

Source: RGA Office of Architectural Design

Figure 2.4-6  
Photometric Plan

#### 2.4.2.4 Other Design Considerations

The remainder of the Project site (approximately 8.8 acres) would be improved with pavement/asphalt surfaces. Typical uses of these areas would include:

- Employee/visitor parking. Employee/visitor parking would be provided consistent with parking standards for the BMP zone.
- Parking areas for construction vehicles and construction equipment. It is anticipated that up to 50 vehicles/pieces of equipment would be parked at the site at any given time.<sup>3</sup>
- Construction materials and construction components storage. All outdoor storage at the Project site would be required to conform with the provisions of City Municipal Code (Chapter 19.285 - *Outdoor Storage Yard*).
- An equipment testing area located at the northwest corner of the Project site.

The Project would also construct all on-site improvements and supporting infrastructure consistent with City Conditions of Approval and service provider requirements. These improvements would include, but would not be limited to:

- Site-adjacent access and roadway improvements;
- Water and sewer service connections;
- On-site stormwater management and stormwater quality treatment systems, and connection to the municipal storm drain system;
- Connection to SoCal Gas natural gas services;
- Connection to City of Riverside electric services;
- Connection to existing serving communications systems;
- On-site Electric Vehicle (EV) charging infrastructure and EV charging stations;
- Perimeter screening and security, bicycle amenities, landscaping, lighting, and potential signage;<sup>4</sup>
- Site security features such as gate-restricted or guard-controlled access, and perimeter security/privacy fencing.

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<sup>3</sup> Specification sheets for representative vehicles and equipment that would be parked and maintained at the Project site are presented at Appendix I to this IS/MND.

<sup>4</sup> Any proposed signs would be processed under separate permit consistent with City requirements.

Final Project designs would be required to comply with provisions of City Municipal Code (Chapter 19.130 - *Industrial Zones [BMP, I, AI, and AIR]*).

### 2.4.3 Project Operations Summary

For the purposes of this analysis, the following operational characteristics are assumed:

- The Project will be complete and fully operational by 2023, the Project Opening Year.
- Typical operating hours for the Project facilities is 7:00 a.m. to 7:00 p.m. Monday through Friday. To establish a potential maximum impact scenario, this analysis assumes the Project will be open and operational year-round, 24 hours per day, 7 days per week.
- Typical operations within the Project site would include the following:
  - Office/administrative functions;
  - Vehicle and equipment repair, maintenance, and testing. The predominance of these activities would occur within the proposed maintenance building. An outdoor equipment testing/training area<sup>5</sup> is reserved at the northwest corner of the Project site, providing maximum separation between testing/training activities and residential uses located east/southeast of the Project site;
  - Personnel training exercises involving deployment, operation, and maintenance of equipment;
  - Vehicle equipment fueling. Fuel dispensing would not exceed 1,000 gallons per day;
  - Vehicle washing – typically 1 truck per day/one hour per day;
  - Outdoor loading, unloading, and storage of materials used in the construction of power systems, underground utilities, and communications systems. All

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<sup>5</sup> Outdoor testing/training is reflected in the analyses presented here. Specific scheduling of outdoor training/testing activities is equipment and personnel dependent. The Project tenant(s) will coordinate these activities with the City if/as required.

outdoor storage at the Project site would be required to conform with the provisions of the City Municipal Code (Chapter 19.285 - *Outdoor Storage Yard*).

- Based on information provided by the Applicant, the Project would provide an estimated 100 – 164 full-time jobs.

#### **2.4.4 Access and Circulation**

Regional access to the Project site and surrounding areas is provided by Central Avenue (E – W), the northern Project Site boundary, and Arlington Avenue (E – W) located approximately 0.5 miles south of the Project Site. Central Avenue and Arlington Avenue connect with Streeter Avenue (N – S) approximately 0.5 miles east of the Project Site.

Preliminary concepts indicate local access to the Project Site would be provided via two driveways connecting north to Central Avenue, and one driveway connecting east to Hillside Avenue. Ultimate driveway locations, configurations, and internal circulation plans for the Project would be required to comply with City requirements based on detailed site plans. As part of the Project, both Central Avenue and Hillside Avenue would be improved adjacent to the site. All Project roads, drive aisles, and access points would be required to comply with City engineering standards and City of Riverside Fire Department design and access requirements.

#### **2.4.5 Parking**

The Project would be required to comply with parking requirements set forth in the City Municipal Code (Chapter 19.580 - *Parking and Loading*, et al.). Parking assignments and design of parking areas within the site are subject to City review and approval.

## **2.4.6 Infrastructure/Utilities**

### **2.4.6.1 Water Services**

Domestic water would be provided by the City of Riverside Public Utilities Department. The Project would connect to water lines located in adjacent Central Avenue and/or in adjacent Hillside Avenue rights-of-way. Final designs and any necessary modification of water conveyance systems serving the Project would be required to comply with City of Riverside requirements.

### **2.4.6.2 Recycled Water Services**

Recycled water service is currently unavailable to the Project site. On-site recycled water systems would be constructed and connect to City of Riverside recycled water services when such services are available. On-site recycled water lines would be charged with domestic water until such time as recycled water is available from the City. The Project would extend and connect to recycled water lines consistent with City of Riverside requirements.

