

# COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT

PLANNING DIVISION

## DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 3

1. Case Number: P19-0926 (GENERAL PLAN AMENDMENT), P19-0943 (REZONE), P19-

0958 (DESIGN REVIEW), P19-0959 (VARIANCE)

2. **Project Title:** Ivy Street Self Storage Expansion Project

3. **Hearing Date:** September 16, 2021

4. Lead Agency: City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street, 3<sup>rd</sup> Floor Riverside, CA 92522

**5. Contact Person:** Brian Norton, Senior Planner

**Phone Number:** (951) 826-5371

**6. Project Location:** The proposed project is located within the city of Riverside at 2998 Ivy Street

between State Route 91 (SR-91) and the BNSF Railroad, south of Ivy Street. The regional location is identified in Figure 1. Figure 2 identifies the project location on a USGS map and Figure 3 shows the project location on an aerial photograph.

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

Andy Turner

4437 Twain Avenue

San Diego, California 92120

**8.** General Plan Designation: Existing: LDR (Low Density Residential)

9. **Zoning:** Existing: APN 219-270-006 - R-1-7000 (Additional Single-Family Residential Zone)

APN 223-050-009 – CG (General Commercial)

**Proposed:** CR-CS (Commercial Retail – Commercial Storage Overlay Zone)

## 10. Description of Project:

The proposed project involves the expansion of the existing self-storage facility located south of the site by constructing an additional storage area of 13,400 square feet on a 1.40 acre parcel.

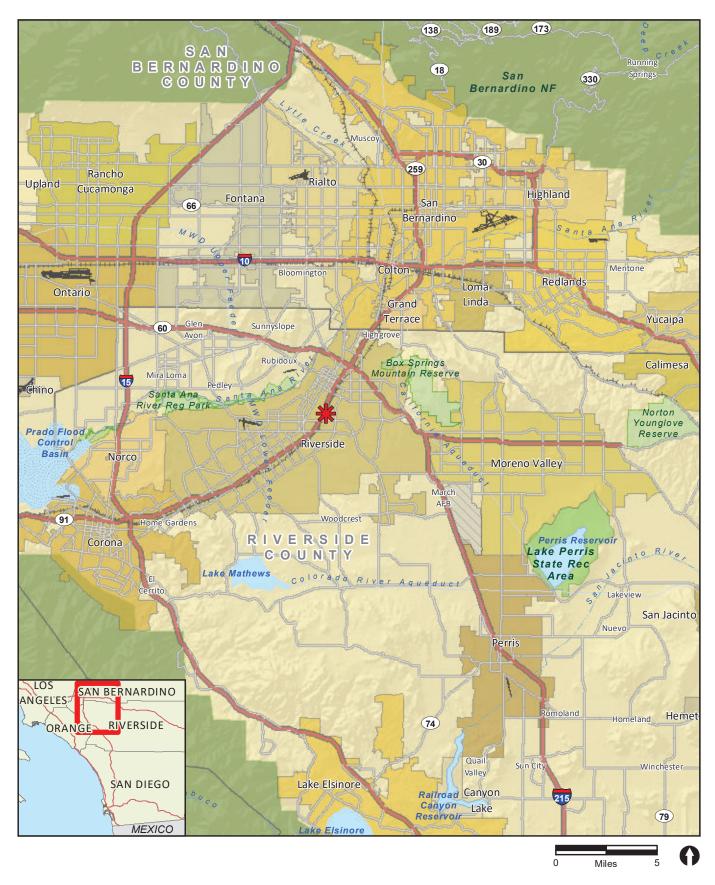
The following entitlements are proposed as part of the project:

- General Plan Amendment to amend 1.33 acres of the project site from LDR Low Density Residential to C Commercial;
- Zoning Code Amendment to rezone 1.40 acres from R-1-7000 Single-Family Residential Zone to CG-CS Commercial General and Commercial Storage Overlay Zones;
- Design Review of project plans; and
- Variance to allow the use of a decorative wrought iron fence along the project's perimeter where a decorative masonry wall is required by the Zoning Code.

Architecturally, the proposed expansion would match the existing facility to the south in both color and material. Buildings would be constructed with light gauge steel framing and have a maximum height of 12 feet (one story). Existing fencing surrounding the project site includes 6-foot-high chain-link fencing and would be replaced with 6-foot-high ornamental aluminum fencing.

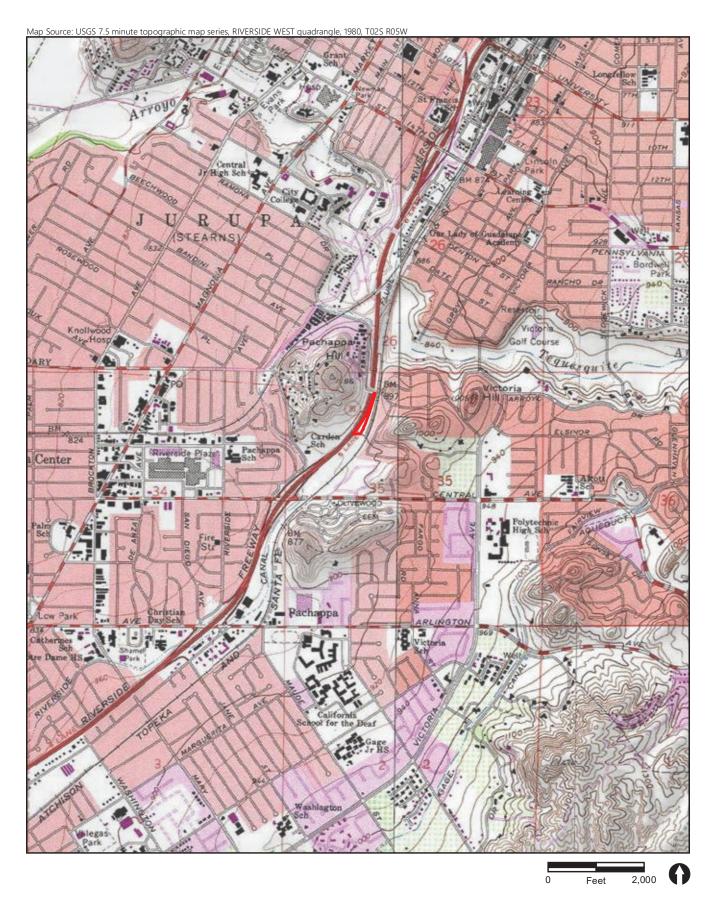
Vehicular access to the project site would be through the existing self-storage facility located south of the proposed expansion. Vehicles/moving trucks driving through the project site would access individual storage units, and roll-up doors. A new emergency exit is proposed at the north end of the project site connecting to Ivy Street. Additionally, the proposed project would require the extension of the existing irrigation system on the south property and electrical service for site lighting. The project does not propose the extension of existing walls or fences surrounding the site. The preliminary grading plan for the proposed project is shown on Figure 4.

The self-storage facility main entry gate would be open from 5:00 A.M. -9:00 A.M. seven days a week. While the office would be open Monday through Saturday from 9:00 A.M. -6:00 P.M. and Sunday from 10:00 A.M. -4:00 P.M.









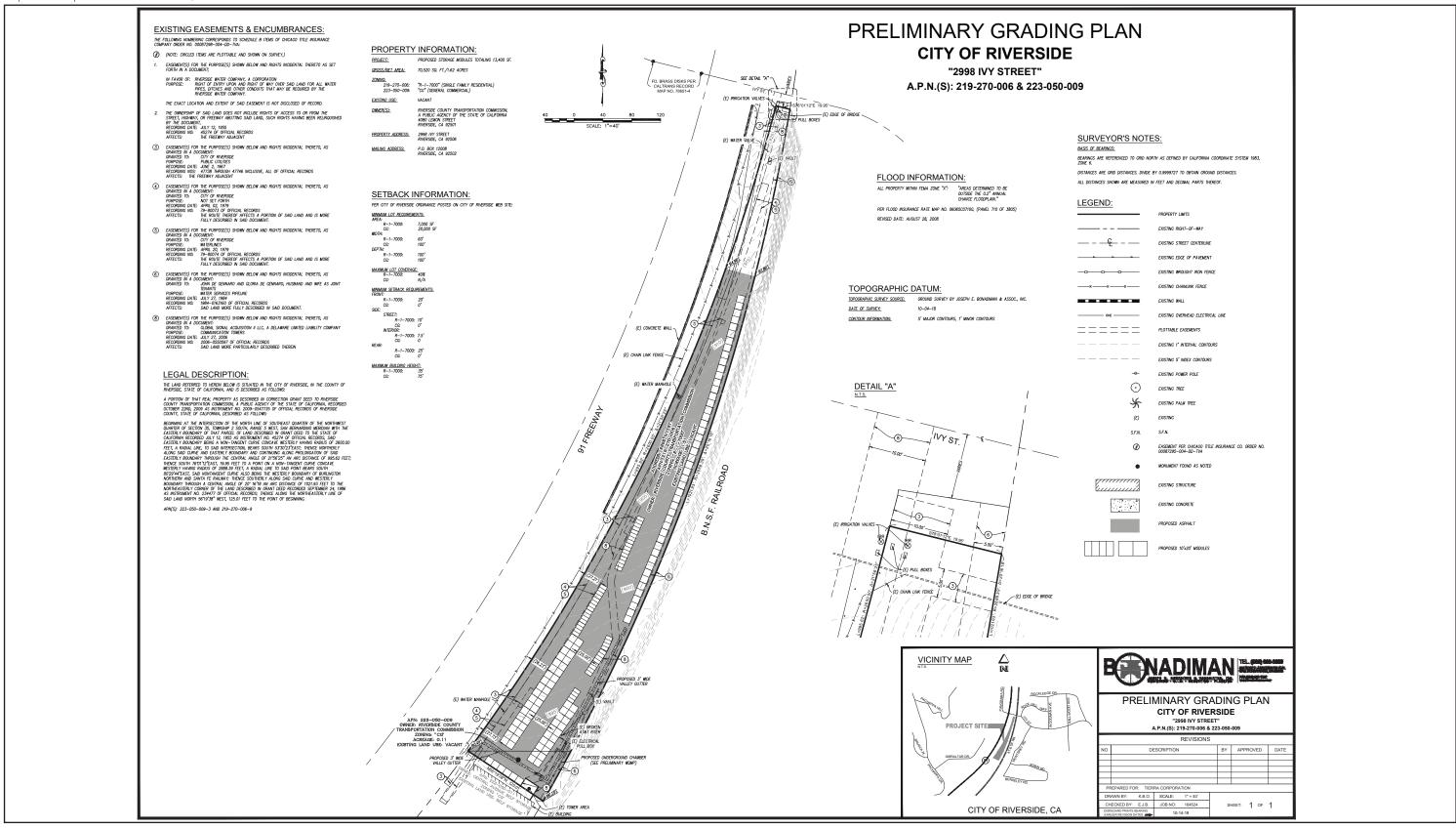




PANORAMA RD ROBIN RD Feet







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

The 1.62-acre project site is currently vacant. The site contained a single-family residence that was demolished in 2009 to facilitate improvements to SR-91. SR-91 borders the site to the north and west, the BNSF Railroad borders the site to the east, and the existing self-storage facility borders the site to the south. The proposed project would accommodate an expansion of the existing self-storage facility.

	<b>Existing Land Use</b>	General Plan Designation	Zoning Designation
Project Site	Vacant	LDR - Low Density Residential	APN 219-270-006 - R-1- 7000 - Single-Family Residential Zone  APN 223-050-009 – CG - Commercial General Zone
North	SR-91	n/a	n/a
East	BNSF Railroad	LDR - Low Density Residential	RWY - Railway Zone
South	Self Storage Facility	C - Commercial	CG - Commercial General
West	SR-91	n/a	n/a

- 12. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement.):
  - a. Riverside County Airport Land Use Commission (ALUC)
- 13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

RECON Environmental, Inc. contacted the Native American Heritage Commission on August 22, 2019, requesting a search of their Sacred Lands File for information on Native American cultural resources in or adjacent to the project area of potential effect (APE). A reply was received on September 19, 2019, stating that the search of the Sacred Lands Files was completed with negative results. In accordance with Senate Bill (SB) 18 and Assembly Bill (AB) 52 requirements, the City contacted Native American tribes who may also have knowledge of cultural resources in the project area. A total of five tribes responded and three tribes requested consultation including the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe.

