

## COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT

## PLANNING DIVISION

WARD: 4

Case Number: P16-0774 (Tentative Tract Map), P19-0578 (Grading Exception)

2. **Project Title:** TTM 37177

3. Hearing Date: March 17, 2022

4. Lead Agency: City of Riverside

Community & Economic Development Department

**Planning Division** 

3900 Main Street, 3rd Floor

Riverside, CA 92522

5. **Contact Person:** Judy Egüez, Associate Planner

**Phone Number:** (951) 826-3969

6. **Project Location:** South side of Bradley Street, between Golden Star Avenue and Harbart Drive

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

REN-DE LLC 64 Twinflower Irvine, CA 92620 (909) 680-3803

8. **General Plan Designation:** VLDR - Very Low Density Residential

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

#### 10. Description of Project:

The project site is located on the south side of Bradley Street, between Golden Star Avenue and Harbart Drive in the City of Riverside (City), County of Riverside (County), California. The project site consists of Assessor Parcel Numbers (APN) 242-170-034, 242-170-029, and 242-170-027. The subject property is characterized by diverse topography, ranging from gently rolling to flat and rocky terrain; the northerly portions of the project site consist of jurisdictional drainages. The drainage feature will remain in its natural state with minor impacts and will be maintained by a third-party management group. The project site has an average natural slope of 12.7 percent and is subject to the City's Hillside Grading Ordinance.

The proposed project requires approval of a Tentative Tract Map that would subdivide a 34.6 gross acre site into 46 lots, for the future development of single-family residences and associated improvements. The proposed single-family residential lots would range in size from 0.50 acres to 0.99 acres, with building pads ranging in size from 6,218 square feet to 24,927 square feet.

In addition to the Tentative Tract Map, the proposed project would require approval of a grading exception under the Hillside Grading Ordinance (Title 17) for the allowance of a retaining wall in excess of the allowable maximum height for the purposes of providing a master planned public trail adjacent to Bradley Road. The retaining wall will avoid the grading impacts associated with the widening of Bradley Road, including the installation of the adjacent public trail, to the natural creek bed adjacent to the existing roadway. The retaining wall is not visible from the public right of way and will be screened by the existing vegetation in the creek bed.

Construction of the proposed Project would begin in April of 2022 and be completed approximately in August of 2022.

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

The project site is a vacant parcel located on the south side of Bradley Street and east of Harbart Drive. The project site is bounded by Bradley Street and single-family residences to the north, single-family residences and vacant land to the south, vacant land and single-family residences that are currently under construction to the east, and single-family residences to the west.

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant	VLDR - Very Low Density Residential	R-1-½ Acre - Single- Family Residential Zone
North	Single-Family Residences and Vacant Land	VLDR - Very Low Density Residential	R-1-½ Acre - Single- Family Residential Zone
East	Vacant Land	VLDR - Very Low Density Residential	R-1-½ Acre - Single- Family Residential Zone
South	Single-Family Residences and Vacant Land	HR - Hillside Residential	RC - Residential Conservation Zone
West	Single-Family Residences and Vacant Land	VLDR - Very Low Density Residential	R-1-½ Acre - Single- Family Residential Zone and R-1-1/2 Acre-WC – Single-Family Residential and Water Course Overlay Zones

Source: (General Plan 2025 Figure LU-10 – Land Use Policy Map; General Plan 2025 Land Use and Urban Design Element; Zoning Map of the City of Riverside; and Google Maps 2018, Google).

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

- A. City of Riverside
- B. Regional Water Quality Control Board (RWQCB), Santa Ana Region National Pollutant Discharge Elimination System (NPDES) Construction General Permit
- C. RWQCB, Santa Ana Region Storm Water Pollution Prevention Plan (SWPPP)

- D. RWQCB, Santa Ana Region 401 Water Quality Certification Waste Discharge Requirement (WDR)
- E. U.S. Army Corps of Engineers (USACE) Section 404 Clear Water Act Permit
- F. California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement
- G. South Coast Air Quality Management District (SCAQMD) Dust Control Plan

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

- A. City of Riverside General Plan 2025
- B. City of Riverside General Plan 2025 Final Program Environmental Impact Report (GP 2025 FPEIR)
- C. Title 17, Grading Code
- D. Title 19, Zoning Code
- E. Title 20, Cultural Resources
- F. Air Quality and Greenhouse Gas Emissions Impact Analysis TR 37177 by Vista Environmental, dated October 10, 2016
- G. Biological Studies TTM 37177 by Gonzales Environmental Consulting, LLC, dated August 29, 2019
- H. Determination of Biologically Equivalent or Superior Preservation Report TM 37177 by Gonzales Environmental Consulting, LLC, dated July 20, 2019
- I. Focused Surveys for least Bell's vireo TM 37177 by Gonzales Environmental Consulting, LLC, dated September 12, 2018
- J. Habitat Assessment & Focused Surveys for Burrowing Owl TM 37177 by Gonzales Environmental Consulting, LLC, dated August 29, 2016
- K. Delineation of Waters of the United States and Department of Fish and Wildlife Jurisdictional Habitats for TM 37177 by Gonzales Environmental Consulting, LLC, dated September 12, 2018
- L. Delineation of Waters of the United States and Department of Fish and Wildlife Jurisdictional Habitats for TM 37177 by Gonzales Environmental Consulting, LLC, dated August 26, 2016
- M. Limited Excavatability Evaluation by Aragón Geotechnical, Inc., dated November 10, 2015
- N. Infiltration Feasibility Assessments & Test Protocols TR 37177 by Aragón Geotechnical, Inc., dated January 5, 2017
- O. WQMP Infiltration Feasibility Report TR 37177 by Aragón Geotechnical, Inc., dated July 31, 2018
- P. City of Riverside Tentative Tract Map No. 37177 Noise Analysis Memorandum by Vista Environmental, dated November 7, 2016
- Q. Environmental Initial Study for TM 33028 (Noise Study), dated February 9, 2006

- R. Cultural Resources Assessment for TR 37177 with Confidential Appendix by Brian F. Smith and Associates, Inc., dated May 3, 2019
- S. TR 37177 Traffic Study Exemption Evaluation Letter from Urban Crossroads, Inc., dated September 15, 2016
- T. TTM 33028 and 33029 Initial Study and Mitigated Negative Declaration Appendix G: Traffic Impact Analysis by Kunzman Associates, dated March 25, 2005

## 14. Acronyms

AB Assembly Bill

AERMOD Model American Meteorological Society/Environmental Protection Agency Regulatory

AICUZ Air Installation Compatible Use Zone Study

APN Assessor's Parcel Number
AQMP Air Quality Management Plan
ARB California Air Resources Board

ASHRAE American Society of Heating, Refrigerating and Air Conditioning Engineers

ASTM American Society for Testing and Materials

AUSD Alvord Unified School District

Basin South Coast Air Basin
BAU Business As Usual

BMP Best Management Practice B/OP Business/Office Park

C&D Construction and Demolition

CalRecycle California Department of Resources Recycling and Recovery

CAP Climate Action Plan

CAPCOA California Air Pollution Control Officers Association

CBC California Building Code
CCR California Code of Regulations

CDFW California Department of Fish and Wildlife

CEC California Energy Commission

CEQA California Environmental Quality Act
CHL California Historical Landmarks

CHRIS California Historical Resources Information System

City of Riverside

CMP Congestion Management Plan
CNEL Community Noise Equivalent Level

CO Carbon monoxide

CPHI California Points of Historical Interest

CREC Controlled Recognized Environmental Conditions

DAMP Drainage Area Management Plan

dBA A-weighted decibels
Division Planning Division

DOC California Department of Conservation

DPM diesel particulate matter
EIC Eastern Information Center
EIR Environmental Impact Report
EMWD Eastern Municipal Water District

EO Executive Order

EOP Emergency Operations Plan

EPA United States Environmental Protection Agency

ESA Environmental Site Assessment

FEMA Federal Emergency Management Agency

FIND Facility Information Detail

FPEIR Final Programmatic Environmental Impact Report

FRA Federal Railroad Administration
FTA Federal Transit Administration
GAP Green accountability performance

GCC Global Climate Change GHG Greenhouse Gas

GIS Geographic Information System

GP General Plan
GP 2025 General Plan 2025

2025 HCM Highway Capacity Manual HCP Habitat Conservation Plan HRA Health Risk Assessment

HREC Historic Recognized Environmental Conditions

HRI Historic Resource Inventory

HVAC Heating, Ventilation and Air-Conditioning

IS Initial Study
Lbs/day Pounds per day

LHMP Local Hazard Mitigation Plan

Lmax maximum noise level LOS Level of Service

LST Localized Significance Threshold

MARB/MIP March Air Reserve Base/March Inland Port MATES Multiple Air Toxics Exposure Studies

MBTA Migratory Bird Treaty Act

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

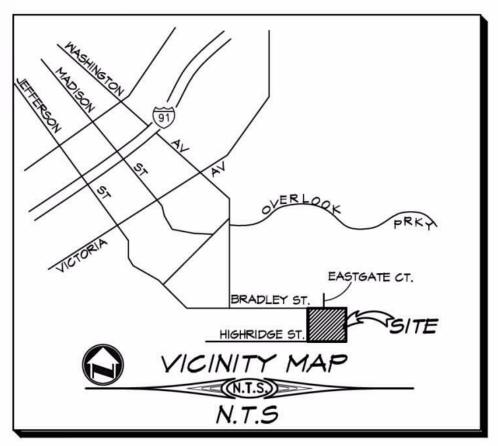
USGS United States Geologic Survey
WMWD Western Municipal Water District
WQMP Water Quality Management Plan

Google

Figure 1: Regional Location Map



Figure 2: Local Vicinity Map



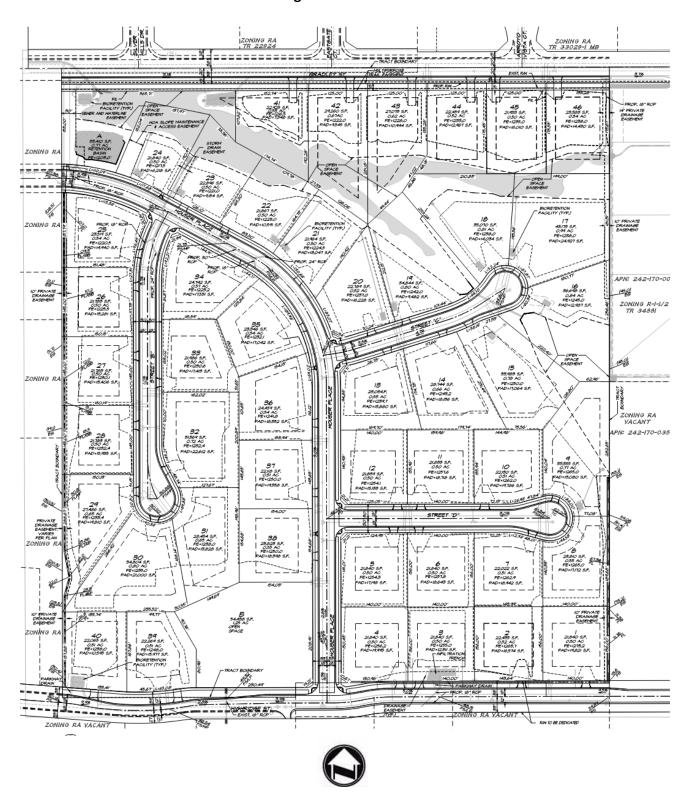
SECTION 14, T. 35, R. 5W

Figure 3: Aerial View





Figure 4: Site Plan



# **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked be impact that is a "Potentially Significant			st one		
Aesthetics	Agriculture & Forest Resources	Air Quality			
Biological Resources	Cultural Resources	Energy			
Geology/Soils	Greenhouse Gas Emissions	Hazards & Hazardous Mate	rials		
Hydrology/Water Quality	Land Use/Planning	Mineral Resources			
Noise	Population/Housing	Public Service			
Recreation	Transportation	Tribal Cultural Resources			
Utilities/Service Systems	Wildfire	Mandatory Findings of Significance			
<b>DETERMINATION:</b> (To be completed by	y the Lead Agency)				
On the basis of this initial evaluation recommended that:	which reflects the independent j	udgment of the City of Riverside	e, it is		
The City of Riverside finds that the propose a NEGATIVE DECLARATION will be prepared		t effect on the environment, and			
The City of Riverside finds that although th there will not be a significant effect in this by the project proponent. A MITIGATED N	case because revisions in the project h	nave been made by or agreed to			
The City of Riverside finds that the propose ENVIRONMENTAL IMPACT REPORT is required.		ect on the environment, and an			
The City of Riverside finds that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.					
The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.					
Signature		Date			
Printed Name & Title Judy Egüez, As	sociate Planner F	or <u>City of Riverside</u>			



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PLANNING DIVISION

#### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
  - a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?			$\boxtimes$	
CCM-4 – Master Plan of Roadways; General Plan 20 Boulevards and Parkways; Table 5.1-A – Scenic and Parkways; and, Zoning Map of the City of Riverside.  Less Than Significant Impact. The City has determined that scen project results in either: (1) construction of a structure that bloscenic vista.  Here, the project site is not identified as a scenic vista in the Cothe project site's immediate vicinity. Moreover, the proposed and development of residential communities are proposed proposed project site; existing residential communities exist to the proposed project will not result in development on a scen project will neither block the view of a scenic vista nor alter a have a less than significant direct, indirect, and cumulative	Special Bould.  Inic vistas can ocks the view of the immorphism of the west and other inic hillside or a scenic vista.	be significantly of a scenic visual lan 2025 and the is zoned for rediate north, and north of the ridgeline. Act	y impacted if sta; or (2) alt here is no so esidential de south, and project site. cordingly, the proposed	f a proposed teration of a enic vista in evelopment, east of the Moreover, he proposed project will
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
1b. Response: (Source: California Scenic Highway Scenic 4 – Master Plan of Roadways, General Plan 2025 F. Parkways, Table 5.1-A – Scenic and Special Boulevar Forest Tree Policy Manual, Title 20 – Cultural Resources Assaby Brian F. Smith and Associates, Inc., dated May 3, Less Than Significant Impact. There are no scenic highways waddition, the proposed project is not located along or within boulevard as designated by the City's General Plan 2025 and resources within a scenic roadway. Moreover, much of the developed or slated for development. These development Additionally, there are rock outcroppings that have been mark the property. These will be preserved, and their scenic value	PEIR Figure 5 ds, Table 5.1 urces and, Table 5.2 essment for 2019) ithin the City n view of a d therefore version surrous already line and as culturated as culturated.	5.1-1 – Scenic of B – Scenic Paritle 19 – Article TR 37177 with that could pot scenic boulevers will not have a unding the promit the scenic promit the scenic paresources in	and Special of the V – Chapte of Confidential of the confidential of the confidential of the confidential of the control of th	Boulevards, City's Urban er 19.100 – al Appendix  mpacted. In y or special any scenic ect is either e property. y portion of
project would not substantially damage these rock outcropping or historic buildings within a state scenic highway.  Therefore, the proposed project will have a less than signification resources. No mitigation is required.	gs, nor would	the proposed	project impa	ict any trees

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?  1c. Response: (Source: General Plan 2025, General Plan 2025, General Plan 2025, General Plan 2025)			Citywide.	Design and
Less Than Significant Impact. The project site is in an urban with any applicable zoning or other regulations governing seridential land uses on the City's General Plan 2025 and zo City's Zoning Map. Consistent with the applicable zoning Moreover, the proposed project has been designed to be condescribed and will meet all development standards as establed degrade the existing visual character of the area.  Therefore, the proposed project will have a less than signimitigation is required.	scenic quality ned for resid , the project mpatible wit lished by the	y. The project lential develop t proposes reach th the surround e City. The pro	t site is designment as sho sidential des ding area as oposed proje	gnated for own on the velopment. previously ect will not
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 Lighting Area).  Less Than Significant Impact. The proposed project would not that would adversely affect day or nighttime views in the a residential buildings and street lighting that would be visible for streets. all outdoor street lighting will be designed to compount Municipal Code, which has provisions to ensure preservation sky glow and preventing glare and light trespass. (Municipal Code within the Mount Palomar Lighting Area; therefore, no in Observatory would be impacted.	ot create a n rea. While t rom adjacent bly with Chap of the natura Code, § 19.55	ew source of s the proposed p t streets and ve oter 19.556 (O ally dark night s 66.010, et seq.)	ubstantial lig project woul chicles opera utdoor Light ky by reduci Additionally	ght or glare d add new ting on the ing) of the ng artificial of the site is
As a result, the proposed project will have a <b>less than signific</b> to substantial light or glare which would adversely affect darrequired.				_

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant Impact	Significant With Mitigation Incorporated	Significant Impact	Impact
2. AGRICULTURE AND FOREST RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				

Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability; Riverside County GIS). 2a.

Less than Significant Impact. The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. The proposed project is located within an urbanized area. The City General Plan Conservation Element and Riverside County's GIS Application indicates the location of agricultural lands within the City and the City's Sphere of Influence related to Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The City General Plan 2025, Figure OS-2: Agricultural Suitability indicates that the project site and surrounding property are designated as Urban and Built-Up Land (D), Farmland of Local Importance (P), and Other Land (X). Based on a review of this figure, the project site is not designated as, 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 of the California Resources Agency. Although the land is listed as Farmland of Local Importance, it is not being used for crops and, based on a review of past Google Earth images, has not been used as farmland since at least 1994, which is the date of the oldest available aerial photo.

Therefore, the proposed project will have a less than significant direct, indirect, or cumulative impact related to farmland. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact			
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?		Incorporated					
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)							
<b>No Impact.</b> A review of Figure OS-3 – <i>Williamson Act Preserve</i> site is not located within an area that is affected by a Williamso Moreover, the project site is not zoned for agricultural use a therefore, the proposed project will have <b>no impact</b> directly, in for agricultural use, or to a Williamson Act contract. No mitigates	on Act Preservand is not ne and is not ne adirectly, or o	ve or under a W ext to land zon cumulatively re	/illiamson Ad ed for agricu	ct Contract. ultural use;			
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?							
2c. Response: (Source: GIS Map – Forest Data)  No Impact. The City of Riverside has no forest land that can supany timberland; therefore, the proposed project will have no to timberland. No mitigation is required.							
d. Result in the loss of forest land or conversion of forest land to non-forest use?				$\boxtimes$			
2d. Response: (Source: GIS Map – Forest Data)  No Impact. The City of Riverside has no forest land that can supany timberland; therefore, the proposed project will have no to forest land. 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?							

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

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 19and GIS Map - Forest Data)

Less Than Significant Impact. The proposed project is located within an urbanized area of the city. Additionally, the site is identified as urban/built out land and does not support agricultural resources or operations. The proposed project will not result in the conversion of property currently used as farmland to non-agricultural uses. There are no agricultural resources or operations, including farmlands within proximity of the project site. The City has no forest land that can support 10-percent native tree cover.

Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively relating to conversion of farmland to a non-agricultural use or to the loss of forest land. 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:		
	<b>a.</b> Conflict with or obstruct implementation of the applicable air quality plan?		

3a. Response: (Source: City of Riverside General Plan Land Use Policy Map (Figure LU-10), Air Quality and Greenhouse Gas Emission Impact Analysis prepared by Vista Environmental, Inc. on October 10, 2016.)

**Less Than Significant Impact.** The proposed project will not conflict with or obstruct implementation of the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP). Under the AQMP, projects in the South Coast Air Basin generating emissions that exceed specified construction-related or operational emissions thresholds are considered to be significant. Here, the proposed project's construction- and operation-related emissions fall far below the regional thresholds of significance, as set forth in Tables A and B below. (See also, Air Quality and Greenhouse Gas Emissions Impact Analysis, pp. 38-42.)

**Table A – Construction-Related Regional Criteria Pollutant Emissions** 

	Pollutant Emissions (pounds/day)					
Activity	VOC	NOx	СО	SO <sub>2</sub>	PM10	PM2.5
Site Preparation						
Onsite	4.84	51.75	39.40	0.04	9.80	6.41
Offsite	0.12	0.58	1.65	0.00	0.25	0.07
Total	4.96	52.33	41.05	0.04	10.05	6.48
Grading <sup>1</sup>						
Onsite	6.10	69.59	46.81	0.06	6.70	4.45
Offsite	0.12	0.59	1.74	0.00	0.27	0.08
Total	6.22	70.18	48.55	0.06	6.97	4.53
Building Construction						
Onsite	3.10	26.41	18.13	0.03	1.78	1.67
Offsite	0.13	0.68	1.93	0.00	0.29	0.08
Total	3.23	29.09	20.06	0.03	2.07	1.75

SUES (AND SUPPORTING FORMATION SOURCES):			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Paving				oo.poratou		
Onsite	1.75	17.16	14.49	0.02	0.94 0	.86
Offsite	0.05	0.07	0.80	0.00	0.17 0	.05
Total	1.80	17.23	15.29	0.02	1.11 0	.91
Architectural Coatings						
Onsite	16.77	1.84	1.84	0.00	0.13 0	.13
Offsite	0.01	0.01	0.18	0.00	0.05 0	.01
Total	16.78	1.85	2.02	0.00	0.18 0	.14
Combined Building Construction, Paving, and Architectural Coatings	21.81	46.17	37.37	0.05	3.36 2	.80
SCQAMD Thresholds	75	100	550	150	150 5	5
Exceeds Threshold?	No	No	No	No	No N	lo
Malaa						

Source: CalEEMod Version 2016.3.2.