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### **2.4.6.3 Sewer Services**

Sewer service would be provided by the City of Riverside Public Utilities Department. The Project would connect to the sanitary sewer line located in Portola Way, east of the Project. Final designs and any necessary modification of sanitary sewer conveyance systems serving the Project would be required to comply with City of Riverside requirements.

### **2.4.6.4 Stormwater Management System**

Existing drainage patterns on-site would be maintained. The Project would implement on-site stormwater management systems to detain and treat stormwater discharges. Per the Preliminary Project WQMP, the entire design capacity volume (DCV) would be retained and treated on-site. Treated stormwaters would be discharged east to the proposed storm drain to be constructed in the Hillside Avenue right-of-way, east of the Project site. The Project Final WQMP, as approved by the City, would ensure that the Project stormwater management systems have been designed to convey and treat

stormwater discharges and limit the post-development peak flows consistent with available storm drain capacities.

#### **2.4.6.5 Solid Waste Management**

The Project would be served by existing municipal solid waste (MSW) hauling companies. Authorized commercial hauling services for the City are provided by Athens Services, Burrtec Waste Industries, and CR&R Waste Services. All collected non-hazardous solid waste collected is taken to the Robert A. Nelson Transfer Station, which is owned by the County of Riverside, and then transferred to the Badlands, El Sobrante, or Lamb Canyon Landfills for disposal.

#### **2.4.6.6 Electricity**

City of Riverside Public Utilities would provide electricity to the Project site from existing vicinity facilities. All proposed connections and modifications to facilities would be required to comply with provider and City of Riverside requirements. Will-serve letter or similar conditional commitment document for provision of electric service would be provided concurrent with application for building permits.

#### **2.4.6.7 Natural Gas**

Southern California Gas Company (The Gas Company) would provide natural gas to the Project. All proposed connections and modifications to Gas Company facilities would be required to comply with Gas Company and City of Riverside requirements. Will-serve letter or similar conditional commitment document for provision of natural gas service would be provided concurrent with application for building permits.

#### **2.4.6.8 Communications Services**

Communications services, including wired and wireless telephone and internet services are available through numerous private providers and would be provided on an as-needed basis. To the extent practical and consistent with City Conditions of Approval, existing and proposed wires, conductors, conduits, raceways, and similar communications improvements within the Project area would be installed underground. Any necessary surface-mounted equipment, e.g., terminal boxes, transformers, meters,

service cabinets, etc., would be screened and would be required to comply with City building setback requirements. Will-serve letter or similar conditional commitment document for provision of communications service(s) would be provided concurrent with application for building permits.

#### **2.4.7 Energy Efficiency/Sustainability**

Energy-saving and sustainable design features and operational programs would be incorporated in all Project facilities. The Project would be required to comply with incumbent energy efficiency and performance standards established under the CALGreen Code and the *City of Riverside Restorative Growthprint: Climate Action Plan*.

#### **2.4.8 Construction Area Traffic Management Plan**

Temporary and short-term traffic detours and traffic disruptions could result during construction activities including implementation of access and circulation improvements noted above. Accordingly, the Applicant would be responsible for the preparation and submittal of a Construction Area Traffic Management Plan (Plan). Typical elements and information incorporated in the Plan would include, but not be limited to:

- **Name of on-site construction superintendent and contact phone number.**
- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).
- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).
- **Identification and Description of Material Storage Locations (if any).**
- **Location and Description of Construction Trailer (if any).**

- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.
- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.
- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the first building permit. The Plan and its requirements would also be required to be provided to all contractors as one component of building plan/contract document packages.

## 2.5 PROJECT OBJECTIVES

The primary goal of the Project is establishment of a regional hub providing coordinated and efficient storage, deployment, servicing, and maintenance of equipment and material used in the construction and maintenance of power, underground utilities, and communications systems. Complementary Project Objectives include the following:

- Create a development providing long-term employment opportunities for area residents.
- Implement new development providing additional construction employment opportunities.



- Implement new development near existing roadways and freeways to reduce VMT, traffic congestion, and air emissions.
- Create a development wherein the Project uses would benefit from the site's accessibility from adjacent Central Avenue and Hillside Avenue.
- Establish new development that would further the City's near-term and long-range fiscal goals.

## **2.6 DISCRETIONARY APPROVALS and PERMITS**

Discretionary actions, permits, and related consultation(s) necessary to approve and implement the Project include, but are not limited to, the following.

### **2.6.1 Lead Agency Discretionary Actions and Permits**

- CEQA Compliance;
- Adoption of this IS/MND and approval of the MND Mitigation Monitoring Plan;
- Approval of Minor Conditional Use Permits;
- Design Review of Project plans;
- Lot Consolidation;
- Potential Review and Approval by the Riverside County Airport Land Use Commission (ALUC).

## 2.6.2 Other Consultation and Permits

Anticipated consultation and permits necessary to realize the Project would likely include, but are not limited to, the following:

- Permitting by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit.
- Permitting by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment or land uses that may be implemented pursuant to the Project.
- Permitting (i.e., utility construction and connection permits) from affected utility purveyors.
- Other ministerial permits necessary to realize all on- and off-site improvements related to the development of the site.

