount.
- Use of standard Best Management Practices (BMPs) to minimize the impacts during construction.
- Construction-related equipment will be stored in developed areas, outside of drainages.
- Source control and treatment control BMPs will be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs will be implemented throughout the project to capture and treat potential contaminants.
- To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
- Employees shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.

c. Have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐

4c. Response: (*Source: City of Riverside GIS/CADME USGS Quad Map Layer), and General Biological Resources Assessment (GBRA),* Helix, March 17, 2021 *(Appendix B).*

Less Than Significant Impact. A general and focused biological survey, including a jurisdictional delineation, was conducted on the project site (GBRA 2021). The jurisdictional delineation conducted in September 2020 determined the site contained two drainage features (Drainages A and B) as described in Section 4.b above. The project site supports approximately 0.10 acre of non-wetland waters of the State regulated by the Regional Water Quality Control (RWQCB) and CDFW. Based on the new Navigable Waters Protection Rule initiated by the USACE, ephemeral streams are no longer regulated under the Clean Water Act Section 404. Therefore, Drainages A and B are not likely to be considered waters of

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

the U.S., and no special aquatic features were observed on the project site.

Therefore, the proposed project would have a **less than significant impact** on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means on a direct, indirect, or cumulative basis with adherence to existing regulations and code requirements.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐

4d. Response: (*Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage), and General Biological Resources Assessment (GBRA),* Helix, March 17, 2021 *(Appendix B).*

Less than Significant with Mitigation Incorporated.

The project site does not directly connect to large blocks of habitat and is constrained by existing development in all directions. The project site may facilitate local movement of wildlife within its boundaries. However, implementation of the proposed project would not impact regional wildlife movement. Construction activities within the project site could disturb or destroy active migratory bird nests, including eggs and young. Disturbance to or destruction of migratory bird eggs, young, or adults is in violation of the MBTA and CFG Code. To avoid project impacts to nesting birds, the project will implement **Mitigation Measure BIO-2** (nesting birds) outlined in Section 4.a above. With implementation of that measure, the project will have a **less than significant impact** to wildlife movement on a direct, indirect, or cumulative basis.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

4e. Response: (*Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual), and General Biological Resources Assessment (GBRA),* Helix, March 17, 2021 *(Appendix B).*

Less Than Significant Impact. The proposed project is subject to the MSHCP and is consistent with the General Plan 2025. The proposed project will not conflict with General Plan 2025 Policy OS-6.4, which requires the City to continue efforts to establish a wildlife movement corridor between Sycamore Canyon Wilderness Park and the Box Springs Mountain Regional Park, between Box Springs Mountain Reserve and the Santa Ana River via Springbrook Wash.

The project is also consistent with General Plan 2025 Policy OS-6.1, which addresses preserving wildlife migration areas in general, and with Policies OS-7.3 and LU-5.6, which address wildlife movement through preservation and expansion of the Santa Ana River open space and the crossing of Alessandro Arroyo. Implementation of the proposed Project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.

Any project within the City of Riverside's boundaries that proposes planting a street tree within a City right-of-way must follow the Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. If applicable, the project will comply with the Tree Policy Manual when planting a tree within a City right-of-way, and therefore, **impacts will be less than significant**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

4f. Response: (*Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan, and Natural Community Conservation Plan), and General Biological Resources Assessment (GBRA), Helix, March 17, 2021 (Appendix B).*

Less Than Significant with Mitigation Incorporated. The project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area. The MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on conservation of species and their associated habitats in Western Riverside County. The MSHCP's overall goal is to provide for the conservation of covered species and their habitats, as well as maintain biological diversity and ecological processes while allowing for future economic growth within the urbanized areas. The project site is not located in an MSHCP Existing Cores, Linkages, non-contagious habitat blocks, MSHCP Cell area, MSHCP Area Plan or criteria cell.

The project site is not within a County Area Plan of the MSHCP and is not located within or adjacent to an MSHCP Criteria Area, therefore, the project site is not subject to special conservation requirements that apply to cells and is not required to undergo the HANS process. The following sections demonstrate the project's compliance with MSHCP requirements:

Section 6.1.2 (Riparian/Riverine Areas and Vernal Pools)

Riverine Areas. The MSHCP Riverine Areas mapped on the project site is equivalent to waters of the State. Implementation of the proposed project would result in permanent impacts to approximately 0.08 acre of MSHCP Riparian Habitat, including 0.08 acre of Drainage A and less than 0.01 acre of Drainage B. Since the project proposes impacts to MSHCP Riverine Areas, the project is required to prepare a DBESP, which provides a detailed account of impacts and proposed mitigation to compensate for impacts. Permanent impacts to the MSHCP Riverine Areas would be mitigated through on-site or off-site enhancement, restoration, and/or creation at a ratio of no less than 2:1 (see **Mitigation Measure BIO-3** in Section 4.b above).

Riparian/Riverine and Vernal Pool Species. The project site supports suitable habitat for only one Riparian/Riverine and Vernal Pool species (smooth tarplant). There is potential suitable habitat for smooth tarplant based on the presence of disturbed habitat and depressional areas on the project site. The general biological survey was conducted at the end of the flowering period for this species (September) and is easily and regularly identifiable once senesced. This species was not detected on the project site. As discussed above, the proposed project is consistent with MSHCP regarding MSHCP Section 6.1.2.

Section 6.1.3 (Narrow Endemic Plant Species)

The project site is not located within a Narrow Endemic Plant Species Survey Area (NEPASA), therefore, no focused surveys were required and the proposed project is consistent with Section 6.1.3 of the MSHCP.

Urban/Wildland Interface Guidelines (MSHCP Section 6.1.4)

Proposed developments adjacent to MSHCP Conservation Areas may create edge effects that can impact conserved biological resources. Since the project site is not within or adjacent to MSHCP Conservation areas, many of the MSHCP Urban/Wildland Interface Guidelines are not required. As discussed below, the project will comply with applicable guidelines to ensure consistency with MSHCP Section 6.1.4:

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

Drainage. The project site supports two drainage features, Drainages A and B. Therefore, the project will incorporate measures to avoid discharge of untreated surface runoff into downstream waters. Measures will include those required for construction pursuant to the State Water Resources Control Board General Construction Stormwater Permit and those required post-construction pursuant to the National Pollutant Discharge Elimination System and Municipal Storm Drain requirements. The project shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes downstream from the project site.

Toxics. Land uses that use chemicals or generate bio-products that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge into downstream waters. Measures such as those employed to address drainage issues would be implemented by the proposed project to avoid the potential impacts of toxics.

Lighting. The project site does not occur directly adjacent to MSHCP Conservation Areas, which are separated by existing development. Therefore, lighting standards are not applicable.

Noise. The project site does not occur directly adjacent to MSHCP Conservation Areas, which are separated by existing development. Therefore, noise standards are not applicable.

Invasives. No invasive plants for erosion control, landscaping, wind rows, or other purposes shall not be planted within the project site. Planting of invasive plants in Table 6.2 of the MSHCP will be prohibited (see **Measure BIO-5**).

Barriers. Since the project site is not directly adjacent to the MSHCP Conservation Area, barriers or signage are not necessary.

Grading/Land Development. The project site is not adjacent to an existing or proposed MSHCP Conservation Areas. Therefore, manufactured slopes will not extend into any MSHCP Conservation Areas.

MSHCP Section 6.3.2 (Additional Surveys)

The project site is not within a CASSA or an amphibian or mammal survey area. No impacts to CASSA species or sensitive amphibian or mammal species are proposed. Based on the results of the Step I survey, the project site supports suitable BUOW habitat. Prior to commencement of ground-disturbing activities, Step II Focused Burrow and BUOW surveys will be conducted in accordance with the County's survey protocol (County 2006)(see **Mitigation Measure BIO-1**). If BUOW is not detected during the Step II Focused surveys, a pre-construction survey must be conducted within 30 days of ground-disturbing activities (i.e., earthwork, clearing, and/or grubbing). If BUOW is detected during the Step II surveys, a DBESP must be prepared to ensure that the proposed alternative provides for replacement of any lost functions and values of habitat. If BUOW is detected during the pre-construction survey or Step II surveys, avoidance of active nests and/or relocation of BUOW would be required as outlined in Measure BIO-2. As discussed above, the proposed project is consistent with MSHCP Section 6.3.2.

MSHCP Section 6.4 (Fuels Management)

The project site is not adjacent to an MSHCP Conservation Area. Therefore, fuel modification impacts would not extend into a conservation area. The project is consistent with MSHCP Section 6.4.

MSHCP and Stephens' Kangaroo Rat Fees

In order for the project to participate in the MSHCP, the project proponent is required to pay a Local Development Mitigation Fee (LDMF) in order to finance the acquisitions of conservation areas to provide habitat for MSHCP covered species. The LDMF must be paid prior to issuance of a building permit.

The applicant shall pay the LDMF as determined by the City. Final fee credits shall be determined through coordination with the City. The project site is also within the SKR HCP but is not located within any of the core reserves. Therefore, the project is required to pay a SKR mitigation fee for incidental take authorization under the SKR HCP. The project will implement Mitigation Measure BIO-6 which requires the project proponent to pay the MSHCP LDMF and SKR HCP fees.

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

In summary, the proposed project is consistent with the guidelines of MSHCP, including Section 6.1.4, Guidelines Pertaining to the Urban/Wildlife Interface and related policies in the General Plan 2025, including Policy LU-7.4. The project will also implement **Mitigation Measures BIO-5 and BIO-6** to address payment of established The project is consistent with the Stephen's Kangaroo Rat (SKR) HCP and with General Plan Policy OS-5.3. Therefore, impacts will be **less than significant** impact on a direct, indirect, or cumulative basis to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Mitigation Measures

BIO-5 MSHCP Landscaping Restrictions. In accordance with MSHCP Section 6.1.4, no species listed in Table 6-2, Plants that Should Be Avoided Adjacent to the MSHCP Conservation Area, shall be used in the project landscape plans (including hydroseed mix used for interim erosion control).

BIO-6 Habitat Conservation Plan Fees. The project applicant is subject to the MSHCP Local Development Mitigation Fee and the SKR Habitat Conservation Plan Fee, which shall be paid prior to issuance of any building permit.

5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☐	☐	☒

5a. Response: (*Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix C, Title 20 of the Riverside Municipal Code, and site-specific Cultural Resources Survey prepared by MIG in January 2020)*

No Impact. The project is located on a site where no historic resources exist as defined in Section 15064.5 of the CEQA Guidelines as verified in the Cultural Resources records search conducted by MIG in January 2020. Structures were present on the project site at one time, and at some point the structures were demolished prior to discontinuation of agricultural uses on the project site. No structural remains or historic-period artifacts were found in the southern portion of the property, where a building was present on the project site.

The proposed project also does not involve restoration, rehabilitation, alteration or demolition of a historical resource as defined under Section 15064.5 (a) of the CEQA Guidelines. If any structure is unearthed, CEQA Guidelines for site and or structure/structures as well as Title 20 of the Riverside Municipal Code will be adhered to. As such, the project will have no impact on a direct, indirect, or cumulative basis on historical resources as defined under Section 15064.5 (a) of the CEQA Guidelines.

Therefore, the project will have **no impact** on a direct, indirect, or cumulative basis to historical resources and no mitigation is required.

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

5b. Response: (*Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix C – Cultural Resources Study and site-specific Cultural Resources Survey prepared by MIG in January 2020)*

Less Than Significant Impact with Mitigation. A site survey for archeological resources was prepared by MIG on

January 22, 2020. The survey meets the Secretary of the Interior Standards and Guidelines and has found the following:

There are no known archeological resources present on the site. No known cultural resources were identified on records searches for the project site. Mitigation Measures CUL-1 through CUL-5 will reduce impacts to archeological resources on a direct, indirect, or cumulative basis as a result of the project to a less than significant level. Several known culturally sensitive sites do occur within one-mile of the project site. Often areas with known culturally sensitive sites within the vicinity have a higher likelihood of unearthing a previously undiscovered archeological resource. In accordance with State Law AB 52 consultation notices were sent on August 14, 2020to the appropriate tribal representatives. Three tribes requested consultation (Rincon Band of Luiseño, Pechanga Band of Luiseño, , and Agua Caliente Band of Cahuilla Indians) pursuant to AB 52, and one tribe (San Manuel Band of Mission Indians) requested monitoring on the site but no consultation. Consultation with Rincon Band of Luiseño was held on August 24, 2020 and concluded on October 27, 2020. Consultation with Agua Caliente Band of Cahuilla Indians was held on August 24, 2020 and concluded on September 1, 2020. Consultation with Pechanga Band of Luiseño was held on September 22, 2020. Pechanga indicated that the project site is located within the Traditional Cultural Property (TCP) and requested an easement for potential reburial on-site. The conservation easement for reburial is depicted on Parcel 3 of the proposed Parcel Map. Consultation was concluded on May 4, 2021. Though no known archeological resources are present on the site with implementation of Mitigation Measures CUL-1 through CUL-5 in the event an unintended discovery is made, the archeological resource would be protected. Through implementation of these mitigation measures, impacts to archeological resources on a direct, indirect, or cumulative basis as a result of the project can be reduced to a less than significant level.