Table B – Operational Regional Criteria Pollutant Emissions

	Pollutant Emissions (pounds/day)					
Activity	VOC	NOx	СО	SO <sub>2</sub>	PM10	PM2.5
Area Sources <sup>1</sup>	2.37	0.05	3.99	0.00	0.09	0.09
Energy Usage <sup>2</sup>	0.05	0.41	0.17	0.00	0.03	0.03
Mobile Sources <sup>3</sup>	1.49	4.33	17.43	0.05	3.58	1.00
Total Emissions	3.91	4.79	21.59	0.05	3.70	1.12
SCQAMD Operational Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Calculated from CalEEMod Version 2013.2.2

While it is possible in theory for a project's air emissions to exceed the State and Federal air quality standards even if they do not exceed regional thresholds, the proposed project here would not have any significant local impact resulting from construction or operation of the proposed project. Table C below summarizes the potential onsite emissions for each of the proposed project's construction phases, and it demonstrates that no phase of the project—including emissions resulting from concurrent construction, paving, gravel installation, and architectural coatings—would result in a potentially significant local air quality impact.

<sup>&</sup>lt;sup>1</sup> Site Preparation and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

<sup>&</sup>lt;sup>2</sup> Onsite emissions from equipment not operated on public roads.

<sup>&</sup>lt;sup>3</sup> Offsite emissions from vehicles operating on public roads.

<sup>&</sup>lt;sup>1</sup> Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

<sup>&</sup>lt;sup>2</sup> Energy usage consist of emissions from natural gas usage (excluding hearths).

<sup>&</sup>lt;sup>3</sup> Mobile sources consist of emissions from vehicles and road dust.

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
	Impact	With	Impact	-
		Mitigation		1
		Incorporated		1

Table C – Construction-Related Local Criteria Pollutant Emissions

	Pollutant	Pollutant Emissions (pounds/day)				
Phase	NOx	СО	PM10	PM2.5		
Site Preparation <sup>1</sup>	51.75	39.40	9.80	6.41		
Grading <sup>2</sup>	69.59	46.81	6.70	4.45		
Building Construction	26.41	18.13	1.78	1.67		
Paving	17.16	14.49	0.94	0.86		
Architectural Coatings	1.84	1.84	0.13	0.13		
Combined Building Construction, Paving, Gravel Installation and Architectural Coatings	45.41	34.46	2.85	2.66		
SCAQMD Thresholds for 25 meters (82 feet)	270	1,577	13	8		
Exceeds Threshold?	No	No	No	No		

#### Notes:

Similarly, as to local air emission impacts related to operation of the proposed project, Table D below shows that operational daily emissions would not result in a significant impact to the local air quality.

Table D – Operations-Related Local Criteria Pollutant Emissions

	Pollutant Emissions (pounds/day)					
On-Site Emission Source	NOx	СО	PM10	PM2.5		
Area Sources	0.05	3.99	0.09	0.09		
Energy Usage	0.41	0.17	0.03	0.03		
Onsite Vehicle Emissions <sup>1</sup>	0.54	2.18	0.45	0.13		
Total Emissions	1.00	6.34	0.57	0.25		
SCAQMD Thresholds for 25 meters (82 feet) <sup>2</sup>	270	1,577	4	2		
Exceeds Threshold?	No	No	No	No		

#### Notes:

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in Area 23, Metropolitan Riverside County.

Moreover, the proposed project is consistent with the AQMP's assumptions regarding growth, which further evidences that the proposed project will not conflict with or obstruct the AQMP. In particular, the project site is currently designated as Very Low Density Residential (VLDR) in the General Plan and is zoned Single-Family Residence (R  $1^{1}/_{2}$ ). The proposed project is consistent with the current land use designation and zoning and would not require a General Plan Amendment or zone change. As such, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP. The proposed project will not result in an inconsistency with the SCAQMD AQMP.

<sup>&</sup>lt;sup>1</sup> Site Preparation and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

<sup>&</sup>lt;sup>2</sup> The nearest sensitive receptors are single-family homes located as near as 5 feet west of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25 meter thresholds.

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for five acres in Air Monitoring Area 23, Metropolitan Riverside County.

<sup>1</sup> Onsite vehicle emissions based on 1/8 of the gross vehicular emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the project site.

<sup>&</sup>lt;sup>2</sup> The nearest sensitive receptors are single-family homes located as near as 5 feet of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Therefore, overall the proposed project will have <b>less than</b> related to a conflict with or obstruction of the implementation required.	-	irect, indirect,		•
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?				
<ul> <li>3b. Response: (Source: General Plan 2025 FPEIR Tall Thresholds, South Coast Air Quality Managemen CalEEMod Version 2013.2.2, and Air Quality and Grapy Vista Environmental, Inc. on October 10, 2016.)</li> <li>Less Than Significant Impact. The proposed project will not rany criteria pollutant for which the region is in non-attainment Basin, which is currently designated by the Environmental Profattainment area for ozone and PM2.5 and by the California Air a non-attainment area for ozone, PM10 and PM2.5. As set fort would result in less than significant regional emissions of Vorelating to construction and operation. No mitigation is required.</li> </ul>	esult in a cun t. The project tection Agency r. Resources B h in Tables A	nulatively constant (CPA) for fed through D above	ity Manager pact Analysi diderable net d in the Sou leral standar or the state so	ment Plan, is prepared increase of th Coast Air ds as a non-standards as osed project
c. Expose sensitive receptors to substantial pollutant concentrations?				
3c. Response: (Source: General Plan 2025 FPEIR To Thresholds, South Coast Air Quality Management URBEMIS 2007 or CalEEMod, EMFAC 2007 Model and Analysis prepared by Vista Environmental, Inc. on Concentrations. As set forth in Tables C and D above, the liproduced in the nearby vicinity of the proposed project are lidiesel exhaust is the predominant toxic air contaminant (TAC the project will result in less than significant PM emissions. schedule, the relatively limited number of heavy-duty construt to operational impacts, the nominal number of diesel truck residential project. Moreover, the proposed project is required 13, Article 4.8, Chapter 9, Section 2449, which regulates off-roothings, limits idling of equipment to no more than five mesignificant short-term toxic air contaminant impacts from occurrence.	t District's 2 d Air Quality Dctober 10, 2 d expose sense ocal concent ess than sign in most are. This is due, in action equipment trips that we do to adhere ad diesel equinutes and in urring.	and Greenhouse of critical and the control of critical of control of contro	ity Manage use Gas Emis to substanti eria pollutan ulate matter ussed in Tab short-term of for the projectated by the ode of Regu fornia and, a ures to furth	ial pollutant it emissions (PM) from les C and D, construction ject, and, as e proposed lations Title mong other her prevent
to substantial pollutant concentrations. No mitigation is requi	red.			

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?					
3d. Response: (Source: Air Quality and Greenhouse Environmental, Inc. on October 10, 2016.)	Gas Emission	n Impact Anal	ysis prepare	ed by Vista	
Less Than Significant Impact. The proposed project would nodors, adversely affecting a substantial number of people. The associated with odor complaints. These uses include activity processing plants, chemical plants, composting activities, refin molding. (South Coast Air Quality Management District. CEQ, residential development will not be involved in any of the afort of the proposed project would not introduce any new sources activities associated with the expected build out of the project such as asphalt pavement, paints and solvents, diesel emission would occur only during daylight hours, be short-term in durate of the construction site. Moreover, future construction-rela California Code of Regulations, which limits the idling of defurthermore, the proposed project is required to comply with from any source whatsoever such quantities of air contaminate nuisance, or annoyance to any considerable number of person repose, health or safety of any such persons or the public, or injury or damage to business or property." Accordingly, the number of people to objectionable odors.  For the foregoing reasons, construction and operation of the (such as those leading to odors) adversely affecting a substant significant. No mitigation is required.	e SCAQMD haties relating eries, landfill A Air Quality rementioned of odors to tect site may go as, and archition, and wouted trucks miesel-powered SCAQMD Runts or other mans or to the proposed propose	as identified lar to livestock, ro s, and business Handbook, App odor-generatir he project vicing generate airbo ectural coating ld be isolated to ust adhere to and vehicles to alle 402, which material which bublic, or which oublic, or which or have a nate roject would no	nd uses that a cendering factoring factoring activities. In the case in the case in the case in jury a endanger to the case in jury and t	are typically cilities, food in fiberglass he proposed Operation om sources s, emissions liate vicinity 2485 of the ve minutes. e "discharge, detriment, he comfort, cy to cause, substantial er emissions	
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(s): General Plan 2025, prepared by City of Riverside, November 2007, General Plan 2025 Final Program Environmental Impact Report, prepared by City of Riverside, November 2007, Habitat Assessment Including the Results of a Focused Burrowing Owl Survey, Least Bell's Vireo Survey, MHSCP Consistency Analysis TM 37177, City of Riverside, Riverside County, California, USGS 7.5-minute topographic Riverside East Quadrangle, Township 3 South, Range 5 West, portion of Section 14, prepared by Gonzales Environmental Consulting LLC, September 12, 2018, DBESP prepared by Gonzales Environmental Consulting, LLC, July 20, 2019.					
<b>Less Than Significant Impact With Mitigation.</b> The proposed either directly or through habitat modification, on any spec					

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

status species with compliance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the incorporation of MM-BIO-1 through MM-BIO-6.

The project site is located within the MSHCP; no criteria cell, core, or linkage under the MSHCP is located in or around the project area. The MSHCP was adopted by the County of Riverside in June 2003. Section 6.1.2 of the MSHCP requires an assessment of the potentially significant effects of the proposed project on riparian/riverine areas, vernal pools, and where a qualified biologist identifies suitable habitat for the following species, the MSHCP requires focused surveys for the following species: the least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, and certain crustaceans. Here, a qualified biologist prepared a habitat assessment for the project site, and the biologist did not observe any such species on the project site. Moreover, the project site does not contain suitable habitat for any of these species, except potentially for the least Bell's vireo. Moreover, Section 7.5.3 of the MSHCP provides a series of construction guidelines that are binding on this Project and that minimize the Project's potential impacts to a level of less than significant.

A Determination of Biologically Equivalent or Superior Preservation Report (DBESP) was prepared for the Project pursuant to the MSHCP, and the United States Fish and Wildlife Service and the California Department of Fish and Wildlife (collectively, the "Wildlife Agencies") signed off on the DBESP. As set forth in the DBESP, and as discussed below, no special-status animal species were observed on the project site based on surveys conducted. Nevertheless, mitigation measures have been incorporated into the proposed project to ensure that the proposed project will have a less than significant impact on candidate, sensitive, or special status species. Based on surveys and assessments conducted, the proposed project could potentially significantly impact sensitive vegetation communities, but as discussed below, the proposed project has incorporated mitigation measures that would reduce any such impact to a level of less than significant.

## **Vegetation Communities**

1.723 acres of riparian habitat (Salix gooddingii Riparian woodland) will be conserved on site. Pursuant to Mitigation Measure BIO-1, a conservation easement shall be recorded for the on-site conserved riparian habitat.

The Project will not conserve all riparian habitat onsite. Absent mitigation, the Project will result in impacts to 0.105 acres of onsite riparian area and 0.462 acres of riverine areas. Pursuant to the MSHCP, a DBESP was prepared, and the City and the Wildlife Agencies agreed to a mitigation measure that would reduce these impacts to a level of less than significant. The mitigation measure is set forth in MM-BIO-2 below, and it provides for participation in an in-lieu fee program for off-site reestablishment of riparian habitat. With this mitigation measure, the Wildlife Agencies agreed that the Project was equivalent or superior to the existing condition.

## Least Bell's Vireo

No least Bell's vireo were detected during the habitat assessment and focused surveys (eight surveys conducted between April 15 and July 10), but the project site does possess riparian habitat with riparian features that could potentially support least Bell's vireo. To ensure that the proposed project will not result in any significant impact to least Bell's vireo and consistent with MSHCP Section 6.1.2, Mitigation Measure BIO-3 has been incorporated into the proposed project. Consistent with the MSHCP, MM-BIO-3 requires a preconstruction survey before any project activity with a potential to significantly impact least Bell's vireo may occur, and if any least Bell's vireo are located during such survey, MM-BIO-3 has measures in place to ensure a less than significant impact to the least Bell's vireo.

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
	Impact	With	Impact	1
		Mitigation		1
		Incorporated		

## **Raptor Species**

The riparian habitat provides marginal habitat for raptor species. To ensure that the proposed project will not result in any potentially significant impacts to any raptor species, MM-BIO-4 has been incorporated into the Project. MM-BIO-4 will require surveys for the presence of any active raptor nests seven days before any construction activities that may occur during the raptor nesting season (February 1 to June 30), and if any nests are found, the site shall be protected and significant impacts to the nest and raptor species shall be avoided.

## Burrowing Owl

Consistent with MSHCP Section 6.2.3, habitat, burrow, and burrowing owl surveys were conducted for the burrowing owl. No burrowing owls or burrow were observed on the project site. To ensure that the proposed project will not result in any potentially significant impacts to the burrowing owl, MM-BIO-5 has been incorporated into the proposed project. MM-BIO-5 require surveys be conducted for the presence of any active burrowing owl nests before any construction activities may occur during the raptor nesting season (February 1 to June 30), and if any burrows/burrowing owl are found, the site shall be protected and significant impacts to the burrows and burrowing owl shall be avoided.

## Migratory Birds

To ensure that the proposed project will not result in any potentially significant impacts to any migratory birds protected by the Migratory Bird Treaty Act (MBTA), MM-BIO-6 has been incorporated into the proposed project. MM-BIO-6 provides for nesting bird surveys during the MBTA nesting cycle (February 15 to September 15), and it requires a 300 foot buffer around any active bird nest in which construction will not be permitted while the nest remains active.

## **Indirect impacts**

Although minimal direct impacts are anticipated to any species identified as a candidate, sensitive, or special status species, nesting birds may experience indirect impacts from project activity, such as disturbance-related nest abandonment due to noise. Any such impacts, however, would be minor and less than significant for the following reasons: (1) Most of the potentially impacted species are common species and not Species of Special Concern; (2) The project area is already disturbed by the existing anthropogenic activities and surrounding developments; and (3) The species of special concern expected to occur in the project area would only do so as rare or occasional visitors, under current conditions. Moreover, to the extent species of special concern do occur in the project area, Mitigation Measures 1 through 6 below will ensure any indirect project impacts would be less than significant. This is because, as outlined in the mitigation measures, a qualified biologist will conduct surveys for least Bell's vireo, nesting birds, and burrowing owl before construction commences, and if any special species occur, no construction will be permitted within the buffer zone surrounding the nest/burrow or occurrence.

For the foregoing reasons, the construction and operation of the proposed project will have a less than significant impact with mitigation 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 Wildlife or U.S. Fish and Wildlife Service.

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

## Mitigation

MM-BIO-1: 1.723 acres of riparian habitat (Salix gooddingii Riparian woodland) will be conserved on site. A conservation easement shall be recorded for the on-site conserved riparian habitat and managed by either Riverside Corona Resource Conservation District, Rivers and Land Conservancy, San Diego Conservancy, or Southwest Resource Management Association.

MM-BIO-2: Provision of a one-time fee for 1.5 acres in-lieu fee program through Riverside-Corona Resource Conservation District, or any other approved in-lieu fee program at the time of rough grading permit issuance will be acquired for mitigation of the impacts at a minimum ratio of 2:1 or greater if required by another agency. Mitigation for the impacts will be at a minimum 3:1 ratio for riverine or whatever is required by California Department of Fish and Wildlife California Regional Water Quality Control Board, and US Army Corps of Engineers. Should sufficient in-lieu fee credits not be available for purchase at the time the project is implemented, or should other agencies not approve in-lieu fee credit purchase, then the Developer must prepare and submit for review and approval a Habitat Mitigation and Monitoring Plan (HMMP) for a site-specific restoration project at a minimum 3:1 mitigation to impact ratio. The plan must meet County of Riverside requirements, as well as requirements of other resource and wildlife agencies. Appropriate guarantees for the restoration project must be in place prior to issuance of a grading permit.

MM-BIO-3: In addition to the measures addressing riparian/riverine resources, which will benefit the least Bell's vireo, the project will further avoid, minimize, and mitigate effects to the least Bell's vireo with implementation of the following measures:

- To avoid and minimize effects to the least Bell's vireo, removal of riparian vegetation prior to construction shall occur between September 1 and February 14 to avoid least Bell's vireo breeding season, as well as the general breeding season for other nesting birds. If vegetation removal must occur during nesting season, a nest survey shall be conducted by a qualified biologist within seven days prior to vegetation removal activities to ensure that no active nests are present. If nests are present, no vegetation removal shall occur within 50 feet of the active nest until the young have fledged or the nest is determined to be inactive.
- Should any construction activity occur during the nesting season for least Bell's vireo (February 15 to October 31), seven days prior to the onset of construction activities during the least Bell's vireo nesting season, a qualified biologist shall survey within 500 feet of the project impact area for the presence of any active least Bell's vireo nests. Any nest found during survey efforts shall be mapped on the construction plans. If no active nests are found, no further mitigation would be required. If nesting activity is present at any raptor nest site, the active site shall be protected until nesting activity has ended to ensure compliance with Section 2503.5 of the California Fish and Game Code. To protect any nest site, the following restrictions to construction activities are required until nests are no longer active as determined by a qualified biologist: (1) clearing limits shall be established within a 500-foot buffer around any occupied nest, unless otherwise determined by a qualified biologist, and (2) access and surveying shall be restricted within 300 feet of any occupied nest, unless otherwise determined by a qualified biologist. Any encroachment into the buffer area around the known nest shall only be allowed if the biologist determines that the proposed activity will not disturb the nest occupants. Construction can proceed when the qualified biologist has determined that fledglings have left the nest and the nest is determined to be inactive.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
MM-BIO-4: Should any construction activity occur during the seven days prior to the onset of construction activities durin shall survey within 500 feet of the project impact area for the special status). Any nest found during survey efforts shall be nests are found, no further mitigation would be required. If the active site shall be protected until nesting activity has en the California Fish and Game Code. To protect any nest site, t are required until nests are no longer active as determined be established within a 500-foot buffer around any occupied n biologist, and (2) access and surveying shall be restricted within determined by a qualified biologist. Any encroachment into be allowed if the biologist determines that the proposed Construction can proceed when the qualified biologist has det  MM-BIO-5: A preconstruction burrowing owl survey shall be verify the presence or absence of the owl on the project site activities, a qualified biologist shall survey within 500 feet of the burrows. Any active burrow found during survey efforts shall the surveys shall be provided to the City of Riverside. If no a required. If burrowing owls are found onsite during the 30-d will notify the Wildlife Agencies, the City of Riverside, and the Owl Protection and Relocation Plan in conjunction with and a disturbance. If nesting activity is present at an active burrow activity has ended to ensure compliance with Section 3503.5 activity for burrowing owl in the region normally occurs betourrow, the following restrictions to construction activities shall active burrow, unless otherwise determined by a qualified restricted within 300 feet of any active burrow, unless otherwise determined by a qualified restricted within 300 feet of any active burrow, unless otherwise determined by a qualified process activity will not disturb the occupants. A Bube approved by USFWS and CDFW before construction can of found.	g the raptor of presence of a mapped on nesting activity ded to ensure the following by a qualified est, unless of the buffer and activity with the project site be mapped of the burrow ay preconstructive burrow by w, the active all be required by the established biologist, an erwise determined that the project site of the California berequired by the stablished biologist, an erwise determined that the project site of the california burrow and the calif	nesting season any active rap the constructive ity is present at e compliance verstrictions to biologist: (1) otherwise determined around the ll not disturb the fledglings have the for the present the construction survey, diately and will the Wildlife Against Site shall be promise its hand and August. It within a 500-d (2) access a mined by a que allowed if the Protection and and and and and a que allowed if the Protection and and and and a que allowed if the Protection and and and and a que allowed if the Protection and and and and and a que allowed if the Protection and and and and and and and and and an	n, a qualified of the nests (colon plans. If it any raptor with Section construction clearing limit rmined by a nest, unless known nest the nest of a grading onset of colon plans. If develop a light of the project plans is a further mithe project plans. If develop a light of the project plans is a further mithe project plans is a further mithe project plans. If develop a light of the project plans is a further mithe project plans is a further mithe project plans is a further and surveying a further and su	d biologist ommon or no active nest site, 2503.5 of activities its shall be a qualified otherwise shall only occupants. st.  permit to active owl Results of tigation is proponent Burrowing re ground till nesting it. Nesting the active ger active round any g shall be gist. Any etermines Plan must
MM-BIO-6: If construction is to occur during the MBTA nesting days prior to the onset of construction activities during the MB the project area for any birds protected by the MBTA. The bid held global positioning system (GPS) and a 300-foot buffer will raptor nest, in which case a 500 foot buffer will be required. On the buffer areas while the nest remains active (e.g., has eggs of the system).	BTA nesting cologist must nust nust nust nust nust nust nust n	ycle, a qualified hap active bird around the ne activity shall no	d biologist sh nests utilizin st, unless th	nall survey ng a hand- e nest is a
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?

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

4b. Response: Source: General Plan 2025, prepared by City of Riverside, November 2007; General Plan 2025 Final Program Environmental Impact Report, prepared by City of Riverside, November 2007; Habitat Assessment Including the Results of a Focused Burrowing Owl Survey, a Focused Least Bell's Vireo Survey, DBESP, and MHSCP Consistency Analysis TM 37177, City of Riverside, Riverside County, California, USGS 7.5-minute topographic Riverside East Quadrangle, Township 3 South, Range 5 West, portion of Section 14, prepared by Gonzales Environmental Consulting LLC, December 2018; and, Delineation of Waters of the United States and Department of Fish and Wildlife Jurisdiction Habitats for TM37177, prepared by Gonzales Environmental Consulting, LLC, September 12, 2018.

**Less Than Significant Impact With Mitigation.** As set forth in the DBESP, the Project site includes 1.828 acres of *Salix gooddingii* Riparian Woodland and 0.581 acres of riverine habitat. The vast majority of the riparian habitat (*Salix gooddingii* Riparian Woodland), 1.723 acres, will be conserved on site. Pursuant to Mitigation Measure BIO-1, a conservation easement shall be recorded for the on-site conserved riparian habitat.