- 14. Other Environmental Reviews Incorporated by Reference in this Review:
  - a. General Plan 2025
  - b. GP 2025 FPEIR

#### 15. List of Attachments:

- 1: Air Quality and Greenhouse Gas Analysis for the Ivy Street Self Storage Expansion Project, RECON Environmental, Inc., October 17, 2019
- 2: Cultural Resources Survey for the Ivy Street Self Storage Expansion Project, RECON Environmental, Inc., October 28, 2019
- 3: Water Quality Management Plan, 2998 Ivy Street, Joseph E. Bonadiman & Assoc., Inc., August 2019
- 4: Noise Analysis for the Ivy Street Self Storage Expansion Project, RECON Environmental, Inc., August 18, 2020

#### 16. Acronyms

AB Assembly Bill

Air Quality Management Plan **AQMP** 

California Environmental Quality Act CEQA

**Emergency Operations Plan EOP** 

GP 2025 Final Programmatic Environmental Impact Report **FPEIR** 

Greenhouse Gas **GHG** GP 2025 General Plan 2025

LHMP Local Hazard Mitigation Plan

Multiple Species Habitat Conservation Plan **MSHCP** 

Office of Emergency Services **OEM** 

Program Environmental Impact Report **PEIR** 

Riverside County Airport Land Use Compatibility Plan **RCALUCP** 

South Coast Air Quality Management District SCAQMD

**SWPPP** Storm Water Pollution Prevention Plan

United States Geologic Survey USGS Western Municipal Water District WMWD Water Quality Management Plan **WQMP** Airport Land Use Commission ALUC

APE Area of potential effect

California Department of Transportation Caltrans Farmland Mapping and Monitoring Program **FMMP** 

South Coast Air Basin SoCAB

Air Quality Management Plan **AOMP** 

Commercial General CG

California Ambient Air Quality Standards **CAAQS** National Ambient Air Quality Standards **NAAQS** 

LST localized significance thresholds

particulate matter less than 2.5 microns in diameter PM<sub>2.5</sub> particulate matter less than 10 microns in diameter  $PM_{10}$ 

Reactive organic gases **ROG** 

United States Fish and Wildlife Service **USFWS** USGS United States Geological Survey

United States Army Corps of Engineers USACE

Stephen's Kangaroo Rat SKR **HCP** Habitat Conservation Plan California Code of Regulations CCR CALGreen California Green Building Standards

**RPU** Riverside Public Utilities

Southern California Gas Company **SCGC** California Energy Commission CEC

metric tons of carbon dioxide equivalent MT CO<sub>2</sub>E

CARB California Air Resources Board

CAPCOA California Air Pollution Control Officers Association

AB Assembly Bill SB Senate Bill

BMP Best Management Practice
MRZ Mineral Resource Zone
dB(A) A-weighted decibel

L<sub>eq</sub> one-hour equivalent noise level FHWA Federal Highway Administration

ppv peak particle velocity in/sec inch per second LOS Level of service

MS4 Municipal Separate Sewer Permit
VHFHSZ Very High Fire Hazard Severity Zones
CALFIRE California Department of Forestry and Fire

# ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

	pelow would be potentially affected by the pact" as indicated by the checklist on the		impact			
Aesthetics	Agriculture & Forest Resources	Air Quality				
Biological Resources	Cultural Resources	Energy				
Geology/Soils	Geology/Soils Greenhouse Gas Emissions Hazards & Hazardous Materia					
Hydrology/Water Quality	Land Use/Planning	Mineral Resources				
Noise	Population/Housing	Public Services				
Recreation	Transportation	Tribal Cultural Resources				
Utilities/Service Systems	Wildfire	Mandatory Findings of Significance				
<b>DETERMINATION:</b> (To be composed on the basis of this initial evaluat recommended that:	leted by the Lead Agency) ion which reflects the independent jud	Igment of the City of Riversic	le, it is			
The City of Riverside finds that the pro and a NEGATIVE DECLARATION was	pposed project COULD NOT have a signifi ill be prepared.	cant effect on the environment,				
there will not be a significant effect in t	gh the proposed project could have a signifi his case because revisions in the project hav NEGATIVE DECLARATION will be prep	re been made by or agreed to by				
The City of Riverside finds that the pre ENVIRONMENTAL IMPACT REPOR	oposed project MAY have a significant effect 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 Brian Norto	on, Senior Planner	For <u>City of Riverside</u>				



# COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT

PLANNING DIVISION

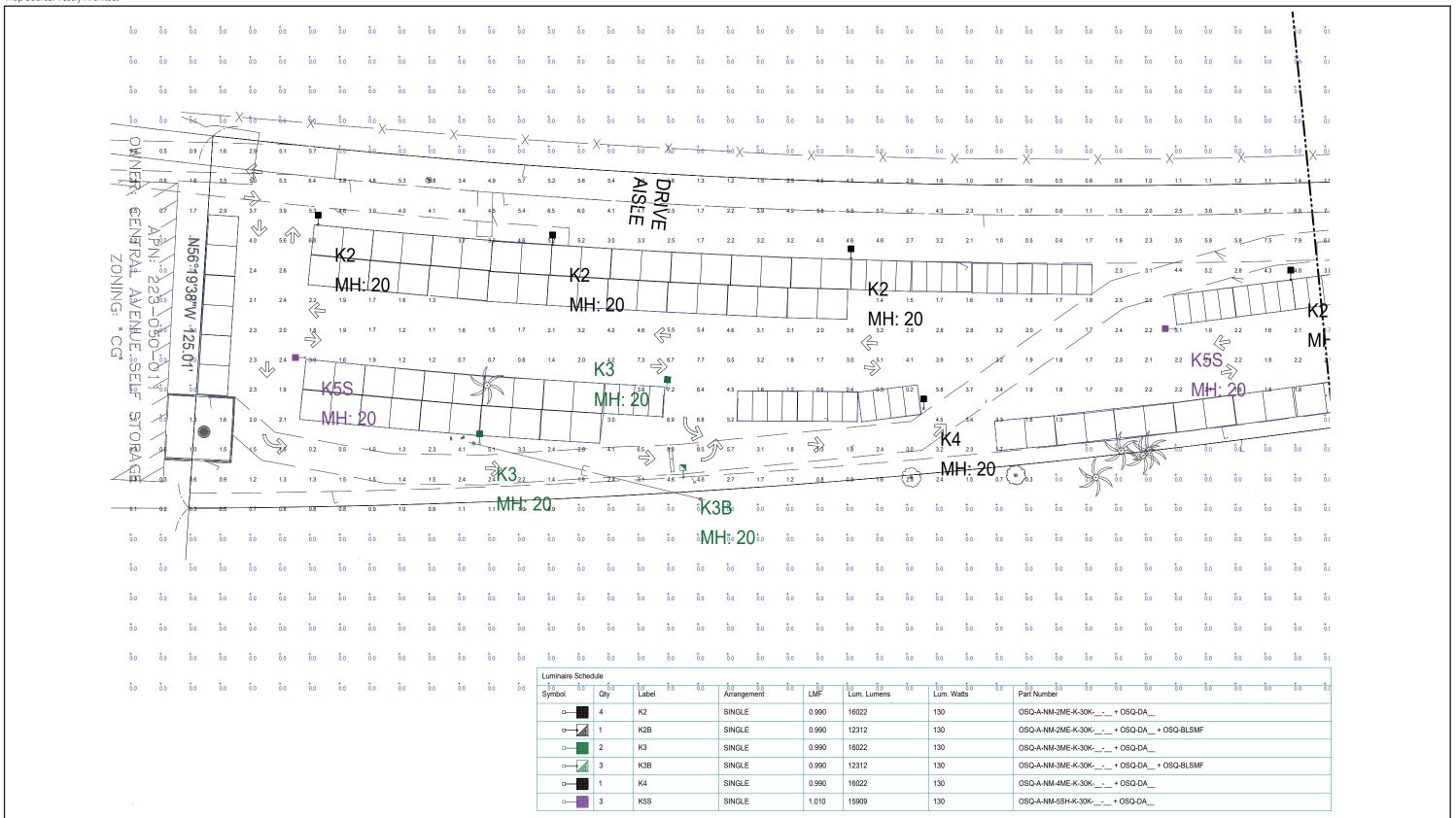
## ENVIRONMENTAL INITIAL STUDY

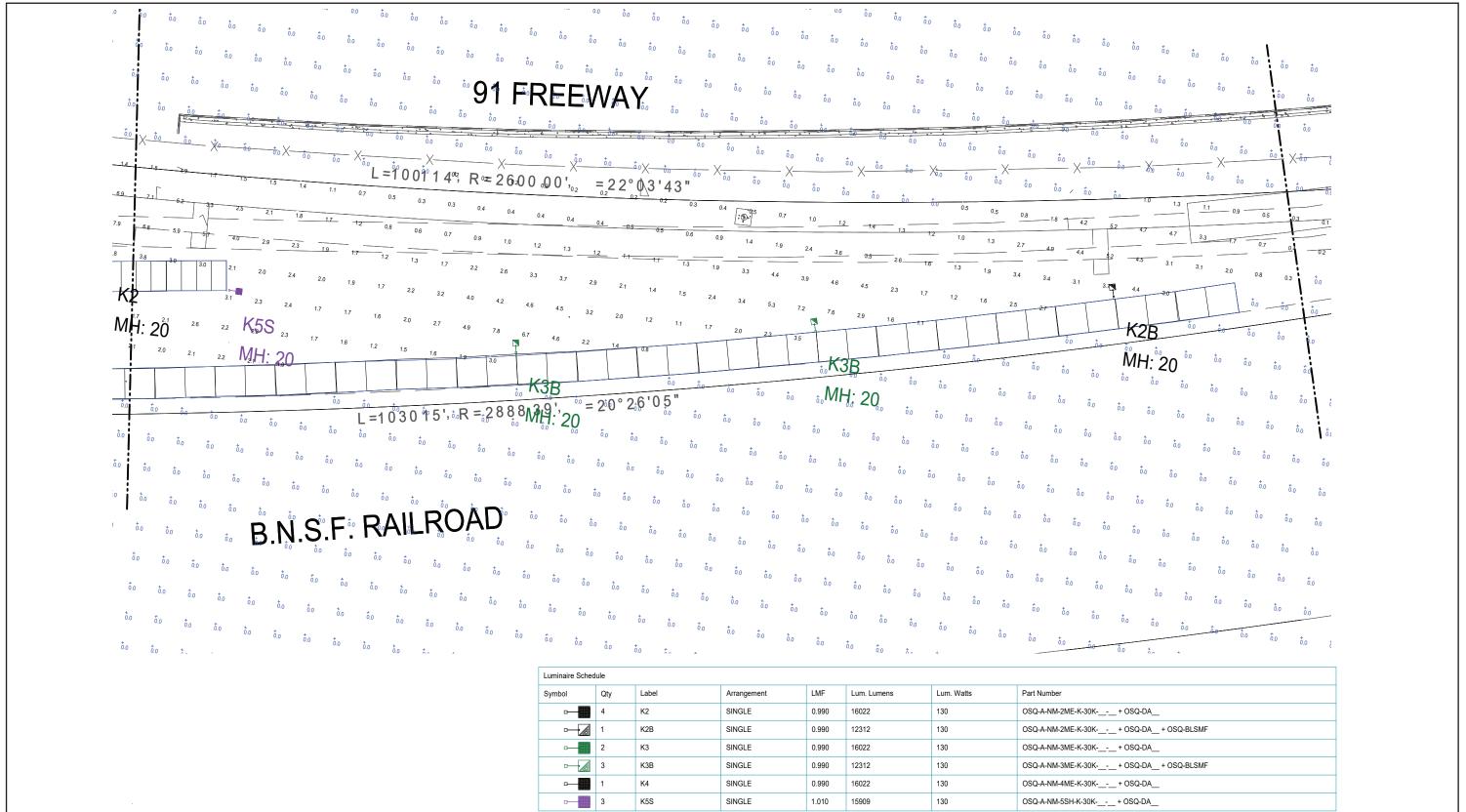
#### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