## **3.0 ENVIRONMENTAL ASSESSMENT**

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# CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

PLANNING DIVISION

## DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 3

1. **Case Number(s):** PR-2021-001198
2. **Project Title:** Raptor Court Quanta Project
3. **Hearing Date:** TBD
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:** Regine Osorio, Associate Planner  
**Phone Number:** (951) 826-5712
6. **Project Location:** Southwest corner of Central Avenue and Hillside Avenue. Existing Project site Assessor Parcel Numbers: 190-210-016, 190-210-017, and 190-210-005.
7. **Project Applicant/Project Sponsor’s Name and Address:**

<u>Owner</u>	<u>Engineer/Architect</u>
Orbis Retail Estate Partners	RGA
280 Newport Center Drive, Suite 240	15231 Alton Parkway, Suite 100
Newport Beach, CA 92660	Irvine, CA 92618
8. **General Plan Designation:**

Existing: B/OP - Business/Office Park  
Proposed: B/OP - Business/Office Park
9. **Zoning:**

Existing: BMP - Business and Manufacturing Park Zone  
Proposed: BMP - Business and Manufacturing Park Zone

## 10. Project Description:

The proposed Raptor Court Quanta Project (Project) would be implemented on an approximately 12.84-acre site, located at the southwest corner of Central Avenue and Hillside Avenue in the City of Riverside. Existing Project site Assessor Parcel Numbers are: 190-210-016, 190-210-017, and 190-210-005. The Project proposes facilities and site improvements that would support a regional hub for a national power and infrastructure construction company. To these ends, the Project proposes the following:

- An administrative office building of approximately 40,000 square feet.
- A maintenance building with attached ancillary tool storage area. The maintenance/tool storage building would total approximately 34,000 square feet.
- A private truck washing station of approximately 1,000 square feet. The truck washing station would serve only vehicles and equipment owned by, or otherwise under control of, the Applicant/owner.
- Aboveground storage tanks (ASTs) for diesel fuel and gasoline. All Project ASTs would be required to conform with provisions of the Aboveground Petroleum Storage Act (see: <https://riversideca.gov/fire/divisions/prevention/aboveground-petroleum-storage-act>). Fuel storage at the Project site would comprise one (1) 10,000-gallon double-walled fuel tank, and one (1) 2,000-gallon double-walled fuel tank. 1 Project ASTs would include an advanced monitoring system for leak detection. All fuel stored at the Project site would be available only to equipment and vehicles owned by, or otherwise under control of, the Applicant/owner.

It is also anticipated that the Project would provide limited temporary storage of used oil and used antifreeze. Used oil and antifreeze would be temporarily stored on-site in 50-gallon drums and would be transported by a qualified professional third party vendor for recycling to designated licensed recycling facilities within the City of Riverside and/or County of Riverside.<sup>2</sup>

Bulk petroleum products or other potentially hazardous materials stored, used, transported, or disposed of as part of the Project would be required to conform with applicable provisions of City of Riverside Municipal Code Chapter 9.48 - *Unified Hazardous Materials Program*.

- A fuel island with 2 fuel points. This fuel facility would serve only vehicles and equipment owned by, or otherwise under control of, the Applicant/owner. Based on information provided by the Applicant, fuel throughput at this facility would not exceed 1,000 gallons per day or 365,000 gallons per year. In context, fuel throughput for a typical commercial fuel station is expressed in terms of multiple millions of gallons per year.
- Areas of the Project site not occupied by structures or landscaping would be improved with pavement/asphalt surfaces. These areas would provide parking for the Project tenant uses; would allow generally for on-site movement of trucks and equipment; and would provide designated areas assigned to vehicle/construction equipment parking and material/equipment storage. Open/paved areas of the Project site would also accommodate periodic training exercises for deployment use and maintenance of construction equipment.

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<sup>1</sup> Although no manufacturer has been identified to date, a typical 10,000-gallon (double-walled) aboveground storage tank is 28 feet long, 10 foot wide, 10 foot tall and weighs approximately 16,000 (dry weight) pounds. A typical 2,000-gallon (double-walled) aboveground storage tank is 12 feet long, 5 feet wide, 5.5 feet tall and has a dry weight of 3,700 pounds.

<sup>2</sup> The storage, use, and disposal/recycling of fuel, oil, antifreeze and other hazardous or potentially hazardous materials are common activities within most urbanized communities. A stringent regulatory system has evolved around the gasoline dispensing and vehicle maintenance and repair facilities. The Applicant would comply with all local, regional, and state regulations addressing Project storage, use, and disposal/recycling of hazardous or potentially hazardous materials.

**Project Construction Best Management Practices**

Recognizing potential effects of construction activities on proximate residential uses, the following construction Best Management Practice(s) (BMPs) are incorporated as Project Conditions of Approval. To facilitate coordination and their effective implementation, the BMPs listed below shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit.

- All construction equipment shall be tuned and maintained in accordance with the manufacturer’s specifications.
- Off-road diesel construction equipment shall comply with California Air Resources Board (CARB) performance standards as follow:
  - All equipment operating at >100 horsepower (hp) shall be CARB Tier III-Certified or better.
  - All equipment operating at <100 hp shall be CARB Tier IV Interim-Certified or better.