The Project will impact 0.105 acres of riparian habitat and 0.462 acres of riverine habitat as a result of lot and internal road grading. Section 6.1.2 of the MSHCP describes the process through which protection of riparian and riverine areas would occur within the MSHCP Plan Area. It provides that where, as here, avoidance of direct impacts to riparian and riverine habitat is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian and riverine habitats and associated functions to the greatest extent possible shall be selected. Here, this is achieved through MM-BIO-1, which protects the vast majority of riparian habitat. Section 6.1.2 further provides that any impacts to riparian or riverine habitat shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced pursuant to the DBESP process. Here, the DBESP process has been completed, and the Wildlife Agencies determined that with the incorporation of MM-BIO-2, the Project is biologically equivalent or superior to the existing condition. Specifically, MM-BIO-2 mitigates the Project's impacts to riparian and riverine habitat by providing for participation in an in-lieu fee program or, alternatively, through a Habitat Mitigation and Monitoring Plan at a minimum 3:1 mitigation to impact ratio. Because the Project site falls within the MSHCP, and because the Wildlife Agencies have agreed that with MM-BIO-2, the Project would be biologically equivalent or superior, the Project's impacts on riparian and riverine habitat is less than significant with the incorporation of mitigation.

Moreover, in addition to this mitigation, the Project will require approval of the following regulatory permits related to impacts to riverine and riparian habitat:

- 1. Approval of a Streambed Alteration Agreement (SAA) from CDFW under Section 1600 of the California Fish and Game Code (GFGC);
- 2. Approval of a 401 Water Quality Certification will be required from RWQCB to fulfill requirements of Section 401 of the CWA; and,
- 3. Approval of a permit from USACE under the requirements of Section 404 of the CWA.

Compliance with the regulatory requirements of Section 1600 of the CFGC; Section 401 Water Quality Certification; and Section 404 of the CWA will further ensure less than significant impacts. For all of the foregoing reasons, the Project's impacts on riparian and riverine habitat is less than significant with the incorporation of mitigation.

For the foregoing reasons, the construction and operation of the proposed project will have a **less than** significant impact with mitigation on any riparian habitat or other sensitive natural community identified in

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
local or regional plans, policies, regulations or by the Californi Wildlife Service.	a Departmen	•	/ildife or U.S	. Fish and
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: General Plan 2025, prepared by 2025 Final Program Environmental Impact Report, Habitat Assessment Including the Results of a Focu Vireo Survey, DBESP, and MHSCP Consistency Analy California, USGS 7.5-minute topographic Riverside E portion of Section 14, prepared by Gonzales E Delineation of Waters of the United States and Dep for TM37177, prepared by Gonzales Environmental	, prepared b sed Burrowi ysis TM 3717 ast Quadran invironment partment of l	y City of Rive ng Owl Survey 7, City of Rive gle, Township al Consulting Fish and Wildli	rside, Nover , a Focused rside, Rivers 3 South, Rai LLC, Decen fe Jurisdiction	mber 2007; Least Bell's ide County, nge 5 West, nber 2018;
<b>Less Than Significant Impact With Mitigation</b> . The Project w federally protected wetlands with the incorporation of mitig was prepared for the proposed project, and the study determine Riparian Woodland (wetlands) on the project site.	gation. A juri	isdictional/wet	lands deline	ation study
As noted above, the vast majority of the <i>Salix gooddingii</i> Rip site. Pursuant to Mitigation Measure BIO-1, a conservation eariparian habitat.				
The jurisdictional/wetlands delineation study determined that <i>Salix gooddingii</i> Riparian woodland and 0.462 acres of riverine As discussed above, however, the DBESP process has been confided that, with implementation of MM-BIO-2, the Project with project impacts. Therefore, the project will replace lost fur equivalent or superior" project in compliance with the MSHCP complies with State and Federal laws and regulations.	e habitat as a ompleted for ould support octions and v	result of lot ar the Project, ar t equal or supe alues, and is co	d internal rond the Wildli rior values a ensidered a "	bad grading. fe Agencies s compared biologically
Therefore, the proposed project would have a <b>less than sig</b> waters and wetlands directly, indirectly, and cumulatively.	gnificant imp	act with mitig	<b>gation</b> on ju	risdictional
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: General Plan 2025, prepared by 2025 Final Program Environmental Impact Report, Habitat Assessment Including the Results of a Focus	prepared by	y City of River g Owl Survey a	side, Noven nd MHSCH C	nber 2007; Consistency

INFORMATION SOURCES):	Potentially	Less Than	Less Than	No		
	Significant	Significant	Significant	Impact		
	Impact	With	Impact			
		Mitigation Incorporated				
Piverside Fast Quadranale Townshin 3 South Re	inge 5 West	· ·	ction 14 nr	enared by		
Riverside East Quadrangle, Township 3 South, Range 5 West, portion of Section 14, prepared by Gonzales Environmental Consulting LLC, September 12, 2018.						
Less Than Significant Impact With Mitigation. The proposed with the General Plan 2025. The proposed project will not conf with efforts to establish a wildlife movement corridor betwee Springs Mountain Regional Park as shown on the MSHCP. New provide for the corridor and Caltrans shall be encouraged to because the project site is not located between Sycamore CRegional Park.	flict with Genden en Sycamore w developme to provide ar	eral Plan 2025 Canyon Wildents in this area n underpass at	Policy OS-6.4 erness Park a shall be cor t the 60/215	("Continue and the Box nditioned to Freeway")		
Impacts to wildlife species are considered significant if they 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. Here, the proposed project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established wildlife corridors for multiple reasons. Notably, the project site is not within any wildlife corridor. To the contrary, the project site is already substantially surrounding by development, as land immediately adjacent to the site's northern, eastern, and western boundaries is improved with residential properties. Moreover, the proposed project will not impede the use of native wildlife nursery sites. As discussed in Section 4.a above, Mitigation Measures BIO-3 through BIO-6 have been incorporated into the Project, and these mitigation measures each require pre-construction surveys to ensure that the Project will not adversely impact native wildlife nursery sites.  For the foregoing reasons, the project will have a less than significant impact with mitigation directly, indirectly, and cumulatively relating to impacts to the movement of any native resident or migratory fish or wildlife species or the establishment of native resident or migratory wildlife corridors or impede the use of native wildlife nursery						
and cumulatively relating to impacts to the movement of any or the establishment of native resident or migratory wildlife co	native reside	ent or migrator	y fish or wild	dlife species		
and cumulatively relating to impacts to the movement of any	native reside	ent or migrator	y fish or wild	dlife species llife nursery		

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 (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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
Association, and the American National Standards Institute. $$ Trequired to be in compliance with the Manual when planting a				jects will be
Therefore, the proposed project would have a <b>less than sig</b> policies or ordinances protecting biological resources and s indirectly, and cumulatively.	-		•	
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: General Plan 2025, prepared by 2025 Final Program Environmental Impact Report, Habitat Assessment Including the Results of a Focus	, prepared b	y City of Rive	rside, Nove	mber 2007;
Analysis TM 37177, City of Riverside, Riverside C	County, Calif	ornia, USGS 7	'.5-minute t	opographic
Riverside East Quadrangle, Township 3 South, Ra	nge 5 West,	portion of Se	ection 14, p	repared by
Gonzales Environmental Consulting LLC, September	12, 2018.			
Less Than Significant Impact. The proposed project will not of Conservation Plan, Natural Community Conservation Plan, or Conservation Plan. An assessment was prepared by a qualified project is consistent with the guidelines of the MSHCP, including Urban/Wildlife Interface, and related policies in the General proposed project does not adversely affect the Reserve Assem is not located within a criteria cell. Additionally, the project Plan Policy OS-5.3. Accordingly, the proposed project will have	other appro biologist for uding Section Plan 2025, in bly goals of t is consistent	oved local, reginate proposed proposed proposed proposed for the following policy the MSHCP, and with the SKR	onal, or state project. The ines Pertain LU-7.4. No I the propose HCP and wit	te Habitat proposed ing to the tably, the ed project
5. CULTURAL RESOURCES. Would the project:				1
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 Figure 5.5-1 Prehistoric Cultural Resources Sensitivity; Appending Resources Survey prepared by Brian F. Smith and Resources Assessment with Confidential Appending Associates, Inc., March 8, 2018 and revised May 3, 2  Less than Significant Impact. The proposed project will not cause of a historical resource. CEQA defines a "historical resource following criteria: (1) is listed in, or determined eligible for listing (California Register); (2) is listed in a local register of historical resource Section 5020.1(k); (3) is identified as significant in a historical resource Section 5024.1(g); or (4) is determined to be a historical resource.	dix D - Cul Associates, In a for TR 371 2019). Use a substante" as a resound ing in, the Califesources as deresource surres	tural Resource oc., October 12 77, prepared tial adverse chaurce that mee fornia Register lefined in Publi vey meeting th	es Study and 2, 2017; and by Brian F. ange in the sts one or mof Historical contracts are requirements.	A Cultural Smith and Significance fore of the Resources Code (PRC) ents of PRC
and State CEOA Guidelines Section 15064 5(a)\ A "substantial"	adverse chan	ge" to a histori	ical resource	according

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

to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

The proposed project is located on a site where no significant historical resources exist as defined in Section 15064.5 of the CEQA Guidelines. The project site contains approximately 34.6 acres of moderately disturbed, undeveloped land composed of primarily low to moderate quality Riversidean sage scrub and non-native grassland. Mildly rolling hills form the site's topography. The project site contains evidence of previous site disturbance caused by grazing practices and human activities such as off-road vehicle use, recreational activities, and trash dumping.

A review of historic aerial photographs indicates that no structures have ever been located on the property. The aerial photographs show that the property has been partially dry-farmed since the 1940s. The 1948, 1966, and 1967 aerial photographs of the project site show the area as disked and being utilized for agriculture. The aerial photographs from 1966 and onward show development in the surrounding areas as Alessandro and Arlington Heights were subdivided for the construction of single-family residential homes.

A cultural resource assessment was prepared for the project site by Brian F. Smith and Associates, Inc., March 8, 2018 and revised May 3, 2019. The assessment for the project site consisted of an institutional records search; pedestrian survey by qualified archaeologists; a testing and evaluation program; and, preparation of a technical report. The assessment conformed to the City's Cultural Resources Ordinance; the statutory requirements of CEQA, Section 15064.5; and, the Secretary of the Interior Standards and Guidelines. The cultural resource assessment found four (4) previously recorded bedrock milling sites (RIV-3580, RIV-3581, RIV-3594, and RIV-3595) and two (2) refuse deposits (RIV-7754 and RIV-7756) on the project site, none of which qualify as a historical resource under CEQA. None of the milling sites and neither of the refuse deposits are listed in, or are eligible to be listed in, California Register or a local register of historical resources. And, none of the milling sites or refuse deposits, (1) are associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) are associated with the lives of persons important in our past; (3) embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual; (4) possess high artistic values; or (5) have yielded, or may be likely to yield, information important to prehistory or history.

The first of the refuse deposits, RIV-7754, is a small trash deposit containing refuse that primarily dates from the mid- to late-twentieth century. Subsurface investigations of the site did not reveal any substantial or significant deposit of historic artifacts. Accordingly, because the site lacks unique elements, the site does not qualify as a historic resource under CEQA and would not qualify for local City of Riverside listing, the California Register, or the National Register of Historic Places (National Register). The site is not associated with specific elements of the City's culture, important individuals, or events. The lack of any associated artifacts and the documentation of the common site type indicates that the site does not represent a distinctive characteristic, work of a notable builder, or a cultural landscape; does not possess high artistic values; and is not the last remaining or best example of its kind. Moreover, RIV-7754 has not yielded and is not likely to yield any new information important to history or prehistory. The level of information already obtained from the site, including documentation of boundaries, collection of a sample of artifacts, and dating analysis of recovered artifacts, has exhausted its research potential. For all of the foregoing reasons, RIV-7754 does not qualify as a historic resource under CEQA and impacts to RIV-7754 thus will not result in a significant impact to historic resources.

The second of the refuse deposits, RIV-7756, is a trash deposit containing refuse that primarily dates from the mid-1920s to the 1950s. Like RIV-7754, because RIV-7756 lacks unique elements, the site does not qualify as a historic resource under CEQA and would not qualify for local City of Riverside listing, the California Register, or

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
the National Register. Moreover, for the same reasons RIV-CEQA, RIV-7756 similarly does not qualify as a historic resource result in a significant impact to historic resources.  Furthermore, as discussed further in Section 5b below, the r	e under CEQA ecorded bedr	and impacts to	o RIV-7754 th	nus will not
RIV-3594, and RIV-3595) do not qualify as a historic resource impacts to these sites will thus not result in a significant impa	ct to historic	resources.		
For all of the foregoing reasons, the proposed project has <b>le</b> cumulatively to historical resources pursuant Section 15064.5	_	•	•	•
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 or 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 D — Cultural Resources Study and Cultural Resources Survey prepared by Brian F. Smith and Associates, Inc., October 12, 2017;;and, A Cultural Resources Assessment for TR 37177, prepared by Brian F. Smith and Associates, Inc., March 8, 2018 and revised May 3, 2019).

**Less Than Significant Impact With Mitigation.** The proposed project will not cause a substantial adverse change in the significance of any known unique archaeological resource. Absent mitigation, however, grading associated with the proposed project may have a potential impact on unidentified, unknown archaeological resources that could potentially exist below the surface of the project site. Mitigation Measures CUL-1 through CUL-6 below would reduce this potential impact to a level of less than significant.

State CEQA Guidelines section 15064.5, "[i]f an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment." (State CEQA Guidelines, § 15064.5, subd. (c)(4); see also Pub. Resources Code, § 21083.2.) CEQA defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person. (Pub. Resources Code, § 21083.2, subd. (g).)

Here, a Cultural Resource Assessment was prepared for the project site by Brian F. Smith and Associates, Inc., March 8, 2018 and revised May 3, 2019. The Cultural Resource Assessment analyzed four (4) previously recorded bedrock milling sites (RIV-3580, RIV-3581, RIV-3594, and RIV-3595) and two (2) refuse deposits (RIV-7754 and RIV-7756) on the project site. A Phase II significance testing and evaluation program of all six (6) sites was accomplished on July 17, 2017 and between January 3 and 16, 2018. Because none of the sites produced any significant archaeological deposits, all six were determined to lack significance under the criteria set forth by the City of Riverside, in CEQA, and in the NHRP.

None of the bedrock milling sites and neither of the refuse deposits qualify as a "unique archaeological resource" under CEQA. The two (2) refuse deposits do not qualify as a historic resource or an archaeological resource and are thus not CEQA-significant, as further discussed above in Section 5a. The four bedrock milling sites similarly do not to qualify as a historic resource or unique archaeological resource under CEQA. Based on surface and

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No	
INFORMATION SOURCES):	Significant	Significant	Significant	Impact	l
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subsurface inspections, no artifacts were observed in the area of any of the milling sites. The lack of any artifacts associated with the milling sites indicates that the sites lack research potential and do not contain information needed to answer important scientific research questions. Moreover, the sites are not associated with specific elements of the City's culture, important individuals, or events, nor are they associated with events that made a significant cultural contribution to the broad patterns of California's history and cultural heritage. The lack of any artifacts associated with the site and the documentation of the common site type indicates that the milling sites do not represent a distinctive characteristic, the work of a notable builder, high artistic values, a cultural landscape, a last remaining example, or a best available example. Again, because no artifacts are associated with the milling sites, the sites have not yielded and are not likely to yield any new information important to history or prehistory. The level of information already obtained from the sites, including documentation of boundaries and the milling features, have exhausted the sites' research potential. Moreover, the bedrock milling sites are not unique or exceptional within the City of Riverside. Bedrock milling feature sites like RIV-3580, RIV-3581, RIV-3594, and RIV-3595 are common to the Riverside area and represent the expedient utilization of natural features by the prehistoric inhabitants. Moreover, the integrity of each of these sites appears to have been impacted by past use For all of the foregoing reasons, the milling sites do not qualify as historical or unique archaeological resources under CEQA and impacts to these sites will thus not result in a significant impact to historic or archaeological resources.

While the milling sites do not qualify as Historical Resources on Unique Archaeological Resources under CEQA and site-specific mitigation measures are not required under CEQA, consultation with California Native Tribes did occur to evaluate the proposed project's potential impact pursuant to AB 52. The City commenced tribal notification in accordance with AB 52 on November 15, 2016. Four California Native American tribes (San Manuel Band of Mission Indians, Gabrieleno Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and Pechanga Temecula Band of Luiseño Indians) responded as part of the AB 2 consultation effort. San Manuel Band of Mission Indians and Gabrieleno Band of Mission Indians had no comments. The Agua Caliente Band of Cahuilla Indians, and Pechanga Temecula Band of Luiseño Indians requested Government to Government consultation. Consultation with Agua Caliente Band of Cahuilla Indians occurred on February 28, 2017 and consultation concluded on June 28, 2018. Consultation with Pechanga Temecula Band of Luiseño Indians occurred on January 18, 2017 and consultation concluded on May 28, 2019.

A site visit was conducted on July 11, 2017, which included representatives from the Pechanga Band of Luiseño Mission Indians, the City of Riverside, the applicant, the project engineer, and the archaeologist. The goal of the meeting was to provide the representatives of the Pechanga Band and the City of Riverside an opportunity to review the property and observe the identified milling sites, as well as to provide input and recommendations with regards to the milling sites identified within the project area. As a result of the meeting, the original project design was modified to include the open space parcel identified as Lot B for the preservation and protection of the largest concentration of bedrock milling features found within the project area. Specifically, this modification seeks to preserve and protect the largest concentration of bedrock milling features within the project area found at Site RIV-3581. The applicant additionally agreed to make reasonable efforts to relocate the remaining bedrock milling features at Site RIV-3581, as well as those from sites RIV-3580, RIV-3594, and RIV-3595 that are within the grading envelope to Lot B, where they will be preserved as well. Ultimately, every effort will be made to relocate the bedrock milling features that are outside of Lot B, but if relocation is not feasible, the features will be removed as part of the grading process. All relocation work shall be directed by an archaeological monitor and a Native American representative. The relocated bedrock milling features should be mapped using a Trimble GeoXT Global Positioning System (GPS) unit equipped with TerraSync software and these locations will be recorded on site maps, which will be filed with the updated site forms submitted to the Eastern Information Center (EIC) at the University of Riverside (UCR)

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
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While no occurrence of unique archaeological resources as defined under State CEQA Guidelines section 15064.5 exists on the project site, based on the consultation effort with the Tribes, a potential for such resources existing below the surface of the project site cannot be discounted. At the request of the consulting Tribes, the following measures have been identified to address any potential impact to undiscovered, buried unique archaeological resources:

### MM-CUL-1

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 interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City and interested 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 Applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the Project site if the site design and/or proposed grades should be revised.

#### MM-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 interested 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 rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;
  - 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. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and
  - e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-6.

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
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- **MM-CUL-3** Relocation of Resources: All relocation of resources previously identified for relocation shall be directed by the project archaeologist and Native American Tribal Monitors from consulting tribes.
- MM-CUL-4 Relocated Resource Mapping: The relocated bedrock milling features shall be mapped using Trimble GeoXT Global Positioning System (GPS) unit equipped with TerraSync software. These locations shall be recorded on site maps and filed with the updated site forms submitted to the Eastern Information Center (EIC) at the University of Riverside (UCR).
- MM-CUL-5 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:
  - Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the Project Archaeologist. The removal of any artifacts from the Project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and
  - 2. 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 & Economic Development Department with evidence of same:
    - Accommodate the process for onsite 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;
    - b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would 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;
    - c. If more than one Native American tribe or band is involved with the Project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center by default; 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

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
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training for the construction	n staff held du	uring the requi	ired pre-grad	de meeting
and, in a confidential appen	dix, include th	e daily/weekly	/ monitoring	notes from
the archaeologist. All reports	produced wil	I be submitted	to the City o	of Riverside
Eastern Information Center a	and interested	tribes.		
to be followed during ground disturbance in sensitive a unanticipated resources are discovered. Only construction pe construction and disturbance activities in sensitive areas. A	reas and pro	tocols that ap nave received t	oply in the his training c	event that an conduct
to be followed during ground disturbance in sensitive a unanticipated resources are discovered. Only construction per construction and disturbance activities in sensitive areas. A included in the Phase IV Monitoring Report.  For all of the foregoing reasons, the proposed project would	reas and pro- rsonnel who h sign-in sheet have a less th	tocols that appared to the for attendees and significant	oply in the his training cof this traini	event that an conduct ng shall be
contractors to provide Cultural Sensitivity Training for all cons to be followed during ground disturbance in sensitive a unanticipated resources are discovered. Only construction per construction and disturbance activities in sensitive areas. A included in the Phase IV Monitoring Report.  For all of the foregoing reasons, the proposed project would relating to archeological resources under State CEQA Guideling to archeological resources under State CEQA Guideling to the formal cemeteries?  5c. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archive areas)	reas and pro- resonnel who had sign-in sheet have a less the nessection 15	tocols that appared to the for attendees an significant 064.5.	oply in the his training cof this trainining cof this traininininininininininininininininininin	event that an conduct ng shall be mitigation

Cultural Report, the site was mostly used as ephemeral milling sites and thus there is no probable likelihood of Native American human remains within the proposed project site.