Mitigation Measures

CUL-1 **Tribal Coordination.** Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural resources and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

CUL-2 **Archaeological and Paleontological Monitoring**. At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:

   a. Project grading and development scheduling;

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

   c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered

cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;

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

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

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

CUL-3 **Native American Monitor**. Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following:

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

If mutually agreed upon, any agreement with the tribe(s) may include compensation for the Tribal Monitors. If the developer/permit applicant and the consulting tribe(s) are unable to reach an agreement regarding compensation, the mitigation measure shall be considered satisfied if the developer/permit applicant provides sufficient evidence that they have made a reasonable effort to reach an agreement with the consulting tribes with regards to items a-d, as listed above).

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

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

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

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

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

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

b. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed, with an exception that sacred items, burial good and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains and grave goods. Any reburial process shall be culturally appropriate. List of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV report shall be prepared by the project archeologist and shall be filled with the City under a confidential cover and not subject to a Public Records Request;

c. If reburial is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; and

d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

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

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

5c. Response: (*Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity)*

Less Than Significant with Mitigation. Where construction is proposed in undeveloped areas, disturbance on vacant lands could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outsides of formal cemeteries. Consistent with State laws protecting these remains, sites containing human remains must be identified and treated in a sensitive manner. In the event that Native American human remains are inadvertently discovered during project-related construction activities, there would be unavoidable significant adverse impacts to Native American resources, but implementation of **Mitigation Measures CUL-1 through CUL-6** will

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

reduce impacts to human remains, including those interred outside of formal cemeteries, to a less than significant level.

Mitigation Measures

CUL-6 **Discovery of Human Remains.** In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

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

6. ENERGY

Would the project:

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No 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: ***(Source: GHG and Energy Analysis prepared by MIG in December 2020)***

Less Than Significant Impact. A detailed energy use analysis was prepared by MIG as part of the greenhouse gas emissions study (MIG 2020b, Appendix A). Implementation of the Project would increase the demand for energy at the Project site during construction and operation. However, the proposed business park would be designated to current CalGreen Code requirements, and the energy consumption associated with development activities would be necessary. The proposed Project would not use energy in a wasteful, inefficiency, or unnecessary manner. Electric power would be required for lighting and electronic equipment (e.g., computers) located in trailers used by the construction crew. However, the electricity used for such activities would be temporary and would have a negligible contribution to the Project's overall energy consumption. Natural gas consumption is not anticipated during construction of the Project. Fuels used for construction would generally consist of diesel and gasoline, which are discussed in the next subsection. Any amount of natural gas that may be consumed during Project construction would be nominal and would have a negligible contribution to the Project's overall energy consumption.

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

The operation of heavy-duty, off-road equipment associated with Project construction would consume approximately 30,015 gallons of diesel fuel. Worker, vendor, and hauling trips associated with Project construction are estimated to consume approximately 17,000 and 9,417 gallons of gasoline and diesel fuel, respectively. In total, Project construction is estimated to require approximately 17,000 gallons of gasoline and 39,432 gallons of diesel (totals may not equal due to rounding).

On- and off-road petroleum-powered vehicles/equipment would be subject to various rules and regulations at the federal and state levels. On the federal level, on-road vehicles would be subject to the SAFE Vehicles Rule. On the state level, off-road equipment at the site would also be required to comply with CARB's Airborne Toxic Control Measures, which restricts heavy-duty diesel vehicle idling to five minutes. In addition, the efficiency of petroleum use is related to numerous other state-wide regulations and programs, such as the LCFS (on- and off-road vehicles/equipment), ACC Program (on-road passenger vehicles), and ACT Program (on-road trucks). In addition, on the local level (i.e., immediate Project-level) Mitigation Measure AIR-1, contained in the Air Quality and Construction Health Risk Assessment Report prepared for the proposed Project, would require the use of late engine model years (i.e., equipment meeting U.S. EPA and CARB Tier IV Final Emission Standards) and use of electric-powered and liquefied or compressed natural gas equipment in lieu of diesel-powered equipment (e.g., generators) to the maximum extent feasible. Since petroleum use during construction would be temporary and is a necessary component when conducting development activities, it would not be wasteful or inefficient.

During operation of the new business park / warehousing buildings, the project would consume electricity from appliance operation, general building systems (e.g., lighting, HVAC equipment), and outdoor lighting. Based on estimates generated by CalEEMod, the proposed project would consume approximately 1,186,939 kWh per year of electricity. The proposed project would be required to comply with the standards contained in the CalGreen Code (i.e., Part 11 of the Title 24 Building Code) that requires the buildings constructed at the site meet energy efficiency standards that improve upon those from previous years.

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

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

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

Although electricity would increase at the site under implementation of the project, the proposed facility would be designed to the 2019 Title 24 Building Code standards, and benefit from other actions taken at the State level. For these reasons, the electricity consumed by the Project is not considered to be inefficient or wasteful.

Natural gas consumption would be required during operation of the Project for various purposes, such as hot water and building HVAC. Based on estimates generated by CalEEMod, the proposed Project would consume approximately 411,473 kBtu per year of natural gas. Although natural gas consumption would increase at the site under implementation of the Project, the building envelope, HVAC, lighting, and other systems, would likely be more efficient than other business park / warehousing uses in the area, because of the energy efficiency requirements outlined in the 2019 Title 24 Building Code. For these reasons, the natural gas that would be consumed by the Project is not considered to be inefficient or wasteful.

Gasoline and diesel would be consumed during operation of the proposed Project. Both forms of petroleum fuel would be consumed from future workers and customers traveling to and from the site. As estimated in CalEEMod, based on the trip generation rates and trip distances provided for in the Urban Crossroads traffic reports, the proposed Project is anticipated to generate approximately 2,322,547 VMT on an annual basis. Based on the average fuel economies and vehicle fleet mix attributable to the proposed Project, vehicle trips associated with the proposed Project are estimated consume approximately 69,861 and 22,509 gallons of gasoline and diesel, respectively, on an annual basis. These fuel consumption estimates are based on vehicle efficiency in 2022 and would decrease in future years as trucks become more fuel efficient and ZEV trucks are more commonly available and used within Riverside County.

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

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

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

6b. Response: ***(Source: GHG and Energy Analysis prepared by MIG in December 2020)***

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
with nor obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts will be **less than significant** and no mitigation is required.				
7. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
7i. Response: (*Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019)* **Less than Significant Impact.** The existing San Jacinto Valley fault line located approximately 4 miles east of the project site in Moreno Valley, as indicated in the City General Plan 2025, and has experienced several earthquakes of moderate magnitude on the Richter Scale since records have been kept. The project site lies outside of any known Alquist-Priolo Earthquake Fault Zone as specified in the geo-technical investigation and report completed by NorCal Engineering on May 8, 2019. The primary seismic hazards that result are ground-shaking and the potential for ground rupture along the surface trace of the fault. Secondary seismic hazards resulting from the interaction of ground shaking with existing soil and bedrock conditions include liquefaction, settlement, and landslides. Compliance with the California Building Code regulations will ensure that a **less than significant impact** related to strong seismic ground shaking will occur on a direct, indirect, or cumulative basis.				
ii. Strong seismic ground shaking?	☐	☐	☒	☐
7ii. Response: (*Source: General Plan 2025 FPEIR Appendix D – Geotechnical Report May 8, 2019)* **Less than Significant Impact.** The San Jacinto Fault Zone located northeast of the City, and the Elsinore Fault Zone, located in the southern portion of the City's Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause intense ground shaking. Because the proposed project will comply with California Building Code regulations, impacts associated with strong seismic ground shaking will have **less than significant impact** on a direct, indirect, or cumulative basis.				
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
7iii. Response: (*Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix D – Geotechnical Report May 8, 2019)* **Less Than Significant Impact.** The project site is located in an area with low potential for liquefaction as depicted in the General Plan 2025 Liquefaction Zones Map – Figure PS-2 and the Geo-technical Investigation completed by NorCal Engineering on May 8, 2019. Compliance with the California Building Code regulations will ensure that impacts related to seismic-related ground failure, including liquefaction would have **less than significant impact** on a direct, indirect, or cumulative basis.				
iv. Landslides?	☐	☐	☒	☐

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

7iv. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix D – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code, and for projects over 1 acre: Storm Water Pollution Prevention Plan SWPPP, Project Geotechnical Report May 8, 2019)*

Less Than Significant Impact. As identified in the Geo-technical investigation report prepared by NorCal Engineering on May 8, 2019, the project site is gently sloping and in an area with a very low potential for unstable slope conditions (see Figure 5.6-1 of the General Plan 2025 Program Final PEIR). Landslides may occur from heavy rainfall, erosion, and removal of vegetation, seismic activity or other factors. Slope stability depends on many factors and their interrelationships. A geotechnical study/preliminary soils report has been prepared to determine the soil properties and specific potential for landslides based upon the proposed development. Per the City's development review process, the project has incorporated the recommended design measures of the geotechnical study into the project design.

The proposed grading and development shall meet all requirements of the City Building Ordinance and will not impose any adverse effect on existing adjacent land or structures. Compliance with the California Building Code regulations; geo-technical study recommendations, and compliance with Title 17 – Grading of the Riverside Municipal Code will ensure that impacts related to landslides are reduced to **less than significant impact** levels on a direct, indirect, or cumulative basis.

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

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

Less Than Significant Impact. Erosion and loss of topsoil could occur as a result of the project. State and Federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, with the erosion control standards for which all development activity must comply (Grading Code (Title 17) requires the implementation of measures designed to minimize soil erosion. Compliance with State and Federal requirements as well as with Title17 will ensure that soil erosion or loss of topsoil will be a **less than significant impact** on a direct, indirect, or cumulative basis.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

7c. Response: (*Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019)*

Less than Significant Impact. The project is not located on a geologic unit or soil that is considered unstable. Furthermore, the proposed project will not cause soil to become unstable, as the project does not involve development, grading activities, or structures on any geologically unstable slope or soil type. As such, the project will have less than significant impact resulting in a geologic unit or soil becoming unstable resulting in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse on a direct, indirect, or cumulative basis. The general topography of the subject site is flat. Compliance with the project geotechnical report and the City's existing codes and the policies contained in the General Plan 2025 will help to ensure that impacts related to these geologic conditions are reduced to a **less than significant** level on a direct, indirect, or cumulative basis.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
direct or indirect risks to life or property?				

7d. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix D – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)*

Less than Significant Impact. A soils and geo-technical analysis conducted by NorCal Engineering on May 8, 2019 determined the project site contains soils classifying as silty sand with clay, gravel, small cobbles, roots and minor debris at a depth of 6 inches to 3 feet. Native soils were observed at a depth of greater than 3 feet and included silty sand with some clay content. Groundwater was not detected on the project site during the geo-technical analysis and historic high groundwater in the vicinity has been recorded greater than 50 feet below grade. Results of the in-place density tests reveal that the soil shrinkage will be on the order of 10 to 12 percent due to excavation and recompacting. Subsidence is estimated at 0.10 feet due to earthwork operations and would therefore indicate a low likelihood of soils with high shrink potential will be encountered (Appendix D Geo-Technical Report). The preliminary soils report indicates that the soil is not an expansive soil. Compliance with the recommendations of the soils report, and applicable provisions of the City's Grading Code – Title17 of the California Building Code, with regard to soil hazards related to expansive soils will be reduced to a less than significant impact for this project on a direct, indirect, or cumulative basis As such, the project will have **less than significant impact** resulting in substantial risks to life or property due to expansive soils on a direct, indirect, or cumulative basis.

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?	☐	☐	☐	☒

7e. Response: (*Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019)*

No Impact. The proposed project will be served by sewer infrastructure. Therefore, the project will have **no impact.**

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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

Less than Significant with Mitigation Incorporated. The project is located in an urbanized area. New development involving grading/ground disturbance are proposed that would create a potential for disturbance of paleontological resources or site or unique geologic features. Activities including construction-related and earth-disturbing activities could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines Section 15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact.

A Cultural Resources Survey prepared by MIG on January 22, 2020 has determined that the proposed project is consistent with General Plan Policy HP-1.3, which states the City shall protect sites of archeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in this planning and project review process. Therefore, MIG recommended implementation of the following measures:

Mitigation Measures

PAL-1 Conduct Paleontological Sensitivity Training for Construction. Personnel. Prior to the start of grading, the applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The training will include a handout and will focus on how to identify

paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

PAL-2 Conduct Periodic Paleontological Spot Checks during Grading and Earth-moving Activities. Prior to the start of grading, the applicant shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology. During grading the paleontologist shall conduct periodic Paleontological Spot Checks beginning at depths below five feet to determine if construction excavations have extended into older Quaternary deposits. After the initial paleontological spot check, further periodic checks will be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources will be required. The applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional paleontologist.