Further details regarding the Project are presented at IS/MND Section 2.4, *Development Concept*.

**11. Surrounding land uses and setting: Briefly describe the project’s surroundings:**

	Existing Land Use	General Plan Designation	Zoning Designation
<b>Project Site</b>	Vacant/ Disturbed	B/OP - Business Park	BMP - Business and Manufacturing Park Zone
<b>North</b>	Single Family Residential	MDR - Medium Density Residential	R-1-7000 - Single Family Residential
<b>East</b>	Single Family Residential	MDR - Medium Density Residential	R-1-7000 - Single Family Residential
<b>South</b>	Single Family Residential/ Borrow/Fill Site	PF - Public Facilities	R-1-7000 - Single Family Residential
<b>West</b>	Light Industrial/ Business Park	B/OP - Business Park	BMP - Business and Manufacturing Park Zone

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

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

**13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

In compliance with Assembly Bill 52, Tribal consultation has been initiated by the City of Riverside. Consultation was initiated 11/24/2021. Three requests for consultation were received: Gabrieleno Band of Mission Indians, Pechanga Cultural Resources Department, and Rincon Band of Luiseño Indians. Mitigation Measures have been implemented consistent with Tribal requests and recommendations received pursuant to that consultation.

**14. Environmental Analyses Incorporated by Reference:**

- *City of Riverside General Plan 2025*, November 2007.
- *City of Riverside Final Program Environmental Impact Report for the City of Riverside General Plan*, November 2007.

## 15. Acronyms

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

### Appendices:

- A. *Raptor Court Quanta Project, Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022.
- B. *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 2022; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022.
- C. *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022.

- D. *Phase I Environmental Assessment, Cleared 12.44 Acre Parcels of Land [Raptor Court Quanta Project], 5750 Central Avenue and 6639 Hillside Avenue, Riverside, California* (HEI Corporation) March 22, 2018.
- E. *Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022.
- F. *Raptor Court Quanta Project, Noise and Vibration Analysis* (Urban Crossroads, Inc.) June 22, 2022.
- G. *Raptor Court Quanta Project Vehicle Miles Traveled (VMT) Analysis* (Urban Crossroads, Inc.) September 15, 2022; *Raptor Court Quanta Project Trip Generation Assessment* (Urban Crossroads, Inc.) June 22, 2022; *Traffic Analysis Scoping Form, Raptor Court Quanta Project* (Urban Crossroads, Inc.) n.d.
- H. *Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* (BCR Consulting LLC) June 22, 2022.
- I. *Equipment Specification Sheets* (representative of vehicles and equipment parked and maintained at the Project site). **Note:** Up to 50 pieces of equipment may be parked at the site at any given time. Equipment types specifically used in installation and maintenance of utility poles and utility lines would include: Truck-mounted personnel elevators/cranes, and truck-mounted digger derricks. Other vehicles would include general purpose pick-up trucks.
- J. *Riverside Airport Compatibility Assessment – Proposed Raptor Court Quanta Project* (Johnson Aviation Consulting) September 8, 2022.

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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated in the following analyses.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Hazards & Hazardous Materials        | <input type="checkbox"/> Recreation                                    |
| <input type="checkbox"/> Agriculture & Forest Resources  | <input type="checkbox"/> Hydrology / Water Quality            | <input type="checkbox"/> Transportation                                |
| <input type="checkbox"/> Air Quality                     | <input type="checkbox"/> Land Use / Planning                  | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources                    | <input type="checkbox"/> Utilities / Service Systems                   |
| <input checked="" type="checkbox"/> Cultural Resources   | <input type="checkbox"/> Noise                                | <input type="checkbox"/> Wildfire                                      |
| <input type="checkbox"/> Energy                          | <input checked="" type="checkbox"/> Paleontological Resources | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology / Soils                 | <input type="checkbox"/> Population / Housing                 |  |
| <input type="checkbox"/> Greenhouse Gas Emissions        | <input type="checkbox"/> Public Services                      |  |

**DETERMINATION:** (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature \_\_\_\_\_

Date \_\_\_\_\_

Printed Name & Title \_\_\_\_\_

For City of Riverside



*ENVIRONMENTAL INITIAL STUDY*

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

**ISSUES (AND SUPPORTING INFORMATION SOURCES):**

<b>Potentially Significant Impact</b>	<b>Less-Than- Significant Impact With Mitigation Incorporated</b>	<b>Less-Than- Significant Impact</b>	<b>No Impact</b>
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**1. AESTHETICS.**

Except as provided in Public Resources Code Section 21099, would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

**1a. Response:**

**Less-Than-Significant Impact.** Hills and ridgelines surrounding the City provide opportunities for residents to experience long distance views of surrounding hills and natural terrain. Notable scenic vistas include the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park.