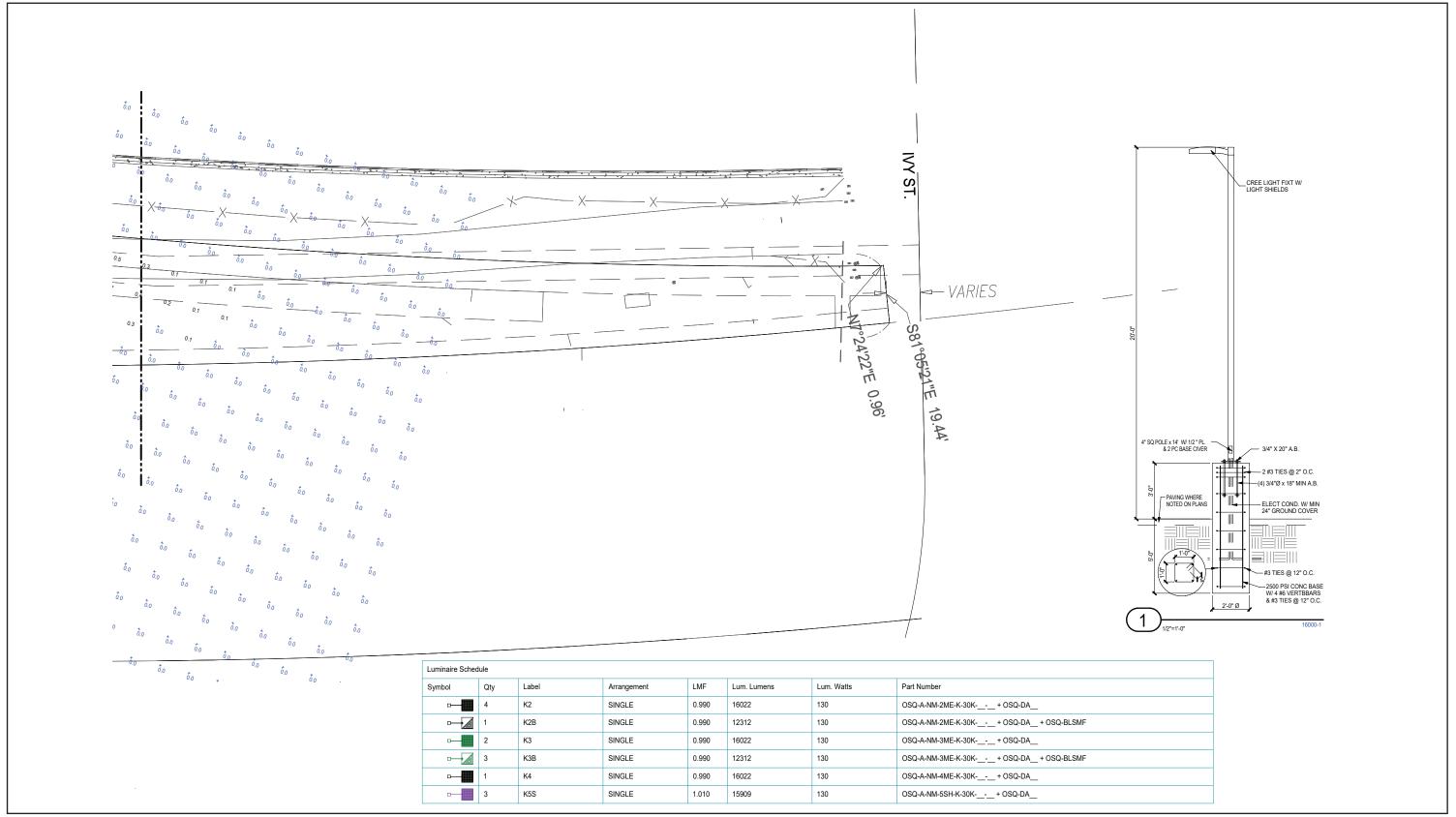
ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
1. AESTHETICS.  Except as provided in Public Resources Code Section 21099, would the project:						
a. Have a substantial adverse effect on a scenic vista?						
1a. Response: (Source: General Plan 2025 Figure CCM-4 – Figure 5.1-1 – Scenic and Special Boulevards and Parkwa Table 5.1-B – Scenic Parkways)						
Less Than Significant Impact. The City's General Plan 2025 Open Space and Conservation Element identifies scenic resources in the city and states that "the hillsides and ridgelines above Riverside offer scenic benefits to the community." Notably, Box Springs Mountain, Mount Rubidoux, Arlington Mountain, Alessandro Heights, and the La Sierra/Norco Hills are scenic resources and offer scenic views in the city. The project site is not located near these scenic resources.  The proposed project involved the expansion of an existing self-storage facility that is located within an urbanized area. SR-91 borders the site to the west, the BNSF Railroad borders the site to the east followed by residential homes, and the existing self-storage facility borders the site to the south. The proposed project would expand and reflect the existing self-storage facility south of the site. The project will be subject to design review by the City for compliance with the Citywide Design Guidelines. The City's General Plan 2025 policies are aimed at balancing development interests with broader community preservation objectives. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista and impacts would be						
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?						
thin a state scenic highway?  1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, Title 20 – Cultural Resources and, Title 19 – Article V – Chapter 19.100 – Residential Zones - RC Zone; Caltrans 2018)  Less than Significant Impact. The California Scenic Highway Program by the California Department of Transportation (Caltrans) classifies highways meeting specific criteria as "scenic" throughout the state. The purpose of the program is to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. According to Caltrans, "a highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view" (Caltrans 2018). SR-91, located west of the project site, is designated as an eligible state scenic highway. Because SR-91 is not officially designated as a state scenic highway and no rock outcroppings or historic buildings are on or near the project site, no impacts to scenic resources would occur. Therefore, impacts would be less than significant.						
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?						

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact		
FORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	Impact		
1c. Response: (Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)						
<b>Less than Significant Impact</b> . The proposed project is a self-storage lot adjacent to the SR-91 freeway and a rail line. The storage facility located south of the project site.						
The proposed project site and surrounding area are highly urbanized. of the Zoning Code and the Citywide Design Guidelines to assure quality. This includes installation of landscaping, articulated and decoand varying roof design, consistent with the Citywide Design Guidelithe area would be less than significant.	ality site designative screeni	gn and building ng walls and f	g architecture taçades, window	that is of high w fenestration		
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 20 Guidelines)	025 FPEIR, A	Zoning Code,	Citywide Des	ign and Sign		
Less than Significant Impact. The project site is located in an area that is already subject to nighttime lighting from vehicles on SR-91 to the west, trains on the BNSF Railroad and exterior residential lights to the east, and outdoor security lighting at the existing self-storage facility to the south. New sources of light and glare during project construction would primarily be for security purposes and would be temporary; this lighting would cease upon construction completion. As shown in the photometric plans (Figure 5), new operational light sources would be similar to existing light sources at the self-storage facility south of the site. All light would drop to 0.0FC at the property lines.						
No light-sensitive uses are adjacent to the project site. Existing residential uses east of the project site are physically separated from the site by the BNSF Railroad and would not be subject to light spillover from on-site lighting.						
The project site is also located outside the Mount Palomar Policy Ar 2007). Thus, the project would not affect nighttime observations from significant impacts related to new light sources would occur.						









IS	SUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact	
FC	PRMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	<b>-</b>	
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 nonagricultural use?					
No Gor Up loca pro rev adja as I imp	<ul> <li>2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability &amp; General Plan 2025 FPEIR – Appendix I – Designated Farmland Table, California Department of Conservation, Farmland Mapping and Monitoring Program [FMMP])</li> <li>No Impact. The California Department of Conservation administers the FMMP pursuant to Section 65570 of the California Government Code. Under the FMMP, the project site and the adjacent developed areas are designated as Urban and Built-Up Land. No Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance is located on or near the site. The project site and the surrounding area are not subject to agricultural activities. Rather, the project site is located within an urbanized area and is an expansion of the self-storage facility located south of the site. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the site is not designated as, and is not adjacent to, the Arlanza-La Sierra Agricultural Area or the Arlington Heights Greenbelt nor is it adjacent to land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would have no impact on Farmland or agricultural uses.</li> </ul>					
	b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?					
No does Con to su proj	2b. Response: (Source: General Plan 2025 – Figure OS-3 - W Figure 5.2-4 – Proposed Zones Permitting Agricultural Use Impact. The project site is currently zoned CG (Commercial General Storage Overlay Zones, which would not allow agricultural uses under their current zoning designations. A sect site is not located within an area that is affected by a William refore, no impacts would occur.  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))?	es, and Title I eral) and R-1- the project si al uses. Areas s shown in Fig	9) -7000 (Single- te to CG-CS near the project gure OS-3 in the	Family Reside - Commercial et site are also he General Pla	ential), which General and not permitted in (2025), the	
	2c. Response: (Source: U.S. Forest Service (USFS). Nation Conservation, FMMP)	onal Forest L	Locator Map,	California D	epartment of	
	<b>Impact.</b> According to the FMMP, the project site is designated icultural resources or operations and is not designated as Prime					

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
Farmland, or Farmland of Local Importance. In addition, the site has no agricultural resource or operation, including farmland adjacent to the site.  The project site currently contains ornamental trees. The project site and surrounding areas do not support trees that may be considered a forest. Therefore, the proposed project would not affect or convert forest land to other uses. Thus, no impacts would occur in regards to the conversion of farmland to non-agricultural use or to the loss of forest land.						
d. Result in the loss of forest land or conversion of forest land to non-forest use?	ural use or to	the loss of fore	est land.	$\boxtimes$		
2d. Response: (Source: U.S. Forest Service (USFS). National No Impact. See response to 2c above.	Forest Locato	r Map)				
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?						
2e. Response: (Source: U.S. Forest Service (USFS). National Forest Locator Map, California Department of Conservation, FMMP) No Impact. See response to 2c above.						
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?				$\boxtimes$		
3a. Response: (Source: Air Quality and Greenhouse Gas October 17, 2019)	Analysis pr	epared by R	ECON Envir	onmental on		
An Air Quality and Greenhouse Gas (GHG) Analysis was prepared found as Attachment 1.						
<b>No Impact.</b> As described in the Air Quality and GHG Analysis, the South Coast Air Basin (SoCAB) is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except for the 8-hour ozone and PM <sub>2.5</sub> (particulate matter less than 2.5 microns in diameter) standards. The SoCAB is also designated as in nonattainment for state air quality standards for 8-hour ozone and PM <sub>2.5</sub> , and additionally is in nonattainment of state PM <sub>10</sub> standards. The regional air quality plan, the 2016 Air Quality Management Plan (AQMP), outlines measures to reduce emissions of ozone and PM <sub>2.5</sub> . Whereas reducing particulate matter concentrations is achieved by reducing emissions of PM <sub>2.5</sub> to the atmosphere, reducing ozone concentrations is achieved by reducing the precursors of photochemical formation of ozone, volatile organic compounds, and oxides of nitrogen (NO <sub>X</sub> ).						
The growth forecasting for the AQMP is based in part on the land uses established by local general plans. Thus, if a project is consistent with land use as designated in the local general plan, it can normally be considered consistent with the AQMP. Projects that propose a different land use than is identified in the local general plan may also be considered consistent with the AQMP if the proposed land use is less intensive than buildout under the current designation. For projects that propose a land use that is more intensive than the current designation, analysis that is more detailed is required to assess conformance with the AQMP.						
The small southeast corner of the project site is designated as Commremaining majority of the project site is designated as Low Densi Residential). The project would require a rezone of a majority of the	ty Residential	and is zoned	l R-1-7000 (S	ingle-Family		

because the project is an expansion to an existing self-storage facility and does not include a residential component, the project would not increase growth in the region. The project would not exceed the growth assumptions of the 2016 AQMP.