PAL-3 Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered. If paleontological resources and/or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until an appropriate paleontological treatment plan has been approved by the applicant and the City. Work shall be allowed to continue outside of the buffer area. The applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include the implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

PAL-4 Prepare Report Upon Completion of Paleontological Monitoring or Salvage Services. Within 60 days of completion of monitoring and/or salvage activities (if required), the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant, the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

With adherence to **Mitigation Measures PAL-1 through PAL-4**, the project would have a less than significant impact on paleontological resources and comply with General Plan Policy HP-1.3. Unanticipated discoveries such as paleontological resources would be protected by stopping work in the area and notification of the project archeologist. Therefore, the project will have a **less than significant impact** directly or indirectly to a unique paleontological resource or site or unique geologic feature.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

8a. Response: (*Source: GHG Analysis prepared by MIG in December 2020*)

Less Than Significant Impact. An Air Quality, Greenhouse Gas and Health Risk Assessment was conducted by MIG in December 2020. The analysis assessed whether the project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Local plans, policies, and regulations that provide for the reduction of emissions of greenhouse gases were also reviewed. The City of Riverside has adopted the Riverside Restorative Growth print, which includes a Climate Action Plan (RRG-CAP) that includes policies and measures that the City implements to achieve the reduction targets required by the state's AB 32 requirements and the statewide GHG reduction goals. The City has also adopted the California Building Code (Title 24), which includes the CalGreen requirements which incorporates statewide GHG reduction goals. As previously stated in the Air Quality Section of this initial study, the SCAQMD's Tier 3 thresholds used Executive Order S-3-05 goal as the basis for deriving the screening level. The California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following targets:

2010: Reduce greenhouse gas emissions to 2000 levels
2020: Reduce greenhouse gas emissions to 1990 levels
2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

The project's emissions meet the threshold for compliance with Executive Order S-3-05, and the project's emissions also comply with the goals of AB 32 and the City's RRG-CAP. The project also meets the current interim emissions targets/ thresholds established by SCAQMD. The project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by SB-32. The post 2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the project will be required to comply with these regulations when they come into effect. Currently these regulations have not been implemented.

MIG estimated the short- and long-term GHG emissions expected by project construction and operation, respectively. These estimates are shown in Tables 9 and 10. It is estimated the project will emit 562.6 metric tons of carbon dioxide equivalent ($MTCO_2e$) during construction in 2021, and ongoing operations will emit approximately 1,600 $MTCO_2e$ each year once the project is completed and occupied. The MIG study concluded the project's short-term and long-term emissions would not exceed the SCAQMD industrial threshold of 10,000 MTCO2E per year. Once operational, the proposed Project would generate annual emissions of GHG from area, energy, mobile, off-road, water/wastewater, and solid waste sources.

Table 9: Project Construction GHG Emissions

	Annual GHG Emissions (MT/Year)[1]			
Source	**CO_2**	**CH_4**	**N_2O**	**Total $MTCO_2e$**
2021 Annual	560.2	0.1	0.0	562.6
Amortized GHG Estimate[2]	18.7	0.0	0.0	18.8

Source: Table 6-2, Air Quality Assessment, MIG, December 2020

1 0.0 does not mean zero but rather greater than zero but less than 0.05.
2 Emissions are amortized over the life of the Project, which is presumed to be 30 years.

Table 10: Project Operation GHG Emissions

	Annual GHG Emissions (MT/Year)[1]			
Source	**CO_2**	**CH_4**	**N_2O**	**Total $MTCO_2e$**
Area	0.0	0.0	0.0	0.0
Energy	400.1	0.0	0.0	401.6

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

Mobile	927.6	0.0	0.0	928.3
Off-Road	26.2	0.0	0.0	26.4
Waste	29.0	1.7	0.0	71.8
Water	124.5	0.9	0.0	152.8
Amortized Construction	18.7	0.0	0.0	18.8
Total	**1,526.1**	**2.6**	**0.0**	**1,599.6**
SCAQMD 2020 Interim Threshold				10,000
Project-specific 2030 Emissions Goal				6,000
SCAQMD Interim Threshold or Project-specific Goal Exceeded?				No

Source: Table 6-3, Air Quality Assessment, MIG, December 2020

1 0.0 does not mean zero but rather greater than zero but less than 0.05.
2 Emissions are amortized over the life of the Project, which is presumed to be 30 years.

In addition, projects that are consistent with the projections of employment and population forecasts identified by the SCAG are considered consistent with the AQMP growth projections, since these forecast numbers were used by SCAG's modeling section to forecast travel demand and air quality for planning activities such as the RTP, the SCAQMD's AQMP, RTIP, and the Regional Housing Plan. This project is consistent with the projections of employment and population forecasts identified by the SCAG that are consistent with the General Plan 2025 "Typical Growth Scenario."

Therefore, the Project will produce GHG emissions, both during construction or operation, that will have a **less than significant** direct, indirect or cumulative impact on the environment.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No 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: Sycamore Canyon Business Park Specific Plan, GHG Analysis prepared by MIG in December 2020*)

Less Than Significant Impact. The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim Greenhouse Gas (GHG) threshold. As indicated in Question A, above, the project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction and, as demonstrated in the Climate Change Analysis, will not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05.

The City adopted its Riverside Restorative Growth print (RRG) Economic Prosperity Action Plan (RRG-EPAP) and Climate Action Plan (RRG-CAP) in January 2016. The City of Riverside is a participant in the Western Riverside Council of Governments (WRCOG) Sub-regional Climate Action Plan (CAP) project, whereby Riverside and 11 additional local jurisdictions prepared baseline inventories to quantify GHG emissions from community contributors and government operations. 2010 was chosen as the inventory base year for 10 of the 12 participating jurisdictions within the WRCOG subregion, including the City of Riverside. The local Riverside Climate Action Plan (CAP), while consistent with the WRCOG sub-regional CAP, is customized to meet the specific needs of the City and designed to be integrated with the many planning projects that are currently underway in the City. In order to show a more comprehensive and locally-focused picture of the City's emissions profile, 2007 is used as the baseline emissions year for the local CAP. Selecting 2007 as the baseline year recognizes important accomplishments the City has already taken to reduce community-wide GHG emissions, most notably the shift from coal-generated electricity to renewable sources, and it ensures that those accomplishments are accounted for in assessing progress toward future goals.

The Air Quality Element of the City of Riverside General Plan includes the following objectives:

Objective AQ-1 Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.

Objective AQ-2 Reduce air pollution by reducing emissions from mobile sources.

Objective AQ-3 Prevent and reduce pollution from stationary sources, including point sources (such as power plants and refinery boilers) and area sources (including small emission sources such as residential water heaters and architectural coatings).

Objective AQ-4 Reduce particulate matter, as defined by the Environmental Protection Agency (EPA), as either airborne photochemical precipitates or windborne dust.

Objective AQ-5 Increase energy efficiency and conservation in an effort to reduce air pollution.

Objective AQ-6 Develop a public education program committed to educating the general public on the issues of air pollution and mitigation measures that can be undertaken by businesses and residents to improve air quality.

Objective AQ-7 Support a regional approach to improving air quality through multi-jurisdictional cooperation.

Objective AQ-8 Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards.

In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990

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

by 2020 through an enforceable statewide emission cap which was phased in starting in 2012.

Therefore as the Project's emissions meet the threshold for compliance with Executive Order S-3-05, they will also comply with the goals of AB 32 and the City of Riverside Draft CAP. Additionally, as the project meets the current interim emissions targets/thresholds established by SCAQMD (as described in Section V, Air Quality Standards), the project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by SB-32. Furthermore, all of the post 2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the project will be required to comply with these regulations as they come into effect.

Based upon the prepared Climate Change Analysis for this project and the discussion above, the project will not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG and thus a **less than significant impact** will occur on a direct, indirect, or cumulative basis in this regard.

9. HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

9a. Response: (*Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, Phase I Environmental Site Assessment prepared by Environmental & Regulatory Specialists, Inc., May 13, 2019 (Appendix E), 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan)*

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

The future operational use of the site would typically include the storage and use of hazardous materials such as fuels, oils, solvents, pesticides, electronic waste, and other materials. These materials would be stored on site in small quantities, and therefore would not pose a significant threat to the public. However, through the compliance with all applicable Federal and State laws, and the submittal of a business plan to the City's Fire Department related to the transportation, storage and disposal of hazardous materials, the likelihood and severity of accidents would be reduced. Oversight by the appropriate Federal, State, and local agencies, and compliance by the new development with applicable regulations related to the handling, storage and disposal of hazardous materials will cause the project to have a **less than significant impact** on a direct, indirect, or cumulative basis. Therefore, there would be less than significant impact on a direct, indirect, or cumulative basis to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9b. Response: (*Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan and Project Specific - Business Plan)* **Less Than Significant.** The project may involve the limited use of hazardous materials but shall comply with all applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials. Compliance with all applicable Federal, State and local laws related to the transportation, use and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use and storage to a **less than significant impact** on a direct, indirect, or cumulative basis.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
9c. Response: *(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code and Project Specific - Business Plan, AQMP CalEEMod Model, and Health Risk Assessment prepared by MIG in December 2020)* **No Impact.** There are no existing or planned schools within a quarter mile of the proposed project site. Therefore there are no impacts and no mitigation is required. All businesses that handle or have onsite transportation of hazardous materials are required to comply with the provisions of the City of Riverside's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for the Business Emergency Plan. The project will not involve the substantial use or handling of hazardous or acutely hazardous materials or waste. Hazardous materials and or waste generated from the proposed project would be subject to all applicable safety regulations and would not pose a health risk to nearby existing schools. Therefore the Project will have **no impact** on schools regarding risk of hazardous materials.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
9d. Response: (*Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)* **No Impact.** A review of hazardous materials site lists compiled pursuant to Government Code Section 65962.5 found that the project site is not included on any such lists. Therefore, the project would have **no impact** to creating any significant hazard to the public or environment on a direct, indirect, or cumulative basis.				
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?	☐	☐	☒	☐

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

9e. Response: (*Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base)*

Less Than Significant Impact. The project site is located within the Zone B1-APZ Zone II of the March Joint Air Reserve Base/March Inland Port Land Use (March Base) Compatibility Plan (March ALUCP). Zone B1 is categorized as the Inner Approach/Departure Zone so there would be periodic flights overhead. The Project was not required to be submitted to the Riverside County Airport Land Use Commission (ALUC) for review as the City's General Plan is consistent with the March ALUCP and the Project does not include a legislative entitlement. However, the Project was submitted by the applicant to ALUC staff for preliminary review and was found to be consistent with the planning, design, and construction limitations of March Base PZ-II including building height, lighting, water bodies, and landscaping with adherence to the following building occupancy restrictions of the APZ-II:

ALUC Density Calculations based on B1-APZ Zone II: 50 Per Person Average Acer / 100 Per Person Single Acre

ALUC Per Person Average Acer Maximum Occupancy
ALUC Per Person Average Acer All Buildings Provided: 14,000SF / 200(O/M) = 70, 106,110SF / 500(WH) = 212, 282(TO) / 8.21(Acres)
ALUC Per Person Average Acre Building 1 Provided: 4,000SF / 200(O/M) = 20, 32,900SF / 500(WH)= 66, 86 (TO) / 2.43(Acres)
ALUC Per Person Average Acre Building 2 Provided: 8,000SF / 200(O/M) = 40, 53,570SF / 500(WH)=107, 147(TO) / 3.71 (Acres)
ALUC Per Person Average Acre Building 3 Provided: 2,000SF / 200(O/M) = 10, 19,640SF / 500(WH)= 39, 43(TO) / 1.13 (Acres)
ALUC Per Person Single Acre Building 1 Provided: 67 Auto Stalls x 1.50 = 100 (TO) / 2.42 Acres
ALUC Per Person Single Acre Building 2 Provided: 90 Auto Stalls x 1.50 = 135 (TO) / 3.71
ALUC Per Person Single Acre Building 3 Provided: 28 Auto Stall x 1.50 = 42 (TO) / 1.13

ALUC Per Person Single Acre Maximum Occupancy
ALUC Per Person Single Acre Building 1 Provide:30,870SF Land (210'x147'), 2,000SF / 200(O/M) = 10, 28,870SF / 500(WH) = 58
ALUC Per Person Single Acre Building 2 Provide:30,870SF Land (210'x147'), 4,000SF / 200(O/M) =210, 26,870SF / 500(WH) = 54
ALUC Per Person Single Acre Building 3 Provide:20,700SF Land (150'x138), 2,000SF / 200(O/M) = 10, 18,700SF / 500(WH) = 38

The next closest airport is the Riverside Municipal Airport 5.92 miles west of the Project site and the San Bernardino International Airport is 8.17 miles northeast of the project site. Therefore, the project will have a **less than significant impact** resulting in a safety hazard for people residing or working in the project area on a direct, indirect, or cumulative basis.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

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

No Impact. The Project will not result in physical alterations to the project site that would impair implementation or physically interfere with an adopted emergency plan. The site is located on Old 215 Frontage Road which is a major north-south collector in the eastern portion of Riverside and the far western end of Moreno Valley. Fire and safety plans for the Sycamore Canyon Business Park Specific Plan have already included the planned development of the project site. Therefore, the Project would have **no impact** on a direct, indirect, or cumulative basis to an emergency response or evacuation plan.

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

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

9g. Response: ***(Source: 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)***

Less Than Significant Impact. The proposed Project is located in an urbanized area where no wildlands exist, and the property is located 0.4 miles west of a Very High Fire Severity Zone (VHFSZ). Therefore, with adherence to the City of Riverside building and safety code requirements a **less than significant impact** regarding wildland fires on a direct, indirect, or cumulative basis from this Project will occur.

10. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

10a. Response: (*Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, Appendix H - Hydrology Study and Water Quality Management Plan prepared by SDH & Associates, Inc. and Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019)*

Less than Significant Impact. The proposed project is located within the Santa River Watershed (see GP 2025 FPEIR Figure 5.8-1). The project will not directly or indirectly result in physical alterations to the project site (i.e. grading, ground disturbance, structure or paving) that would affect water quality or be affected by water quality standards or waste discharge requirements. The project involves the construction of warehouse buildings located on a vacant parcel of land with an existing Riverside County Flood Control drainage feature onsite. A Geo-technical Investigation completed by NorCal Engineering determined that groundwater was not encountered on any of the test excavations and historic high groundwater was not encountered greater than 50 feet below grade, based upon nearby groundwater monitoring well data. Prior to grading, a final approved WQMP will be required for the project, as well as coverage under the State's General Permit for Construction Activities, administered by the Santa Ana RWQCB. Storm water management measures will be required to be implemented to effectively control erosion and sedimentation and other construction-related pollutants during construction. Given compliance with all applicable local, state, and federal laws regulating surface water quality and the fact that the project will result in a net increase of surface water runoff but will have onsite filtration, the proposed project as designed is anticipated to result in a **less than significant impact** on a direct, indirect, or cumulative basis to any water quality standards or waste discharge.

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 Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan, and WMWD Urban Water Management Plan and projects of Statewide, Regional or Areawide Significance.***

No Impact. The proposed project is located within the Santa Ana River Water supply Basin. The Project will not use well water, nor will it affect a groundwater recharge area and will therefore not directly or indirectly deplete groundwater supplies or interfere substantially with ground water recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. None of the physical alterations to the project site (i.e. grading, ground disturbance, structures or paving) are proposed that would affect the local groundwater table. The Project is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements that will ensure the proposed Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there will be **no impact** to groundwater supplies and 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?	☐	☐	☒	☐

10c.i. Response: (*Source: Preliminary grading plan, Stormwater Pollution Prevention Plan, and Water Quality Management Plan)*

Less Than Significant Impact. A culvert currently conveys runoff from the residential areas to the east under Old 215 Frontage Road onto the project site. Runoff enters the site near the southeast corner and flows west then ponds in the southwest portion of the site. This area (identified as Parcel A) is planned for a detention basin as part of the project to retain onsite runoff. The offsite runoff currently entering the Project site would be contained in an underground pipe along the same general alignment as the surface drainage at present, except it would then flow through the planned detention basin (without mingling flows) and continue offsite to the southwest then south in an improved open storm drain channel along the east side of the I-215 Freeway. These improvements are being made at the direction of the Riverside County Flood Control and Water Conservation District. The District has already approved the design and has indicated it will approve the final plans as soon as the CEQA document is approved.

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. Further, the drainage patterns on the site such as the surface water drainage flows to existing storm drains will remain. Therefore, the project will have a **less than significant impact** on a direct, indirect, or cumulative basis to existing drainage patterns.

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

10c.ii. Response: (*Source: Preliminary grading plan, and Project Specific – Stormwater Pollution Prevention Plan, and Water Quality Management Plan)*

Less than Significant Impact. The project will not directly result in any activity or physical alteration of the site or surrounding area, (i.e. through grading, ground disturbance, structures or additional paving) that would alter the existing drainage pattern of the site. However, it should be noted the District is already in the process of constructing Line LL of the Moreno West End Drainage Master Plan through the southern end of the site (RCFCWCD letter dated February 20, 2020) to eliminate the informal surface drainage and detention area on the site.

No alterations to a natural stream or river or increase the rate or amount of surface runoff that would result in flooding on- or off-site is proposed. The project consists of construction of a concrete tilt-up industrial buildings and parking area. The project design incorporates surface water drainage patterns that collect storm water runoff to collection basins, which are designed to hold a capacity of a 100-year flood. All applicable Best Management Practices will be employed to prevent onsite flooding in the event of a storm event. Therefore, no flooding on or off-site as a result of the project will occur and there will be **less than significant impact** on a direct, indirect, or cumulative basis that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems	☐	☐	☐	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
or provide substantial additional sources of polluted runoff; or				

10e.iii. Response: (*Source: Preliminary Grading Plan, and Water Supply Assessment prepared by Goodman & Associates on August 15, 2018, Stormwater Pollution Prevention Plan, and Water Quality Management Plan)*

Less Than Significant Impact. Within the scope of the project is the installation of a storm water drainage system, specifically as described within the project description portion of this project. As the storm water drainage system will be installed concurrently with the construction of this project, the storm water drainage system will be adequately sized to accommodate the drainage created by this project. The project is expected to generate the following pollutants: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil & grease, and pesticides. These expected pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific Water Quality Management Plan (WQMP). Therefore, as expected pollutants will be addressed through the project site design, source control, and treatment controls already integrated into the project design, and the project will not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Project impacts will be a **less than significant impact** on a direct, indirect, or cumulative basis.

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

10c.iv. Response: (*Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Enter zone and panel number)*

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

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

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

No Impact. The Project site is not located within or near a flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 06065C0745G Effective Date August 28, 2008) or subject to dam inundation as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas. There are also no dams, lakes, or other large impoundments of water upstream of the site that could result in flooding on the property. The closest lake to the site is Lake Perris almost 7 miles southeast of the site and its floodway is over 100 feet below the elevation of the site, so potential flooding from a seiche of dam failure from that source is negligible.

Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis will occur on a direct, indirect, or cumulative basis. The proposed Project site and its surroundings have generally flat topography and is within an urbanized area and are not adjacent to any upland areas (e.g., Box Springs Mountain Area), and the site's relative distance from existing hillsides would lower the likelihood of mudflow. The Project consists of development of three industrial buildings within an urbanized area and will result in direct physical alterations to the project site through grading, ground disturbance, structures and paving. The site design does not substantially alter the existing topography. Therefore, there is **no impact** potential for the release of pollutants from flooding, tsunami, seiche, or mudflow on a direct, indirect, or cumulative basis to affect the Project site.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

**10e. Response: (*Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, Appendix H - Hydrology*

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

Study and Water Quality Management Plan prepared by SDH & Associates, Inc., Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019, and the State Department of Water Resources (DWR) Adjudicated Areas Interactive Map Website 2021 https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin)

Less than Significant Impact.

Water Quality Control Plan. The proposed Project is located within the Santa River Watershed (see GP 2025 FPEIR Figure 5.8-1). The Project will not directly or indirectly result in physical alterations to the project site (i.e. grading, ground disturbance, structure or paving) that would affect water quality or be affected by water quality standards or waste discharge requirements. The Project involves the construction of warehouse buildings located on a vacant parcels of land with no known water resources features located onsite. A Geo-technical Investigation completed by NorCal Engineering determined that groundwater was not encountered on any of the test excavations and historic high groundwater was not encountered greater than 50 feet below grade, based upon nearby groundwater monitoring well data. Prior to grading, a final approved WQMP will be required for the project, as well as coverage under the State's General Permit for Construction Activities, administered by the Santa Ana RWQCB consistent with the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan).

The Basin Plan, updated in February 2016, establishes water quality standards for groundwater and surface water in the basin and standards for both beneficial uses of specific water bodies and the water quality levels that must be maintained to protect those uses. The Basin Plan includes an implementation plan describing actions by the Santa Ana RWQCB and others needed to achieve and maintain the water quality standards. The Santa Ana RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface waters. The Basin Plan lists water quality problems for the region along with their causes where they are known. Plans for improving water quality are included for water bodies with quality below the levels needed to enable all the beneficial uses of the water.

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

Groundwater. The Sustainable Groundwater Management Act (SGMA) was passed into law in 2014 and requires that medium and high priority groundwater basins designated by the Department of Water Resources (DWR) be managed by Groundwater Sustainability Agencies (GSAs). Regarding a sustainable groundwater management plan, the Project site is in the far eastern portion of the San Bernardino – Riverside Basin Area South which was adjudicated in 1992 and is managed by the Riverside Basin Area Watermaster. However, groundwater is collected and supplied to the Project area by the Riverside Public Utilities (RPU) in coordination with the Western Municipal Water District (WMWD). The City's Urban Water Management Plan was last updated in 2015.

In addition, the previous analysis in Threshold 10.b concluded that the Project site would not have a significant impact on groundwater quantity or quality. Therefore, the Project will have less than significant impacts related to ongoing groundwater management planning efforts for this area and no mitigation is required.

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

11. LAND USE AND PLANNING: Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐

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

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

Less Than Significant Impact. The proposed project has been designed to be consistent with and to fit into the pattern of development of the surrounding area providing adequate access, circulation and connectivity consistent with the General Plan 2025, and in compliance with the requirements of the Zoning and Subdivision Codes. The project is an infill project currently served by fully improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or an established community. Further, the project is consistent with the General Plan 2025, the Zoning Code, the Subdivision Code and the Citywide Design and Sign Guidelines. Therefore, the project impacts related to the physical division of an established community are **less than significant** and no mitigation is required.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

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

Less than Significant Impact. The project is an infill project consistent with the General Plan 2025 and the Sycamore Canyon Business Park Specific Plan. It is not located within other plan areas and it is not a project of Statewide, Regional or Areawide Significance. Further, the project is consistent with the General Plan 2025, the Zoning Code, the Subdivision Code and the Citywide Design and Sign Guidelines. For these reasons, this project will have **less than significant** impact on an applicable land use plan, policy or regulation on a direct, indirect, or cumulative basis.

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

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

No Impact. The project does not involve extraction of mineral resources. The project site is located in Mineral Resource Zone MRZ-3 which indicates that the area contains known or inferred mineral occurrences of undetermined mineral resource significance. However, no mineral resources have been identified on or found to be associated with the project site, and there is no historical use of the site or surrounding area for mineral extraction purposes. The closest area with identified mineral resources is a "rock products" (RP) area a half mile southwest of the site just west of the I-215 Freeway north of Alessandro Boulevard. The project geotechnical investigation also did not identify deposits of minerals on the project site at any of the eleven subsurface exploratory excavation locations. Based on available evidence, the project site is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the General Plan 2025, specific plan or other land use plan. Therefore, the project will have **no impact** on mineral resources on a direct, indirect, or cumulative basis.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

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

No Impact. The GP 2025 FPEIR determined that there are no specific areas with the City or the City Sphere Area which

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The proposed project is consistent with the General Plan 2025. Therefore, there is **no impact** on a direct, indirect, or cumulative basis and no mitigation is required.				
13. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

13a. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Noise Existing Conditions Report, Title 7 – Noise Code, and Project Noise Impact Analysis prepared by MIG in December 2020 (Appendix F)***

Less than Significant Impact. Sound is a pressure wave created by a moving or vibrating source that travels through an elastic medium such as air. Noise is defined as unwanted or objectionable sound. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and in extreme circumstances, hearing impairment. Decibels are measured on a logarithmic scale, which quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3-dBA decrease.

Construction. Potential construction noise and vibration levels were estimated for worst-case equipment operations (generally 100 and 200 feet from building locations and exterior use areas, respectively) and average equipment operations based on the distance from the interior of the site to adjacent buildings and exterior use areas (generally 300 feet away).

The City of Riverside's Municipal Code does not establish a numeric limit for temporary construction noise levels; however, Section 7.35.020 subsection (G) sets forth that construction activities may not occur between 7:00 PM and 7:00 AM on weekdays, between 5:00 PM and 8:00 AM on Saturdays, or at any time on Sunday or a federal holiday. The noise level increases at the adjacent residential land uses, when compared to the existing ambient noise environment, would be approximately 3 to 10 dBA higher than existing conditions, depending on the construction activities undertaken. The upper noise level increase would represent an approximate doubling of loudness in these residential exterior use areas. Although these increases could occur, they would occur over a relatively short duration (i.e., approximately two-and-a-half months or less), with the majority of construction activities generating noise levels that are only slightly (i.e., approximately 3 dBA L_{eq}) higher than the existing noise environment. These noise level increases would not exceed any City standards, which only limit the hours of construction, not the specific noise levels that could occur.

Operation. Once constructed, the proposed project would generate noise from on-site and off-site activities. Onsite activities would include vehicle travel and parking, truck travel, maneuvering, and idling, heating, ventilation, and air conditioning (HVAC) equipment operations, and other miscellaneous activities such as refuse collection, small, non-diesel-powered pallet jacks and lifts, and landscaping equipment. Off-site noise activities would include vehicle travel on Old 215 Frontage Road and other roads used to access the site. The proposed project could generate worst-case combined noise levels of approximately 52 dBA L_{eq} to 67 dBA L_{eq} at adjacent property line locations, as shown in Table 11. Exhibit 8 shows the noise monitoring locations for the noise study. The noise level estimates assume peak vehicle travel, vehicle parking, truck travel, and truck maneuvering and idling activity rates. During non-peak and nighttime hours, potential project noise levels would be approximately 5 to 10 dBA lower. Noise levels would be lowest at residential property lines to the east, across the Old 215 Frontage Road and within the City of Moreno Valley, due to setbacks on the project site, the

100-foot right-of-way for the frontage road (which increases the distance between Project noise sources and residential property lines), and the fact that most truck docks (20 out of 27) would be located on the western side of Buildings 1 and 2. Noise levels would be highest (66.9 dBA L_{eq}) at the adjacent industrial property line to the south of the site within the City of Riverside. This is due to the proximity of this property line to the Project's noise sources, the higher percentage of passenger cars and trucks using Cottonwood Avenue to access the site, and the presence of loading docks at Buildings 1 and 2 that have a direct line of site to the adjacent industrial land use. Noise levels at the residential property further to the south of the site (also within Riverside) would be lower than the levels predicted for the commercial property line because this residential property is set back from Cottonwood Avenue by more than a hundred feet.