The Project would introduce new development at the site and would thereby alter existing views. However, development of the Project would not impair any views of any distant natural vistas. In this regard, the Project area is developed with urban uses, and the Project would implement low profile development that would not potentially interfere with or obstruct views of distant offsite natural features. Further, the Project would be required to conform to Citywide Design and Sign Guidelines, thereby encouraging high-quality design and minimizing the potential to result in adverse visual impacts generally. Based on the preceding, the potential for the Project to have a substantial adverse effect on a scenic vista is considered less-than-significant.

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**Sources:** General Plan 2025 Figure CCM-4 – *Master Plan of Roadways*; General Plan 2025 FPEIR Figure 5.1-1 – *Scenic and Special Boulevards and Parkways*, Table 5.1-A – *Scenic and Special Boulevards*, Table 5.1-B – *Scenic Parkways*; Google Earth Images; Project Application Materials.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

**1b. Response:**

**No Impact.** No designated state scenic highways or any eligible state scenic highways traverse the City or its Sphere of Influence. There are no state scenic highways located near the Project site. Neither is the Project located along or within view of a state scenic highway. Interstate 15 (I-15) is an eligible state scenic highway that exists in north – south alignment approximately 6 miles west of the Project site. In the Project vicinity, Victoria Avenue, a General Plan designated scenic boulevard, exists in a southwest – northeast alignment approximately 2.25 miles southeast of the Project site. No viewshed exists between the Project site and Victoria Avenue due to intervening development. Based on the preceding, the Project would have no potential to substantially damage scenic resources within a state scenic highway.

**Sources:** 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*; Google Earth Images; Project Application Materials.

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

**1c. Response:**

**Less-Than-Significant Impact.** The Project site is located in an urbanized area. The Project uses are permitted or conditionally permitted by the site’s existing BMP (Business and Manufacturing Park) Zoning designation. The Project would be required to comply with applicable provisions of the City of Riverside Zoning Code (Zoning Code) and the *Citywide Design and Sign Guidelines*. The City would verify compliance with applicable provisions of the Zoning Code and *Citywide Design and Sign Guidelines* prior to the issuance of development permits. On this basis, the potential for the Project to substantially degrade the existing visual character or quality of public views of the site and its surroundings; or conflict with applicable zoning and other regulations governing scenic quality is considered less-than-significant.

**Sources:** General Plan 2025; General Plan 2025 FPEIR; City of Riverside Zoning Code; *Citywide Design and Sign Guidelines*; Project Application Materials.

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

**1d. Response:**

DRAFT

**Less-Than-Significant Impact.** All Project exterior lighting would be required to conform to applicable provisions of Zoning Code Chapter 19.556, *Lighting* and Chapter 19.590, *Performance Standards*. The Project would also be required to conform to exterior lighting requirements presented in the *Citywide Design and Sign Guidelines*. The City would verify compliance with applicable provisions of the Zoning Code and *Citywide Design and Sign Guidelines* prior to the issuance of development permits. All Project exterior lighting would be directed, oriented, and shielded to prevent light overspill onto off-site properties, or in manner that would potentially affect flight paths or aircraft operations. Please refer also to IS/MND Section 2.0, *Project Description*, Figure 2.4-6, *Lighting Concept/Photometric Plan*. The Project is located in an urbanized area subject to urban ambient light conditions. Any increased illumination resulting from the Project would not substantially increase or otherwise affect ambient lighting conditions. The Project does not propose or require uses that would create or result in substantial glare. Per data provided by the Riverside County *Map My County* Geographic Information System (GIS), the Project site is located outside the Mount Palomar Policy Area. Project lighting would therefore not affect nighttime observations from Mount Palomar Observatory. Based on the preceding, the potential for the Project to create a new source of substantial light or glare that would adversely affect day or nighttime views in the Project area is considered less-than-significant.

**Sources:** General Plan 2025 FPEIR Figure 5.1-2 – *Mount Palomar Lighting Area*; City of Riverside Zoning Code Title 19 – Article VIII – Chapter 19.556 – *Lighting*, Title 19 – Article VIII – Chapter 19.590.070 *Performance Standards*; *Citywide Design and Sign Guidelines*; Riverside County *Map My County* Geographic Information System; Project Application Materials.

**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 compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

**2a. Response:**

**No Impact.** The Project is located within an urbanized area. Per General Plan 2025 Figure OS-2 – *Agricultural Suitability*, the Project site is designated “Urban and Built-Up Land.” Data provided by the Riverside County *Map My County* GIS indicates that the Project site is not in an agricultural preserve. The Project site is not designated as, or considered to be, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project does not propose or require uses or activities that would otherwise affect any properties designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Based on the preceding, the Project would have no potential to convert or otherwise adversely affect Farmlands of any type.

**Sources:** General Plan 2025 FPEIR Figure 5.2-1– *Designated Farmland*; Riverside County *Map My County* Geographic Information System; Project Application Materials.

- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

**2b. Response:**

**No Impact.** The Project is located within an urbanized area. Per General Plan 2025 FPEIR Figure 5.2-2 – *Williamson Act Preserves*, the Project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Per General Plan 2025 FPEIR Figure 5.2-3 – *Existing Zones Permitting Agricultural Uses*, and General Plan 2025 FPEIR – Figure 5.2-4 – *Proposed Zones Permitting Agricultural Uses*, the Project site is not located within, or proximate to any areas that are currently zoned for agricultural uses, or that are proposed for agricultural uses. On this basis, the Project would have no potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.