Another factor used to determine if a project would conflict with implementation of the AQMP is determining if the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS]) or interim emissions reductions specified in the AQMP. NAAQS and CAAQS violations could occur if project emissions would exceed regional significance thresholds or localized significance thresholds (LSTs). As shown in Tables 1 and 2, construction and operational emissions would be less than the regional significance thresholds. Additionally, as shown in Tables 3 and 4, construction and operational emissions would be less than the LSTs. Therefore, the project would not result in an air quality violation and the project would not conflict with or obstruct the implementation of the AQMP or applicable portions of the SIP. No impacts would occur.

Table 1 Summary of Project Construction Emissions (pounds per day)						
Pollutant						
Construction	ROG	NO <sub>X</sub>	CO	$SO_X$	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation	2	18	8	<1	7	4
Grading	1	15	7	<1	6	3
Building Construction	2	15	13	<1	1	1
Paving	1	8	9	<1	1	<1
Architectural Coatings	5	2	2	<1	<1	<1
Maximum Daily Emissions	5	18	13	<1	7	4
SCAQMD Regional Threshold	75	100	550	150	150	55
SOURCE: Attachment 1	•		•			

Table 2 Summary of Project Operational Emissions (pounds per day)						
Pollutant						
Source	ROG NO <sub>X</sub> CO SO <sub>X</sub> PM <sub>10</sub> PM <sub>2.5</sub>					PM <sub>2.5</sub>
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	<1	1	<1	<1	<1
Total	<1	<1	1	<1	<1	<1
Significance Threshold	55	55	550	150	150	55
Exceed Threshold? No No No No No No					No	
SOURCE: Attachment 1						

Table 3 Localized Construction Emissions				
	Pollutant			
	CO	$NO_X$	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily On-Site Emission	13.2	18.3	6.6	3.7
LST Threshold	883	170	7	4
Threshold Exceeded?	No	No	No	No
SOURCE: Attachment 1				

Table 4 Localized Operational Emissions					
	Pollutant				
	CO	$NO_X$	$PM_{10}$	PM <sub>2.5</sub>	
On-Site Area and Energy Sources	<1	<1	<1	<1	
LST Threshold	883	170	2	1	
Threshold Exceeded?	No	No	No	No	
SOURCE: Attachment 1		•	•		

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?						
3b. Response: (Source: Air Quality and Greenhouse Gas October 17, 2019)	Analysis pr	repared by R	ECON Envir	onmental on		
Less than Significant Impact. The SoCAB is classified as in attain (particulate matter less than 10 microns in diameter), and PM <sub>2.5</sub> . The SAAQS for the 8-hour ozone and PM <sub>2.5</sub> standards, and is in nonatta emitted directly, but is a result of atmospheric activity on precursors the chief "precursors" of ozone. These compounds react in the present As shown in Tables 1 and 2, emissions of ozone precursors (RO)	SoCAB is designment area of the NOx and read note of sunligh G and NOx),	gnated as a nounder state PM ective organic to produce or $PM_{10}$ , and $PM_{10}$	nattainment ar $I_{10}$ standards. gases (ROG) at zone.	ea for federal Ozone is not are known as struction and		
operation would be below the South Coast Air Quality Management thresholds are designed to provide limits below which project emiss affect regional air quality or the timely attainment of the NAAQS ar cumulatively considerable net increase in emissions of ozone, PM <sub>10</sub> ,	ions from an i	ndividual proj herefore, the p	ject would not roject would r	significantly not result in a		
c. Expose sensitive receptors to substantial pollutant concentrations?						
3c. Response: (Source: Air Quality and Greenhouse Gas October 17, 2019)	Analysis pr	repared by R	ECON Envir	onmental on		
<b>No Impact.</b> A sensitive receptor is a person in the population who is air contaminant than is the population at large. Examples of sensitive schools, playgrounds, childcare centers, churches, athletic facilities, The sensitive receptors nearest to the project site include residential under the facilities of the LCT and the facilities of the facilities of the LCT and the facilities of the faci	receptor locat retirement ho ses east of the	ions in the corones, and long project site.	mmunity inclu g-term health o	de residences, care facilities.		
Results of the LST analysis indicate that the project would not exceed Results of the LST analysis also indicate that the project would not (see Table 4). Therefore, sensitive receptors would not be exposed construction or operation. No impacts would occur.	exceed the SC	CAQMD LSTS	during opera	tional activity		
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?						
3d. Response: (Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019, Bay Area Air Quality Management District 2010)  Less than Significant Impact. During construction, diesel equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses to the east of the project site; however, exposure to odors associated with project construction would be short term and temporary in nature. Construction odor impacts would be less than significant.  The following list provides some common types of facilities that are known producers of objectionable odors (Bay Area Air Quality Management District 2010). This list of facilities is not meant to be all-inclusive.						
<ul> <li>Wastewater Treatment Plant</li> <li>Sanitary Landfill</li> <li>Composting Facility</li> <li>Asphalt Batch Plant</li> <li>Fiberglass Manufacturing</li> <li>Rendering Plant</li> <li>Food Processing Facility</li> </ul>	Transfer Stati Petroleum Re Chemical Ma Painting/Coa Coffee Roast	efinery anufacturing ting Operation er		,		
Green Waste and Recycling Operations	Metal Smeltin	-	- 52 254 Duny			

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The project does not include any of these uses that are typically associany uses or activities that would result in potentially significant ope Rule 402 acts to prevent occurrences of odor nuisances. The project odors affecting a substantial number of people. Impacts would be less	rational-sourcet is not expec	e odor impact eted to generat	s. Additionally	y, SCAQMD
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
4a. Response: (Source: General Plan 2025 – Figure OS-6 – St Habitat Conservation Plans (HCP), Figure OS-7 – Multipl and Linkages, Figure OS-8 – MSHCP Cell Areas, General Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, F Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species	le Species Hal Plan 2025 FF Tigure 5.4-6 –	bitat Conserva PEIR Figure 5 MSHCP Nari	tion Plan (MS .4-2 – MSHC row Endemic	SHCP) Cores P Area Plans, Plant Species
<b>Survey Area)</b> Less than Significant Impact with Mitigation. The project site is lean urbanized area. Mature ornamental landscaping is present, incluprovide habitat for nesting birds. As a standard practice, a condition of specifying that, in the event that vegetation clearing is necessary during a preconstruction survey to identify the locations of nests within the zone shall be established around any active nest. The dimensions of this dependent on the species of bird detected. This zone shall be clearled not be conducted within this zone until the biologist determines the reof approval (Mitigation Measure BIO-1) in place, a less than significant to federally endangered threatened, or rare species or their habitations.	ding approxing approval (M) app	nately 10 mate itigation Meas season, a qualid by clearing be determined the field, and coper er active. With	ure palm trees ure BIO-1) will fied biologist activities. An by a qualified onstruction or on the above no	s, which may Il be required shall conduct exclusionary biologist and clearing shall ted condition
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
4b. Response: (Source: General Plan 2025 – Figure OS-6 – SKR Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plans, Figure 5.4-4 – MSHCP Criteria Cells and Subunit A Species Survey Area, Figure 5.4-7 – MSHCP Criteria A Burrowing Owl Survey Area, MSHCP Section 6.1.2 – Produce Areas and Vernal Pools)  No Impact. The project site is located on a highly disturbed site within or other sensitive natural community exists. The site is also not locate as an arroyo, open water, vernal pool, riparian forest, riparian scrub area has been developed for many years; and a long history of disturt that any riparian habitat could have persisted. Therefore, the propose or other sensitive natural community identified in local or regions. Department of Fish and Wildlife (CDFW) or United States Fish are	eneral Plan 20 Areas, Figure Area Species otection of Sp  In an urbanized ted in an area , or other natural rbance exists in ed project wou al plans, policy	025 FPEIR For 5.4-6 – MSH Survey Area, recies Associated area of the circle Riverside areal community in the area, such dave no imposes, or regular	igure 5.4-2 - N CP Narrow E. Figure 5.4- ted with Ripa ty where no rip General Plan I y. Further, the ch that there is pact on any rip tions or by the	MSHCP Area ndemic Plant 18 – MSHCP rian/Riverine parian habitat has identified surrounding little chance parian habitat he California

cumulatively.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
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 – Figure 0S 8.1)  No Impact. Figure OS 8.1 - Rivers, Creeks and Streams in the Open Space and Conservation Element of the General Plan shows that the site is not located near the Santa Ana River, Arlington Canal, Temescal Creek, or other blueline streams in and near the City. The USFWS National Wetlands Inventory and United States Geological Survey (USGS) National Map Viewer do not show blueline streams, wetlands, riparian areas, or riparian mapping areas on the project site or near the site. No state or federally protected wetlands, (including, but not limited to, marsh, vernal pool, coastal, etc.), are on or near the site. The project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and, thus, does not include United States Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to state or federally protected wetlands directly, indirectly, and cumulatively.						
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?						
4d. Response: (Source: MSHCP, General Plan 2025 – Figure OS-7 – MSHCP Cores and Linkage)  No Impact. The project site is within an urbanized area; is surrounded by existing urban developments including SR-91 to the west, the BNSF Railroad to the east, Ivy Street to the north, and the existing self-storage facility to the south; and is not located within any Western Riverside County MSHCP Criteria Cells, Cores, or Linkages. The project site is also not located near the Sycamore Canyon Wilderness Park or the Box Springs Mountain Regional Park, between Box Springs Mountain Reserve and the Santa Ana River via Springbrook Wash, or between the Santa Ana River and La Sierra/Norco Hills, which all serve as wildlife corridors in the City. In addition, the site is not located near the Tequesquite, Prenda, or Alessandro arroyos, which are also considered valuable wildlife corridors in the city. The site is not adjacent to large open space areas and water bodies that support wildlife movement. Thus, the proposed project would not result in a barrier to the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, nor impede the use of native wildlife nursery sites. Therefore, the proposed project would have no impact to wildlife movement directly, indirectly, and cumulatively.						
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?						
<ul> <li>4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual)</li> <li>No Impact. Implementation of the proposed project is subject to all applicable federal, state, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees. This project has been reviewed against these policies and found to be in compliance with the policies. Thus, no impacts would occur.</li> </ul>						
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?						
4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 –SKR Core Reserve and Other HCP, SKR HCP, Lake Mathews MSHCP and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)  No Impact. The project is located on a vacant site, in an urbanized area that has been previously graded and will not affect						

existing Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans directly, indirectly, or cumulatively. Therefore, the project will have no impact on the provisions