Relative to the land uses east of the site in Moreno Valley, the proposed project's onsite operations would not generate noise levels that would exceed the City of Moreno Valley's exterior daytime and nighttime noise standards for residential (65 dBA L_{eq}), commercial (65 dBA L_{eq}) or industrial land uses (70 dBA L_{eq}) established in Section 7.25.010 of the Municipal Code. The proposed project's design and estimated noise levels would also be consistent with City General Plan Noise Element policies. The increase in ambient noise levels at commercial and residential property lines would generally not be discernible and would not cause a change in the land use noise compatibility category in these areas. The increase in ambient noise levels at the industrial property line immediately south of the project site would be noticeable, however, industrial/warehouse land uses are not noise sensitive, and the existing plus project noise level at this location would remain within the City's normally acceptable level. For these reasons, the proposed project's onsite operations would not result in noise levels that exceed City standards or otherwise result in a substantial permanent increase in ambient noise levels in the vicinity of the project.

The proposed project would generate off-site vehicle trips that would be distributed onto the local roadway system and potentially increase noise levels along travel routes, particularly Old 215 Frontage Road. Caltrans considers a doubling of total traffic volume to result in a three (3) dBA increase in traffic-related noise levels. The proposed project would not increase existing traffic volumes on Old 215 Frontage Road by more than 4% at most and, therefore, would not result in a substantial off-site increase in noise levels.

Table 11: Summary of Project Increase in Noise Levels at Property Lines (Hourly L_{eq} dBA)

Property Line Receiver[1]	Project Noise Level, All Sources	Allowable Noise Standard (Daytime and Nighttime)[2]	Standard Exceeded?[1]
East R1 (Commercial)	60.5	65	No
East R2 (Residential)	57.6	65	No
East R3 (Residential)	56.4	65	No
East R4 (Residential)	55.4	65	No
East R5 (Residential)	51.9	65	No
East R6 (Residential)	59.8	65	No
East R7 (Residential)	59.3	65	No
South R8 (Industrial)	66.9	70	No
South R9 (Residential)	57.8	65	No

Source: Table 5-7, MIG, Inc. (See Noise Study Appendix C, Sheet 2)

[1] Receivers 1 – 7 are located within the City of Moreno Valley; receivers 8 and 9 are located within the City of Riverside (see Exhibit 8).

[2] The allowable noise standard has been increased to 65 dBA pursuant to City Municipal Code Section 7.25.010.B due to higher than standard ambient noise levels

Based on the results of the noise study, project construction or operation will not expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable agency standards. Impacts are considered to be **less than significant** on a direct, indirect, or cumulative basis and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

13b. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours (delete figures that do not apply to your project), FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G –and Project Noise Impact Analysis prepared by MIG in December 2020)***

Less Than Significant Impact. Vibrational construction activities could take place as close as approximately 100 feet from the nearest structure, which is an industrial land use south of the Project site. The use of a vibratory roller at this distance would have the potential to generate worst-case ground-borne vibration levels of approximately 0.035 in/sec PPV, which would be slightly perceptible per the transient Caltrans criteria. All other equipment operating would not be perceptible and at no point during construction would project equipment generate ground-borne vibration that has the potential to damage the structural integrity of any buildings in its proximity. All other receptors are further away and therefore would be exposed to lower ground-borne vibration noise levels than those received south of the site. Since the proposed project would not generate vibration that would be perceptible to receptors for a prolonged amount of time, nor would it generate ground-borne vibration levels that would damage structures, it would not generate excessive ground-borne vibration or ground-borne noise levels. The proposed project would also not result in excessive operational vibration levels because it does not involve the use of large or vibration-inducing equipment near off-site structures during operations.

Therefore, the project will have **a less than significant impact** on the exposure of persons to the generation of excessive groundborne vibration or groundborne noise levels on a direct, indirect, or cumulative basis.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

13c. Response: (*Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUCP, March Air Reserve Base/March inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005), and Noise Analysis prepared by MIG in December 2020 (Appendix F)*

Less than Significant Impact. The proposed project is located in B1 (Inner Approach/Departure Zone) of the MARB/MIP LUCP. The next closest airport is more than 5 miles from the project site. The Project site is also located within the 60 CNEL noise contour associated with March ARB/IP, however, the proposed project is not a noise-sensitive land use. The March ARB/IP ALUCP and City General Plan Policies N-2.1, N-2.5, and N-3.3 establish specific requirements for the review and control of airport-related noise at the proposed Project site. The ALUCP requires all building office areas to be constructed with appropriate noise attenuation measures to meet a 45 CNEL interior noise level. The proposed Project site is within the 60 CNEL noise contour for March ARB/IP, meaning actual airport-related noise exposure may range between 60 CNEL and 65 CNEL. The proposed project, therefore, may require an exterior to interior airport noise level reduction of up to 20 CNEL to meet ALUCP compatibility requirements. The March ARB/IP ALUCP sets forth that standard building construction is presumed to provide adequate sound attenuation where the difference between the exterior noise exposure and the interior standard is 20 dB or less, which is be case for the proposed Project (65 dB CNEL – 20 db = 45 CNEL). The Project, therefore, would not expose people living or working at the Project site to excessive airport-related noise levels

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
and thus will have **a less than significant impact** on people residing or working in the project area to excessive noise levels on a direct, indirect, or cumulative basis.				
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)*				
Less Than Significant Impact. The project involves the construction of a new concrete tilt-up industrial building that may increase job growth. The General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the General Plan 2025 Typical Growth scenario would not have significant population growth impacts. Because the proposed project is consistent with the General Plan 2025 Typical Growth scenario and population growth impacts were previously evaluated in the GP 2025 FPEIR, the project does not result in new impacts beyond those previously evaluated in the GP 2025 FPEIR. Therefore, the impacts will be **less than significant** on a direct, indirect, or cumulative basis.				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14b. Response: (*Source: CADME Land Use 2003 Layer, photos from site visit, aerial imaging)*				
No Impact. The project will not displace existing housing, necessitating the construction of replacement housing elsewhere because the project site is vacant land that has no existing housing that will be removed or affected by the proposed project. Therefore, there will be **no impact** on existing housing on a direct, indirect, or cumulative basis.				
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?	☐	☐	☒	☐
15a. Response: (*Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)*				
Less than Significant Impact. The project is located in an urbanized area designated for industrial uses and does not propose residential uses. Light industrial uses will occur in the proposed building. No residential uses or hazardous material storage are proposed on the project site that would require additional fire capabilities beyond those already available. City of Riverside Fire Station #13, located approximately 1.1 miles northwest of the project site at 6490 Sycamore Canyon Boulevard, provides fire services for the east region of the City of Riverside. With implementation of				

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

fire suppression equipment and adherence to fire code standards, the project site would not result in the need for new fire stations. Therefore, the project will have a **less than significant** impact on the demand for additional fire facilities or services on a direct, indirect, or cumulative basis.

b. Police protection?	☐	☐	☒	☐

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

Less than Significant Impact. The City of Riverside maintains approximately 130 sworn officers, 24 Sergeants, 6 Lieutenant Watch Commanders, 1 Executive Lieutenant, 1 Traffic Lieutenant and a civilian support staff (RPD 2021).. Officers are assigned to one of four Neighborhood Policing Centers (NPC) and are accountable for their assigned area. Adequate police facilities and services are provided by the East Neighborhood Policing Center (NPC). Each NPC is tasked with managing resources and coordinating efforts to reduce crime in their assigned geographic areas, while addressing issues of neighborhood livability. Each NPC is managed by an Area Commander and staffed with a group of Burglary and Auto Theft Detectives, School Resource Officers, Police Service Representatives and Problem Oriented Policing Officers. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there will be a **less than significant** impact on the demand for additional police facilities of services on a direct, indirect, or cumulative basis.

c. Schools?	☐	☐	☒	☐

15c. Response: (*Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-3 – AUSD Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Student Generation for RUSD By Education Level, and Figure 5.13-4)*

Less Than Significant Impact. School facilities and services are provided by Riverside Unified School District to serve this area of Riverside. Non- residential uses are proposed for the project site which would create additional demand on local schools. With implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Riverside Unified School District impact fees used to offset the impact of new development, there will be a **less than significant** impact on the demand for school facilities or services on a direct, indirect, or cumulative basis.

d. Parks?	☐	☐	☐	☒

15d. Response: (*Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)*

No Impact. The project is a non-residential use that will not involve the addition of any housing units that would increase the population. Therefore, there will be no impact on the demand for additional park facilities or services on a direct, indirect, or cumulative basis.

e. Other public facilities?	☐	☐	☐	☒

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

No Impact. The project is in an urbanized area within an existing building and does not propose new residences. The project would accommodate new light industrial business(es), which exert a minimal demand on public facilities such as libraries and community centers. Development of the project site with new businesses is consistent with the growth projected by the General Plan 2025 and Sycamore Canyon Business Park Specific Plan. The GP 2025 and HBPSP provide adequate public facilities for the growth anticipated throughout the project area/. Therefore, this project will not result in the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
intensification of land use and there will be **no impact** on the demand for additional public facilities or services on a direct, indirect, or cumulative basis.				
16. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

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

No Impact. The General Plan 2025 analyzed the development of the project site with light industrial uses consistent with the Sycamore Canyon Business Park Specific Plan and the underlying General Plan Land Use designation of BB/OP – Business/Office Park. The project will further be required to pay applicable Local, Regional, Aquatic and Trails Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department; therefore, this project will have **no impact** on a direct, indirect, or cumulative basis.

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

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

Less than Significant Impact. Section 13.18 of the RMC requires that recreational trails within the City be developed according to approved standards and design elements as set forth in the Trails Master Plan. Trails in the City are designated to accommodate equestrian, bike, and pedestrian users. Where possible, the City is working to coordinate trail development and connections with the County of Riverside. However, there are no existing or planned trails or trail connections adjacent to or in the immediate area of the project site. consistent with the Trails Master Plan. The proposed project would require the construction of recreational facilities, including trails. Therefore, a **less than significant** impact on a direct, indirect, or cumulative basis would occur.

17. TRANSPORTATION Would the project result in:				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

17a. Response: (*Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, and if required/recommended by the City's Traffic Engineer: Project Specific Traffic Operations Analysis prepared by Urban Crossroads on November 3, 2020 (Appendix G1), VMT Memorandum prepared by Urban Crossroads on June 4, 2021 (Appendix G2), and 2019 RCTC's Congestion Management Plan)*

Less than Significant Impact. The project site does not include a state highway or principal arterial within Riverside County's Congestion Management Program (CMP). The proposed project would be subject to Riverside Municipal Code Section 16.68, which requires new developments to pay fees into the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program. In addition, City of Riverside General Plan 2025 Circulation and Community Mobility Element Policy CCM-2.3 states that LOS D or better on arterial streets is recommended wherever possible. A Traffic

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

Operations Analysis (TOA) focusing on Level of Service impacts was prepared for the project and the project study area is shown in Exhibit 9.

It should be noted that the primary CEQA thresholds of significance for transportation and traffic impacts have shifted in recent years. In the past the analysis focused on the Level of Service (LOS) which measured congestion at local intersections and roadway segments. The emphasis of these past studies was to assure the street grid network functioned well and allowed for efficient movement of vehicles. The current focus is to encourage active transportation (e.g., pedestrians, bicyclists, etc.) and transit, and to limit increases in Vehicle Miles Travelled (VMT, see Section 17.b below). An important part of this analysis is to determine if a proposed action is consistent with both the vehicular and non-vehicular aspects of the Circulation and Community Mobility Element of the General Plan.

Vehicular Plan Consistency. Policy CCM-2.3 of the General Plan Circulation and Community Mobility Element sets an LOS standard for City streets as shown below:

Policy CCM-2.3: *Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.* The TOA examined Project traffic impacts on local roadways and intersections in the opening year including cumulative traffic. Exhibit 6-2 of the TOA demonstrates that surrounding roads will achieve the City's LOS standards with implementation of the recommended onsite and offsite improvements[3], payment of City Developer Impact Fees (DIF), payment of regional County Traffic Uniform Mitigation Fee (TUMF), and appropriate fair share contributions for future improvements to various local roadways and intersections to offset Project-related traffic increases. With implementation of these various improvements and fees, the Project will have **less than significant** impacts related to vehicular plan consistency.

Non-Vehicular Plan Consistency. Objective CCM-2 of the City's General Plan Circulation and Community Mobility Element promotes and supports modes of transportation that offer an alternative to single-occupancy automobile use and help reduce air pollution and road congestion, as shown below:

> ***Objective CCM-2:*** *Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development.*

Emphasizing non-vehicular transportation are also key elements of SB 375 and SCAG's Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). Non-vehicular transportation includes pedestrians (sidewalks), bicycles (on-road lanes or off-road paths), bus transit, and train transit. Sidewalks will be available along the west side of Old 215 Frontage Road adjacent to the east boundary of the site and will provide pedestrian access both north and south of the site. State Street to allow employees access to commercial and other uses to the north and south of the site.