**Sources:** General Plan 2025 FPEIR– Figure 5.2-2 - *Williamson Act Preserves*, General Plan 2025 FPEIR – Figure 5.2-3 – *Existing Zones Permitting Agricultural Uses*, General Plan 2025 FPEIR – Figure 5.2-4 – *Proposed Zones Permitting Agricultural Uses*; Project Application Materials.

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

**2c. Response:**

**No Impact.**

- Public Resources Code (PRC) Section 12220(g) defines “forest land” as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.
- Per PRC Section 4526, “timberland” means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.
- PRC Section 51104(g) defines “timberland production zone” to mean an area which has been zoned pursuant to [PRC] Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

No City of Riverside properties are zoned for forest land, timberland, or timberland production. The Project does not propose or require uses that would otherwise affect properties designated for forest land, timberland, or timberland production. On this basis, the Project has no potential to conflict with existing zoning for, or cause rezoning of properties designated for forest land, timberland, or timberland production.

**Sources:** Public Resources Code (PRC) Section 12220(g), PRC Section 4526, PRC Section 51104(g); City of Riverside Zoning Code; City of Riverside Zoning Map; Project Application Materials.

- d. Result in the loss of forest land or conversion of forest land to non- forest use?
- 

**2d. Response:**

**No Impact.** The City of Riverside has no designated forest lands. The Project does not propose or require uses that would otherwise affect forest land or result in the conversion of designated forest lands.

**Sources:** PRC Section 12220(g); General Plan 2025; City of Riverside Zoning Code; City of Riverside Zoning Map; Project Application Materials.

- 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:**

**No Impact.** The Project proposes contemporary light industrial and office uses within an existing urbanized context. The Project does not “involve other changes in the existing environment that could result in Farmland to non-agricultural use, or conversion of forest land to non-forest use.” Based on the preceding, the Project would have no potential to “involve other changes” that could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use. Please refer also to preceding Checklist Items 2 a – c.

**Sources:** General Plan 2025 FPEIR Figure 5.2-1– *Designated Farmland*; General Plan 2025; Riverside County *Map My County* Geographic Information System; City of Riverside Zoning Code; City of Riverside Zoning Map; Public Resources Code (PRC) Section 12220(g), PRC Section 4526, PRC Section 51104(g); Project Application Materials.

**3. AIR QUALITY.**

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

- a. Conflict with or obstruct implementation of the applicable air quality plan?

**3a. Response:**

**Less-Than-Significant Impact.** The Project is located within the South Coast Air Basin (SCAB), which is characterized by relatively poor air quality. The South Coast Air Quality Management District (SCAQMD) has jurisdiction over an approximately 10,743-square-mile area consisting of the four-county SCAB and the Los Angeles County and Riverside County portions of what used to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, as well as state and federal agencies, to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

The SCAQMD has adopted Air Quality Management Plans (AQMPs) outlining strategies to achieve state and federal ambient air quality standards. AQMPs are periodically updated to reflect technological advances, recognize new or pending regulations, more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the SCAQMD released the Final 2016 AQMP (2016 AQMP). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 – 2040 RTP/SCS) and updated emission inventory methodologies for various source categories. Air quality conditions and trends presented in the 2016 AQMP assume that regional development will occur in accordance with population growth projections identified by SCAG in the 2016 – 2040 RTP/SCS.

The SCAG 2016 – 2040 RTP/SCS in turn derives its assumptions, in part, from general plans of cities located within the SCAG region. Accordingly, if a project is consistent with the development and growth projections reflected in the adopted general plan, it would be consistent with the growth assumptions in the SCAG 2016 – 2040 RTP/SCS and 2016 AQMP. The 2016 AQMP further assumes that development projects within the region will implement appropriate strategies to reduce air pollutant emissions, thereby promoting timely implementation of the AQMP.

Criteria for determining consistency with the AQMP are identified at Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD *CEQA Air Quality Handbook* (1993). AQMP consistency criteria are listed below. Project consistency with, and support of, these criteria is presented subsequently.

- **Criterion No. 1:** The project under consideration will not 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 or the interim emissions reductions specified in the AQMP.
- **Criterion No. 2:** The project under consideration will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

**Criterion No. 1:** The violations that Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations would occur if Localized Significance Thresholds (LSTs) or regional significance thresholds were exceeded. Project construction-source emissions would not exceed applicable LSTs or regional significance thresholds. See following discussion at Item 3 b) under the heading “Localized Impacts.”

Project operational-source emissions would not exceed applicable LSTs or regional significance thresholds. See following discussion at Item 3 b) under the heading “Localized Impacts.” Further, the Project would implement applicable Best Available Control Measures (BACMs), and would comply with applicable SCAQMD rules, acting to further reduce potential air quality impacts. On this basis, the Project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations.

**Criterion No. 2:** Criterion No. 2 addresses consistency of a given project with approved local and regional land use plans and associated potential AQMP implications. That is, AQMP emissions models and emissions control strategies are based in part on land use data provided by local general plan documentation; and regional plans, which reflect and incorporate local general plan information. The emphasis of this criterion is to ensure that the analyses conducted for any given project are based on the same forecasts as the AQMP.