In the unlikely event that Native American human remains are inadvertently discovered during project-related construction activities the steps and procedures specified in Health and Safety Code 7050.5, State CEQA Guidelines 15064.5(e), and Public Resources Code 5097.98 would be implemented. In accordance with Public Resources Code (PRC) Section 5097.98, the Riverside County Coroner would be notified within 24 hours of the discovery of potential human remains. The Coroner would then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with PRC Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification. Whenever the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the MLD and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

	UES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
the	With compliance with State law, and given that there is no evidence that there are human remains at the site, the project will have <b>less than significant impact</b> directly, indirectly, or cumulatively related to human remains. No mitigation is required.						
6.	ENERGY. Would the project:						
	a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?						

6a. Response: (Source: General Plan 2025; California Energy Commission, Total System Electric Generation (2017), www.energy.ca/gov).

**Less Than Significant Impact.** The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resourced during project construction or operation.

<u>Construction:</u> Electricity demand during construction of the proposed project will be temporary, nominal, and will cease upon the completion of construction. Electricity will be supplied through existing power lines near the project site. Construction activities will require limited energy consumption and are not expected to have an adverse impact on available energy supplies and infrastructure. Natural gas typically is not consumed during construction. Construction impacts associated with the installation of natural gas connections will be confined to trenching in order to place the lines below surface. By coordinating with the gas company to identify locations and depths of all existing gas lines, the project will not disrupt local gas service. While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. The proposed project would have a **less than significant impact** directly, indirectly, or cumulatively related to electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during construction. No mitigation is required.

Operation: According to the CalEEMod data provided in the Air Quality Report (Vista Environmental, 2016), operation of the proposed project will use 368,623 kilowatt-hours per year of electricity. It should be noted that the proposed project must comply with all Federal, State, and City requirements related to the consumption of electricity, including California Code of Regulations Title 24, Part 6 energy efficiency standards for residential buildings. These standards require energy efficiency measures to be incorporated into the proposed homes, and require all new homes constructed after January 1, 2020 to include photovoltaic solar panels on the roofs. It is anticipated the proposed project will be designed and built to minimize electricity use, and that existing and planned electricity supplies would be sufficient to support the projected electricity demand. According to the CalEEMod model run provided in the Air Quality Report (Vista Environmental, 2016), operation of the proposed project would utilize 1,621 million British thermal units (BTU) of natural gas per year. The proposed project will be designed and built to minimize natural gas use, and existing and planned natural gas supplies will be sufficient to support the proposed project's natural gas demand. According to the CalEEMod model run provided in the Air Quality Report (Vista Environmental, 2016), operation of the proposed project would generate 1,557,050 vehicle miles traveled per year. According to the EMFAC2017 model, the fleet average miles per gallon rate for all vehicles in Southern California in the year 2020 is anticipated to be 24.6 miles per gallon. Based on this rate, operation of the proposed project would use 63,295 gallons of transportation fuel per year. It should be noted that the proposed project would comply with all Federal, State, and City requirements related to the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant	Less Than Significant	Less Than Significant	No Impact		
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		Incorporated				
consumption of transportation energy, including California Co Building Standards that require all new homes to include a ded	icated circuit	in the garage t	o be utilized	for electric		
car charging. It is anticipated the proposed project will be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned						
capacity and supplies of transportation fuels would be sufficie		•	_	•		
proposed project would have a less than significant impact di						
supply and infrastructure capacity energy resources during op	•	•	•	0,		
<ul> <li>b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</li> </ul>						
6b. Response: (Source: General Plan 2025; California Ene		sion, Total Syst	tem Electric	Generation		
(2017), www.energy.ca/gov, Green Riverside Action	n Plan).					
<b>No Impact.</b> The applicable renewable energy or energy efficient Action Plan. The proposed project would comply with the Giphotovoltaic solar panels, which is also a regulatory requirement.	reen Riversio	le Action Plan	through ins	tallation of		
standards for residential buildings. The proposed project w renewable energy or energy efficiency based on the informat	ould not cor	nflict with any	state or loc	al plan for		
have <b>no impact</b> directly, indirectly, or cumulatively related to energy efficiency. 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 I	ault Zones; G	eneral Plan	2025 FPEIR		
Appendix E – Geotechnical Report; Preliminary Geo		-				
Kunny Ranch, City of Riverside, California, Leighton			•	-		
Infiltration Feasibility Report by Aragon Geotechnic Evaluation by Aragon Geotechnical, Inc dated Nove		•		avatability		
Evaluation by Aragon Geotechnical, inc dated Nove	ilibel 10, 201	is, Kiversiae C	ounty Gisj			
No Impact. Seismic activity is to be expected in Southern Calif	ornia. In the	City of Riversid	e, there are	no Alquist-		
Priolo zones. The project site does not contain any known faul		•	•			
shaking is low. Compliance with the California Building Code	_	vill ensure that	t no impacts	related to		
strong seismic ground will occur directly, indirectly and cumul	latively.					
ii. Strong seismic ground shaking?			$\boxtimes$			
7ii. Response: (Source: General Plan 2025 FPEIR Ap Geotechnical Investigation Tentative Tract No. 33028	-		-	-		

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
	Impact	With	Impact	
		Mitigation		
		Incorporated		
April 8, 2005; TR 37177 WQMP Infiltration Feasibility		•		-
2018; TR 37177 Limited Excavatability Evaluation by A Riverside County GIS)	ragon Geote	cnnicai, inc aa	tea Novemb	er 10, 2015;
Riverside County disj				
Less than Significant Impact. The San Jacinto Fault Zone loca	ated in the no	ortheastern po	rtion of the	City or the
Elsinore Fault Zone located in the southern portion of the Cit	y's Sphere of	Influence have	the potenti	al to cause
moderate to large earthquakes that would cause intense gro	_	•		-
comply with California Building Code regulations, impacts a		_	-	_
have a <b>less than significant impact</b> directly, indirectly, or cum	iulatively rela	ted to strong s	eismic grour	nd shaking.
No mitigation is required.				
iii. Seismic-related ground failure, including			$\square$	$\overline{}$
liquefaction?				
7iii. Response: (Source: General Plan 2025 Figure PS-1	– Reaional Fo	ault Zones: Fia	ure PS-2 – L	iauefaction
Zones; Figure PS-3 – Soils with High Shrink-Swell	_			
Geotechnical Report; Preliminary Geotechnical Inve			-	-
Leighton and Associates, Inc. dated April 8, 2005;	TR 37177 W	QMP Infiltratio	on Feasibility	Report by
Aragon Geotechnical, Inc dated July 31, 2018; TR 3	7177 Limited	Excavatabilit	y Evaluation	by Aragon
Geotechnical, Inc dated November 10, 2015; Rivers	ide County G	IS).		
Lass Theor Circuitionant Insurant Assembling to Dispuside Country	/- CIC!:-			<b>c</b>
<b>Less Than Significant Impact.</b> According to Riverside County moderate liquefaction potential. The proposed project would				
in accordance with the recommendations of the soils report. 1		•		
to liquefaction. The incorporation of recommended design i				
regulations will ensure that impacts related to seismic-related				
significant directly, indirectly, and cumulatively. No mitigation	-			
iv. Landslides?				
7iv. Response: (Source: General Plan 2025 FPEIR Figure		•		
E - Geotechnical Report, Title 18 - Subdivision C	-	_		
Pollution Prevention Plan SWPPP and Preliminary	•	•		
33028 Kunny Ranch, City of Riverside, California, Le	ignton ana A	ssociates, inc.	April 8, 2003	5).
Less Than Significant Impact. The project site and its surrou	ndings have a	generally flat t	opography a	nd are not
located in an area prone to landslides per Figure 5.6-1 of the				
the proposed project will have a less than significant directly		_		· .
No mitigation is required.				
b. Result in substantial soil erosion or the loss of topsoil?				
7b. Response: (Source: General Plan 2025 FPEIR Figure		-		_
4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subd			_	
Water Pollution Prevention Plan SWPPP and Prelin	-		_	
No. 33028 Kunny Ranch, City of Riverside, Californ			•	
37177 WQMP Infiltration Feasibility Report by Arag Limited Excavatability Evaluation by Aragon Geot			•	-
County GIS).	common, mic	aatta HUVEIII	JUI 10, 2010	,, mvcisiae
County GIS).				

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No		
INFORMATION SOURCES):	Significant	Significant	Significant	Impact		
	Impact	With	Impact	ı		
		Mitigation				
		Incorporated				
<b>Less Than Significant Impact.</b> The proposed project would n						
topsoil. State and Federal requirements call for the preparation	•					
Prevention Plan (SWPPP) establishing erosion and sediment						
project must comply with the National Pollutant Discharge Eli			_			
with the erosion control standards for which all development	•		• •	•		
(Title 17) requires the implementation of measures designed			•			
and Federal requirements as well as with Title 18 and 17 will e <b>than significant impact</b> directly, indirectly, or cumulatively.	nsure that so	on erosion or io	ss or topson	will be less		
than significant impact directly, indirectly, or cumulatively.						
c. Be located on a geologic unit or soil that is unstable,			$\boxtimes$			
or that would become unstable as a result of the						
project, and potentially result in on- or off-site				<u> </u>		
landslide, lateral spreading, subsidence, liquefaction				<u> </u>		
or collapse?						
7c. Response: (Source: General Plan 2025 Figure PS-1 -	Regional Fa	ult Zones; Figi	ure PS-2 – L	iquefaction		
Zones; General Plan 2025 FPEIR Figure PS-3 – Soils wit	th High Shrin	k-Swell Potent	ial; Figure 5	.6-1 - Areas		
Underlain by Steep Slope; Figure 5.6-4 – Soils; Table 5.	6-B – Soil Typ	es; Appendix E	– Geotechn	ical Report;		
Preliminary Geotechnical Investigation Tentative To	ract No. 330	028 Kunny Ra	nch, City o	f Riverside,		
California, Leighton and Associates, Inc. April 8, 2005;		-				
Aragon Geotechnical, Inc dated July 31, 2018; TR 37		-		by Aragon		
Geotechnical, Inc dated November 10, 2015; Riverside	County GIS;	NRCS Soil Sur	vey.)			
Less Than Significant Impact. The proposed project is not loo	satod on a go	ologic unit or	coil that ic u	nctable or		
that would become unstable as a result of the project, and	_					
proposed project could potentially result in an on- or off-site la			•	•		
or collapse.	iasiiae, iatei	ar spreading, se	ibbiacrice, iii	factaction,		
or conapse.						
The proposed project site contains approximately 34.6 ac	res of mode	erately disturb	ed, undevel	oped land		
composed of primarily low to moderate quality Riversidean sa	age scrub and	d non-native g	rassland. M	ildly rolling		
hills form the site's topography. Leighton's 2005 Geotechnica	l Investigatio	n indicates tha	nt onsite soil	s possess a		
very low to low expansion potential. Therefore, the propose			_	•		
directly, indirectly, or cumulatively related to location on a go	_					
become unstable as a result of the project, and potentially re		or off-site lands	slide, lateral	spreading,		
subsidence, liquefaction or collapse. No mitigation is required	•					
d. De legated on expansive sail as defined in Table 10.1			$\square$			
d. Be located on expansive soil, as defined in Table 18-1-			$\boxtimes$			
B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				İ		
· · · ·	E 6 1 Soils	Figure F 6 A	Soils Table	E G D Soil		
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 E – Geotechnical Report;						
California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside						
Municipal Code; Preliminary Geotechnical Investiga			-			
of Riverside, California, Leighton and Associates,			-			
Feasibility Report by Aragon Geotechnical, Inc date	-			-		
Evaluation by Aragon Geotechnical, Inc dated Nove	•					
			•			

ISSUES (AND SUPPORTING Potentially			Less Than	No			
INFORMATION SOURCES):	Significant	Significant	Significant	Impact			
	Impact	With	Impact				
		Mitigation Incorporated					
Less Then Cignificant Impact. The proposed project will not be	o located on	•	Assording t	a the NDCC			
<b>Less Than Significant Impact.</b> The proposed project will not b Soil Survey, the subject site largely consists of sandy loam s		-	_				
	preliminary soils report prepared for the project site indicates that the soil onsite possesses a very low to low						
expansion potential, with Expansion Indices ranging from 0 to 22. Localized deposits of expansive soil may be							
encountered during grading, particularly in the drainage areas	of the projec	t site. Complia	nce with the	applicable			
provisions of the City's Subdivision Code - Title 18 and the C		_	-				
related to the expansive soils will ensure a less than significant	•						
have a <b>less than significant impact</b> directly, indirectly, or cum	ulatively rela	ted to expansiv	e soil. No m	litigation is			
required.							
e. Have soils incapable of adequately supporting the use				$\square$			
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, a	nd the			
Tentative Map of Tract No. 37177).							
<b>No Impact.</b> The proposed project will be served by municipal s	•						
or use of septic tanks or alternative waste water disposal systems at disposal size of the college of the second state of the second size of the s							
<b>impact</b> directly, indirectly, or cumulatively related to soils inc tanks or alternative waste water disposal systems. No mitigation	•		orting the us	se or septic			
tanks of alternative waste water disposar systems. No fininga	tion is require	zu.					
f. Directly or indirectly destroy a unique paleontological			$\boxtimes$				
resource or site or unique geologic feature?							
7f. Response: (Source: General Plan 2025 Policy HP-1.3	)						
Less than Significant Impact. The proposed project will not dir	•			_			
resource or site or unique geologic feature. While the pro							
construction and earth-disturbing that could potentially dar	-	•					
would not result in damage or destruction to any unique parties. During construction and earth-disturbing activiti	•		•	0 0			
accordance with standard City procedures in the unlikely eve				-			
Specifically, the contractor would be required to halt work i	•	•					
professional paleontologist to examine the materials to dete							
resource. If this determination is positive, the scientifically co	nsequential	information w	ould be fully	recovered			
by the paleontologist consistent with standard City protoc		• •					
significant impact directly, indirectly, or cumulatively on a unique paleontological resource or site or unique							
geologic feature. No mitigation is required.							
8. GREENHOUSE GAS EMISSIONS.							
Would the project:							
a. Generate greenhouse gas emissions, either directly or			$\boxtimes$				
indirectly, that may have a significant impact on the	_	_	_				
environment?							

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

8a. Response: (Source: Air Quality and Greenhouse Gas Emission Impact Analysis prepared by Vista Environmental, Inc. on October 10, 2016.)

Less Than Significant Impact. The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed project consists of a 46 single-family residential subdivision. It is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment, but these impacts would result in a less than significant impact. The project's GHG emissions have been calculated with the CalEEMod model. A summary of the results is shown below in **Table 10**.

Table 10 – Proposed Project Greenhouse Gas Annual Emissions

	Greenhouse Gas Emissions (Metric Tons per Year)					
Category	CO <sub>2</sub> CH <sub>4</sub> N <sub>2</sub> O					
Area Sources <sup>1</sup>	12.34	0.00	0.00	12.42		
Energy Usage <sup>2</sup>	191.98	0.01	0.00	192.92		
Mobile Sources <sup>3</sup>	627.15	0.02	0.00	627.63		
Solid Waste <sup>4</sup>	11.40	0.67	0.00	25.55		
Water and Wastewate <sup>5</sup>	18.91	0.10	0.00	21.87		
Construction <sup>6</sup>	766.07	0.19	0.00	770.10		
Total Emissions	1,627.85	0.80	0.00	1,650.49		
SCAQMD Draft Residential Thresh		3,500				

## Notes:

The data provided in Table 10 shows that the proposed project would create 1,650.49 MTCO<sub>2</sub>e per year. According to the SCAQMD draft threshold of significance, a cumulative global climate change impact would occur if the GHG emissions created from the on-going operations would exceed 3,500 MTCO<sub>2</sub>e per year.

Therefore, impacts will be **less than significant** directly, indirectly, and cumulatively related to the generation of greenhouse gas emissions. No mitigation is required.

b.	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			
	ermosions of greenhouse gases.			

8b. Response: (Source: Air Quality and Greenhouse Gas Emission Impact Analysis prepared by Vista Environmental, Inc. on October 10, 2016.)

Less Than Significant Impact. The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. In order to identify significance criteria under CEQA for development projects, SCAQMD initiated a Working Group, which provided detailed methodology for evaluating significance under CEQA. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that provides a quantitative annual threshold of 3,500 MTCO<sub>2</sub>e for residential land use type projects.

<sup>&</sup>lt;sup>1</sup> Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

<sup>&</sup>lt;sup>2</sup> Energy usage consists of GHG emissions from electricity and natural gas usage.

<sup>&</sup>lt;sup>3</sup> Mobile sources consist of GHG emissions from vehicles.

<sup>&</sup>lt;sup>4</sup> Waste includes the CO<sub>2</sub> and CH<sub>4</sub> emissions created from the solid waste placed in landfills.

<sup>&</sup>lt;sup>5</sup> Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

<sup>&</sup>lt;sup>6</sup> Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009. Source: CalEEMod Version 2013.2.2.

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No		
INFORMATION SOURCES):	Significant	Significant	Significant	Impact		
	Impact	With	Impact			
		Mitigation				
Although the SCAOAAD provided substantial evidence support	ting the use of	Incorporated	arachald the	y have not		
Although the SCAQMD provided substantial evidence suppor been formally adopted because the SCAQMD was awaiting the	_			•		
the California Building Industry Association v. Bay Area Air Q		•				
filed on December 17, 2015 and the SCAQMD Board has not v				William Was		
	• •					
According to the project GHG emissions calculations above, im						
in the generation of 1,650.49 MTCO <sub>2</sub> e per year. The propose						
bright line threshold of 3,500 MTCO <sub>2</sub> e. The proposed project				pian, policy		
or regulation of an agency adopted for the purpose of reducing	ng the emissi	ons of greening	ouse gases.			
As detailed above, development of the proposed project wou	ıld meet the t	argets outline	d in the GHG	Reduction		
Plan and meet SCAQMD's bright line threshold. The propos						
plan, policy or regulation of an agency adopted for the purpo	se of reducin	g the emission	s of greenho	use gases.		
The man and maries to mand the man along the mark in the	من المحالية	al:a.e.l				
The proposed project would have a <b>less than significant impa</b> applicable plan, policy or regulation of an agency adopted for t	•	• •	•			
gases. No mitigation is required.	ne pui pose oi	reducing the t	211113310113 01	greennouse		
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 Safe	ty Element, (	GP 2025 FPEIR	, California	Health and		
Safety Code, Title 49 of the Code of Federal Reg	-	•	•			
Department EOP, 2002 and Riverside Operationa						
OEM's Strategic Plan, and Phase I Environmental 243-230-015 and -016, Riverside, California, June 30		ient, KUO Pro	perty, Parce	is Numbers		
243-230-013 una -016, kiversiae, Canjornia, June 30	J, 2006J.					
Less Than Significant Impact. The proposed project is not a	nticipated to	involve the ro	utine transp	ort, use, or		
disposal of any hazardous material because the project propos	-		-			
hazardous materials such as oil, diesel fuel, and gasoline may	be transporte	ed to and used	at the proje	ct site. The		
California State Department of Toxic Substances Control oper				-		
and transport and takes enforcement actions against those		-				
improperly. The Riverside County Department of Environme		•				
haulers to collect and transport hazardous wastes. Complia		•				
Department of Toxic Substances Control and the Riverside County Department of Environmental Health would reduce the impact to less than significant levels. Compliance with the requirements of the California DTSC and						
Riverside County of Environmental Health is not considered unique mitigation pursuant to CEQA. Therefore, the						
proposed project will have a less than significant impact dire		•				
significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous						
materials. No mitigation is required.						
b. Create a significant hazard to the public or the						
environment through reasonably foreseeable upset and accident conditions involving the release of						
hazardous materials into the environment?						
וומבמושטש ווומנכוומוט ווונט נווכ כוועווטוווופווני						

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No	
INFORMATION SOURCES):	Significant	Significant	Significant	Impact	
	Impact	With	Impact		
		Mitigation			
		Incorporated			
9b. Response: (Source: General Plan 2025 Public Safety				-	
Health and Safety Code, Title 49 of the Code of Fed Riverside's EOP, 2002 and Riverside Operational Are	_		_		
Strategic Plan and Phase I Environmental Site Asse					
015 and -016, Riverside, California, June 30, 2006),		• •			
prepared by Kleinfelder, Inc. dated June 30, 2004.					
, , ,					
<b>Less Than Significant Impact.</b> The proposed project does not		•			
proposed use for the site is single-family residential development.	•	•	•		
materials would be generated. The project will have no impact	-	-	-	_	
significant hazard to the public or the environment thro	•	•	•		
conditions involving the release of hazardous materials into t 1 site assessment and a search of EnviroStor, this project si			-		
dumping of hazardous materials, so there is no risk of hazardous					
project will have a less than significant impact directly, indire					
hazard to the public or the environment through reasonably for	•	•		_	
the release of hazardous materials into the environment. No					
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					
Health and Safety Code, Title 49 of the Code of Fed Riverside's EOP, 2002 and Riverside Operational Are	_		_		
Strategic Plan and Phase I Environmental Site Asse				-	
015 and -016, Riverside, California, June 30, 2006).	<i>55</i> 6, N. C. C	орс. су, . с		.5 _ 70	
No Impact. The proposed project will not result in the e		•	•	-	
substances or waste within one-quarter mile of an existing sch				•	
and Woodcrest Elementary School, are each located appro	•	•		•	
Therefore, the proposed project will have <b>no impact</b> dire	•	•	•		
hazardous emissions or handle hazardous or acutely hazard quarter mile of an existing or proposed school? No mitigation			, or waste v	vitnin one-	
quarter fille of all existing of proposed school: No fillingation	i is required.				
d. Be located on a site which is included on a list of				$\boxtimes$	
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 –					
A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information, 5.7-C – DTSC					
EnviroStor Database Listed Sites and Phase I Environmental Site Assessment, KUO Property, Parcels					
Numbers 243-230-015 and -016, Riverside, Californi	и, липе 30, 2	uuoj.			
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 proposed project will have **no impact** 