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
of an adopted Habitat Conservation Plan, Natural Community Conservation plan.	ervation Plan,		ved local, regi	onal, or state	
Mitigation Measure					
BIO-1: In the event that vegetation clearing is necessary during the qualified biologist shall conduct a preconstruction survey to by clearing activities. An exclusionary zone shall be established shall be determined by a qualified biologist and is dependently marked in the field, and construction or clearing shall determines the nest is no longer active.	identify the long the description identify the long the specific areas in the specific areas and the specific areas are specifications.	ocations of nesty active nest. Secies of bird de	sts within the a The dimension etected. This a	areas affected as of the zone zone shall be	
5. CULTURAL RESOURCES. Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?					
5a. Response: (Source: Cultural Resources Survey prepared b	y RECON En	vironmental (	on October 28	, 2019)	
<b>No Impact</b> . According to the Cultural Resources Survey (RECON 2019, Attachment 2), one historical resource (P-33-12837), 2998 Ivy Street, was previously recorded within the project APE. P-33-12837 is no longer extant; only several ornamental landscaping elements remain. No previously unrecorded cultural resources were observed within the APE during the survey. Therefore, project design would not result in impacts to any known historical resources.					
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?					
5b. Response: (Source: Cultural Resources Survey prepared by RECON Environmental on October 28, 2019)  Less than Significant Impact with Mitigation. According to the Cultural Resources Survey (RECON 2019), no significant prehistoric cultural resources were found during the survey of the project property. No prehistoric cultural resources were mapped on or immediately adjacent to the property in the record search files. Therefore, the proposed project will have no impact on known prehistoric cultural resources. Additionally, in accordance with SB 18 and AB 52 requirements, the City contacted Native American tribes who may also have knowledge of cultural resources in the project area. A total of five tribes responded and three tribes requested consultation including the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe. Native American representatives from these tribes have requested implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4, which outline monitoring and treatment during the course of grading for the project. Therefore, implementation of Mitigation Measures CUL-1 through CUL-4 would reduce any potentially significant impacts regarding unknown tribal resources to less than significant.  c. Disturb any human remains, including those interred outside					
5c. Response: (Source: Cultural Resources Survey prepared b	v RECON En	vironmental (	n October 28	. 2019)	
Less than Significant Impact. According to State Health and Safety (or remains that may be human) are discovered at the implementing of the construction contractors shall immediately stop all activities in shall then inform the Riverside County Coroner and the City of R permitted to examine the remains. If the coroner determines that the would notify the Native American Heritage Commission and the Contract Thus, project adherence to state regulations would ensure impacts we Mitigation Measures	y Code Section levelopment prothe immediate iverside Planna re remains are numission woul	n 7050.5, in the roject site durite area of the fining Division, to of Native Arld identify the	e event that hu ing grading or ind. The proje and the coron merican origin "Most Likely!	uman remains earthmoving, ect proponent her would be , the coroner	

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 consulting tribes to provide an electronic copy of the revised plans for review. Additional

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

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

- CUL-2: Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.
  - 1. The project archaeologist, in consultation with consulting tribes, the developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:
    - a. Project grading and development scheduling;
    - b. The development of a 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.
- CUL-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:
  - 1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the City evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
  - 2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on-site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and
  - 3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:

	AND SUPPORTING FION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Accommodate the process for on-site reburial of the tribes or bands. This shall include measures and provimpacts. Reburial shall not occur until all cataloguin	isions to prot	ect the future re	eburial area fro	m any future
b.	A curation agreement with an appropriate qualified standards per 36 Code of Federal Regulations (CF and made available to other archaeologists/researce records shall be transferred, including title, to an appear accompanied by payment of the fees necessary for the fees neces	R) Part 79 and thers for furth oppropriate cur	d therefore wil ner study. The ation facility v	l be profession collections ar	nally curated and associated
c.	If more than one Native American tribe or band is in as to the disposition of cultural materials, they shall of Riverside by default; and				
shall be Tribal resource resource training the dai Rivers:  CUL-4: Cultura Americe Cultura ground discovered	completion of grading, excavation, and ground-distur- e submitted to the City documenting monitoring activ Monitors within 60 days of completion of grading. Sees on the property; describe how each mitigation rese recovered and the disposition of such resources g for the construction staff held during the required pro- ly/weekly monitoring notes from the archaeologist. Ide, Eastern Information Center, and consulting tribes al Sensitivity Training: The Secretary of Interior can monitors shall attend the pre-grading meeting will Sensitivity Training for all construction personnel. Idisturbance in sensitive areas and protocols that bered. Only construction personnel who have received the sensitive areas. A sign-in sheet for attendees of the	This report s measure was ; provide evice-grade meeting. All reports p s.  Standards Count the development of the development of the development of the this training.	ed by the project hall document fulfilled; doc	ct archaeologic the impacts to the impacts to the type equired culturn fidential appears archaeologist der's contractor dures to be follonanticipated or postruction and	st and Native o the known e of cultural al sensitivity ndix, include o the City of and Native rs to provide lowed during esources are d disturbance
6. ENERG Would the p					
wastefi	in potentially significant environmental impact due to al, inefficient, or unnecessary consumption of energy es, during project construction or operation?			$\boxtimes$	
Code (Code Signiutility companies The City of Rive the General Plan	nse: (Source: California Code of Regulations (CCI CALGreen Code) (24 CCR, Part 11)) ficant Impact. The Riverside Public Utilities (RPU) is that currently provide and would continue to provide riside has made energy efficiency and conservation and, the Green Action Plan and the Economic Prosperity and by the City to reduce and conserve energy.	and the South de electrical a priority. The	hern California and natural gas Open Space a	Gas Compan services to th nd Conservation	y (SCGC) are e project site on Element o

The State of California has adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements. Title 24 of the CCR, specifically Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The 2016 Title 24 energy are the currently mandated building standards. The upcoming 2019 Title 24 Building Standards become effective for projects that obtain their building permits on or after January 1, 2020.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
The 2016 CALGreen Standards Code (24 CCR 11), also known as the CALGreen Code, contains mandatory requirements for new residential and nonresidential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The Code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impacts during and after construction. The proposed project is required to be consistent with these objectives and policies.					
Construction Project construction would require the use of construction equipment for building activities. All off-road construction equipment is assumed to use diesel fuel. Construction also includes construction worker's vehicular trips traveling to and from the project site. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. Furthermore, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than comparable construction sites in other parts of the state. Energy used in the construction of the project would enable the development of buildings that meet the latest energy efficiency standards as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.  Operation The proposed project would promote building energy efficiency through compliance with energy efficiency standards (2016 Title 24 and CALGreen). The project structures would also comply with the requirements of the state's Title 24 and CALGreen					
requirements which reduce electrical, heating, solid waste disposal an not result in an inefficient, wasteful, or unnecessary consumption of e	d water demar	ds. Therefore,	, the proposed	project would	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?					
6b. Response: (Source: CCR – Part 6, 2016 CALGreen Code and Conservation Element)	(24 CCR, Par	t 11), Genera	l Plan 2025 –	Open Space	
Less than Significant Impact. The project would be required to comply with the State of California's Title 24 Building Standards and CALGreen requirements for energy efficiency. As such, the project would be consistent with the energy efficiency and transportation goals established within the City's Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan. Because the project complies with the latest applicable energy efficiency standards, the project would not conflict with or obstruct a state or local plan for renewable energy efficiency and impacts would be less than significant.					
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:					
<ol> <li>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.</li> </ol>					
7i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones)  No Impact. Seismic activity is to be expected in southern California; however, there are no Alquist-Priolo zones in the project area. The project site does not contain any known fault lines and the potential for fault rupture or seismic shaking is low. Compliance with the California Building Code regulations will ensure that no impacts related to strong seismic ground would occur.					

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact	
FORMATION SOURCES):	Impact	With Mitigation	Impact	<b>F</b>	
ii Stuama aniamia amazumd ababin a?		Incorporated			
ii. Strong seismic ground shaking?			$\boxtimes$		
7ii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones)  Less than Significant Impact. Just like most of southern California, in the event of an earthquake strong ground shaking is expected to occur on the project site. The proposed development lies outside of any Alquist-Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered very remote. The site is located in an area of high regional seismicity and the San Jacinto fault is located approximately 8 miles northeast from the site. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. As previously described, design and construction would comply with current building codes and standards which would reduce the risk of loss, injury, or death resulting from strong ground-shaking. Impacts would be less than significant.  iii. Seismic-related ground failure, including liquefaction?					
7iii. Response: (Source: General Plan 2025 Figure PS-1	 _ Regional F	Gault Zones B		I iquefaction	
Zones, General Plan 2025 FPEIR Figure PS-3 – Soils Less than Significant Impact. According to the General Plan 2025 L located in an area with low potential for liquefaction. In addition, according Swell Potential Map – Figure PS-3, the project site is not located in a compliance with California Building Code regulations would ensuliquefaction, are reduced to less than significant impact levels.	with High Sh iquefaction Zording to the Corn area with so	<i>rink-Swell Po</i> ones Map – Fig General Plan 20 oils of high sh	tential) gure PS-2, the 025 Soils with rink-swell pot	project site is High Shrink- ential. Project	
iv. Landslides?				$\square$	
<b>7iv. Response:</b> (Source: General Plan 2025 FPEIR Figure No Impact. Factors contributing to the stability of slopes include slothe earth materials comprising the slope, and intensity of ground shak Final PEIR, the project site and its surroundings have generally flandslides. Thus, no impacts would occur related to landslides.	ope height and ing. Per Figur	e 5.6-1 of the	General Plan 2 ocated in an	2025 Program	
b. Result in substantial soil erosion or the loss of topsoil?					
7b. Response: (Source: General Plan 2025 FPEIR Figure 5. Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code Prevention Plan [SWPPP])  Less than Significant Impact. Erosion and loss of topsoil could occur call for the preparation and implementation of a SWPPP establishing of The project must also comply with the National Pollutant Discharge with the erosion control standards for which all development activity the implementation of measures designed to minimize soil erosion. Cas with Title 17 will ensure that soil erosion or loss of topsoil will be	r as a result of erosion and ser Elimination Smust comply, Compliance wi	the project. Stadiment control System (NPDE the Grading Cath State and F	and Storm We ate and federal s for construct (ES) regulations (Code (Title 17)	requirements ion activities. s. In addition, also requires	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?					
7c. Response: (Source: General Plan 2025 Figure PS-1 – Reg General Plan 2025 FPEIR Figure PS-3 – Soils with High S by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Typ Less than Significant Impact. As described previously in this section or liquefaction. In the absence of a shallow groundwater table, lateral the City's codes and the policies and the project-specific recommen- that impacts related to geologic conditions are reduced to less than sig	Shrink-Swell I es), on-site soils a spreading is a dations contain	Potential, Figure not considered ned in the geo	red susceptible l unlikely. Con	e to landslides mpliance with	

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?					
7d. Response: (Source: General Plan 2025 FPEIR Figure 5.6- Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appe Code as adopted by the City of Riverside and set out in Title No Impact. Expansive soils, defined under California Building Code,	ndix E – Geot e 16 of the Riv	echnical Repo erside Munici	ort, and Califo ipal Code)	rnia Building	
type of clay present in soil determines its shrink-swell potential. According PEIR, the project site does not contain soils with high-shring expansive soils and there will be no impact.	ording to Figur	e 5.6-5 of the	General Plan 2	2025 Program	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?					
7e. Response: (Source: Preliminary Grading Plan) No Impact. The proposed project will not require septic tanks and wioccur.	ll be served by	y sewer infrast	ructure. No in	npacts would	
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?					
7f. Response: (Source: General Plan 2025 Policy HP-1.3; GP Resources Sensitivity)	2025 FPEIR	Figure 5.5-2	– Prehistoric	Cultural	
<b>Less than Significant Impact</b> . According to the General Plan 2025 F prehistoric cultural resource sensitivity. However, the entire project si with the development of the railroad and the railroad right of way paleontological resources or sites would be less than significant.	te has been pro	eviously distur	bed with grad	ng associated	
8. GREENHOUSE GAS EMISSIONS. Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?					
8a. Response: (Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019)					
Less than Significant Impact. As shown in Table 10 of the Air Quality and Greenhouse Gas Analysis (see Attachment 1), construction and operation of the project would result in the annual equivalent emission of 91 metric tons of carbon dioxide equivalent (MT CO <sub>2</sub> E) per year. Project GHG emissions would be less than the applicable SCAQMD screening level of 3,000 MT CO <sub>2</sub> E for commercial uses. As project emissions would be less than the 3,000 MT CO <sub>2</sub> E screening level, GHG emissions impacts would be less than significant.					