The Riverside Transit Agency (RTA) operates a number of bus routes in the region but the closest routes to the project site are Route 20 on Alessandro Boulevard a half mile south of the site and Route 26 on Eucalyptus Avenue a half mile north of the site. There is also a Metrolink Station 1.5 miles (walking) southwest of the site in Moreno Valley. The proposed Project is non-residential in nature so it will not directly generate new residents who will want to take regular advantage of non-vehicular transportation. However, employees of the proposed Project will be able to take advantage of these non-vehicular transportation options (i.e., sidewalks, bicycle lanes, or transit) as they so choose, although using them as a replacement for commuting will only be possible if an employee lived within a convenient distance to the Project site. Based on the availability of non-vehicular transportation options, the proposed Project will not conflict with applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Therefore, the project will not conflict with any program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts will be **less than significant** directly, indirectly or

[3] The TOA referred to needed improvements as mitigation but as of January 1, 2020 any actions to improve LOS are no longer considered mitigation under CEQA, however this can be required as conditions of approval for planning purposes

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
cumulatively and no mitigation is required.				
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐

17b. Response: ***Source: Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, and if required/recommended by the City's Traffic Engineer: Project Specific Traffic Operations Analysis prepared by Urban Crossroads on November 3, 2020 (Appendix G1), VMT Memorandum prepared by Urban Crossroads on June 4, 2021 (Appendix G2), and 2019 RCTC's Congestion Management Plan)***

Less than Significant Impact with Mitigation Incorporated. In June 2020, the City of Riverside City Council adopted analytical procedures, screening tools and impact thresholds for VMT, which are documented in the City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (May 2020) (City Guidelines). To aid in the project-level VMT screening process the City of Riverside utilizes the Western Riverside Council of Governments (WRCOG) VMT Screening Tool (Screening Tool). The web-based Screening Tool allows a user to select an assessor's parcel number (APN) to determine if a project's physical location meets one or more of the land use screening thresholds documented in the City Guidelines. These thresholds were obtained from the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). The focus of this evaluation is to assess each of the City's screening thresholds to determine if the proposed Project would be expected to cause a less than significant impact to VMT without requiring a more detailed VMT analysis.

Urban Crossroads prepared a quantitative analysis of the proposed project (Appendix G2). The City Guidelines provide step-by-step procedures to conduct a project-level VMT screening assessment to determine if a more detailed quantitative analysis is required. The screening procedures include the following three steps: Step 1: Transit Priority Area (TPA) Screening; Step 2: Low VMT Area Screening; and Step 3: Project Type Screening. A land use project must only meet one of the above screening thresholds to result in a less than significant impact. However, the proposed project did not meet any of these screening thresholds, so a more detailed quantitative analysis is required.

The Riverside Transportation Analysis Model (RIVTAM) is a useful tool to estimate VMT because it considers interaction between different land uses based on socio-economic data such as population, households and employment. The City Guidelines identifies RIVTAM as the appropriate tool for conducting VMT analysis for land use projects in Riverside County. Adjustments in socio-economic data (SED) (i.e., employment) have been made to the appropriate traffic analysis zone (TAZ) within the RIVTAM model to reflect the Project's proposed land use (i.e., employment use). The Project has an occupancy limit of 130 persons so a maximum of 130 employees have been assumed for the proposed project. Using the most current version of RIVTAM, Project VMT has been calculated for the Project baseline (2012) at 13.94 VMT per worker and 15.61 for the Project cumulative period (2040). By comparison, WRCOG provides VMT calculations for baseline model year (2012) and cumulative model year (2040) for each of its member agencies. The City of Riverside's baseline (2012) value is 13.24 VMT per worker while the cumulative year (2040) value is 14.81 VMT per worker. It should be noted that all references to calculated VMT are to Home Based Work (HBW) trips per the City's guidelines.

Table 12 illustrates the comparison between the Project-generated VMT per worker to the City of Riverside's baseline and cumulative VMT per worker. The Project's baseline VMT per worker is 5.28% above the City's current baseline VMT per worker, while the Project's cumulative HBW VMT per worker is 17.90% above the City's current baseline VMT per worker. The City's adopted VMT significance threshold is 15% below the current baseline VMT per worker value. Since the Project would exceed the City's threshold, the Project VMT impact is potentially significant and requires mitigation.

Table 12
Home-Based Work VMT Per Worker Values

VMT Characteristic	Baseline VMT/Worker	Cumulative VMT/Worker
City of Riverside Threshold	13.24	13.24
Project	13.94	15.61

Difference	+0.70	+2.37
Percent Change	+5.28%	+17.90%
Potentially Significant?	**Yes**	**Yes**

Source: Table 2, VMT Memo, Urban Crossroads, 2021

Consistent with City Guidelines, projects that are found to have a potential impact using efficiency-based metrics (such as VMT per worker) need to also provide an additional assessment to evaluate a project's effect on VMT. This analysis is performed using the boundary method, which includes all vehicle trips with one or both trip-ends within a specific geographic area of interest (i.e., the City of Riverside). Once the areawide VMT value is calculated, it is then normalized by dividing by that City's service population (SP)(i.e., population and employment). As shown on Table 13, the Project is anticipated to result in a baseline (2012) net increase of less than 0.01 VMT/SP and a cumulative (2040) net decrease of less than 0.01 VMT/SP within the City, which would indicate that the Project would decrease the efficiency of travel in near-term conditions and increase the efficiency of travel in long-term conditions. This assessment assumes the Project will implement a number of VMT reduction strategies as outlined in Mitigation Measures VMT-1 through VMT-4 outlined below.

Table 13
Cumulative City VMT Per Service Population

VMT Characteristic	2012 (Baseline)		2040	
	Without Project	**With Project**	**Without Project**	**With Project**
Population	305,719	305,719	367,784	367,784
Employment	119,544	119,674	228,619	228,749
VMT	5,730,358	5,733,631	8,720,133	8,721,729
VMT/SP	13.4749	13.4784	14.6212	14.6207
Change in VMT	+0.0035		-0.0005	
Potentially Significant?	**Yes**		**No**	

Source: Table 3, VMT Memo, Urban Crossroads, 2021

Based on a review CAPCOA transportation demand management (i.e., TDM or VMT reducing) measures, WRCOG has indicated that seven measures may be most effective at a project level. The effectiveness of these TDM measures would be dependent in large part on future Project design features and building occupancies, which are unknown at this time. However, application of Beyond the Project's tenancy considerations, land use context is a major factor relevant to the potential application and effectiveness of TDM measures. More specifically, the land use context of the Project is characteristically suburban. Of itself, the Project's suburban context acts to reduce the range of feasible TDM measures and moderates their potential effectiveness. With implementation of **Mitigation Measures VMT-1 through VMT-4**, potential impacts will be reduced to **less than significant** levels.

City VMT Mitigation Program

The City of Riverside is in the process of developing a VMT mitigation fee program. The City first needs to fund a Nexus Study to actually develop the VMT fee program. Once the VMT Nexus Study and fee program are adopted by the City, the City will identify fair share costs of improvements necessary to address deficiencies. The proposed Project's fair share cost of improvements is based on the ratio of Project total VMT to new total VMT within the City of Riverside, and new VMT is total future (Cumulative Year) VMT less existing baseline VMT. The project's fair share percentage has been calculated for the daily total VMT within the City of Riverside utilized link-level VMT calculated from RivTAM for the base model year (2012) and cumulative model year (2040). A more formal project contribution will be identified once the VMT program has been formally adopted.

Mitigation Measures

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

VMT-1 Pedestrian Network Improvements. The project shall install sidewalks along the west side of Old 215 Frontage Road adjacent to its property prior to the issuance of a certificate of occupancy.

VMT-2 Telecommuting/Alternative Work Schedules. Until such time as the City adopts a VMT Mitigation Plan, each owner/tenant of a project building(s) shall prepare a Telecommuting/Alternative Work Schedule Plan for review and approval by the City. This Plan will require employers to allow their workers to telecommute or adopt alternative work schedules to the greatest extent feasible. Alternative work schedules could take the form of staggered starting times, flexible schedules, or compressed work weeks. This Plan shall be approved annually by the City until it adopts a VMT Mitigation Plan. Any employer that participates in the City VMT Mitigation Program will no longer have to file an annual Telecommuting/Alternative Work Schedule Plan.

VMT-3 Ride-Sharing Programs. Until such time as the City adopts a VMT Mitigation Plan, each owner/tenant of a project building(s) shall prepare a Ride-Sharing Plan for review and approval by the City. This Plan will require employers to establish or actively participate in established carpool and/or vanpool programs for the Riverside area to the greatest extent feasible. This Plan shall be approved annually by the City until it adopts a VMT Mitigation Plan. Any employer that participates in the City VMT Mitigation Program will no longer have to file an annual Ride-Sharing Plan.

VMT-4 VMT Mitigation Bank Program. Prior to issuance of a building permit, the project applicant shall pay their Project Fair-Share fee of 0.11 percent of the $61,583,924.03 total cost toward the City's bicycle and pedestrian projects, which will be used to develop a Vehicle Miles Traveled mitigation bank study. The Project Fair-Share Cost is estimated to be $67,742.32 and shall be paid to the City of Riverside by the Project applicant.

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

17c. Response: (*Source: Project Site Plans, Lane Striping and Signing Plans and if required/recommended by the City's Traffic Engineer: Project Specific Traffic Impact Analysis Urban Crossroads on November 3, 2020)*

Less Than Significant Impact. The project site is located on the west side of Old 215 Frontage Road and just east of the I-215 Freeway. Old 215 Frontage Road has a sweeping curve just north of the site which limits sight distance but it is designed for the posted speed and there is no evidence of major accidents along the southbound segment of this roadway adjacent to the project site. The site plan shows three 35-foot wide driveways accessing the site off of Old 215 Frontage Road (at the north end of each proposed building) and a 35-foot driveway on Cottonwood Avenue at the south end of the site (northeast of Building 1). There is also a 20-foot wide "fire lane" with a 24-foot driveway for emergency access off of Cottonwood Avenue just west of Old 215 Frontage Road. The intersection of Old 215 Frontage Road/Cottonwood Avenue is scheduled to be signalized and the proposed project will make a fair share contribution to its construction. As a condition of approval, the project will adhere to all applicable circulation, safety plans, and design guidelines. Therefore, this project will have a **less than significant impact** on increasing hazards through design or incompatible uses on a direct, indirect, or cumulative basis.

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

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

No Impact. The project site is located on the west side of Old 215 Frontage Road and just east of the I-215 Freeway. The site plan shows three 35-foot wide driveways accessing the site off of Old 215 Frontage Road and a 35-foot driveway on Cottonwood Avenue at the south end of the site - there is also a 20-foot wide "fire lane" with a 24-foot driveway for emergency access off of Cottonwood Avenue just west of Old 215 Frontage Road. The intersection of Old 215 Frontage Road/Cottonwood Avenue is scheduled to be signalized and the proposed project will make a fair share contribution to its

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
construction. As a condition of approval, the project will adhere to all applicable circulation, safety plans, and design guidelines. The project has been developed in compliance with Title 18, Section 18.210.030 (Streets) of the Subdivision Code, the City's Fire Code RMC Title 16 and Section 503 of the California Fire Code (2007). In addition, the project site will include internal roadway widths and access that would be reviewed by the City of Riverside emergency service providers to ensure emergency access is adequately provided. Emergency access vehicles will not be restricted in mobility by site design of the proposed project in terms of blocking access ways, restricting access to the project site or indirectly by providing a use on the project site that would restrict emergency access to adjacent uses. Therefore, there will be **no impact** on a direct, indirect, or cumulative basis to emergency access.				
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: ***(AB 52 Consultation)*** **Less Than Significant Impact.** Assembly Bill (AB 52) specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB 52 requires tribes interested in a development project within a traditionally and culturally affiliated geographic area to notify the tribe within14 days of deeming a development application complete. Subject to CEQA notifying the requesting tribe within 14 days to consult on the project complies with the AB 52 requirements. The proposed project included AB52 Consultation and would not 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.) The City of Riverside commenced AB-52 notification on August 14, 2020. A total of nine Native American tribes were contacted. Three tribes requested consultation (Rincon Band of Luiseño, Pechanga Band of Luiseño, and Agua Caliente Band of Cahuilla Indians) pursuant to AB 52, and one tribe (San Manuel Band of Mission Indians) requested monitoring on the site but no consultation. Consultation with Rincon Band of Luiseño was held on August 24, 2020 and concluded on October 27, 2020. Consultation with Agua Caliente Band of Cahuilla Indians was held on August 24, 2020 and concluded on September 1, 2020. Consultation with Pechanga Band of Luiseño was held on September 22, 2020. Pechanga indicated that the project site is located within the Traditional Cultural Property (TCP) and requested an easement for potential reburial on-site. The conservation easement for reburial is depicted on Parcel 3 of the proposed Parcel Map. Consultation was concluded on May 4, 2021. The cultural resources records search results from the (CHRIS-EIC) indicated that there are no historical resources located within the Study Area and there are no historic resources located within a one-mile radius of the Study Area. There were no historic resources identified during the pedestrian survey. Therefore, the proposed project would result in no adverse change in the significance of a historical resource as defined in §15064.5. Therefore, impacts will be less than significant.				
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	☐	☒	☐	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

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

Less Than Significant with Mitigation Incorporated. Although there was no indication of TCRs at the project site and the research and surveys conducted by MIG qualified archaeologists were negative for known or anticipated TCRs, AB 52 (Gatto, 2014) is clear in stating that it is the responsibility of the Public Agency (e.g. Lead Agency) to consult with Native American tribes early in the CEQA process to allow tribal governments, lead agencies, and project proponents to discuss the appropriate level of environment review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 2108.3.2). Specifically, government-to government consultation may provide "tribal knowledge" of the Project Area that can be used in identifying TCRs that cannot be obtained through other investigative means. The City of Riverside has commenced AB-52 notification on August 14, 2020. A total of nine Native American tribes were contacted and consultations have been concluded. With implementation of **Mitigation Measures CUL-1 through CUL-6**, impacts will be reduced to **less than significant** levels.