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
directly, indirectly, or cumulatively as it would not be located materials sites compiled pursuant to Government Code Sectionsificant hazard to the public or the environment. No mitigate	tion 65962.5	and, as a resu		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
9e. Response: (Source: General Plan 2025 Figure PS-6 – And March Air Reserve Base/March Inland Port Configure Air Installation Compatible Use Zone Study for Maximum Environmental Site Assessment, KUO Property, Page California, June 30, 2006).	mprehensive arch Air Rese	e Land Use Cor erve Base (Au	mpatibility F gust 2005) d	Plan (2014), and Phase I
<b>Less Than Significant Impact.</b> The project site is located rough Zone D according to the RCALUCP. Noise impacts in Zone D are Per Countywide Policy 4.1.5, the CNEL considered normally accord MARB/IPA is 65dB. Risk level associated with safety and aimperiphery of flight corridors.	e moderate to eptable for n	o low, mostly w ew residential	vithin 55-CNI land uses in	EL contour. the vicinity
Moreover, the Property Owner has agreed not to permit construction between any installation at March and aircruction between and other lights or impair visibility in the landing, take-off, or maneuvering of aircraft on or at March.	aft, or to ca	use difficulty	for pilots to	distinguish
The proposed project will not change air traffic patterns, incr traffic patterns. It is not located within an airport influence consistent with the RCALUCP, impacts related to hazards from indirectly, and cumulatively. No mitigation is required.	area. Becau	ise the project	has been fo	ound to be
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
9f. Response: (Source: GP 2025 FPEIR Chapter 5.7 – Ha EOP, 2002 and Riverside Operational Area – Mu Strategic).				
Less Than Significant Impact. The development of the propundeveloped site that includes circulation system improveme in the project vicinity would not impair the ability of the City to emergency evacuation routes. The proposed project would prand an extension of Houser Place to connect to Highridge Strewould improve emergency access to the vicinity of the proposets. Therefore, the proposed project will have a less cumulatively related to an emergency response or evacuation	nts. The chap implement ovide access et. The changosed project than significations.	nge in the ove its emergency from Bradley S ge in the overa t by widening	rall circulation response plant street, Highri Il circulation and extendi	on patterns an or utilize dge Street, in the area ng existing

g. Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?  9g. Response: (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, Cit of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part and OEM's Strategic Plan and Phase I Environmental Site Assessment, KUO Property, Parcels Numbe 243-230-015 and -016, Riverside, California, June 30, 2006).  Less Than Significant with Mitigation. The improvement of the site as part of the Project will reduce the fir hazard that would exist on the vacant site, and it would also reduce the risk of any fire spreading to adjacen neighborhoods. Any existing fire hazard that exists within the riparian area itself is part of the existing condition an eighborhoods. Any existing fire hazard that exists within the riparian area itself is part of the existing condition of the homes to the site would not exacerbate the existing fire hazard. Moreover, the addition or retaining walls as part of the Project will improve the baseline condition with respect to fire hazards within the riparian area. Specifically, the retaining walls will be located at the base of the slope of the property and elevat the pads above the flame length at the face of the wall. Thus, the homes to be constructed as part of the project would be substantially above the existing elevation at the riparian area.  Nevertheless, portions of the proposed project are located within a Very High Fire Severity Zone (VHFSZ). As result, special consideration is required with respect to defensible space and clearing of vegetation adjacent mew structures. Additionally, structures proposed within hazard zones will be required to be constructed usin approved fire-retardant materials per the California Fire Code. At a meeting with RCA, the California Departmen of Fish and Wildlife requested a Full Modification Plan will be reparted an approved by the Riverside County Fire Department fire	ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part and OEM's Strategic Plan and Phase I Environmental Site Assessment, KUO Property, Parcels Numbe 243-230-015 and -016, Riverside, California, June 30, 2006).  Less Than Significant with Mitigation. The improvement of the site as part of the Project will reduce the firn hazard that would exist on the vacant site, and it would also reduce the risk of any fire spreading to adjacen neighborhoods. Any existing fire hazard that exists within the riparian area itself is part of the existing condition. The addition of the homes to the site would not exacerbate the existing fire hazard. Moreover, the addition or the thorest of the Project will improve the baseline condition with respect to fire hazards within th riparian area. Specifically, the retaining walls will be located at the base of the slope of the property and elevat the pads above the flame length at the face of the wall. Thus, the homes to be constructed as part of the project would be substantially above the existing elevation at the riparian area.  Nevertheless, portions of the proposed project are located within a Very High Fire Severity Zone (VHFSZ). As result, special consideration is required with respect to defensible space and clearing of vegetation adjacent to new structures. Additionally, structures proposed within hazard zones will be required to be constructed usin approved fire-retardant materials per the California Fire Code. At a meeting with RCA, the California Departmen of Fish and Wildlife requested a Fuel Modification Plan will outline requirements for thinning and maintenance of native fire-resistant planting adjacent to the conservation area, but not within it. This will in turn reduce potential vecto control issues caused by standing water. Pursuant to MM-HAZ-1, the Fuel Modification Plan will be prepared an approved by the Riverside County Fire Department Fire Protection Planning Section before final occupancy of the Project. The Project's	indirectly to a significant risk of loss, injury or death				
hazard that would exist on the vacant site, and it would also reduce the risk of any fire spreading to adjacen neighborhoods. Any existing fire hazard that exists within the riparian area itself is part of the existing condition or the addition of the homes to the site would not exacerbate the existing fire hazard. Moreover, the addition or retaining walls as part of the Project will improve the baseline condition with respect to fire hazards within the riparian area. Specifically, the retaining walls will be located at the base of the slope of the property and elevate the pads above the flame length at the face of the wall. Thus, the homes to be constructed as part of the project would be substantially above the existing elevation at the riparian area.  Nevertheless, portions of the proposed project are located within a Very High Fire Severity Zone (VHFSZ). As result, special consideration is required with respect to defensible space and clearing of vegetation adjacent to new structures. Additionally, structures proposed within hazard zones will be required to be constructed usin approved fire-retardant materials per the California Fire Code. At a meeting with RCA, the California Departmen of Fish and Wildlife requested a Fuel Modification Plan will outline requirements for thinning and maintenance of native fire-resistant planting adjacent to the conservation area, but not within it. This will in turn reduce potential vecto control issues caused by standing water. Pursuant to MM-HAZ-1, the Fuel Modification Plan will be prepared an approved by the Riverside County Fire Department Fire Protection Planning Section before final occupancy of the Project. The Project's future Homeowner's Association will be required to implement the Fuel Modification Plan' conditions on a continual basis.  With the Fuel Modification plan and strict adherence to the California Government Code, the Building Code, am local regulations, the project will have a less than significant impact with mitigation directly, indirectly, and cumu	of Riverside's EOP, 2002, Riverside Operational Arc and OEM's Strategic Plan and Phase I Environment	ea – Multi-Ju al Site Assess	risdictional LH	MP, 2004 P	art 1/Part 2
result, special consideration is required with respect to defensible space and clearing of vegetation adjacent to new structures. Additionally, structures proposed within hazard zones will be required to be constructed using approved fire-retardant materials per the California Fire Code. At a meeting with RCA, the California Departmen of Fish and Wildlife requested a Fuel Modification Plan because portions of the tract are located in a Very High Fire Hazard Zone. The Fuel Modification Plan will outline requirements for thinning and maintenance of native fire-resistant planting adjacent to the conservation area, but not within it. This will in turn reduce potential vector control issues caused by standing water. Pursuant to MM-HAZ-1, the Fuel Modification Plan will be prepared an approved by the Riverside County Fire Department Fire Protection Planning Section before final occupancy of the Project. The Project's future Homeowner's Association will be required to implement the Fuel Modification Plan' conditions on a continual basis.  With the Fuel Modification plan and strict adherence to the California Government Code, the Building Code, and local regulations, the project will have a less than significant impact with mitigation directly, indirectly, and cumulatively on exposing people or structures to a significant risk of loss, injury, or death involving wildland fires.  MM-HAZ-01: A Fuel Modification Plan for TR 37177 shall be prepared and submitted for review to the City of Riverside Fire Department Fire Protection Planning Section (Fire Department) prior to final occupancy. The Fuel Modification Plan shall show the area and location of fuel modification necessary to reduce risk to structures from combustible mitigation and shall adhere to the Fire Department's guidelines, standards, and policies governin Fuel Modification Plans. After the Fire Department approves the Fuel Modification Plan, the Homeowner' Association of the Project shall be responsible for implementing the Fuel Modification Plan.  10. HYDROL	hazard that would exist on the vacant site, and it would also neighborhoods. Any existing fire hazard that exists within the The addition of the homes to the site would not exacerbate t retaining walls as part of the Project will improve the baselin riparian area. Specifically, the retaining walls will be located at the pads above the flame length at the face of the wall. Thus,	reduce the riparian area he existing file condition vert the base of the homes to	risk of any fire a itself is part o re hazard. Mo vith respect to the slope of th	e spreading to f the existing reover, the fire hazards ne property a	to adjacent g condition. addition of within the and elevate
local regulations, the project will have a less than significant impact with mitigation directly, indirectly, and cumulatively on exposing people or structures to a significant risk of loss, injury, or death involving wildland fires.  MM-HAZ-01: A Fuel Modification Plan for TR 37177 shall be prepared and submitted for review to the City of Riverside Fire Department Fire Protection Planning Section (Fire Department) prior to final occupancy. The Fuel Modification Plan shall show the area and location of fuel modification necessary to reduce risk to structures from combustible mitigation and shall adhere to the Fire Department's guidelines, standards, and policies governing Fuel Modification Plans. After the Fire Department approves the Fuel Modification Plan, the Homeowner' Association of the Project shall be responsible for implementing the Fuel Modification Plan.  10. HYDROLOGY AND WATER QUALITY.  Would the project:  a. Violate any water quality standards or waste discharge requirements or otherwise degrade surface	result, special consideration is required with respect to defer new structures. Additionally, structures proposed within haza approved fire-retardant materials per the California Fire Code of Fish and Wildlife requested a Fuel Modification Plan because Fire Hazard Zone. The Fuel Modification Plan will outline require-resistant planting adjacent to the conservation area, but no control issues caused by standing water. Pursuant to MM-HAZapproved by the Riverside County Fire Department Fire Protect Project. The Project's future Homeowner's Association will be	nsible space a ard zones will At a meetin use portions of uirements fo ot within it. T Z-1, the Fuel Nation Planning	and clearing of I be required to go with RCA, the of the tract are thinning and This will in turn Modification Place.	vegetation a to be construct California De located in a maintenance reduce pote an will be pro e final occup	adjacent to ucted using repartment a Very High e of native, nitial vector epared and ancy of the
Riverside Fire Department Fire Protection Planning Section (Fire Department) prior to final occupancy. The Fue Modification Plan shall show the area and location of fuel modification necessary to reduce risk to structures from combustible mitigation and shall adhere to the Fire Department's guidelines, standards, and policies governing Fuel Modification Plans. After the Fire Department approves the Fuel Modification Plan, the Homeowner' Association of the Project shall be responsible for implementing the Fuel Modification Plan.  10. HYDROLOGY AND WATER QUALITY.  Would the project:  a. Violate any water quality standards or waste discharge requirements or otherwise degrade surface	local regulations, the project will have a less than significar	nt impact wi	th mitigation	directly, indi	rectly, and
Would the project:  a. Violate any water quality standards or waste discharge requirements or otherwise degrade surface	Riverside Fire Department Fire Protection Planning Section (F Modification Plan shall show the area and location of fuel mod combustible mitigation and shall adhere to the Fire Departm Fuel Modification Plans. After the Fire Department approv	ire Departme ification nece ent's guidelir es the Fuel	ent) prior to fin essary to reduce nes, standards, Modification F	al occupancy e risk to struct and policies Plan, the Ho	y. The Fuel ctures from governing
discharge requirements or otherwise degrade surface					
or ground water quality?  10a. Response: (Source: GP 2025 FPEIR Table 5.8-A; Project Specific Water Quality Management Pla	discharge requirements or otherwise degrade surface or ground water quality?		Gic Water Qua		ement Plan

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

Hydrology/Hydraulic Study for Tentative Tract No. 37177 PW 16-0736 prepared by Adkan Engineers on May 18, 2018)

Less Than Significant Impact. The proposed project consists of 46 single-family residential homes on 34.6 +/-acres. The proposed project will include improvement of proposed local interior streets and storm drain improvements. The street water runoff will drain into a number of different infiltration trenches and bio-retention facilities. The majority of the low flows from the site will drain into a bio-retention basin located at the North East end of the tract, and any high flows will drain into the adjacent existing drainage course. The remaining on lot low flows will filter through different infiltration trenches, and high flows will exit the infiltration trenches via the high flow pipe at each trench and be routed to either the adjacent existing drainage course or to the storm drain on Highridge Street. The project incorporates site design, source control, and treatment control BMPs. Treatment control BMPs include an infiltration trench, bioretention areas, and self-retaining/landscaped areas. See the below table for more details regarding source control BMPs. A majority of the flows from the project site will be captured in on-street gutters and conveyed to retention basins for infiltration. In addition, the Project Applicant is proposing site design techniques and BMPs including minimizing urban runoff, minimizing the impervious footprint, and removing directly connected impervious areas. These design techniques include maximizing permeable area, constructing to the minimum width, and minimizing hardscape whenever possible.

**Permanent and Operational Source Control Measures** 

	remanent and operational source control	vicasui cs				
Potential Sources of	Permanent Structural Source Control	Operational Source Control BMPs				
Runoff Pollutants	BMPs					
Landscape/outdoor	Use saturated soil-tolerant plants in self-	Maintain landscaping using				
pesticide use	retaining areas. Use pest-resistant plants	minimum or no pesticides.				
	adjacent to hardscape.					
Roofing, gutters, and trim	Avoid roofing, gutters, and trim made of					
	copper or other unprotected metals.					
Condensate drain lines	Drain to landscaped areas. Do not drain to					
	storm drain system.					
On-site storm drain inlets	Mark all inlets with words "Only Rain	Maintain inlet markings, provide				
	Down the Storm Drain" or similar.	stormwater pollution prevention				
		info to owners.				
Future indoor and	Note building design features that	Provide integrated pest				
structural pest control	discourage entry of pests	management info to owners.				
Source: Project-Specific Preliminary Water Quality Management Plan for TR 37177						

<u>Construction Impacts</u>: The proposed project is required to obtain a NPDES Municipal Stormwater Permit for construction activities, which involves preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). As stated in the Permit, during and after construction, best management practices (BMPs) will be implemented to reduce/eliminate adverse water quality impacts resulting from development. Furthermore, the City has ensured that the development does not cause adverse water quality impacts, pursuant to its Municipal Separate Storm System (MS4) permit through the project's WQMP. Mandatory compliance with SWPPP would ensure that the proposed project does not violate any water quality standards or waste discharge requirements

<u>Operations Impacts:</u> To meet NPDES requirements, the Project's proposed storm drain system is designed to route first flush runoff to the proposed water quality basin. The Project would be required to implement a Water Quality Management Plan (WQMP), pursuant to the requirements of the applicable NPDES permit. The WQMP

during construction activities.

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	NO			
INFORMATION SOURCES):	Significant	Significant	Significant	Impact			
	Impact	With	Impact				
	-	Mitigation	- 				
		Incorporated					
is a post-construction management program that ensures the on-going protection of the watershed basin by							
requiring structural and programmatic controls. The WQMP i							
and/or otherwise appropriately treat storm water runoff f							
Mandatory compliance with the WQMP would ensure that		•	-				
•	-	. does not vio	iate ally wa	ter quality			
standards or waste discharge requirements during long-term operation.							
	<b>c</b>						
Therefore, the proposed project would have a less than signi	-		-	imulatively			
related to violating water quality standards and degrading wa	ter quality. I	No mitigation is	s required.				
b. Substantially decrease groundwater supplies or							
interfere substantially with groundwater recharge			 				
such that the project may impede sustainable			1				
groundwater management of the basin?							
-		Diam myomayod	h. Adless C				
10b. Response: (Source: Project Specific Water Quality N	_		-	_			
December 16, 2016 and revised January 5, 2018;				t Stuay Jor			
Tentative Tract No. 37177 PW 16-0736 prepared by	Aakan Engir	ieers on iviay 1	.8, 2018)				
<b>Less Than Significant Impact.</b> The proposed project is located i	n the Upper S	Santa Ana Valle	y - Riverside	- Arlington			
groundwater basin, basin number B-002.03 per the California I	Department (	of Water Resou	irces GIS pro	gram. The			
project consists of 46 single-family residences and is required	I to connect	to the City's se	wer and wa	ter system			
and comply with all NPDES and WQMP requirements, which wi	ll ensure the	proposed proje	ect will not su	ubstantially			
deplete groundwater supplies. The 34.6 acre project will incr				-			
However, it will also include bio-retention trenches to allow	-			-			
There will be <b>a less than significant impact</b> to groundwater s	-	_	_				
cumulatively. No mitigation is required.	applies and	recharge entire	an ectry, in	ancetty, or			
cumulatively. No minigation is required.							
c. Substantially alter the existing drainage pattern of the			$\square$				
site or area, including through the alteration of the							
			1				
course of a stream or river, or through the addition of			1				
impervious surfaces in a manner which would:							
i. Result in substantial erosion or siltation on- or							
off-site?							
10c.i. Response: (Source: Project Specific Water Quality	Managemer	nt Plan prepar	ed by Adkan	Engineers			
on December 16, 2016 and revised January 5, 20	018; TR 3302	58 Rough Gra	ding Plan pı	repared by			
Adkan Engineers, dated February 16, 2016, Preli	minary Hydi	ology/Hydrau	lic Study for	· Tentative			
Tract No. 37177 PW 16-0736 prepared by Adkan E		• • •					
, , , , , , , , , , , , , , , , , , ,	<b>3</b>	-, -,,					
Less Than Significant Impact. The project is subject to NP	DES requirer	ments: areas o	of one acre (	or more of			
	•	•					
disturbance are subject to preparing and implementing a SWPI	•		_				
Erosion, siltation, and other possible pollutants associated	_	-	-	-			
addressed as part of the WQMP and grading permit process				_			
preservation of existing vegetation, fiber rolls, street sweeping	ng, sandbag l	barriers, storm	drain inlet	protection,			
stabilized construction entrances/exits, and dust control. Fu	rther, the dra	ainage pattern	s on the site	mimic the			
pre-development hydrograph with the post-development h	ydrograph, f	or a 2-year re	turn freque	ncy storm.			
Generally, the hydrologic conditions of concern are not significant if the post-development hydrograph is no							

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
more than 10% greater than pre-development hydrograph. The significant impact directly, indirectly, or cumulatively to exist				
<ul> <li>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:</li> <li>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site.</li> </ul>				
10c.ii. Response: Response: (Source: Project Specific Wa	-	_		-
Engineers on December 16, 2016 and revised Janu Study for Tentative Tract No. 37177 PW 16-0736 p				-
Less Than Significant Impact. The proposed project hydrology project and the surrounding area has sufficient capacity to ha project site would be collected by storm drains and streets, storm flow from curb to curb, while 100-year storms are accorfrom the project site in a developed condition has been studied the drainage pattern would be altered, the off-site discharge condition. The drainage patterns on the site mimic the pre-developed significant if the post-development hydrograph is no more that Therefore, there will be less than significant impact directly, in surface runoff that it will not result in flooding on- or off-site.	ndle the relawhich are demmodated wand required would be the relopment hy y, the hydron 10% greated adirectly, or the hydron 10% greated and rectly, or the hydron the rectly, or the rectle hydron the rect	esigned to accomithin street right to be attenuate same or simily drograph with blogic conditioner than pre-devicumulatively in	noff. All rur ommodate thts-of-way. ted on-site, slar to the un the post-dens of conce	noff for the he 10-year The runoff o although developed velopment rn are not ydrograph.
<ul> <li>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:         <ul> <li>iii. Exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</li> </ul> </li> <li>10c. iii. Response: (Source: Project Specific Water Quality on December 16, 2016 and revised January 5, 2018, Tentative Tract No. 37177 prepared by Adkan Engineer</li> </ul>	and, Prelim	ninary Hydrolo	-	_
Less Than Significant Impact. The proposed project would is system, specifically as described within the project description drainage system would be installed concurrently with the considerable adequately sized to accommodate the drainage created by the expected to generate the following pollutants: sediment demanding substances, bacteria and viruses, oil & grease, and treated through the incorporation of the site design features specified in the project-specific WQMP. The drainage pages	portion of the nstruction of the proposed nt/turbidity, d pesticides.	is proposed pr f the proposed project. The p nutrients, tra These expect trol, and treati	oject. The side of	torm water d would be ject would ris, oxygen s would be I measures

hydrograph with the post-development hydrograph for a 2-year return frequency storm. The proposed project would not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No	
INFORMATION SOURCES):	Significant	Significant	Significant	Impact	
	Impact	With	Impact	1	
		Mitigation		i	
		Incorporated			
systems or provide substantial additional sources of pollute		•		-	
have a <b>less than significant impact</b> directly, indirectly, or cumrunoff water that would exceed capacity or existing or planne	•				
source of polluted runoff. No mitigation is required.	a storriwate	i diamage syst	ems or add	Substantial	
c. Substantially alter the existing drainage pattern of the			$\boxtimes$		
site or area, including through the alteration of the				i	
course of a stream or river, or through the addition of				i	
impervious surfaces in a manner which would:				i	
iv. impede or redirect flood flows?					
10c. iv. Response: (Source: Project Specific Water Quality	_		-	_	
on December 16, 2016 and revised January 5, 2018; a Tentative Tract No. 37177 PW 16-0736 prepared by A			-	uay jor	
remative tructivo. 37177 PW 10-0730 prepared by A	akun Engine	ers on way 10,	2010)		
Less Than Significant Impact. The proposed project would	include the	installation of	storm wate	er drainage	
$system, specifically \ as \ described \ within \ the \ project \ description$	portion of th	is proposed pr	oject. The st	torm water	
drainage system would be installed concurrently with the co					
adequately sized to accommodate the drainage created by					
project would have a less than significant impact directly, ind	lirectly, or cu	mulatively rela	ited to the ir	npediment	
or redirection of flood flows. No mitigation is required.					
d. In a flood hazard, tsunami, or seiche zones, risk			$\square$		
release of pollutants due to project inundation?					
10d. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hy	drology and	<b>Water Quality</b>	; Project Spe	cific Water	
Quality Management Plan prepared by Adkan Eng				-	
5, 2018; and, Preliminary Hydrology/Hydraulic St	tudy for Ten	tative Tract N	lo. 37177 P	W 16-0736	
prepared by Adkan Engineers on May 18, 2018))					
Less Than Significant Impact.					
Flood Hannedo. The site is leasted in Zone V (unabaded) many	. FFN/1/2	- 000000740	C offortive (	0/25/2000	
<u>Flood Hazards</u> : The site is located in Zone X (unshaded) per which means it has been determined to be outside the 500-					
flood. Therefore, the project site is not subject to any flood h	•	na protectea t	by levee iroi	ii 100-yeai	
Thouse Therefore, the project site is not subject to any nood in	azaras.				
Tsunamis: Tsunamis are large waves that occur in coastal area	s. The City i	s not located in	n a coastal a	rea.	
Caicha Zanasi Caichas and ways that applicate in lakes have		a fa maim		h a a a a	
<u>Seiche Zones:</u> Seiches are waves that oscillate in lakes, bays result of seismic or atmospheric disturbances. The proje	_				
topography and are within a more urbanized area. The project			-	-	
Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, Box Sp					
which transverse the City and its Sphere of Influence.	7111185 1710 01110	am / m ca or am y	or the fine	(3) 411 6) 63	
Therefore, the proposed project will have a less than signi	_	-	-	-	
related to flood hazards, tsunamis, and seiche zones relate	d to the risk	release of po	llutants due	to project	
inundation. No mitigation is required.					