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?				
8b. Response: (Source: Air Quality and Greenhouse Gas Anal October 17, 2019)  Less than Significant Impact. As discussed in Section 3.2.2, EO S-3 state, and AB 32 launched the California Air Resources Board (Creduction measures needed to reach the 2020 target. As discussed abolevel of 3,000 MT CO <sub>2</sub> E for commercial uses. This threshold is be emission capture rate. A 90 percent emission capture rate means that stationary source projects would be subject to a CEQA analysis, whice feasible mitigation measures. The market capture rate is based on guiden Association (CAPCOA) report CEQA & Climate Change, dated Janufor assessing a project's GHG emissions (see Attachment 1). Following an acceptable capture rate and identifies the corresponding emission Guidance, the aggregate emissions from all projects with individual an market capture rate would not impede achievement of the state GHC and SB 32 (2016), and impacts under CEQA would therefore be less capture rate sets the emission threshold low enough to capture a subswill be constructed to accommodate future statewide population and high enough to exclude small projects that will in aggregate contribute GHG emissions.  Project GHG emissions would be less than the applicable SCAQMD of Further, project emissions would decline beyond the buildout year of federal, state, and local reduction measures such as increased federal Public Utilities' increased renewable sources of energy in accordance and regulatory forecasting, project emissions would continue to decline in project emissions, once fully constructed and operational, achieve the 2050 GHG emission reduction targets identified by EO S	B-05 established ARB) Climate ove, the project ased on the consect of the includes and dance from the lary 2008, who get he market consistent and emissions result of the reconstruction of the companies of the cumulates and and state very entire the project and and state very entire the project is in the project in the project in the project is in the project in the project in the project in the project is in the project in	ed GHG emiss e Change Scott emissions woncept of esta fotal emission alyzing feasible California Arich identifies sapture rate appwing rationale sthat are equal duction target ively considered on of future states with, while sessmall fraction elso for 3,000 MT as a result of centicle efficiencials. Based on east 2050. Give	ion reduction ping Plan that ould be below blishing a 90 as from all new le alternatives ar Pollution Conseveral potentiaroach, a lead at presented in to or less than a scodified by able. A 90 per ationary source tring the emission of the cumula are the reasonable of the reasonable	targets for the toutlined the the screening percent GHG wor modified and imposing ontrol Officers al approaches gency defines the CAPCOA the identified AB 32 (2006) cent emission to projects that sion threshold tive statewide the capture of and Riverside and Riverside soly anticipated
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?			$\boxtimes$	
9a. Response: (Source: General Plan 2025 Public Safety Elem Less than Significant Impact. The proposed project does not directly material. Future tenants of the proposed project will not necessarily, be of hazardous materials or wastes. If hazardous materials are propose federal regulation for permitting and inspection by the Hazardous Materials 2025 Public Safety Element also specifies a number of policies hazardous materials, with which the project will comply (GP 2025 Polymer Videly used hazardous materials common at any self-storage land used fluids, and pesticides. The remnants of these and other products are used motor oil, dead batteries, electronic wastes, and other wastes that local landfills. Use of common household hazardous materials and to the community. Impacts associated with the routine transport, used to the community.	v involve the trout may, engaged on-site in the erials Division is regarding the plicies PS-3.1 are include paint disposed of as at are prohibit their disposa	ransport, use, or ge in the routing the future, they not the City File safe handlin through 3.5).  Its and other so is household haved or discourant does not pressure in the routing that the control of	ne transport, us will be subject re Department g, transport and lvents, cleaner zardous waste aged from being sent a substant	se, or disposal ct to state and t. The General and disposal of the crs, automobile that includes ag disposed of ial health risk

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
9b. Response: (Source: Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR)  Less than Significant Impact. The project may involve the use of hazardous materials but shall comply with all applicable federal, state, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials. Compliance will be enforced by the on-site manager who will notify all facility users that the storage of hazardous materials is prohibited. In addition, on-site managers will be trained to specifically identify the transfer/unloading of such materials. Compliance with all applicable federal, state and local laws related to the transportation, use and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use and storage to a less than significant impact.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
CalARP RMP Facilities in the Project Area, Figure 5.13- Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Boundaries, California Health and Safety Code)  Less than Significant Impact. No schools are within 0.25 mile of th School, located 0.9 mile southeast of the project site. The proposed p facility located south of the site by constructing an additional storage waste generated from the proposed development are not expected to schools to hazardous materials caused by this project would result in	schools, Fig. e project site. roject involves area of 13,40 o occur. Thus	The nearest so s the expansion of square feet. impacts asso	- Other Sc hool is Rivers n of the existin Hazardous maciated with th	hool District ide Poly High ng self-storage aterials and/or
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
9d. Response: (Source: General Plan 2025 Figure PS-5 – Ho CERCLIS Facility Information, Figure 5.7-B – Regulate EnviroStor Database Listed Sites)  Less than Significant Impact. No hazardous materials sites, compi	ed Facilities i	in TRI Inforn	nation and 5.	.7-C – DTSC
depicted on or adjacent to the project location on the EnviroStor (20 General Plan 2025 does not list any hazardous waste sites on or ac located on-site and the project will result in a less than significant.	19) online dat	abase. In addi	tion, the Figur	e PS-5 of the
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?				
<b>9e.</b> Response: (Source: General Plan 2025 Figure PS-6) Less than Significant Impact. Riverside Municipal Airport is located and the March Air Reserve Base is located approximately 9.5 miles s the General Plan 2025, the project site is not located within an airport the project was reviewed by the Airport Land Use Commission (AI compatibility zone as well as in compliance with the land use s Compatibility Plan (RCALUCP). Because the project has been found less than significant.	outheast of the safety and co LUC) and dete tandards in the	e project site. A mpatibility zon ermined the prohe Riverside	As shown in F ne. On Decem oject is consis County Airpo	igure PS-6 of ber 20, 2020, stent with the ort Land Use

	UES (AND SUPPORTING MATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
9f. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside's Emergency Operations Plan (EOP), 2002 and Riverside Operational Area – Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), 2004 Part 1, and OEM's Strategic Plan)					
Less than Significant Impact. The project is within an urbanized area and will be served by the surrounding network of existing, fully improved streets. All streets have been designed to meet the Public Works and Fire Department specifications. As part of the project's construction, temporary street closures may be necessary and would be implemented in accordance with a typical traffic control plan approved by the City. Any street closing will be of short duration so as not to interfere or impede with any emergency response or evacuation plan. Therefore, impacts would be less than significant.					pecifications. n accordance
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) No Impact. The proposed project is located in an urbanized area where no wildlands exist and the property is not located within a Very High Fire Hazard Area or adjacent to wildland areas or a Very High Fire Hazard Area (Figure PS-7 GP 2025 Program FEIR). Therefore, no impact would occur.					
	DROLOGY AND WATER QUALITY. build the project:				
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
10a	Response: (Source: GP 2025 FPEIR and Preliminary Wo	ater Quality A	Management I	Plan (WQMP)	prepared by

Joseph E. Bonadiman & Assoc., Inc.)

Less than Significant Impact. The project site is located within the Santa Ana River watershed (General Plan 2025 Figure SO-9 - Watersheds and FPEIR Figure 5.8-1). The project site is currently undeveloped. The Santa Ana Regional Water Quality Control Board (RWQCB) administers the NPDES permit in the region. The City is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce nonpoint source pollutant loading through the implementation of best management practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and educational programs. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The proposed project would not interfere with the implementation of NPDES water quality regulations and standards.

The proposed project will regrade approximately 1.52 gross acres of land and therefore will be subject to NPDES permit requirements during construction activities in addition to standard NPDES operational requirements. The proposed project will require submittal to the local reviewing agency, the Santa Ana RWQCB, a SWPPP that will include BMPs protect water quality during construction activities. BMPs will be required as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. These measures, which include owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, and trash storage areas, will reduce pollutants in storm water runoff and reduce non-storm water discharges to the City's storm water drainage through controlling the discharge of pollutants. Operational BMPs will be identified in a Stormwater Runoff Management Plan that will be submitted with grading and construction documents for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations. Given compliance with all applicable local, state, and federal laws regulating surface water quality, the proposed project as designed is anticipated to result in a less than significant impact.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			$\boxtimes$			
10b. Response: (Source: GP 2025 FPEIR and Preliminary WQMP prepared by Joseph E. Bonadiman & Assoc., Inc.) Less than Significant Impact. The proposed project is located within the Riverside South Water Supply Basin. The project is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements that will ensure the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there will be less than significant impact to groundwater supplies and recharge either directly, indirectly or cumulatively. Therefore, the proposed project will result in a less than significant impact to groundwater supplies and recharge.						
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:						
i. Result in substantial erosion or siltation on-or-off-site?			$\boxtimes$			
habitat or drainage features are located onsite. Furthermore, the project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a SWPPP for the prevention of runoff during construction. Proposed on-site low impact development principles include the implementation of BMPs including landscaping and an infiltration basin. The project-specific Preliminary WQMP (Attachment 3) identifies proposed drainage management areas and the effectiveness of proposed BMPs.  The design of the proposed project will not substantially alter drainage patterns in the area to the extent that substantial onor off-site erosion or siltation will occur. Therefore, the project would have a less than significant impact to existing drainage patterns.						
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?						
10ii Response: (Source: Preliminary WQMP prepared by Less than Significant Impact. As stated in the preliminary WQMP, corner of the site similar to the existing flow. In addition, the project more of disturbance are subject to preparing and implementing a SWI The project would not substantially increase the rate or amount of sur on- or off-site and would require implementation of a SWPPP. Thus,	the proposed on the proposed of the property of the property face runoff in	development variety of PDES require evention of rust a manner whi	vill flow to the ments; areas o noff during co ch would resu	f one acre or nstruction.		
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or						
10iii Response: (Source: Preliminary WQMP prepared by Joseph E. Bonadiman & Assoc., Inc.)  Less than Significant Impact. The proposed development will increase the amount of impervious surface area in the city. This impervious area includes paved parking areas, sidewalks, roadways, and building rooftops; all sources of runoff that may carry pollutants and therefore has the potential to degrade water quality. This development has been required to prepare and implement a WQMP. A preliminary WQMP was prepared for the project on August 2019 by Joseph E. Bonadiman & Associates, Inc.  Preliminary BMPs, in compliance with the preliminary WQMP, have been approved by the Public Works Department.						
Expected storm water pollutants will be treated through the incorporated in the project specific WQMP. Project-rel	oration of the	site design, so	ource control	and treatment		

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact		
infiltration basins and infiltrate into the soil. The proposed water quality function of the basin would reduce the amount of polluted runoff that would be conveyed into the ground water. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff and there would be a less than significant impact.						
iv. Impede or redirect flood flows?						
10iv Response: (Source: Preliminary WQMP prepared by Less than Significant Impact. As stated in the preliminary WQMP, corner of the site similar to the existing flow. In addition, the project more of disturbance are subject to preparing and implementing a SW. Since the proposed project would not impede or redirect flood flows impacts would be less than significant.	the proposed on the proposed of the property o	development w PDES require evention of ru	vill flow to the ments; areas o noff during co	f one acre or nstruction.		
d. In floor hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				$\boxtimes$		
10d. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hyd	drology and W	 Vater Quality)				
No Impact. Tsunamis are large waves that occur in coastal areas; therefore, since the city is not located in a coastal area, no impacts due to tsunamis will occur directly, indirectly, or cumulatively. The proposed project site and its surroundings have generally flat topography and are within an urbanized area not within proximity to Lake Mathews, Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain Area or any of the nine arroyos that transverse the City and its sphere of influence. Therefore, no impact potential for seiche or mudflow exists.						
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?						
10e.Response: (Source: Preliminary WQMP prepared by Joseph E. Bonadiman & Assoc., Inc.)  Less than Significant Impact. The proposed development will increase the amount of impervious surface area in the city. This impervious area includes paved parking areas, roadways, and building rooftops; all sources of runoff may carry pollutants and therefore has the potential to degrade water quality. As previously stated, this development has been required to prepare and implement a WQMP. Expected storm water pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific WQMP. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff and there will be a less than significant impact.						
11. LAND USE AND PLANNING:						
Would the project:				K-7		
a. Physically divide an established community?				$\boxtimes$		
11a.Response: (Source: General Plan 2025 Land Use and Urban Design Element, Preliminary Grading Plan, Google Earth)  No Impact. The project will be served by fully improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or an established community. The proposed project will not physically divide an establish community or have a direct impact on an established						
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?						
11b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning (General Plan Consistency Matrix, Title 10 – Zoning Code)						
Zoning/General Plan Consistency Matrix, Title 19 – Zoning Code)  Less than Significant Impact. The project proposes the development of the site as a self-storage facility. The project will comply to the objectives of the General Plan and Land Use Objectives with its reduction in noise, increase in public safety with the securing of the subject site, and provide traffic relief by providing a closer community service to several neighboring residences currently traveling greater distances for their storage needs. The proposed development would also address the						