Projects that propose general plan amendments may increase the intensity of use and/or result in higher traffic volumes, thereby resulting in increased operational-source emissions (stationary and vehicular-sources) when compared to the AQMP assumptions. However, if a given project is consistent with and does not otherwise exceed the growth projections in the applicable local general plan, then that project would be considered consistent with the growth assumptions in the AQMP.

### **General Plan Consistency**

Uses proposed by the Project are allowed under the site’s current General Plan Land Use designation of B/OP (Business/Office Park). No General Plan Amendment (GPA) is required in conjunction with the Project. The Project would not result in growth or development not anticipated under the AQMP. Project operational-source emissions are reflected in the AQMP assumptions, and would not result in AQMP inconsistencies.

### **Regional Plan Consistency**

Development of the City pursuant to the General Plan is reflected in Southern California Association of Governments (SCAG) planning efforts and policies including: *The 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy* (SCAG) April 2016 (2016 – 2040 RTP/SCS). Development of the City pursuant to the General Plan is also reflected in the recently-adopted 2020 – 2045 RTP/SCS (SCAG) September 2020 (Connect SoCal). The Project is consistent with the General Plan and by extension is reflected in SCAG planning efforts and policies.



The *Final 2008 Regional Comprehensive Plan (SCAG) 2008 (2008 RCP)* defines a vision for the SCAG region to be implemented under a strategic plan addressing the regions interrelated housing, traffic, water and air quality issues. The 2008 RCP does not mandate planning actions. SCAG does however request that local governments consider the 2008 RCP recommendations in developing or amending local plans, codes, design guidelines, and other related actions. SCAG promotes use of the 2008 RCP as an advisory policy document for voluntary use by local agencies. The Project does not propose or require actions that would somehow conflict with 2008 RCP advisory policies.

**AQMP Consistency Conclusion**

Project construction-source emissions would not exceed any applicable regional or local thresholds. Project operational-source emissions would not exceed any applicable regional or local thresholds. The Project would not result in or cause NAAQS or CAAQS violations. The Project does not propose or require amendment of the City General Plan, and the Project land uses are reflected in the AQMP. The Project is consistent with and reflected in applicable regional planning efforts. On this basis, the Project is considered to be consistent with the AQMP. The potential for the Project to conflict with or obstruct implementation of the AQMP is therefore less-than-significant.

**Sources:** *Final 2016 Air Quality Management Plan (SCAQMD) 2016; Final 2008 Regional Comprehensive Plan (SCAG) 2008; The 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy (SCAG) Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.*

- 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:**

**Less-Than-Significant Impact.** The City of Riverside and the Project site are located within the South Coast Air Basin. Attainment Status Designations for the South Coast Air Basin are summarized at Table 3-1.

**Table 3-1  
Attainment Status Designations - South Coast Air Basin**

<b>Criteria Pollutant</b>	<b>State Designation</b>	<b>Federal Designation</b>
O <sub>3</sub> – 1-hour standard	Nonattainment	--
O <sub>3</sub> – 8-hour standard	Nonattainment	Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO <sub>2</sub>	Attainment	Unclassifiable/Attainment
SO <sub>2</sub>	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb	Attainment	Unclassifiable/Attainment

**Source:** *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022.*

Consistent with SCAQMD guidance, less-than-significant non-attainment impacts at the Project level are not cumulatively considerable, and would not result in a cumulatively considerable net increase of criteria pollutant(s) for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Conversely, significant non-attainment impacts at the Project level are cumulatively considerable, and would result in a cumulatively considerable net increase of criteria pollutant(s) for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

**Regional Impacts**

**Construction-Source Air Pollutant Emissions**

Project construction activities (e.g., site preparation, grading, building construction, paving, architectural coating, infrastructure construction) would generate emissions of CO, ROG, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Please refer to *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A) for details regarding equipment use, construction timeframes and other CalEEMod inputs and related construction-source emissions modeling. SCAQMD regional thresholds for construction-source emissions are presented at Table 3-2. Project construction-source emissions in the context of SCAQMD regional thresholds are presented at Table 3-3.

**Table 3-2  
SCAQMD Regional Thresholds – Construction-Source Emissions**

Pollutant	Threshold
NO <sub>x</sub>	100 lbs./day
VOC	75 lbs./day
PM <sub>10</sub>	150 lbs./day
PM <sub>2.5</sub>	55 lbs./day
SO <sub>x</sub>	150 lbs./day
CO	550 lbs./day

*Source: Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022.

As indicated at Table 3-3, Project construction-source emissions would not exceed applicable SCAQMD regional thresholds. The potential for Project construction-source emissions to 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 would therefore be less-than-significant.

**Table 3-3  
Maximum Daily Construction-Source Emissions (pounds per day)**

Year	Emissions (lbs./day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<i>Summer</i>						
2022	3.49	90.24	52.78	0.32	14.29	5.68
2023	14.78	28.00	50.57	0.10	4.38	1.64
<i>Winter</i>						
2022	3.42	93.20	52.96	0.32	14.29	5.68

2023	14.71	28.17	48.59	0.09	4.38	1.64
<b>Maximum Daily Emissions</b>	<b>14.78</b>	<b>93.20</b>	<b>52.96</b>	<b>0.32</b>	<b>14.29</b>	<b>5.68</b>
SCAQMD Regional Threshold	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022.