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-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), Table 5.16-I - Current and Projected Water Use WMWD, Table 5.16- J - General Plan Projected Water Demand for WMWD Including Water Reliability 2025, Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR.)

Less than Significant Impact. According to the City's General Plan, the Riverside Public Works Department operates a comprehensive wastewater collection, treatment, and disposal system that serve most of the City, as well as portions of its sphere of influence and, under contract, the unincorporated communities served by the Jurupa, Rubidoux, and Edgemont Community Services Districts. The remaining portions of the City that are not serviced by the Riverside Public Works Department, including the project site, receive wastewater collection service from the Western Municipal Water District (WMWD). The WMWD operates the Western Water Recycling Facility located near March Air Reserve Base is a three-million gallon-a day-plant for treating wastewater that was expanded in 2010 to produce recycled water for irrigation use. The project proposes 118,580 square feet of warehousing which will generate approximately 9,500 gallons of wastewater per day based on an average generation rate of 80 gallons/1000 square feet (City of Los Angeles CEQA Thresholds Guide). The project is consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). In addition, the project proposes uses that are consistent with the Riverside General Plan upon which the WMWD Wastewater Treatment Master Plan is based. Therefore, the project will have less than significant impacts on wastewater facilities and treatment capacities of the WMWD. The project's expected increase in wastewater generation will be accommodated by the WMWD. As a result, the potential impacts are considered to be **less than significant**.

The WMWD operates 600 miles of water service pipeline, ranging in diameter from 4 to 60 inches, and their 35 water storage reservoirs have a capacity of roughly 76 million gallons. The largest is the Orangecrest Reservoir, which can store up to 12.5 million gallons of water. The project proposes 118,580 square feet of warehousing which will consume approximately 12,000 gallons of water per day based on an average consumption rate of 100 gallons/1000 square feet (City

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

of Los Angeles CEQA Thresholds Guide). The project is consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). In addition, the project proposes uses that are consistent with the Riverside General Plan upon which the Urban Water Master Plan (UWMP) of the WMWD is based. Therefore, the project will have **less than significant** impacts on water facilities and supplies of the WMWD.

Regarding stormwater drainage, offsite runoff currently entering the Project site would be contained in an underground pipe along the same general alignment as the surface drainage at present, except it would then flow through the planned detention basin (without mingling flows) and continue offsite to the southwest then south in an improved open storm drain channel along the east side of the I-215 Freeway. These improvements are being made at the direction of the Riverside County Flood Control and Water Conservation District. The District has already approved the design and has indicated it will approve the final plans as soon as the CEQA document is approved. With these improvements the project will have **less than significant** impacts regarding stormwater drainage.

The project proposes uses that are consistent with the Riverside General Plan upon which the master plans of the various serving agencies or companies for electric power, natural gas, or telecommunication facilities are based. Therefore, the project will have **less than significant** impacts on these other utility facilities and services.

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-H – Current and Projected Domestic Water Supply (acre-ft/year) WMWD Table 5.16-I Current and Projected Water Use WMWD, Table 5.16-J – General Plan Projected Water Demand for WMWD Including Water Reliability 2025, WMWD Master Plan.***

Less Than Significant Impact. The project site is provided potable water by the Western Municipal Water District (WMWD). The WMWD operates 600 miles of water service pipeline, ranging in diameter from 4 to 60 inches, and their 35 water storage reservoirs have a capacity of roughly 76 million gallons. The largest is the Orangecrest Reservoir, which can store up to 12.5 million gallons of water. The project proposes 118,580 square feet of warehousing which will consume approximately 12,000 gallons of water per day based on an average consumption rate of 100 gallons/1000 square feet (City of Los Angeles CEQA Thresholds Guide). The project is consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). In addition, the project proposes uses that are consistent with the Riverside General Plan upon which the Urban Water Master Plan (UWMP) of the WMWD is based. Therefore, the project will have **less than significant** impacts resulting in the insufficient water supplies either directly, indirectly or cumulatively on water facilities or supplies of the WMWD.

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-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD , and Wastewater Integrated Master Plan and Certified EIR)***

Less Than Significant Impact. The project site receives wastewater collection service from the Western Municipal Water District (WMWD). The WMWD operates the Western Water Recycling Facility located near March Air Reserve Base is a three-million gallon-a day-plant for treating wastewater that was expanded in 2010 to produce recycled water for irrigation use. The project proposes 118,580 square feet of warehousing which will generate approximately 9,500 gallons of wastewater per day based on an average generation rate of 80 gallons/1000 square feet (City of Los Angeles CEQA

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

Thresholds Guide). The project is consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). In addition, the project proposes uses that are consistent with the Riverside General Plan upon which the WMWD Wastewater Treatment Master Plan is based. Therefore, the project will have less than significant impacts on wastewater facilities and treatment capacities of the WMWD. The project's expected increase in wastewater generation will be accommodated by theWMWD. As a result, the potential direct, indirect, or cumulative impacts are considered to be **less than significant**.

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 Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)***

No Impact. The project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR). Therefore, **no impact** to landfill capacity will occur directly, indirectly or cumulatively.

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

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

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

20.WILDFIRE

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

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

Less Than Significant Impact. According to both the General Plan 2025 EIR and the City's Local Hazard Mitigation Plan, the proposed Project site is not located within a designated very high fire severity or hazard zone. In addition, the Project site is not classified as a Fire Responsibility Area by the California Department of Forestry and Fire Protection (CAL FIRE 2021). However, the project site is currently vacant and located adjacent to the I-215 Freeway, so it is possible that weedy or native vegetation in these areas could catch fire from embers transported from some upwind regional wildfire, or a fire could start in one or more of these areas as a result of accidents or intentional human action.

The proposed project will replace vacant land with three business park/light industrial buildings and associated improvements. The project site has relatively good access to surrounding areas and the nearby I-215 Freeway via Eucalyptus Avenue to the north and Alessandro Boulevard to the south. The City Fire Department provides fire protective and emergency services to the Project area. The closest fire station to the project site is the Riverside County Station 13 (Box Springs) located 1.4 miles (on-road) northwest of the site. Response time from this station to the Project site is

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
estimated at 2.4 minutes based on an estimated travel speed of 35 miles per hour. When the onsite and adjacent offsite improvements are completed, emergency vehicles will have complete access within and around the site. The City has standard conditions of approval (COAs) that require a project to comply with City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on review of tentative tract maps and plot plans. One of these requirements is to assure that adequate emergency access is provided to proposed homes and other uses. These COAs are determined during the City's development review process, including CEQA. Compliance with standard COAs and current Fire Code requirements is considered regulatory compliance and is not unique mitigation under CEQA. A limited potential exists for the project to temporarily interfere with an emergency response or evacuation plan during construction. Construction work in the street associated with the Project will be limited to lateral utility connections (i.e., water and sewer) that will be limited to nominal potential traffic diversion. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to mitigate any construction circulation impacts. The TCP is a standard condition and is not considered unique mitigation under CEQA. Following construction, emergency access to the project site and area will remain as was prior to the proposed Project and as anticipated in the City's emergency and evacuation plans. Based on available information, the project will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, because no permanent public street or lane closures are proposed. Impacts will be **less than significant** and no mitigation is required.				
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
20b. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/)*** **Less than Significant Impact.** As stated in Threshold 20.a, the proposed Project site is not located within a high or very high fire hazard zone or a Fire Responsibility Area (CAL FIRE 2021). However, it is possible that weedy vegetation in these areas could catch fire from embers transported from some upwind regional wildlfire, or a fire could start in one or more of these area as a result of accident or intentional human action. If vegetation onsite contributed to any wildfire conditions, local residents may be exposed to increased pollutant concentrations including smoke and ash. The City has standard conditions of approval (COAs) that require a project to comply with City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on review of tentative tract maps and plot plans. These COAs are determined during the City's development review process, including CEQA. Compliance with standard COAs is considered regulatory compliance and is not unique mitigation under CEQA. Additionally, the Project will provide impervious surfaces, irrigated landscaping, structures built in compliance with fire codes, fire hydrants, and other measures that will help to reduce wildfire risks. Compliance with the Fire Code and COAs will reduce potential impacts related to long-term emergency response. Based on this information, the Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts will be **less than significant** and no mitigation is required.				
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20c. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/)*** **Less than Significant Impact.** The Project plans do not indicate that the installation or maintenance of major infrastructure, such as roads, fuel breaks, emergency water sources, power lines or other utilities, would be required that could exacerbate fire risk or that could result in temporary or ongoing impacts to the environment. The City has standard conditions of approval (COAs) that require a project to comply with City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on review of tentative tract maps and plot plans. These COAs are determined during the City's development review process and may include the above-listed infrastructure. Compliance with standard COAs is considered regulatory compliance and is not unique mitigation under CEQA. Any impacts will be **less than significant** and no mitigation is required.				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
20d. Response: ***(Source: General Plan 2025 EIR, City of Riverside Local Hazard Mitigation Plan approved by FEMA July 20, 2018, and California Department of Forestry and Fire Protection Website https://www.fire.ca.gov/), Appendix D – Geotechnical Report, NorCal Engineering, May 8, 2019)*** **Less than Significant Impact.** As stated in Threshold 20.a, the proposed Project site is not located within a designated high fire hazard zone or a Fire Responsibility Area (CAL FIRE 2021). It is possible that weedy or native vegetation in the area could catch fire from embers transported from some upwind regional wildfire, or a fire could start in one or more of these area as a result of accident or intentional human action. If these areas were to burn in a regional wildfire, it is unlikely that post-burn hazards or risks might occur on or adjacent to the site, including, landslides, rockfalls, or downstream flooding, due to the site being relatively level and an improved flood control channel is immediately downstream of the site (i.e., southwest corner). For additional discussion on landslides, see Threshold 7.iv under Geology and Soils. The City has standard conditions of approval (COAs) that require a project to comply with City Fire Code (State Fire Code as adopted by the City) and Fire Department requirements based on review of tentative tract maps and plot plans. These COAs are determined during the City's development review process, including CEQA. Compliance with standard COAs is considered regulatory compliance and is not unique mitigation under CEQA. In addition, the Project includes hardscape and landscape improvements that would serve to stabilize the built environment. Based on this information, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Any impacts would be **less than significant** and no mitigation is required.				
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
21a. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP***				

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

Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 – , Appendix B - General Biological Resources Assessment (GBRA), Helix, March 17, 2021, FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code, and site specific Cultural Resources Survey prepared by MIG on January 22, 2020)

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

Biological Resource Mitigation Measures

BIO-1: Burrowing Owl Survey
BIO-2: Nesting Bird Survey
BIO-3: Jurisdictional Permitting
BIO-4: Construction Limitations
BIO-5: Landscaping Restrictions
BIO-6: Payment of MSHCP and SKR Fees

Cultural Resource Mitigation Measures (for Tribal Resources as well)

CUL-1: Tribal Coordination
CUL-2: Archeological and Paleontological Monitoring
CUL-3: Native American Monitor
CUL-4: Treatment and Disposition of Cultural Resources
CUL-5: Cultural Sensitivity Training
CUL-6: Discovery of Human Remains

Paleontological Resource Mitigation Measures

PAL-1: Sensitivity Training
PAL-2: Unanticipated Resources
PAL-3: Treatment Plan
PAL-4: Final Report

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

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

Less Than Significant Impact. Because the project is consistent with the General Plan 2025, no new cumulative impacts are anticipated and therefore cumulative impacts of the proposed project beyond those previously considered in the GP 2025 FPEIR are **less than significant** and no additional mitigation (i.e., other than those measures identified in Thresholds 21a ad 21c in this section) is required.

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

Less Than Significant Impact with Mitigation. Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology & water quality, noise, population and housing, public facilities, hazards and hazardous materials, recreation, and transportation traffic sections of this Initial Study. Project impacts related to biology, cultural and tribal cultural resources, noise and transportation, are less than significant with mitigation incorporated. Based on the analysis and conclusions in this initial study, the project, with mitigation, will not cause substantial adverse effects, directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed project are **less than significant with mitigation** (see below).

Air Quality Mitigation Measures

AIR-1: Reduce Construction DPM Emissions.