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact			
General Plan goals of reducing noise, increase in public safety by securing the existing site and alleviating traffic by providing the community with an in-need service thus reducing travel distances of consumers. For these reasons, this project will have less than significant impact on an applicable land use plan, policy, or regulation.							
12. MINERAL RESOURCES. Would the project:							
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?							
12a. Response: (Source: General Plan 2025 FPEIR Figure – 5.10)  No Impact. The proposed project is located in Mineral Resource Zone 4 (MRZ); MRZs as shown in Figure 5.10 of the General Plan 2025 FPEIR. This indicates that the presence or absence of mineral resources under the site are not known. The California Department of Conservation Division of Mines and Geology emphasizes that this does not necessarily mean that the presence of mineral resources at the site is unlikely; rather, just that there is insufficient information available to determine presence or absence.  However, mining operations in the City have not been active for decades. According to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred; therefore, the proposed project would not result in any loss of availability of any known or unknown mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and surrounding land uses would preclude mining from occurring. Further, the							
designated land uses for the project site and for the surrounding a significant impact will occur.							
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 FPEIR Figure – 5.10)  No Impact. The General Plan 2025 FPEIR determined that there are no specific areas within the city's Sphere of Influence that 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 project proposes a general plan amendment from Low Density Residential to Commercial. This amendment would not affect the current determination on mineral resources in the General Plan 2025 FPEIR. Therefore, the project will have no impact on locally significant mineral resources.							
13. NOISE. Would the project result in:							
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?							
13a. Response: (Source: Project Specific Noise Analysis prep 2019)	pared by REC	ON Environn	ental, Inc. or	October 21,			
A Noise Analysis was prepared for the project by RECON Environm	ental, Inc. and	can be found	as Attachment	; <b>4.</b>			
Less than Significant Impact							
Construction Noise							
Project construction noise would be generated by diesel engine-drive grading, building construction, loading, unloading, and placing ma construction activities to the hours of 7:00 a.m. to 7:00 p.m. on Construction activities would generally occur over the period betwee activities would adhere to the requirements of the City's Municipal C	iterials and pa weekdays, and en 7:00 a.m. a	ving. The Cit d 8:00 a.m. to	y's noise ordi o 5:00 p.m. o	inance limits n Saturdays.			

# ISSUES (AND SUPPORTING FORMATION SOURCES): Potentially Significant Impact Impact Potentially Significant Impact Impact Impact Incorporated No Impact Im

## Operational Impacts

On-site generated noise levels in the city are regulated by Chapter 7.25 of Title 7 of the City's Municipal Code. The primary noise sources on-site would be vehicles/moving trucks driving through the project site to access individual storage units, and roll-up doors. Using the on-site noise source parameters discussed in Section 4.2, noise levels were modeled at a series of 10 receivers located at the adjacent residential uses. Modeled noise levels took into account grading and shielding provided by the proposed buildings. Future noise levels are summarized in Table 6.

Table 6 On-Site Generated Noise Levels								
	Noise Limit Daytime/Nighttime	Noise Level						
Receiver	[dB(A) L <sub>eq</sub> ]	[dB(A) L <sub>eq</sub> ]						
1	55/45	37						
2	55/45	40						
3	55/45	44						
4	55/45	44						
5	55/45	44						
6	55/45	38						
7	55/45	37						
8	55/45	37						
9	55/45	37						
10	55/45	37						

As shown in Table 6, noise levels at the nearby residential uses to the east would range from 37 to 44 dB(A)  $L_{eq}$ , and would not exceed the daytime or nighttime noise limits of 55 and 45 dB(A)  $L_{eq}$ , respectively. According to the Federal Highway Administration's (FHWA) Highway Traffic Noise Analysis and Abatement Guidance, with windows in the open position, standard construction provides an exterior to interior noise level reduction of 10 dB. Thus, because exterior noise levels would be less than 45 dB(A)  $L_{eq}$ , interior noise levels would not exceed the nighttime interior noise level limit of 35 dB(A)  $L_{eq}$ . It should be noted that this is a worst-case analysis with all roll-up doors being opened and closed and 25 moving trucks accessing the site in the same one-hour period. Actual noise levels due to on-site operations would be less than those shown in Table 6. Therefore, noise impacts due to on-site generated noise would be less than significant.

	ore, mense imp			gemerate a men		1000	tiitiii sigiiiiitt		
b.			excessive	groundborne	vibration	or			
	groundborne noise levels?								i

13b. Response: (Source: Project Specific Noise Analysis prepared by RECON Environmental on October 21, 2019)
No Impact. Groundborne vibration generated by construction activities is usually highest during pile-driving, blasting, soil-compacting, jack-hammering, and demolition-related activities. No blasting or demolition activities would occur with the proposed project. However, the project may require pile-driving to provide foundation support.

The City of Riverside has not developed applicable standards for structural damage from vibration. Caltrans has set thresholds for the potential for vibration damage as shown in Table 7.

#### **Potentially** Less Than Less Than No ISSUES (AND SUPPORTING Significant Significant Significant **Impact** With **FORMATION SOURCES): Impact Impact** Mitigation Incorporated Table 7 Vibration Damage Threshold Criteria Maximum ppv (in/sec) Transient Continuous/Frequent Structure and Condition Sources **Intermittent Sources** Extremely fragile historic buildings, ruins, ancient monuments 0.12 0.08 0.2 Fragile buildings 0.1 Historic and some old buildings 0.5 0.25 Older residential structures 0.5 0.3 New residential structures 1.0 0.5 Modern industrial/commercial buildings 2.0 0.5 ppv: peak particle velocity; in/sec: inch(es) per second NOTE: Transient sources create a single isolated vibration event (e.g., blasting or drop balls). Continuous/frequent intermittent sources include impact pile-drivers and vibratory compaction equipment. SOURCE: Caltrans 2013 None of the structures on or adjacent to the site are designated as City of Riverside Cultural Heritage Landmarks nor are they part of a historic district (Riverside 2018). The off-site residential buildings located east of the project site are not considered historic, fragile or extremely susceptible to vibration damage. Thus, the project would not result in the generation of excessive ground borne vibration or ground borne noise levels. No impacts would occur. For a project located within the vicinity of a private airstrip X or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? 13c. Response: (Source: Project Specific Noise Analysis prepared by RECON Environmental on October 21, 2019) Less than Significant Impact. Riverside Municipal Airport is located approximately 5.5 miles southwest of the project site and the March Air Reserve Base is located approximately 9.5 miles southeast of the project site. As shown in Figure 5.7-2 of the General Plan 2025 Program Final PEIR, the project site is not located within an airport safety and compatibility zone. On December 10, 2020, the project was reviewed by the ALUC and determined that the project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUCP. Because the project has been found to be consistent with the RCALUCP impacts to persons residing or working in the area would be less than significant. 14. POPULATION AND HOUSING. Would the project: Induce substantial unplanned population growth in an area, M 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 – Land Use and Urban Design Element) Less than Significant Impact. The project involves the construction of approximately 13,400 square feet of new self-storage facility that may induce population growth through the provision of new employment opportunities within the city. The project proposes a General Plan Amendment from LDR (Low Density Residential) to C (Commercial) and a Zone Change from R-1-7000 (Additional Single-Family Residential Zone) to CR-CS (Commercial Retail - Commercial Storage Overlay Zone). Therefore, the project would reduce land originally designated and zoned for residential use and impacts would be less than significant.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			$\boxtimes$	
14b. Response: (Source: General Plan 2025 – Land Use and U	Irban Design	Element, Goo	gle Earth, Pro	ject Site Visit
<b>Less than Significant Impact.</b> The project would not displace existing replacement housing elsewhere because the project site is proposed of that would be removed or affected by the proposed project. Thus, dissubstantial numbers of existing people or housing would be less than	on vacant land rect and indire	that has no ex	cisting housing	g or residents
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?				
Statistics and Ordinance 5948 § 1)  Less than Significant Impact. The project is in an urbanized area and square-foot self-storage facility. Adequate fire facilities and service Avenue, Riverside, California 92506 to serve this project. In addition compliance with existing codes and standards, and through Fire Departire facilities or services would be less than significant.	es are provided on, with imple	d by Station 3 mentation of C	located at 63 General Plan 2 In the demand	395 Riverside 2025 policies,
b. Police protection?				
15b. Response: (Source: General Plan 2025 Figure PS-8 – Ne. Less than Significant Impact. The project is in an urbanized area an square-foot self-storage facility. The project may require police serv self-storage. Adequate police facilities and services are provided b 10540-B Magnolia Avenue, to serve this project.  As with all development within the city, the project applicant shall provision of police services. In addition, with implementation of Gen and standards, and through Police Department practices, impacts on than significant.	d consists of the consists of	he construction onstruction and Neighborhood e development 5 policies, com	n and operation d operation of Policing Cent impact fees t pliance with e	the proposed er, located at o support the existing codes
c. Schools?				
15c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Bound Boundaries)	daries, Table	5.13-D - RU	SD, Figure 5.	
<b>No Impact</b> . The proposed project is within the boundaries of the Rive a commercial storage use rather than residential uses, no additional he aged children would increase as a result of the proposed project. Pursu Section 65995, the project applicant shall pay school development im California Government Code, Section 65995, no impact to schools w	ousing will be a nuant to Senate apact fees. Thr	generated such Bill 50 and Ca	n that the numb difornia Gove	per of school- rnment Code,
d. Parks?				
15d. Response: (Source: General Plan 2025 Figure PR-1 – Parks Master Plan 2003, GP 2025  Types and Table 5.14-C – Park and Recreation Facilities	FPEIR Table	e 5.14 <b>-</b> A – Pa	rk and Recre	ation Facility

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expansion of recreational facilities.		no impacts w	outu occui reş	garuing the co	monucuon of	

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
17. TRANSPORTATION Would the project result in:					
a. Conflict with the applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?					
17a. Response: (Source: General Plan 2025 Circulation and Community Mobility Element, Project Plans)  Less than Significant Impact. The project was designed to comply with the City requirements relative to access plans and to avoid potential impacts to the adjacent roadway due to the proximity to the rail crossing and the planned Quiet Zone implementation. The project is located west of Union Pacific Railroad Company rail lines and east of SR-91. Access to the project is provided off Central Avenue through the existing self-storage site located south of the project.  The project will not conflict with an applicable plan, ordinance or policy. The 2011 Riverside County Congestion Management Program includes guidelines to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs will effectively utilize new transportation funds, alleviate traffic congestion and					
related impacts, and improve air quality. These guidelines estable roadways designated by the Riverside County Transportation Computer threshold for congestion management process state highways and print or segment had a lower LOS (LOS F) in 1991; these facilities are excimplementation of the conditions, impacts would be less than significant to the conditions of the conditions.	mission. The a ncipal arterial r empt from CM	ndopted minim oadways is LC	num level of s OS E, unless th	ervice (LOS) e intersection	
b. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?					
Less than Significant Impact. Vehicular access to the project site w to and from the project site would utilize the existing network of reg The proposed project would not introduce any new roadways or introland uses in the surrounding area. Therefore, the proposed project w	17d. Response: (Source: Project Site Plans)  Less than Significant Impact. Vehicular access to the project site would be provided via Central Avenue. Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project site area. The proposed project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. Therefore, the proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts related to				
c. Result in inadequate emergency access?					
17e. Response: (Source: Project Site Plans)  Less than Significant Impact. Direct access for emergency vehicles project site would remain open during construction, and project site a of the proposed project would not result in inadequate emergency ac	access would b	e maintained.	Therefore, im	plementation	
18. TRIBAL CULTURAL RESOURCES.				:	
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or					