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?					
10e. Response: (Source: Preliminary Grading Plan, and F Pollution Prevention Plan, and Water Quality Man			Study, Stori	mwater	
Less Than Significant Impact. The proposed project incorp control BMPs. A majority of the flows from the project sit conveyed to bio-retention basins for infiltration. In additional techniques and BMPs including minimizing urban runoff, must directly connected impervious areas. These techniques incluminimum width, and minimizing hardscape whenever possib on the Upper Santa Ana Valley — Riverside — Arlington ground Management Plan has not yet been prepared for this base Sustainable Groundwater Management Plan. The proposed directly, indirectly, and cumulatively related to a conflict with control plan or sustainable groundwater management plan.	e would be on, the proposition in the proposition in the maximizing le. Roughly 1 water basin. Thereford project will ith or obstructs.	captured in the sed project wo impervious for g permeable a .3.5 acres of the However, a Sure, the site do I have a less to timplementa	e on-street gould include ootprint, and rea, construction of the project situation of the stainable Grees not confident signific	gutters and site design d removing cting to the e is located coundwater flict with a ant impact	
11. LAND USE AND PLANNING:					
Would the project:  a Physically divide an established community?			$\square$		
a. Physically divide an established community?  11a. Response: (Source: General Plan 2025 Figure LU-10 – Land Use Policy Map; General Plan 2025 Land Use and Urban Design Element; Zoning Map of the City of Riverside; Project site plan; Tentative Map of Tract No. 37177; and City of Riverside GIS/CADME map layers).  Less Than Significant Impact. The project site is an area depicted on the City General Plan 2025 for Very Low Density Residential (VLDR) development. Residential communities are proposed to the immediate north, south, and east of the project site, and residential communities exist to the west and north of the project site. The project site is zoned R-1-½ Acre - Single-Family Residential. The R-1-½ Acre zone is established for large lot single-family residences where the keeping of livestock and other farm animals and agricultural uses are not permitted. The proposed project will meet the zoning standards for R-1-½ Acre Zone. The proposed project has been designed to be compatible with the pattern of development of the surrounding area, providing adequate access, circulation, and connectivity consistent with the General Plan 2025, and is in compliance with the requirements of the Zoning and Subdivision Codes. The proposed development will not divide an established community, but rather add to one. Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively that would physically divide an established community. No mitigation is required.					
b. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	. —				
11b. Response: (Source: General Plan 2025; General Pla LU-5 – Zoning/General Plan Consistency Matrix; Fi Code; Title 16 – Buildings and Construction and City Code; Title 18 – Subdivision Code; Title 19 – Zoning	gure LU-7 – i wide Design (	Redevelopmen and Sign Guide	nt Areas; Title Llines; Title 1	le 7 – Noise 7 – Grading	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
Less Than Significant Impact. The project is zoned for residential development which is consistent with the residential land use designation as depicted in the General Plan. The proposed development is compatible with future residential development to the north and east, and the existing residences to the west, south and north of the project site. The proposed project would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation. The project will require a grading exception for the allowance of a retaining wall in excess of six feet, but the retaining wall will not result in any significant environmental impacts; notably, the retaining wall would be in an area that is not visible from a public right of way. The grading exception would facilitate development of a bioretention basin for the proposed project, and would not adversely impact the environment.						
Therefore, the proposed project will have a <b>less than significan</b> not conflict with any applicable land use plan, policy, or reproposed project adopted for the purpose of avoiding or mitig	gulation of a	an agency wit	h jurisdictio	*		
<b>12. MINERAL RESOURCES.</b> Would the project:						
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?						
12a. Response: (Source: General Plan 2025 Figure – OS Investigation Tentative Tract No. 33028 Kunny R Associates, Inc. April 8, 2005; TR 37177 WQMP Infil Inc dated July 31, 2018; TR 37177 Limited Excavatab November 10, 2015)	anch, City o tration Feasi	f Riverside, Co bility Report b	alifornia, Le y Aragon Ge	ighton and cotechnical,		
Less Than Significant Impact. A geological appraisal has been conducted and has determined that there is no active mining under a valid permit occurring on site, the project is not adjacent to areas supporting feldspar, silica, limestone, and/or rock products, and that the project does not meet necessary criteria for marketability and threshold values to support mineral resources as specified by the Department of Conservation. Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively that would 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. No mitigation is required.						
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)  Less Than Significant Impact. The City General Plan 2025 FPEIR determined that there are no specific areas with the City of Sphere Area which 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, the proposed project will have a less than significant impact directly, indirectly, or cumulatively that would 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. No mitigation is required.						

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
13. NOISE.  Would the project result in:					
a. Generation of a substantial temporary or permanent increase in ambient noise levels 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-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, 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, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, and City of Riverside – Tentative Tract Map No. 37177 Noise Analysis Memorandum prepared by Vista Environmental, Inc. on November 7, 2016, Appendix F: Noise Study TTM 33028 and 33029 (Kunny Ranch Property) by Michael Brandman Associates.)					
<b>Less Than Significant Impact.</b> The proposed project would have a less than significant impact as to noise as to both construction and operation of the proposed project.					
Construction					
Construction of the project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance. Moreover, pursuant to City of Riverside Municipal Code section 7.35.020, noise sources associated with construction, repair, remodeling, or grading of any real property is exempt from the City's noise standards, provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. In compliance with the Municipal Code, construction associated with the proposed project will not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. Accordingly, the Project's construction-related noise impacts would be less than significant.					
<u>Operation</u>					
Because the proposed project is a residential development, operation of the Project will not generate a substantial temporary or permanent increase in ambient noise levels. The primary source of noise stemming from operation of the proposed project would be due to the proposed project's addition of vehicles to access roadways. This noise impact would be less than significant as an increase in ambient noise by 3dBA CNEL is barely discernable to the human ear in an exterior environment, and the operational noise generated by the proposed project would be less than 3 dBA. Indeed, a noise analysis established that even if the project sought to develop more than three times as many units, the operational noise generated by the proposed project would still be less than 3 dBA.					
Accordingly, the proposed project would have a less than sig		ct relating to n	oise.		
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,					

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

Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 - March ARB Noise Contours, FPEIR Table 5.11-G - Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions Report, and City of Riverside – Tentative Tract Map No. 37177 Noise Analysis Memorandum prepared by Vista Environmental, Inc. on November 7, 2016.)

**Less Than Significant Impact.** The proposed project would involve the construction of single-family detached residences on a vacant site. Caltrans notes that vibration may present a potential impact in the case of such operations as blasting, pile driving, and heavy demolition; none of these activities, however, would be required during project construction. At the completion of construction, no excessive ground borne vibrations or noise would be created by the operation of the proposed project and no significant vibration impacts would result from project development. No mitigation measures are necessary. Therefore, impacts will be less than significant directly, indirectly, and cumulatively related to on-going operation of the proposed project would not include the operation of any known vibration sources. No mitigation is required.

c.	For a project located within an airport land use plan			
	or, where such a plan has not been adopted, within	<del></del>	 	
	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 City of Riverside – Tentative Tract Map No. 37177 Noise Analysis Memorandum prepared by Vista Environmental, Inc. on November 7, 2016.)

Less Than Significant Impact. March Air Reserve Base is located roughly 6 miles southeast of the project site. The runways for March Air Reserve Base are oriented in northwest to southeast orientation and run perpendicular to the project site, and no aircraft would fly over the project site during typical take-off and landing patterns, but is located on the periphery of flight corridors. Per the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (adopted November 2014), the project site is located with Compatibility Zone D. Zone D is referred to as a flight corridor buffer and has no restrictions on residential development. The project site is located outside of the 65 dBA CNEL noise contours of March Air Reserve Base and site observations during the noise measurements did not observe any aircraft flights over the project site. The proposed project would not expose people to excessive noise levels from aircraft.

The project site is located approximately 5 miles southeast of the Riverside Municipal Airport. The project is located to the south/southeast of the established flight path and is beyond the airport's 60-dBA CNEL noise contour. Implementation of the proposed project would not expose the new residents to excessive aircraft noise levels, and no mitigation measures are necessary. Therefore, the proposed project would have a less than significant impact directly, indirectly, or cumulatively related to aircraft noise. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):    Significant Impact   Significant Impact   Significant Impact   Significant Impact   Significant Impact   Significant   Sig					
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 – SC. Population and Households Forecast, Table 5.12-B – General Plan Population and Employme 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 proposed project would not induce any substantial unplanned populating growth, either directly or indirectly. While the proposed project involves new homes that may directly induce population growth and infrastructure that could indirectly induce population growth, the proposed project would not induce any unplanned population growth in the area. The project site is an area designated for Residential the City General Plan 2025 and zoned for residential development as shown on the City Zoning Map. Developme of residential communities are proposed to the immediate north, south, and east, and residential communities to the west and north of the project site. The proposed project will be surrounded by future development and additional infrastructure is consistent with the General Plan 2025 Program.  The General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the Gene Plan 2025 Typical scenario would not have significant population growth impacts. Because the proposed proje is consistent with the General Plan 2025 Typical growth scenario and population growth impacts were previou evaluated in the GP 2025 FPEIR, the proposed project does not result in new impacts beyond those previou evaluated in the GP 2025 FPEIR.  Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively the would induce substantial nu	-	Significant	Significant With Mitigation	Significant	No Impact
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 – SCI. Population and Households Forecast, Table 5.12-B – General Plan Population and Employme 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 proposed project would not induce any substantial unplanned populating growth, either directly or indirectly. While the proposed project involves new homes that may directly indupopulation growth and infrastructure that could indirectly induce population growth, the proposed project would not induce any unplanned population growth in the area. The project site is an area designated for Residential the City General Plan 2025 and zoned for residential development as shown on the City Zoning Map. Developme of residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the proposed project still have development anticipated under the General Plan 2025 Typical Scenario would not have significant population growth impacts. Because the proposed project strong for proposed project will have a less than significant impact directly, indirectly, or cumulatively tha would induce substantial population growth in the area, either directly or indirectly. N					
Population and Households Forecast, Table 5.12-B – General Plan Population and Employme 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 proposed project would not induce any substantial unplanned populating growth, either directly or indirectly. While the proposed project involves new homes that may directly indup population growth and infrastructure that could indirectly induce population growth, the proposed project won not induce any unplanned population growth in the area. The project site is an area designated for Residential the City General Plan 2025 and zoned for residential development as shown on the City Zoning Map. Developme of residential communities are proposed to the immediate north, south, and east, and residential communities exist to the west and north of the project site. The proposed project will be surrounded by future development and additional infrastructure is consistent with the General Plan 2025 Program.  The General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the Gene Plan 2025 Typical scenario would not have significant population growth impacts. Because the proposed project so consistent with the General Plan 2025 Typical growth scenario and population growth impacts were previou evaluated in the GP 2025 FPEIR.  Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively that would induce substantial population growth in the area, either directly or indirectly. No mitigation is required.  b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The project site is vacant land that has no existing housing that will to replacement housing elsewhere. The project site is vacant land that has no existing housing that will tremoved or affected by the proposed projec	a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example,				
growth, either directly or indirectly. While the proposed project involves new homes that may directly indupopulation growth and infrastructure that could indirectly induce population growth, the proposed project won to induce any unplanned population growth in the area. The project site is an area designated for Residential the City General Plan 2025 and zoned for residential development as shown on the City Zoning Map. Development of residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the immediate north, south, and east, and residential communities are proposed to the west and north of the proposed to the immediate north, south, and east, and residential communities are proposed project with the General Plan 2025 Program.  The General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the Gene Plan 2025 Typical growth scenario and population growth impacts. Because the proposed project proposed project does not result in new impacts beyond those previou evaluated in the GP 2025 FPEIR, the proposed project does not result in new impacts beyond those previou evaluated in the GP 2025 FPEIR.  Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively that would induce substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.  The proposed project site is vacant land that has no existing housing that will removed or affected by the proposed project; therefore, the proposed project will have no impact d	Population and Households Forecast, Table 5.12 Projections–2025, Table 5.12-C – 2025 General Pla	-B – Genero In and SCAG	ıl Plan Populo Comparisons,	ntion and E Table 5.12-l	mployment
evaluated in the GP 2025 FPEIR, the proposed project does not result in new impacts beyond those previou evaluated in the GP 2025 FPEIR.  Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively tha would induce substantial population growth in the area, either directly or indirectly. No mitigation is required.  b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?  14b. Response: (Source: CADME Land Use 2003 Layer and project site visit Vista Community Planners, In April 2018).  No Impact. The proposed project will not displace existing housing, and it will not necessitate the construction of replacement housing elsewhere. The project site is vacant land that has no existing housing that will be removed or affected by the proposed project; therefore, the proposed project will have no impact directly indirectly, or cumulatively that would displace substantial numbers of people, necessitating the construction of people.	growth, either directly or indirectly. While the proposed propopulation growth and infrastructure that could indirectly i	oject involves uce population project site in ent as shown orth, south, an project will ling an 2025 Program future develotion growth in	new homes to prome to	hat may dire proposed proposed for Re ning Map. De residential co by future de ated under to se the proposed	ectly induce oject would esidential in evelopment ommunities evelopment the General osed project
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?  14b. Response: (Source: CADME Land Use 2003 Layer and project site visit Vista Community Planners, In April 2018).  No Impact. The proposed project will not displace existing housing, and it will not necessitate the construction of replacement housing elsewhere. The project site is vacant land that has no existing housing that will be removed or affected by the proposed project; therefore, the proposed project will have no impact directly, or cumulatively that would displace substantial numbers of people, necessitating the construction of people.	evaluated in the GP 2025 FPEIR, the proposed project does r		_	•	
housing, necessitating the construction of replacement housing elsewhere?  14b. Response: (Source: CADME Land Use 2003 Layer and project site visit Vista Community Planners, In April 2018).  No Impact. The proposed project will not displace existing housing, and it will not necessitate the construction of replacement housing elsewhere. The project site is vacant land that has no existing housing that will be removed or affected by the proposed project; therefore, the proposed project will have no impact directly, or cumulatively that would displace substantial numbers of people, necessitating the construction of the proposed project.					
April 2018).  No Impact. The proposed project will not displace existing housing, and it will not necessitate the construction of replacement housing elsewhere. The project site is vacant land that has no existing housing that will be removed or affected by the proposed project; therefore, the proposed project will have no impact directly, or cumulatively that would displace substantial numbers of people, necessitating the construction of the proposed project.	housing, necessitating the construction of				
of replacement housing elsewhere. The project site is vacant land that has no existing housing that will be removed or affected by the proposed project; therefore, the proposed project will have <b>no impact</b> directly, or cumulatively that would displace substantial numbers of people, necessitating the construction		d project site	visit Vista Col	mmunity Pla	inners, Inc.
	of replacement housing elsewhere. The project site is vaca removed or affected by the proposed project; therefore, th indirectly, or cumulatively that would displace substantial num	int land that ie proposed	has no existir project will ha	ng housing t eve <b>no impa</b>	hat will be <b>ct</b> directly,

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No	
INFORMATION SOURCES):	Significant	Significant	Significant	Impact	
	Impact	With	Impact		
		Mitigation			
		Incorporated			
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 S	Station Local	tions, Table 5	5.13-C – Riv	erside Fire	
Department Statistics and Ordinance 5948 § 1)					
<b>Less Than Significant Impact.</b> The proposed project includes	•	•	•	•	
family residential homes on approximately 34.6 acres, portion				-	
Severity Zone. An increase of residences may require addition			•		
new fire facilities. Proposed development will not impact fire		_	•		
response times, or other performance objectives. Adequate			•	•	
10 located at 2590 Jefferson Street, Riverside, CA 92504, whi			-		
the proposed project site. In addition, with implementation		•	•		
existing codes and standards and through existing Fire Depa	rtment pract	ices, adequate	e fire protect	.ion will be	
provided.					
The proposed project would thus not result in substantial adv	erse physical	impacts associ	ated with th	e provision	
of new or physically altered fire stations or other government		•		•	
would be less than significant.			·	•	
b. Police protection?					
15b. Response: (Source: General Plan 2025 Figure PS-8 -	Neighborho	od Policing Ce	nters)		
<b>Less Than Significant Impact.</b> The proposed project includes to	•	•	-	_	
family residential homes on approximately 34.6 acres. Adeq	•			•	
Station 10 located at 8181 Lincoln Avenue, Riverside, CA 925				•	
from the proposed project site. The development of the addit	_	•			
the construction of new police facilities and will not impact			-		
ratios, response times, or other performance objectives. Wi	•			•	
compliance with existing codes and standards, and through F	-	-			
will have a less than significant impact directly, indirectly,	or cumulativ	ely related to	police prote	ection. No	
mitigation is required.					
c. Schools?					
15c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Table 5.13-G – Student					
Generation for RUSD and AUSD By Education Level, and Figure 5.13-4 – Other School District Boundaries					
edit as necessary)					
<b>Less Than Significant Impact.</b> The proposed project includes the development of the project site with 46 single-					
	•	•	-	_	
family residential homes on approximately 34.6 acres. An	increase in	iocai school p	opulation of	up to 33 <sup>1</sup>	

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

students could result from development of the proposed project. This increase in student population will not create a need for construction of new school facilities and will not impact existing schools with regards to acceptable service ratios or other performance objectives. The proposed project is located in the Riverside Unified School District and would be served by Victoria Elementary School located at 2910 Arlington Avenue, Riverside, CA 92506; Gage Middle School located at 6400 Lincoln Avenue, Riverside CA 92506; and Poly High School located at 5450 Victoria Avenue, Riverside, CA 92506. Adequate school facilities and services are provided by Riverside Unified School District to serve this proposed project. In addition, implementation of General Plan 2025 policies, compliance with existing codes and standards, and payment of Riverside Unified School District impact fees will offset the impact of new development. Therefore, the proposed project will have less than significant impact directly, indirectly, or cumulatively related to schools. No mitigation is required.