Traffic Mitigation Measures

VMT-1: Pedestrian Improvements
VMT-2: Telecommuting/Work Schedules
VMT-3: Ride-Sharing Program
VMT-4: VMT Mitigation Bank Program

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

Mitigation Monitoring and Reporting Program

Project: Old215 Business Park ***Date: May 19, 2021***

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[4]	Monitoring/ Reporting Method
Air Quality	**AIR-1: Reduce DPM Emissions.** To reduce potential short-term adverse health risks associated with PM10 exhaust emissions, including emissions of diesel particulate matter (DPM), generated during project construction activities, the Applicant and their contractors personnel shall implement the following construction equipment restrictions for the project: 1. Electric-powered and liquefied or compressed natural gas equipment (including generators) shall be employed instead of diesel-powered equipment to the maximum extent feasible. 2. All construction equipment with a rated power-output of 50 horsepower or greater shall meet U.S. EPA and CARB Tier IV Final Emission Standards for PM10. This may be achieved via the use of equipment with engines that have been certified to meet Tier IV emission standards, or through the use of equipment that has been retrofitted with a CARB-verified diesel emission control strategy (e.g., oxidation catalyst, particulate filter) capable of reducing exhaust PM10 emissions to levels that meet Tier IV standards. As an alternative to using equipment that meets Tier IV Final Emissions Standards for off-road equipment with a rated power-output of 50 horsepower or greater, the Applicant may prepare and submit a refined construction health risk assessment to the City once additional Project-specific construction information is known (e.g., specific construction	Add note to grading plans, prior to permit issuance. Add note to Building & Safety plans, prior to permit issuance. During all grading and construction activities Prior to permit issuance.	Building & Safety Inspector(s) Public Works Inspector(s) Planning Division	City to periodically inspect during grading and construction activities HRA submitted to the City for review/acceptance.

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

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[4]	Monitoring/ Reporting Method
	equipment type, quantity, engine tier, and runtime by phase). The refined health risk assessment shall demonstrate and identify any measures necessary such that the proposed Project's incremental cancerogenic health risk at nearby sensitive receptor locations is below the applicable SCAQMD threshold of 10 cancers in a million.	During construction		
Biological Resources	**BIO-1: Burrowing Owl (BUOW).** Prior to commencement of ground-disturbing activities (i.e., earthwork, clearing, and/or grubbing), Step II surveys shall be conducted to determine the presence or absence of BUOW on the project site. The surveys shall be conducted in accordance with the County's survey protocol (2006). If BUOW is not detected during the Step II surveys, a pre-construction survey shall be conducted on the project site within 30 days prior to ground disturbance to determine presence of BUOW. If the preconstruction survey is negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence and no further mitigation is required. If BUOW is observed on the project site during the Step II surveys, a DBESP assessment shall be completed to ensure that the proposed alternative provides for replacement of any lost functions and values of habitat. At least 90 percent of the area with long-term conservation value and BUOW pairs shall be conserved on-site if the project site (including adjacent areas) supports three or more pairs BUOWs; supports greater than 35 acres of suitable habitat; and is non-contiguous with MSHCP Conservation Area lands. If BUOW is observed during the Step II surveys or the pre-construction survey, active burrows shall be avoided by the project in accordance with the CDFW's Staff Report on BUOW Mitigation (2012) or CDFW's most recent guidelines. The project proponent shall inform the RCA of BUOW observations. A BUOW Protection and Relocation Plan (plan) shall be prepared by a	Prior to commencement of ground-disturbing activities Pre-construction survey within 30 days prior to ground disturbance, if required. Preparation of DBESP, if required.	Planning Division Project Biologist Riverside Conservation Authority (RCA)	Step III BUOW surveys and DBESP (if required) submitted ot the City and RCA

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[4]	Monitoring/ Reporting Method
	qualified biologist, which must be sent for approval by RCA prior to initiating ground disturbance. The RCA will coordinate directly with CDFW as needed to ensure that the plan is consistent with the MSHCP and CDFW guidelines. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur outside of the nesting season (September 1 through January 31).			
Biological Resources	**BIO-2: Nesting Birds.** To the extent feasible, (i.e., earthwork, clearing, and grubbing) shall occur outside of the general bird nesting season for migratory birds. The general nesting season is February 15 through August 31 for songbirds and January 15 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory birds and raptors (January 15 through August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of construction activities. If construction is inactive for more than seven days, an additional survey shall be conducted. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified	Prior to commencement of ground-disturbing activities, during nesting season.	Planning Division Project Biologist	Submittal of Nesting Bird survey to the City.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[4]	Monitoring/ Reporting Method
	biologist. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds.			
Biological Resources	**BIO-3: Jurisdictional Resources.** Prior to impacts to jurisdictional resources, the Project Applicant shall obtain regulatory permits from the RWQCB and/or CDFW. Compensatory mitigation for permanent impacts to jurisdiction shall be required as part of subsequent permitting requirements. Permanent impacts to jurisdiction shall be mitigated through purchase of streambed rehabilitation credits at a ratio no less than 2:1 within an agency approved mitigation bank or in-lieu fee program.	Prior to commencement of ground-disturbing activities	Planning Division Project Applicant	Developer to provide written proof of issuance of regulatory permit(s)
Biological Resources	**BIO-4: Construction Limitations.** During ground disturbing activities, the following minimization measures shall be implemented during construction: • The work limits shall be clearly marked with flags and/or fencing prior to the initiation of construction activities. • A biological monitor shall be present during vegetation clearing and trimming to limit removals to the lowest practicable amount. • Use of standard Best Management Practices (BMPs) to minimize the impacts during construction. • Construction-related equipment will be stored in developed areas, outside of drainages. • Source control and treatment control BMPs will be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs will be implemented throughout the project to capture and treat potential contaminants. • To avoid attracting predators during construction, the project shall be kept clean of debris to the extent	During ground-disturbing activities	Project Biological Monitor City Inspection Staff	Final Report from Biological Monitor City Inspection Report

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[4]	Monitoring/ Reporting Method
	possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site. • Employees shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.			
Biological Resources	**BIO-5: MSHCP Landscaping Restrictions.** In accordance with MSHCP Section 6.1.4, no species listed in Table 6-2, Plants that Should Be Avoided Adjacent to the MSHCP Conservation Area, shall be used in the project landscape plans (including hydroseed mix used for interim erosion control).	Prior to approval of landscape plans	Planning Division Project Landscape Architect	Review/Approve plans with certification plant palette meets MSHCP Section 6.1.4 Table 2 restrictions
Biological Resources	**BIO-6: Habitat Conservation Plan Fees.** The project applicant is subject to the MSHCP Local Development Mitigation Fee and the SKR Habitat Conservation Plan Fee, which shall be paid prior to issuance of any building permit.	Prior to issuance of a building permit	Planning Division Public Works Department Building & Safety Division	Proof of fee payments
Cultural Resources	**CUL-1: Tribal Coordination.** Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural resources and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing	Prior to issuance of a grading permit, if there are any changes to project site design and/or proposed grades.	Planning Division Public Works Department	Consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation

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	activities.			
Cultural Resources	**CUL-2: Archaeological and Paleontological Monitoring.** At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a. Project grading and development scheduling; b. The development of a schedule in coordination with the developer/applicant, the project archaeologist, and for designated Native American Tribal Monitors from the consulting tribes for grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and project archeologist and Native American Tribal Monitors' authority to stop and redirect grading activities; c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource	30 days prior to issuance of grading permit.	Planning Division Qualified Archeological Monitor Native American Tribal Monitor	Archeological Monitoring Plan Evidence that a qualified archeological monitor has been retained shall be provided to the City

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	deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation; d. In conjunction with the Archeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. e. Treatment and final disposition of any archeological and cultural and paleontological resources, sacred sites, if discovered on the project site; and f. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure CUL-5.			
Cultural Resources	**CUL-3: Native American Monitor.** Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following: a. The treatment of known cultural resources; b. The treatment and final disposition of any tribal cultural resources, sacred sites, human remains or archaeological and cultural resources inadvertently discovered on the Project site; c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during grading, excavation and ground disturbing activities.	Prior to issuance of grading permits.	Planning Division Project Applicant Native American Tribes	The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s)

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	If mutually agreed upon, any agreement with the tribe(s) may include compensation for the Tribal Monitors. If the developer/permit applicant and the consulting tribe(s) are unable to reach an agreement regarding compensation, the mitigation measure shall be considered satisfied if the developer/permit applicant provides sufficient evidence that they have made a reasonable effort to reach an agreement with the consulting tribes with regards to items a-d, as listed above).			
Cultural Resources	**CUL-4: Treatment and Disposition of Cultural Resources.** In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. **Consulting Tribes Notified:** within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site shall require the approval of the Consulting Tribes and all resources subject to such removal must be thoroughly inventoried with a tribal monitor from each consulting tribe to oversee the process; and 3. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for	On-going through grading and/or ground disturbing activities	Planning Division Project Applicant Qualified Archeological Monitor Native American Tribal Monitor	If resources are found and curated, a copy of the curation agreement shall be provided to the City. Submission of a Phase IV Monitoring Report.

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	impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Preservation-In-Place of the cultural resources, if feasible as determined through coordination between the project archeologist, developer/applicant, and consulting tribal monitor(s). Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources in perpetuity; b. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed, with an exception that sacred items, burial good and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains and grave goods. Any reburial process shall be culturally appropriate. List of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV report shall be prepared by the project archeologist and shall be filled with the City under a confidential cover and not subject to a Public Records Request; c. If reburial is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be			

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	transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; and d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.			
Cultural Resources	**CUL- 5: Cultural Sensitivity Training.** The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report	During pre-grading meeting.	Planning Division Qualified Archeological Monitor Native American Tribal Monitor	Phase IV Monitoring Report
Cultural Resources	**CUL-6 - Discovery of Human Remains:** In the event that human remains (or remains that may be	During any ground-disturbing activities	Planning Division	Consult with County Coroner and take appropriate action

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

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	cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).			
Geo/Soils	**PAL-1: Conduct Paleontological Sensitivity Training for Construction Personnel.** Prior to the start of grading, the applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The training will include a handout and will focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.	Prior to commencement of ground-disturbing activities	Planning Division Project Applicant Qualified Paleontologist	Proof of retention of qualified project paleontologist Proof of completing sensitivity training
Geo/Soils	**PAL-2: Conduct Periodic Paleontological Spot Checks during Grading and Earth-moving Activities.** Prior to the start of grading, the applicant shall retain a professional paleontologist who meets the qualifications set forth by the Society of Vertebrate Paleontology. During grading the paleontologist shall conduct periodic Paleontological Spot Checks beginning at depths below five feet to determine if construction excavations have extended into older Quaternary deposits. After the initial	During any ground-disturbing activities	Planning Division Project Applicant Project Paleontologist Qualified Paleontologist Monitor	Proof of retention of qualified Project Paleontologist and Qualified Paleontologist Monitor

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[4]	Monitoring/ Reporting Method
	paleontological spot check, further periodic checks will be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for paleontological resources will be required. The applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional paleontologist.			
Geo/Soils	**PAL-3: Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered.** If paleontological resources and/or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until an appropriate paleontological treatment plan has been approved by the applicant	During any ground-disturbing activities	Planning Division Project Paleontologist Qualified Paleontologist Monitor	A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until an appropriate paleontological treatment plan has been approved by the applicant and the City.

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	and the City. Work shall be allowed to continue outside of the buffer area. The applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include the implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.			
Geo/Soils	**PAL-4: Prepare Report Upon Completion of Paleontological Monitoring or Salvage Services.** Within 60 days of completion of monitoring and/or salvage activities (if required), the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the applicant, the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.	Within 60 days of completion of monitoring and/or salvage activities (if required)	Planning Division Project Paleontologist	Submit Report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance to the City.
Traffic	**VMT-1: Pedestrian Network Improvements.** The project shall install sidewalks along the west side of Old 215 Frontage Road adjacent to its property prior to the issuance of a certificate of occupancy.	Prior to issuance of any certificate of occupancy	Public Works – Traffic Division Building & Safety Division	Installation of required sidewalks
Traffic	**VMT-2: Telecommuting/Alternative Work Schedules.** Until such time as the City adopts a VMT Mitigation Plan, each owner/tenant of a project building(s) shall prepare a Telecommuting/ Alternative Work Schedule Plan for review and approval by the City. This Plan will require	Prior to issuance of any certificate of occupancy	Public Works – Traffic Division	Submittal of Telecommuting/Alternative Work Schedule Plan to the City.

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	employers to allow their workers to telecommute or adopt alternative work schedules to the greatest extent feasible. Alternative work schedules could take the form of staggered starting times, flexible schedules, or compressed work weeks. This Plan shall be approved annually by the City until it adopts a VMT Mitigation Plan. Any employer that participates in the City VMT Mitigation Program will no longer have to file an annual Telecommuting/Alternative Work Schedule Plan.			
Traffic	**VMT-3: Ride-Sharing Programs.** Until such time as the City adopts a VMT Mitigation Plan, each owner/tenant of a project building(s) shall prepare a Ride-Sharing Plan for review and approval by the City. This Plan will require employers to establish or actively participate in established carpool and/or vanpool programs for the Riverside area to the greatest extent feasible. This Plan shall be approved annually by the City until it adopts a VMT Mitigation Plan. Any employer that participates in the City VMT Mitigation Program will no longer have to file an annual Ride-Sharing Plan.	Prior to issuance of any certificate of occupancy	Public Works – Traffic Division	Submit Ride-Sharing Program Plan(s) to the City.
Traffic	**VMT-4: VMT Mitigation Bank Program.** Prior to issuance of a building permit, the project applicant shall pay their Project Fair-Share fee of 0.11 percent of the $61,583,924.03 total cost toward the City's bicycle and pedestrian projects, which will be used to develop a Vehicle Miles Traveled mitigation bank study. The Project Fair-Share Cost is estimated to be $67,742.32 and shall be paid to the City of Riverside by the Project applicant.	Prior to issuance of a building permit	Public Works – Traffic Division	Fee payment receipt