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
FORMATION SOURCES):	Impact	With Mitigation	Impact	Impact
		Incorporated		
18a. Response: (Source: Cultural Resources Survey prepared l AB 52 Consultation)	by RECON En	vironmental	on October 28	3, 2019, and
Less than Significant Impact with Mitigation. RECON Environ Commission on August 22, 2019, requesting a search of their Sacred resources in or adjacent to the project APE. A reply was received on S Lands Files was completed with negative results.	Lands File for	information o	n Native Ame	rican cultural
In accordance with SB 18 and AB 52 requirements, the City contacted Native American tribes who may also have knowledge of cultural resources in the project area. A total of five tribes responded and three tribes requested consultation including the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe. Native American representatives from these tribes have requested implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4 which outline monitoring and treatment protocols in the event that Native American cultural resources are inadvertently discovered during the course of grading for the project. Therefore, implementation of Mitigation Measures CUL-1 through CUL-4 would reduce any potentially significant impacts regarding unknown tribal resources to less than significant.				
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria 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.				
<b>18b.</b> Response: (Source: AB 52 Consultation)  Less than Significant Impact with Mitigation. No Tribal Cultura resources have been identified on the project site. As described in rethe Soboba Band of Luiseño Indians, the Rincon Band of Luiseño I representatives from these tribes have requested implementation of Mark 4 which outline monitoring and treatment protocols in the event the discovered during the course of grading for the project. Therefore, if CUL-4 would reduce any potentially significant impacts regarding up to the course of the course of grading for the project.	sponse 4.19(a ndians, and the ditigation Mean the Native Amen mplementation	i), above, the ne Agua Calie asures CUL-1 erican cultural n of Mitigatio	City held con nte Tribe. Nat , CUL-2, CUL resources are n Measures C	sultation with tive American L-3, and CUL- inadvertently UL-1 through
Mitigation Measures				
CUL-1, CUL-2, CUL-3, and CUL-4 (See Section 6)				
19. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?				
19a. Response: (Source: General Plan 2025 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, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)				
Less than Significant Impact. The proposed project involves the exp of the site by constructing an additional storage area of 13,400 square in impervious surface areas. An increase in impervious area would affect drainage facilities. However, since the proposed project involved to be impacted.	e feet. The progenerate incre	existing self-st posed project ased storm wa	orage facility would result i ater flows with	n an increase h potential to

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
FORMATION SOURCES):	Impact	With	Impact	Impact
om milion so one Es).	-	Mitigation	-	
The mainting of its arithmetic and in the hours desire of the Court Are DWOCD		Incorporated	1. Ct D-	: A
The project is within the boundaries of the Santa Ana RWQCB Management Plan. The project would be required to comply with all Permit, as enforced by the RWQCB.	provisions of	the NPDES pr	ogram and the	e City's MS4
In addition, subdivision Code (Title 18, Section 18.48.020) requires of	Irainage fees to	o be paid to the	City for new	construction.
Due to the project consisting of a small self-storage facility, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities. In addition, project compliance to the above policies and regulations would mitigate any				
potential impacts regarding the relocation or construction of new policies and programs that would minimize the environmental effective policies.	facilities. In a ects of the dev	ddition, the Grelopment of t	eneral Plan 2	025 includes
would have a less than significant impact on the relocation or constru	action of new	facilities.		
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?				
19b. Response: (Source: FPEIR Figure 5.16-3 – Water Service	e Areas, Figur	e 5.16-4 – Wa	ter Facilities,	<i>Table 5.16-E</i>
<ul> <li>RPU Projected Domestic Water Supply AC-FT/YR, Tab General Plan Projected Water Demand for RPU including</li> </ul>	Water Reliab	ility for 2025)		
No Impact. The project will not exceed expected water supplies. The				
Growth Scenario where future water supplies were determined to be				
5.16- I and 5.16-J of the General Plan 2025 Final PEIR). Therefore,	the project wi	II have no imp	act resulting ii	n insufficient
water supplies.				
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 FPEIR Table 5.16-	-K))			
Less than Significant Impact. The project will not exceed wastewa		equirements o	f the RWQCB	. The project
is consistent with the General Plan 2025 Typical Growth Scenario w				
be adequate (see Table 5.16-K of the General Plan 2025 Final F				
wastewater and the current Wastewater Treatment Master Plan antic	cipates and pro	ovides for this	type of project	t. Therefore,
no impact related to wastewater treatment.				
d. Generate solid waste in excess of State or local standards, or				$\boxtimes$
in excess of the capacity of local infrastructure, or otherwise				
impair the attainment of solid waste reduction goals?	CH 15 11	7.16.16 E		G 11 1 117 .
19d. Response: (Source: FPEIR Table 5.16-A – Existing Land Generation from the Planning Area)	fills and Table	e 5.16-M – Est	imated Futur	e Solid Waste
No Impact. The project is consistent with the General Plan 2025	Typical Buil	dout Project	level where fi	iture landfill
capacity was determined to be adequate (see Tables 5.16-A and 5.16-				
impact to landfill capacity would occur.	ivi of the Gen	0141114112025	1 11141 1 211().	increiore, no
e. Comply with federal, state, and local management and				$\square$
reduction statutes and regulations related to solid waste?			Ш	
19e. Response: (Source: California Integrated Waste Manage	ment Board 2	002 Landfill I	Facility Compl	liance Study)
No Impact. The California Integrated Waste Management Act		_		
jurisdictions divert at least 50 percent of all solid waste generated	by January 1,	2000. The Ci	ty is currently	achieving a
60 percent diversion rate, well above state requirements. In addit				
developments to divert 50 percent of non-hazardous construction and				
and land clearing debris for all non-residential projects beginning Ja the City's waste disposal requirements as well as the California Gre-				
not conflict with any federal, state, or local regulations related to so				

statutes would occur.

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No		
FORMATION SOURCES):	Impact	With	Impact	Impact		
,		Mitigation Incorporated				
20. WILDFIRE		Incorporated				
If located in or near state responsibility areas or lands classified as ve	ry high fire ha	zard severity z	zones, would t	he project:		
a. Substantially impair an adopted emergency response plan or						
emergency evacuation plan?	ad Fina (CAL)	FIDE) Duguan	tion Western	n Diwarsida		
20a. Response: (Source: California Department of Forestry and Fire (CALFIRE) Prevention – Western Riverside County – Very High Fire Hazard Severity Zones in LRA, Public Works Construction Greenbook)						
No impact. The proposed project is not within a designated Very Hig	h Fire Hazard	Severity Zone	es (VHFHSZ),			
CALFIRE Prevention. As stated in Threshold 9f in Section 9, Hazard- city would be conducted under the supervision of the City's Police De						
of Emergency Services in accordance with the City's EOP, LHMP,						
City's planned responses to emergencies and hazards. During constru						
as not to interfere or impede with any emergency response or evacu						
travel would be maintained in each direction at all times. Temporary ar Specifications for Public Works Construction (Greenbook) (as amen						
for maintenance of access; traffic control; and notification of emerg						
through 20d apply only to those projects that are "located in or near	state responsib					
fire hazard severity zones," no impact related to wildland fires would	occur.	1				
b. Due to slope, prevailing winds, and other factors, exacerbate				$\boxtimes$		
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 – Figure PS-7, Ca	AI EIDE)					
No impact. As indicated in Threshold 9g in Section 9, Hazards and		Materials the	project site is	located in an		
urbanized area, and there are no large undeveloped areas and steep s						
wildfire and thus expose future residents to fire hazards and pollutar	its from fire.	The project sit	e and the surr	ounding areas		
are not located in designated Fire Hazard Areas, as shown in Figur						
identified by CALFIRE. Rather, the site is within a Non-VHFHSZ 3.2 miles east of the site, near Sycamore Canyon Wilderness Park. S						
would it create wildfire hazards (as consistent with Riverside General						
would occur.	i imii o ojuuti.	010 0), 110 1111				
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: CALFIRE)		1 VIIII CZ	1 6 11	SALEIDE A		
<b>No impact.</b> As previously discussed, the proposed project is not with indicated in Section 3.0, Project Description, the site is located in a						
infrastructure such as roads and utilities. Any new utility infrastructu						
applicable regulatory standards and would not exacerbate fire risk or						
environment. Additionally, because Thresholds 20a through 20d appl						
responsibility areas or lands classified as very high fire hazard sever	ity zones," no	impacts relate	d to these thre	sholds would		
occur.				<u> </u>		
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: CALFIRE Prevention, Preliminary	WQMP prepa	red by Joseph	E. Bonadim	an & Assoc		
Inc.)	∠ r - r	J P				
No impact. As previously described, the proposed project is not w						
The project is located in a highly urbanized area, and the site topo						
landslide areas. Proposed drainage changes are described in Sec	tion 10, Hydi	rology and W	ater Quality.	Specifically,		

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
implementation of the project would not expose people or structures flooding or landslides, as a result of runoff, post-fire slope instability				
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
21a. Response: (Source: General Plan 2025 – Figure OS-6 MSHCP Cores and Linkages, Figure OS-8 – MSHCP C MSHCP Area Plans, Title 20 of the Riverside Municipal RECON Environmental on October 28, 2019) Less than Significant Impact with Mitigation. As discussed in	ell Areas, Gel ll Code, and	neral Plan 20 Cultural Reso	025 FPEIR F ources Survey	igure 5.4-2 – prepared by
potential impacts related to habitat of fish or wildlife species were a site is located within an urban built-up area and is generally surround.  Additionally, potential impacts to cultural and archaeological resour of Riverside's history or prehistory were discussed in the Cultural Robe less than significant with mitigation incorporated.	all found to be ded by existing rees related to	e less than sign g development major periods	nificant. The v t. s of California	acant project and the City
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
21b. Response: (Source: FPEIR Section 6 – Long-Term Ef	fects/Cumular	tive Impacts j	for the Gener	al Plan 2025
Program) Less than Significant Impact. The proposed project has either no significant impact with mitigation incorporated with respect to all enviscope of direct physical impacts to the environment associated with a project-specific in nature. In addition, since the project is consistent are anticipated and therefore cumulative impacts of the proposed professes than significant.	o impact, a lest rironmental isselhe proposed p with the Gener	ss than significates pursuant to roject, the pro- ral Plan 2025,	cant impact, o o CEQA. Due ject's impacts no new cumul	or a less than to the limited are primarily ative impacts
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				
21c. Response: (Source: FPEIR Section 5 – Environmental In		-		
Less than Significant Impact with Mitigation. Effects on human be hydrology and water quality, noise, population and housing, public transportation, and wildfire sections of this initial study. Based on project, with mitigation, will not cause substantial adverse effects, direct and indirect impacts on human beings that result from the princorporated.	facilities, haze the analysis ectly or indire	ards and haza and conclusio ctly to human	rdous material ns in this initi beings. Theref	ls, recreation, ial study, the fore, potential

## Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
BIO-1	In the event that vegetation clearing is necessary during the bird nesting season (February 1 – September 15), a qualified biologist shall conduct a preconstruction survey to identify the locations of nests within the areas affected by clearing activities. An exclusionary zone shall be established around any active nest. The dimensions of the zone shall be determined by a qualified biologist and is dependent on the species of bird detected. This zone shall be clearly marked in the field, and construction or clearing shall not be conducted within this zone until the biologist determines the nest is no longer active.	In the event that vegetation clearing is necessary during the bird nesting season (February 1 – September 15)	A qualified biologist	Survey Report
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 consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	Prior to grading permit issuance and if there are any changes to project site design and/or proposed grades.	The developer/applicant and the City of Riverside	See Mitigation Measure
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	At least 30 days prior to application for a grading permit and before any grading,	The developer/applicant	See Mitigation Measure

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<sup>&</sup>lt;sup>1</sup> All agencies are City of Riverside Departments/Divisions unless otherwise noted.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.  1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:  a. Project grading and development scheduling;  b. The development of a 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;	excavation and/or ground disturbing activities take place.		

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	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.			
CUL-3	Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:  1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.  2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the	During project grading	The developer/applicant	See Mitigation Measure
	3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	and Economic Development Department with evidence of same:			
	a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;			
	b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;			
	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 or Museum of Riverside by default; and			
	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			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.			
CUL-4	Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pregrading 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.		The Secretary of Interior Standards County certified archaeologist and Native American monitors	See Mitigation Measure