## <sup>1</sup>Student Population Increase Calculation

Age Group	Homes x Student Generation Rate =		= Students		
Elementary	46	0.38	17.48		
Middle School	46	0.11	5.06		
High School	46	0.21	9.66		
Total			33		

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant	Less Than Significant	Less Than Significant	No	
INFORMATION SOURCES).	Impact	With	Impact	Impact	
		Mitigation Incorporated			
d. Parks?					
15d. Response: (Source: General Plan 2025 Figure PR-1 -	•	•			
and Recreation Facilities, Parks Master Plan 2003, ( Facility Types, and Table 5.14-C – Park and Recreat Initiative)					
Less Than Significant Impact. The closest City-wide/Special Use park is Arlington Heights Sports Complex at Van Buren and Cleveland (approximately 4 miles to the west). This 34.50-acre park has lighted baseball fields, soccer fields, restrooms, snack bar, basketball courts, on-site parking, children's playground, and group picnic area. Additionally, the non-city owned California Citrus State Historic Park is near the proposed project at 9400 Dufferin Ave (approximately 3 miles to the west). The closest city-owned park will be the future Golden Star park at Bradley and Washington (approximately 1 mile west). This 19.32-acre site is presently undeveloped, but is listed in the City Parks inventory as a future park site.  As the population grows, the need for parks and other recreational facilities rises due to the additional strain on upkeep and maintenance that is required from the City. The proposed project includes construction of a trail along Bradley Street. The City requires all development projects to pay Park Development Impact Fees before issuing building permits to ensure that adequate park facilities are available for all residents. The funds needed to accommodate additional maintenance and upkeep of parks and other recreational services is fulfilled through the payment of these fees.					
Therefore, there will be a <b>less than significant impact</b> dir construction of new or expansion of existing park facilities cause or services. No mitigation is required.	•	•	emand for pa	•	
b. Other public facilities?					
<ul> <li>15d. 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)</li> <li>Less Than Significant Impact. Adequate public facilities and services, including libraries and community centers, are provided in the Alessandro Heights neighborhood to serve this proposed project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park and Recreation and Community Services and Library practices, there will be a less than significant impact directly, indirectly, or cumulatively related to other public facilities. No mitigation is required.</li> </ul>					
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					

	I		I			
ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than Significant	No .		
INFORMATION SOURCES):	Significant Impact	Significant With	Impact	Impact		
	IIIIpact	Mitigation	iiipact			
		Incorporated				
Community Centers, Riverside Municipal Code Cha	pter 16.60 -	Local Park De	velopment F	ees, Bicycle		
Master Plan May 2007)			•	•		
<b>Less Than Significant Impact.</b> The General Plan analyzed the Low Density land use designation for this project. The proposed project is consistent with the General Plan 2025 and will provide a 15 foot wide multipurpose recreational trail easement along Bradley Street.						
The City's adopted standard for developed park acreage of affected by the increase of approximately 152 residents (i.e., 3 in an area of the City identified to have a parkland shortage.						
The need for park and other recreational facilities rises due to the additional strain on upkeep and maintenance that is required from the City as the population grows. The proposed project does not include on-site recreational facilities. The City requires all development projects to pay Park Development Impact Fees before issuing building permits to ensure that adequate park facilities are available for all residents. The funds needed to accommodate additional maintenance and upkeep of parks and other recreational services is fulfilled through the payment of these fees.						
Therefore, the proposed project will have a <b>less than signi</b> related to existing recreational facilities. No mitigation is requ	-	<b>t</b> directly, indi	irectly, or cu	umulatively		
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?						
Less Than Significant Impact. The proposed project includes the construction of recreational facilities in the form of a 15 foot wide multipurpose trail along Bradley Street. This is consistent with the City's Parks Master Plan. The City's adopted standard for developed park acreage of 3 acres per 1,000 residents will not be adversely affected by the increase of approximately 152 residents (i.e., 3.3 persons per unit). The project site is not located in an area of the City identified to have a parkland shortage. The City requires all development projects to pay Park Development Impact Fees before issuing building permits to ensure that adequate park facilities are available for all residents. The funds needed to accommodate additional maintenance and upkeep of parks and other recreational services is fulfilled through the payment of these fees. Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively related to future recreational facilities. No mitigation is required.						
17. TRANSPORTATION.  Would the project result in:						
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?						
17a. Response: (Source: General Plan 2025:Figure CCM-		-	-	-		

Response: (Source: General Plan 2025: Figure CCM-4 - Master Plan of Rodaways, FFEIR Figure 3:15-4
 Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025); Table 5:15-D - Existing and Future Trip Generation Estimates; Table 5:15-H - Existing and Typical Density Scenario Intersection

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
Levels of Service; Table 5.15-I – Conceptual General Table 5.15-J – Current Status of Roadways Project Freeway Analysis Proposed General Plan; and, A Traffic Study Appendix; SCAG's RTP; Kunny Rokunzman Associates, March 25, 2005; and, The Evaluations Letter prepared by Urban Crossroad,	ted to Operate Appendix H – ( anch Project 1 ract 37177 Tr	tion Improvent at LOS E or F Circulation Ele Traffic Impact affic Study Ti	nent Recomn in 2025; Tab ment Traffic Analysis, p	le 5.15K - Study and repared by	
<b>Less than Significant Impact.</b> The significance of potential in Impact Analysis (TIA) prepared in 2005 and reexamined in 2	-	isting plans we	re evaluated	in a Traffic	
The TIAs found that the project site is currently undeveloped and does not generate significant traffic. Existing roadways adjacent to the proposed project include Washington Street, Overlook Parkway, and Bradley Street. The study area intersections currently (2005) operate at Level of Service C or better during the peak hours for existing traffic conditions.					
The proposed project that was evaluated in the 2005 TIA dwelling units. The 2005 TIA found that the proposed deve vehicle trips, 112 of which will occur during the morning pea peak hour. The 2005 TIA recommended five (5) mitigation recommended five (6) m	elopment woul k hour and 150	d generate apports of which will o	proximately ccur during t	1,426 daily he evening	
However, the current proposed project evaluated in the homes. The 2016 TIA found that the proposed project wou project. The existing and planned roadway system characteristic found that the existing (2016) traffic volumes have general volumes included in the 2005 TIA. The 2016 TIA found that peak hour trips to any potential study area intersection. The volumes are lower than the previously published long reaggregate and for every individual turning movement evaluations.	ald generate less teristics were ally decreased to the proposed ne 2016 TIA also ange (2030) tra	s traffic than t essentially und compared to t project would o found that th	he previously hanged. The 2005 existing to contribute less existing (2)	y approved e 2016 TIA sting traffic ess than 50 016) traffic	
Because the maximum project peak hour traffic contribution 50 peak hour trips, the project contribution is below the <b>significant</b> .		•			
b. Conflict with an applicable congestion manageme program, including but not limited to level of service standards and travel demand measures, or oth standards established by the county congestice management agency for designated roads highways?	ce er on				
17b. (Source: General Plan 2025:Figure CCM-4 – Maste Capacity (V/C) Ratio and Level of Service (LOS) (T Generation Estimates; Table 5.15-H – Existing of Service; Table 5.15-I – Conceptual General Plan 5.15-J – Current Status of Roadways Projected to C Analysis Proposed General Plan; and, Appendix H Appendix; SCAG's RTP; Kunny Ranch Project Traff March 25, 2005; and, Tract 37177 Traffic Study T	ypical 2025); T and Typical De Intersection Im Operate at LOS — Circulation E ic Impact Analy	able 5.15-D – i ensity Scenario pprovement Re E or F in 2025; lement Traffic vsis, prepared i	Existing and on Intersection of Intersection o	Future Trip on Levels o tions; Table K – Freeway traffic Study Associates	

by Urban Crossroad, September 15, 2016).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
<b>No impact.</b> The project site does not include a state highway Congestion Management Program (CMP) and the project Management/Air Quality components of the Program. Therefore directly, indirectly, or cumulatively related to an increase in capacity of the street system.	is consister ore, the propo	nt with the Tosed project wi	ransportation Il have <b>no im</b>	n Demand npact either		
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?						
17c. Response: (Source: General Plan 2025 Figure PS-6A – Airport Safety Zones and Influence Areas and PS-6B – Airport Land Use Compatibility Zones and Influence Areas; 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, Avigation Easement [(March Air Reserve Base and March Inland Port) (May 13, 20160].						
<b>No impact.</b> The Project will not result in any change to air trafe <i>Port Airport Land Use Compatibility Plan</i> (adopted November 2 Zone D. Zone D is referred to as a flight corridor buffer and has	014), the pro	ject site is loca	ted within Co	ompatibility		
The proposed project will not change air traffic patterns, incontraffic patterns. It is not located within an airport influence area directly, indirectly, or cumulatively on-air traffic patterns.						
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?						
17d. Response: (Source: Project Site Plans, Lane Stripi Transportation Highway Design Manual, Municipa Impact Analysis, prepared by Kunzman Associates Traffic Study Exemption Evaluations Letter prepare	l Code, and F s, March 25,	ire Code; Kunr 2005; and Tro	ny Ranch Pro act 37177 Ti	oject Traffic raffic Study		
<b>Less Than Significant Impact.</b> Vehicular traffic to and from the regional and local roadways that serve the project site. The proposed not introduce a land use that would conflict with each Vehicular access to the project site would be provided from of Houser Place.	oposed proje xisting urbar	ct would introd land uses in	duce new roa the surrour	adways but nding area.		
Design of the proposed project, including curb cuts, ingress, subject to review by City Traffic Engineering Section of the P compatible with adjacent existing uses. The proposed pro incompatible use or additional or any hazards to the surround	ublic Works I ject has bee	Department. T en designed so	he proposed	d project is		
Therefore, the proposed project will have a less than significate to a substantially increase hazards due to a design feature. N	-		, or cumulat	ively relate		

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
e. Result in inadequate emergency access?			$\boxtimes$	
17e. Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code; Kunny Ranch Project Traffic Impact Analysis, prepared by Kunzman Associates, March 25, 2005; and Tract 37177 Traffic Study Traffic Study Exemption Evaluations Letter prepared by Urban Crossroad on September 15, 2016).				
Less Than Significant Impact. During construction, the proposed project must require at least one lane of travel to be open and available at all times. This will eliminate any impact to emergency access. The project will be designed in compliance with Title 18, Section 18.210.030 and the 2016 California Fire Code, as adopted in Section 16.32 of the RMC. Such requirements include building and emergency access; adequate emergency notification; and means of egress for emergency vehicles. Prior to project approval, RFD would formally review all project plans to ensure compliance with applicable fire safety requirements, ensuring that emergency access is adequate. The project would not result in inadequate emergency access on-site because it would be subject to plan review and inspection by the City of Riverside Fire Prevention Bureau prior to construction and occupancy, respectively, to ensure that required fire protection safety features, including emergency access, are implemented. Therefore, the proposed project will have a less than significant impact either directly, indirectly, or cumulatively related to inadequate emergency access.				
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?				
17f. Response: (Source: FPEIR, General Plan 2025 Land U Mobility and Education Elements, Bicycle Master F Safe!)				-
No Impact. The proposed project would not affect adopted would be subject to compliance with policies, plans, and pr regarding alternative modes of transportation. Pedestrian pedestrian facilities (e.g., sidewalks and crosswalks) that are paproject would not remove or relocate any alternative transport conflict with adopted plans, policies, or programs support. Therefore, the proposed project will have no impact directly, it transit, bicycle, or pedestrian facilities plans. No mitigation is	ograms of the surrection accessing art of the surrection accessing alternation addrectly, or condinectly, or c	the City and other the proposed counding streets points. The transportation	ner applicable project won the system. The proposed propo	le agencies ould utilize e proposed roject does

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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			$\square$	
Historical Resources, or in a local register of historical				
resources as defined in Public Resources Code Section				
5020.1(k), or				
18a. Response: (AB52 Consultation; GP 2025 FPEIR Figure		_	-	_
5.5-2 - Prehistoric Cultural Resources Sensitivity; Ap	•		•	
Resources Survey prepared by Brian F. Smith and As Evaluation Report and Mitigation Plan for the Kunn	-	-		-
Resource Management, Inc., April 2003;and, A Culti	-			_
prepared by Brian F. Smith and Associates, Inc., Ma			-	,
,	,		, -,,	
<b>Less Than Significant Impact.</b> The proposed project will not ca of a tribal cultural resource that is listed or eligible for listing in a local register of historical resources because there are no	in the Califor	nia Register of	Historical F	Resources or
A cultural resources records search was conducted for the p	•			
Eastern Information Center (EIC) and the University of Californiet identified four previously recorded bedrock milling site				
two previously recorded historic refuse deposits (RIV-7754 and	•			•
sites, however, are listed or eligible for listing in the California				
of historical resources, as set forth in greater detail in Sections	_		ces or ill a i	ocai register
or instanted resources, as see for all in greater detail in sections	o o above and	100 00.000		
Therefore, the proposed project will have less than signification	ant impact d	lirectly or indi	rectly to tri	bal cultural
resources listed or eligible for listing in the California Registe	er of Historic	al Resources o	or in a local	register of
historical resources. No mitigation is required.				
b. A resource determined by the lead agency, in its			$\square$	
discretion and supported by substantial evidence, to				
be significant pursuant to criteria set forth in				
subdivision (c) of Public Resources Code Section				
5024.1. In applying the criteria set forth in				
subdivision (c) of Public Resources Code Section				
5024.1, the lead agency shall consider the				
significance of the resource to a California Native				
American tribe.				.1.51.
18b. Response: (AB52 Consultation; GP 2025 FPEIR Figu.		_	-	_

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

Resources Survey prepared by Brian F. Smith and Associates, Inc., October 12, 2017; Paleontological Evaluation Report and Mitigation Plan for the Kunny Ranch Project, Riverside County by Cogstone Resource Management, Inc., April 2003; and, A Cultural Resources Assessment for TR 37177, prepared by Brian F. Smith and Associates, Inc., March 8, 2018 and revised May 3, 2019).

**Less Than Significant Impact.** The proposed project will not result in a significant impact to a resource determined by the City to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1 This section provides that a resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria: (1) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) is associated with the lives of persons important in our past; (3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (4) has yielded, or may be likely to yield, information important in prehistory or history.

As mentioned above in Section 18a, a cultural resources records search was conducted for the project area and a one-mile radius around it at the Eastern Information Center (EIC) and the University of California, Riverside (UCR). The records search for the project identified four previously recorded bedrock milling sites (RIV-3580, RIV-3581, RIV-3594, and RIV-3595) within the project area. The City engaged in consultation with Native American Tribes regarding these potential tribal cultural resources. Specifically, the City commenced tribal notification in accordance with AB 52 on November 15, 2016. Four California Native American tribes (San Manuel Band of Mission Indians, Gabrieleno Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and Pechanga Temecula Band of Luiseño Indians) responded as part of the AB 52 consultation effort. San Manuel Band of Mission Indians and Gabrieleno Band of Mission Indians had no comments. The Agua Caliente Band of Cahuilla Indians, and Pechanga Temecula Band of Luiseño Indians requested Government to Government consultation. Consultation with Agua Caliente Band of Cahuilla Indians occurred on February 28, 2017 and consultation concluded on June 28, 2018. Consultation with Pechanga Temecula Band of Luiseño Indians occurred on January 18, 2017 and consultation concluded on May 28, 2019.

A project site visit was conducted on July 11, 2017, which included representatives from the Pechanga Band of Luiseño Mission Indians, the City of Riverside, the Project Applicant, the project engineer, and Brian F. Smith and Associates, Inc. The goal of the meeting was to provide the representatives from the Pechanga Band and the City an opportunity to review the property and observe the identified prehistoric sites, as well as to provide design input and recommendations with regards to the prehistoric cultural resources identified within the project APE. Representatives from the Pechanga Band were invited to observe the Brian F. Smith and Associates, Inc. archaeological testing fieldwork. Pechanga Native American representative observed the archaeological testing conducted at prehistoric sites RIV-3580 and RIV-3581 on January 16, 2018.

From the perspective of tribal representatives from the Pechanga Band of Luiseño Mission Indians, the milling features on the property do present important elements of their past use of the property and the surrounding area. The City has considered the significance of RIV-3580, RIV-3581, RIV-3594, and RIV-3595 to the Pechanga Band of Luiseño Mission Indians, and as discussed below, has revised the project to address the Pechanga Band's concerns.

Nevertheless, the City does not conclude that RIV-3580, RIV-3581, RIV-3594, and RIV-3595 is significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

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

First, the milling sites are not associated with any specific events that have made a significant contribution to the broad patterns of California's history and cultural heritage. No archaeological artifacts were identified on the surface of the sites or in any of subsurface excavations; because of the minimally used milling surface and the lack of surface or subsurface cultural materials, it is likely that the milling sites were minimally used prehistoric food processing sites.

Second, the milling sites are not associated with the lives of any specific persons important in the City or the State's past. The milling sites are not associated with the lives of any specific persons at all.

Third, the milling sites do not embody the distinctive characteristics of a type, period, region, or method of construction; they do not represent the work of an important creative individual; and they do not possess high artistic values. To the contrary, as noted above, the evidence suggests that the milling sites were minimally used prehistoric food processing sites.

Fourth, the milling sites have not yielded, and are not likely to yield, information important in prehistory or history. Again, no archaeological artifacts were identified on the surface of the sites or in any of the subsurface excavations in the vicinity of the sites; accordingly, the level of information already obtained from the sites, including documentation of boundaries, has exhausted its research potential.

That said, while the cultural resources do not qualify as Historical Resources under CEQA and site-specific mitigation measures are not required, to address the comments raised by the Pechanga Band of Luiseño Mission Indians during consultation, the applicant plans to preserve and protect the largest concentration of bedrock milling features within the project area found at Site RIV-3581 within an open space parcel identified as Lot B on the project plans. Furthermore, the applicant will also attempt to relocate the remaining bedrock milling features at Site RIV-3581, as well as those from sites RIV-3580, RIV-3594, and RIV-3595 that are within the grading envelope to Lot B, where they will be preserved as well. Moreover, as discussed in Section 5 above, at the request of the Pechanga Band of Luiseño Mission Indians, the applicant has agreed to Mitigation Measures Measure CUL-1 through CUL-6 to address any potential impact to undiscovered, buried unique archaeological resources.

Ultimately, because the City has not determined that any cultural resource at the project site is significant pursuant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, impacts would be less than significant.

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 storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		

9a. Response: (Source: General Plan 2025 Figure LU-10 - Land Use Policy Map; General Plan 2025 Land Use and Urban Design Element; Zoning Map of the City of Riverside; 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; FPEIR Table 5.16-G - General Plan Projected Water Demand for RPU Including Water Reliability for 2025; Table 5.16-I -Current and Projected Water Use WMWD; Table 5.16-J - General Plan Projected Water Demand for

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

WMWD Including Water Reliability 2025; Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area & Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD; and, Figure 5.16-4 — Water Facilities and Figure 5.16-6 — Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR; FPEIR Figure 5.16-2 - Drainage Facilities ;General Plan 2025 Figure PF-2 – Sewer Facilities Map; FPEIR Figure 5.16-5 – Sewer Service Areas; Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area.)

**Less Than Significant Impact.** The proposed project would not result in the relocation or construction of any new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The proposed project is an infill project and waterlines currently exist in the adjacent roadways. The proposed project will install a new onsite water main line that will loop through the project site conveying water supply to each residence. The proposed project will receive water supply through existing water lines located in Bradley Street and Highgrove Street, which will not result in the construction of new or expanded water facilities.

A wastewater line is located within Bradley Street. The proposed project will install an onsite wastewater line to serve the residences. Wastewater facilities would be provided by the City sewer system. The proposed project is within the boundaries of the Santa Ana Regional Water Quality Control Board (RWQCB). Wastewater in the surrounding area is transported to the Riverside Regional Water Quality Control Plant.

The proposed 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). Therefore, the proposed project will have a less than significant impact directly, indirectly, or cumulatively that would result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities. No mitigation is required.

The primary sources of pollutants to storm water from the proposed project are construction and demolition activities and runoff from roofs and paved areas. All new development in the City is required to comply with all provisions of the NPDES program and the City's Municipal Separate Sewer Permit (MS4), as enforced by the RWQCB. The proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or storm water system within the City. The proposed project would discharge its wastewater to a facility that is legally required to meet wastewater standards and the proposed project is required to adhere to the above regulations related to wastewater treatment. The proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City with these existing requirements. Therefore, there will be a less than significant impact directly, indirectly, or cumulatively that would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

The proposed project would result in an increase in impervious surface area, but this would not generate increased storm water flows with potential to impact drainage facilities and require the provision of additional facilities. The City Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund that is maintained by Riverside County Flood Control and Water Conservation District. This Section also complies with the California Government Code (section 66483), which provides for the payment of fees for construction of drainage facilities. Fees are required to be paid as part of the conditions of approval/waiver for filing of a final map or parcel map.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
General Plan 2025 Policies PF 4.1 and PF 4.3 require the City system and to fund and improve those systems as ideal Implementation of these policies will ensure that the City is acceptant 2025 also includes policies and programs that will minimize such facilities. Therefore, the proposed project will have accumulatively on existing storm water drainage facilities that we no mitigation is required.	ntified in th lequately ser ze the envirou less than sig	e City's Capit ved by drainag nmental effect nificant impac	tal Improve e systems. T s of the deve t directly, in	ment plan. The General elopment of ndirectly, or
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				
19b. Response: (Source: General Plan 2025 Figure LU-10 Use and Urban Design Element; Zoning Map of the Service Areas, Figure 5.16-4 – Water Facilities; Table (AC-FT/YR, Table 5.16-F – Projected Water Demand Demand for RPU including Water Reliability for 202 Water Supply (acre-ft/year) WMWD Table 5.16-I Table 5.16-J – General Plan Projected Water Demand Less Than Significant Impact. The proposed project will not project is consistent with the General Plan 2025 Typical Grod determined to be adequate (see Tables t.16-E, 5.16-F, 5.16-G, Final PEIR). Therefore, the proposed project will have a lecumulatively related to water supplies. No mitigation is required.	te City of Rivide 5.16-E - Rivide 5.16 S; Table 5.16 Current and the for WMWI the exceed expowth Scenarion 5.16-H, 5.16- ss than signi	rerside; FPEIR PU Projected D 6-G – General 6-H – Current a Projected Wa D Including Wa ected water so where future	Figure 5.16- Domestic War Plan Projected Iter Use Whater Reliability policy. The water supplies of the General	ater Supply ted Water d Domestic MWD; and, ity 2025.)  proposed plies were Plan 2025
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
19c. Response: (Source: General Plan 2025 Figure LU-10 — and Urban Design Element; Zoning Map of the City Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16 the City of Riverside's Sewer Service Area, Table 5.16 the Planning Area Served by WMWD, and Wastewat	of Riverside, 5-K - Estimate 5-L - Estimate	; FPEIR Figure ed Future Was ed Future Was	5.16-5 - Se tewater Ger tewater Ger	wer Service neration for neration for
Less Than Significant Impact. The proposed project will not expended a Regional Water Quality Control Board. The proposed Typical Growth Scenario where future wastewater generation of the General Plan 2025 Final PEIR). The current Wastewater for this type of project. Therefore, the proposed project indirectly, or cumulatively related wastewater treatment. No	ed project is o was determi er Treatment will have a <b>l</b>	consistent with ined to be ade Master Plan a <b>ess than sign</b> i	the Genera quate (see Ta nticipates ar	l Plan 2025 able 5.16-K nd provides
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?				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant	Less Than Significant	Less Than Significant	No Impact						
	Impact	With Mitigation	Impact							
		Incorporated								
19d. Response: (Source: General Plan 2025 Figure LU-10										
Use and Urban Design Element; Zoning Map of the City of Riverside; and, FPEIR Table 5.16-A – Existing										
Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area.)										
Less Than Significant Impact. Solid waste generated during convil be disposed of at the Badlands Landfill, located at 31125 I project is consistent with the General Plan 2025 Typical Build-determined to be adequate (see Tables 5.16-A and 5.16-M of project, once operational, is estimated to generate a maximum is well below the maximum permitted daily tonnage accepted project will have a less than significant impact directly, indirectly mitigation is required.	ronwood Ave out Project le f the General m of 480 pou by the Badla	enue in Morene evel where futu Plan 2025 Fin nds per day (0 nds Landfill. T	o Valley. The are landfill ca al PEIR). The .24 tons per herefore, the	e proposed apacity was e proposed day) which e proposed						
e. Comply with federal, state, and local management and										
reduction statutes and regulations related to solid waste?										
Use and Urban Design Element; Zoning Map of the Management Board 2002 Landfill Facility Complian  Less Than Significant Impact. The California Integrated Waste requires that local jurisdictions divert at least 50% of all solid currently achieving a 60% diversion rate, well above State required Code requires all developments to divert 50% of non-hazardous and 100% of excavated soil and land clearing debris for all not proposed project must comply with the City's waste disputioning Code and as such would not conflict with any Federa Therefore, the proposed project will have a less than significant proposed solid waste statutes. No mitigation is required.	Managemer waste gene irements. In a construction on-residentia tosal requirer l, State, or lo	nt Act under the rated by Janua addition, the Ca n and demolition I projects beginents as well a cal regulations	e Public Resory 1, 2000. alifornia Greon debris for nning Janua as the Califo related to s	Durce Code The City is en Building all projects ry 1, 2011. rnia Green olid waste.						
<b>20. WILDFIRES</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:										
a. Substantially impair an adopted emergency response plan			$\boxtimes$							
or emergency evacuation plan?										
<b>20a.</b> Response: (Source: General Plan 2025; Figure PS-7).  Less Than Significant Impact. The proposed project would response plan or emergency evacuation plan. While portions High Fire Severity Zone (VHFSZ) as depicted in the City Ger proposed project will be developed in accordance with all appliemergency response planning and emergency evacuation plan	not substar of the propo neral Plan on cable Federa	osed project ar Figure PS-7,	e located wi Fire Hazard	thin a Very Areas, the						

Moreover, the proposed project will be consistent with the requirements for setbacks between structures. In addition, the project site allows for secondary access for emergency vehicles as shown on the Tentative Map of Tract 37177. The proposed project will be reviewed by the City Fire Department and conditions of approval will

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No
INFORMATION SOURCES):	Significant	Significant	Significant	Impact
	Impact	With	Impact	
		Mitigation		
	Th	Incorporated		l t : f
be applied to help ensure the safety of the residents and struc fire hydrants, construction materials, length and grade of the				
ine riyurants, construction materials, length and grade of the t	aliveways, go	iteu entries, an	iu turriirig ra	uius.
Given the relative size and use of the proposed project no impa	act to emerge	ency response	times or ove	rall impacts
on City Fire Department Facilities would be anticipated to occur	r. Any potent	tial significant e	effects will be	prevented
by the payment of standard fees.				
With the payment of standard fees, and strict adherence to th	o California (	Sovernment Co	ada tha Buil	ding Codo
and local regulations, the proposed project will have a <b>les</b> :				_
emergency response plan or emergency evacuation plan direc	_	-		ii ddopted
	, ,	,	, 	
b. Due to slope, prevailing winds, and other factors,		$\boxtimes$		
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; California Ene	way Commis	sian Tatal Sud	tom Floatric	Concretion
(2017), www.energy.ca/gov).	ergy Commis.	sion, Total Syst	em Electric	Generation
(2017), William English, gov,				
Less Than Significant Impact With Mitigation. The proposed p	roject is part	ially located in	a very high f	ire zone as
depicted in the City General Plan on Figure PS-7, Fire Hazard A	•	•		•
in an area of prevailing winds, and there are no other factors t				
project would not expose project occupants to pollutant co spread of a wildfire. Nevertheless, the proposed project will b				
1, which will further ensure that any impact relating to wildfire	•	•	_	
2) Which the faller chaire that any impact relating to this in		enan olgimidan		
MM-HAZ-01: A Fuel Modification Plan for TR 37177 shall be				-
Riverside Fire Department Fire Protection Planning Section (Fi	•			•
Modification Plan shall show the area and location of fuel mod		•		
combustible mitigation and shall adhere to the Fire Departmer Fuel Modification Plans. After the Fire Department approvers	•		•	•
Association of the Project shall be responsible for implementing				incowner 3
	8			
c. Require the installation or maintenance of associated			$\boxtimes$	
infrastructure (such as roads, fuel breaks, emergency water				
sources, power lines or other utilities) that may exacerbate fire				
risk or that may result in temporary or ongoing impacts to the environment?				
20c. Response: (Source: General Plan 2025; California Ene	ray Commis	sion Total Syst	tom Floctric	Generation
(2017), www.energy.ca/gov).	argy Commis	sion, rotur syst	em Liectific	deneration
( <b></b> , , , , , , , , , , , , , , , , , ,				
Less Than Significant Impact. The proposed project would	l not require	the installati	on or maint	enance of
associated infrastructure that may exacerbate fire risk or that	•			
environment. The proposed project would be located as	-			-
development would proceed in accordance with all applica maintenance of project infrastructure would not exacerbate	-			
going impact related to wildfires.	arry KIIOWII I	113K OF 1E30	iit iii teilipoi	ary or one

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
Therefore, the proposed project will have a less than significated.	ant impact r	elating to this	issue. No r	nitigation is
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; California Ene	ergy Commis	sion, Total Sys	tem Electric	Generation
(2017), www.energy.ca/gov).				
Less Than Significant Impact. The proposed project would not such as downslope or downstream flooding or landslides, a drainage changes.  The project site is characterized by diverse topography, ranging are no areas surrounding the project site that would be considered in significant risk of downslope or downstream flooding or landsforth in greater detail in the Hydrology and Water Quality Section significant risks stemming from drainage changes. Moreove this document, the proposed project would not result in significant risks to significant risks, including downslope or downst post-fire slope instability, or drainage changes quality direct	g from gently dered as dow slides associa tion of this d er, as set for icant risk aris ant impact r tream floodi	rolling to flat and an an arrow the procument, the procument of the first from slope and or landslide	ind rocky ter accordingly, roject. Simi project woul ogy and Soil stability issu exposure of s, as a resul	rrain. There there is no larly, as set d not result s Section of ues.
required.				
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to 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, 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(s): General Plan 2025, prepared l	by City of Riv	erside, Novem	ber 2007; Ge	eneral Plan
2025 Final Program Environmental Impact Report, Habitat Assessment Including the Results of a Focus Analysis TM 37177, City of Riverside, Riverside C Riverside East Quadrangle, Township 3 South, Ra Gonzales Environmental Consulting LLC, Septemble Environmental Impact Report, Figure 5.5-1 - Archae Cultural Resources Sensitivity, prepared by City of I Resources Study and Cultural Resources Survey, p	prepared bed Burrowing ounty, Californge 5 West, er 12, 2018; eological Sen Riverside, Note to prepared by	y City of River g Owl Survey a prnia, USGS 7. portion of Se General Pla ssitivity and Fig vember 2007; Brian F. Smitl	rside, Noven nd MHSCH C 5-minute to ection 14, pi n 2025 Fina gure 5.5-2 - Appendix D n and Assoc	nber 2007; Consistency Opographic Cepared by Il Program Prehistoric O – Cultural iates, Inc.,

ISSUES (AND SUPPORTING	Potentially	Less Than	Less Than	No					
INFORMATION SOURCES):	Significant	Significant	Significant	Impact					
	Impact	With	Impact						
		Mitigation							
2: :1.0 :	•	Incorporated	2000 /						
Riverside County, prepared by Cogstone Resource Management, Inc., April 2003; and, A Cultural Resources Assessment for TR 37177, prepared by Brian F. Smith and Associates, Inc., March 8, 2018)									
Resources Assessment for TR 37177, prepared by ы	ian F. Smith	ana Associates	s, inc., iviarci	18, 2018)					
Less Than Significant Impact with Mitigation. 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. 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 and Tribal Cultural Resources Sections of this Initial Study and were found to be less than significant with mitigation.									
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: (Sources: <i>General Plan 2025</i> , prepared by Plan 2025 Final Program Environmental Impact R 2007)									
<b>Less Than Significant Impact.</b> The proposed project will no impacts. Notably, the proposed project is consistent with t which were previously analyzed in the <i>General Plan 202</i> Accordingly, cumulative impacts of the proposed project are	he General F 25 Final Prog	Plan 2025, the gram Environn	cumulative	impacts of					
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?									
21c. Response: (Sources: Please see Sections 1 to 20.)  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. As set forth in this document, project impacts related to applicable sections can be mitigated to a less than significant level. Based on the analysis and conclusions in this Initial Study, the proposed 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 <b>less than significant with mitigation</b> .									

**Note:** Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 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**

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Draft Initial Study-Mitigated Negative Declaration (IS-MND), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

## **Mitigation Monitoring and Reporting Program**

Impact	Minimation Management		luculamentation Timina			Complia	nce Verification
Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Initial	Date	Comments
Biological Resources	MM-BIO-1: 1.723 acres of riparian habitat (Salix gooddingii Riparian woodland) will be conserved on site. A conservation easement shall be recorded for the on-site conserved riparian habitat and managed by either Riverside Corona Resource Conservation District, Rivers and Land Conservancy, San Diego Conservancy, or Southwest Resource Management Association.	Verify recordation of conservation easement.	Prior to issuance of grading permits for the project.	City of Riverside - Community & Economic Development Department – Planning Division			
Biological Resources	MM-BIO-2: Provision of a one-time fee for 1.5 acres in-lieu fee program through Riverside-Corona Resource Conservation District, or any other approved in-lieu fee program at the time of rough grading permit issuance will be acquired for mitigation of the impacts at a minimum ratio of 2:1 or greater if required by another agency. Mitigation for the impacts will be at a minimum 3:1 ratio for riverine or whatever is required by California Department of Fish and Wildlife California Regional Water Quality Control Board, and US Army Corps of Engineers. Should sufficient in-lieu fee credits not be available for purchase at the time the project is implemented, or should other agencies not approve in-lieu fee credit purchase, then the Developer must prepare and submit for review and approval a Habitat Mitigation and Monitoring Plan (HMMP) for a site-specific restoration project at a minimum 3:1 mitigation to impact ratio. The plan must meet County of Riverside requirements, as well as requirements of other resource and wildlife agencies. Appropriate guarantees for the restoration project must be in place prior to issuance of a grading permit.	Verify that all in-lieu mitigation fees are paid.  Submit and have approved a HMMP for a site-specific restoration project at a minimum 3:1 mitigation ratio. This plan must meet the County of Riverside's requirements.	Prior to issuance of grading permits for the project.	City of Riverside - Community & Economic Development Department - Planning Division			
Biological Resources	<ul> <li>MM-BIO-3: In addition to the measures addressing riparian/riverine resources, which will benefit the least Bell's vireo, the project will further avoid, minimize, and mitigate effects to the least Bell's vireo with implementation of the following measures:</li> <li>To avoid and minimize effects to the least Bell's vireo, removal of riparian vegetation prior to construction shall occur between September 1 and February 14 to avoid least Bell's vireo breeding season, as well as the general breeding season for other nesting birds. If vegetation removal must occur during nesting season, a nest survey</li> </ul>	Removal of riparian vegetation shall occur between September 1 and February 14 to avoid impacts to Bell's Vireo and nesting birds. A qualified Biologist shall conduct a survey and help implement mitigation if construction must remove riparian	Prior to issuance of grading permits for the project.	City of Riverside - Community & Economic Development Department — Planning Division			

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Impact						Complia	ance Verification
Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Initial	Date	Comments
	shall be conducted by a qualified biologist	vegetation during					
	within seven days prior to vegetation	nesting season.					
	removal activities to ensure that no active						
	nests are present. If nests are present, no	<ul><li>If construction is to</li></ul>					
	vegetation removal shall occur within 50	occur during nesting					
	feet of the active nest until the young have	season a qualified					
	fledged or the nest is determined to be	biologist will survey,					
	inactive.	map the nests and require a 500-foot					
	<ul> <li>Should any construction activity occur</li> </ul>	buffer around					
	during the nesting season for least Bell's	occupied nests. A					
	vireo (February 15 to October 31), seven	qualified Biologist					
	days prior to the onset of construction	will ensure the					
	activities during the least Bell's vireo	projects adherence					
	nesting season, a qualified biologist shall	to the required					
	survey within 500 feet of the project	mitigation measures					
	impact area for the presence of any active	if occupied nests are					
	least Bell's vireo nests. Any nest found	located on-site.					
	during survey efforts shall be mapped on						
	the construction plans. If no active nests						
	are found, no further mitigation would be						
	required. If nesting activity is present at						
	any raptor nest site, the active site shall be						
	protected until nesting activity has ended						
	to ensure compliance with Section 2503.5						
	of the California Fish and Game Code. To						
	protect any nest site, the following						
	restrictions to construction activities are						
	required until nests are no longer active as						
	determined by a qualified biologist: (1)						
	clearing limits shall be established within a						
	500-foot buffer around any occupied nest,						
	unless otherwise determined by a						
	qualified biologist, and (2) access and						
	surveying shall be restricted within 300						
	feet of any occupied nest, unless						
	otherwise determined by a qualified biologist. Any encroachment into the						
	buffer area around the known nest shall						
	only be allowed if the biologist determines						
	that the proposed activity will not disturb						
	the nest occupants. Construction can						
	proceed when the qualified biologist has						
	determined that fledglings have left the						
	nest and the nest is determined to be						
	inactive.						
Biological	MM-BIO-4: Should any construction activity occur	Prior to construction a	Prior to issuance of grading	City of Riverside - Community			
Resources	during the raptor nesting season (February 1 to	qualified Biologist shall	permits for the project.	& Economic Development			
	June 30), seven days prior to the onset of	conduct a raptor survey if		Department – Planning			
	construction activities during the raptor nesting	construction is to occur during		Division			
	season, a qualified biologist shall survey within 500	the raptor nesting season. A					
	feet of the project impact area for the presence of	qualified Biologist shall ensure					

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Category	Mitigation Measures		Implementation Timing		Initial	Date	Comments	
	any active raptor nests (common or special status). Any nest found during survey efforts shall be mapped on the construction plans. If no active nests are found, no further mitigation would be required. If nesting activity is present at any raptor nest site, the active site shall be protected until nesting activity has ended to ensure compliance with Section 2503.5 of the California Fish and Game Code. To protect any nest site, the following restrictions to construction activities are required until nests are no longer active as determined by a qualified biologist: (1) clearing limits shall be established within a 500-foot buffer around any occupied nest, unless otherwise determined by a qualified biologist, and (2) access and surveying shall be restricted within 300 feet of any occupied nest, unless otherwise determined by a qualified biologist. Any encroachment into the buffer area around the known nest shall only be allowed if the biologist determines that the proposed activity will not disturb the nest occupants. Construction can proceed when the qualified biologist has determined that fledglings have left the nest.	the project complies with the required mitigation.						
Biological Resources	MM-BIO-5: A preconstruction burrowing owl survey shall be conducted before issuance of a grading permit to verify the presence or absence of the owl on the project site. Within thirty days of the onset of construction activities, a qualified biologist shall survey within 500 feet of the project site for the presence of any active owl burrows. Any active burrow found during survey efforts shall be mapped on the construction plans. Results of the surveys shall be provided to the City of Riverside. If no active burrows are found, no further mitigation is required. If burrowing owls are found onsite during the 30-day preconstruction survey, the project proponent will notify the Wildlife Agencies, the City of Riverside, and the RCA immediately and will develop a Burrowing Owl Protection and Relocation Plan in conjunction with and approved by the Wildlife Agencies before ground disturbance. If nesting activity is present at an active burrow, the active site shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the California Fish and Game Code. Nesting activity for burrowing owl in the region normally occurs between March and August. To protect the active burrow, the following restrictions to construction activities shall be required until the burrow is no	A burrowing owl survey shall be conducted before issuance of a grading permit, and a qualified biologist shall survey within 500 feet of the project site for the presence of any active owl burrows within thirty days of the onset of construction activities.	Prior to issuance of grading permits for the project.	City of Riverside - Community & Economic Development Department - Planning Division				

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Impact			lumban sukaki sa Pinda s			Compli	iance Verification
Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Initial	Date	Comments
	longer active as determined by a qualified biologist: (1) clearing limits shall be established within a 500-foot buffer around any active burrow, unless otherwise determined by a qualified biologist, and (2) access and surveying shall be restricted within 300 feet of any active burrow, unless otherwise determined by a qualified biologist. Any encroachment into the buffer area around the active burrow shall only be allowed if the biologist determines that the proposed activity will not disturb the occupants. A Burrowing Owl Protection and Relocation Plan must be approved by USFWS and CDFW before construction can continue if burrowing owls or active burrows are found.						
Biological Resources	MM-BIO-6: If construction is to occur during the MBTA nesting cycle (February 15 to September 15), then seven days prior to the onset of construction activities during the MBTA nesting cycle, a qualified biologist shall survey the project area for any birds protected by the MBTA. The biologist must map active bird nests utilizing a hand-held global positioning system (GPS) and a 300 foot buffer will be flagged around the nest, unless the nest is a raptor nest, in which case a 500 foot buffer will be required. Construction activity shall not be permitted within the buffer areas while the nest remains active (e.g., has eggs or chicks within it).	A qualified Biologist shall survey and map area if construction is to occur during MBTA nesting cycle. The biologist shall give direction to comply with the required mitigation.	Prior to issuance of grading permits for the project.	City of Riverside - Community & Economic Development Department – Planning Division			
Cultural Resources	MM-CUL-1: 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 interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City and interested 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 Applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the Project site if the site design and/or proposed grades should be revised.	Verify that interested tribes have been notified of project changes, if any.  Verify that additional consultation has occurred, if necessary.  Verify that avoidance and preservation measures are implemented if site design and/or proposed grades are revised.  Verify execution of tribal monitoring agreement, as needed.	Prior to issuance of grading permits for the project.	City of Riverside - Community & Economic Development Department - Planning Division			
Cultural Resources	MM-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	Verify the retention of a certified Archaeologist and	At least 30 days prior to application for a grading permit and before any grading,	City of Riverside - Community & Economic Development			

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Impact	Minimahian Managura		Implementation Timing			Compli	ance Verification
Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Initial	Date	Comments
Category	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 interested 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 rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;  c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discovered, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;  d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and  e. The scheduling and timing of the Cultural	Paleontologist to monitor all ground-disturbing activities.  Obtain Archaeological Monitoring Plan.	excavation and/or ground disturbing activities take place.		Initial	Date	Comments
	Sensitivity Training noted in mitigation measure MM-CUL-6.						
Cultural Resources	MM-CUL-3: Relocation of Resources: All relocation of resources, previously identified for relocation, shall be directed by the project archaeologist and Native American Tribal Monitors from consulting tribes.	Under the supervision of the project archaeologist and Native American Tribal Monitors, all previously identified resources shall be relocated.	Prior to Final Occupancy.	City of Riverside - Community & Economic Development Department – Planning Division			

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Category		Action Required			Initial	Date	Comments	
Cultural Resources	MM-CUL-4: Relocated Resource Mapping: The relocated bedrock milling features shall be mapped using Trimble GeoXT Global Positioning System (GPS) unit equipped with TerraSync software. These locations shall be recorded on site maps and filed with the updated site forms submitted to the Eastern Information Center (EIC) at the University of Riverside (UCR).	Obtain evidence that relocated milling features are mapped accordingly.	Prior to issuance of Building Permit for the project.	City of Riverside - Community & Economic Development Department – Planning Division				
Cultural Resources	MM-CUL-5: 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. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the Project Archaeologist. The removal of any artifacts from the Project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and  2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and nonhuman 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 & Economic Development Department with evidence of same:  a. Accommodate the process for onsite 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;  b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred,	Notify Tribes within 24 hours of any inadvertent discovery of cultural resources.  Obtain proof that the project applicant has temporarily curated discovered resources. Obtain inventory of all artifacts removed and verification of tribal oversight.  Obtain evidence that all cultural resources are relinquished through one or more of the designated methods.	As needed during grading.  As needed during grading.  Upon completion of grading.	City of Riverside - Community & Economic Development Department — Planning Division				

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Impact	Mitigation Measures	Action Required Implem		Responsible Agency	Compliance Verification			
Category			Implementation Timing		Initial	Date	Comments	
	facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation:  c. If more than one Native American tribe or band is involved with the Project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center by default; 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 interested tribes.							
Cultural Resources	MM-CUL-6: 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.	Verify completion of Cultural Sensitivity Training and obtain list of attendees.	Prior to grading.	City of Riverside - Community & Economic Development Department - Planning Division				
Hazards & Hazardous Materials	MM-HAZ-01: A Fuel Modification Plan for TR 37177 shall be prepared and submitted for review to the City of Riverside Fire Department Fire Protection Planning Section (Fire Department) prior to final occupancy. The Fuel Modification Plan shall show the area and location of fuel modification necessary to reduce risk to structures from combustible	Fire Department to review a Fuel Modification Plan  Planning to obtain evidence that Fuel Modification Plan has been approved.	Prior to Final Occupancy.	City of Riverside - Fire Department and Community & Economic Development Department - Planning Division				

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Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
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	mitigation and shall adhere to the Fire Department's guidelines, standards, and policies governing Fuel Modification Plans. After the Fire Department approves the Fuel Modification Plan, the Homeowner's Association of the Project shall be responsible for implementing the Fuel Modification Plan.						

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