### Operational-Source Air Pollutant Emissions

Project light industrial operations (e.g., vehicle trips, landscaping, on-going site/building maintenance, onsite equipment operations) would generate emissions of CO, ROG, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Please refer to the Project AQIA/GHGA/HRA for details regarding trip generation, landscaping, maintenance time frames, and associated CalEEMod inputs and related operational-source emissions modeling. SCAQMD Regional Thresholds for operational-source emissions are presented at Table 3-4.

**Table 3-4**  
**SCAQMD Regional Thresholds – Operational-Source Emissions**

Pollutant	Threshold
NO <sub>x</sub>	55 lbs./day
VOC	55 lbs./day
PM <sub>10</sub>	150 lbs./day
PM <sub>2.5</sub>	55 lbs./day
SO <sub>x</sub>	150 lbs./day
CO	550 lbs./day

Source: Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022.

Project operational-source emissions in the context of SCAQMD regional thresholds are presented at Table 3-5. As summarized at Table 3-5, Project operational-source emissions would not exceed SCAQMD regional thresholds. The potential for Project operational-source air pollutant emissions to result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard is less-than-significant.

**Table 3-5**  
**Maximum Daily Operational-Source Emissions**

Source	Emissions (lbs./day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<i>Summer</i>						
Area Source	0.78	6.00E-05	0.01	0.00	2.00E-05	2.00E-05
Energy Source	1.09	0.23	0.25	1.35E-03	0.02	0.02
Mobile Source	0.44	1.06	4.85	0.01	1.18	0.33
On-Site Equipment	0.11	1.04	0.75	0.00	0.04	0.03
Gasoline Dispensing	0.95	0.00	0.00	0.00	0.00	0.00
<b>Total Maximum Daily Emissions</b>	<b>3.37</b>	<b>2.32</b>	<b>5.86</b>	<b>0.02</b>	<b>1.24</b>	<b>0.38</b>
SCAQMD Regional Threshold	55	55	550	150	150	55

Threshold Exceeded?	NO	NO	NO	NO	NO	NO
<i>Winter</i>						
Area Source	1.85	6.60E-04	0.07	0.00	2.50E-04	2.50E-04
Energy Source	0.03	0.26	0.22	1.57E-03	0.02	0.02
Mobile Source	1.55	2.99	15.92	0.04	4.16	1.13
On-Site Equipment	0.11	1.04	0.75	0.00	0.04	0.03
Gasoline Dispensing	0.95	0.00	0.00	0.00	0.00	0.00
<b>Total Maximum Daily Emissions</b>	<b>4.48</b>	<b>4.29</b>	<b>16.96</b>	<b>0.05</b>	<b>4.22</b>	<b>1.19</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022.

## **Localized Impacts**

### **Localized Significance Threshold Analysis**

Per SCAQMD significance criteria, air quality impacts are potentially significant if there is a potential to contribute to or cause localized exceedances of the national and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, the NAAQS/CAAQS establish Localized Significance Thresholds (LSTs).

LSTs were developed in response to the SCAQMD Governing Board’s Environmental Justice Initiative I-4. More specifically, to address potential Environmental Justice implications of localized air pollutant impacts, the SCAQMD adopted LSTs indicating whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. Use of LSTs by local government is voluntary. Lead agencies may employ LSTs as another indicator of significance in air quality impact analyses.

### ***Emissions Considered/Methodology***

LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 microns (PM<sub>10</sub>), and particulate matter less than 2.5 microns (PM<sub>2.5</sub>). The Project LST analysis incorporates, and is consistent with, protocols and procedures established by the SCAQMD *Final Localized Significance Threshold Methodology* (Methodology). The Methodology clearly states that “off-site mobile emissions from the Project should NOT be included in the emissions compared to LSTs.” Therefore, for purposes of the LST analysis, only “on-site” emissions were considered. See also: <http://aqmd.gov/ceqa/handbook/LST/LST.html>.

### ***Sensitive Receptors***

As provided for under the Methodology, potential localized emissions impact have been evaluated at sensitive receptors proximate to the Project site. “Sensitive receptors” are off-site locations where individuals may be exposed to Project-source air pollutant emissions. The LST analysis presented here evaluates localized construction-source and operational-source emissions impacts at the nearest sensitive receptors.

*Residential Receptors* – Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that

house these persons or places where they gather to exercise are defined as sensitive receptors; they are also known to be locations where an individual can remain for 24 hours.

*Non-Residential Receptors* – Per the *LST Methodology*, commercial, office, and industrial facilities are not included in the definition of sensitive receptors because employees and visitors do not typically remain onsite for a full 24 hours but are typically onsite for approximately eight hours. The *LST Methodology* also notes . . . “*LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs*, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours. Consistent with the SCAQMD’s Final LST Methodology recommendations, localized NO<sub>2</sub> and CO impacts affecting industrial or commercial uses have been evaluated.

Evaluated Study Area Receptor Locations are described below and are presented at Figure 3-1:

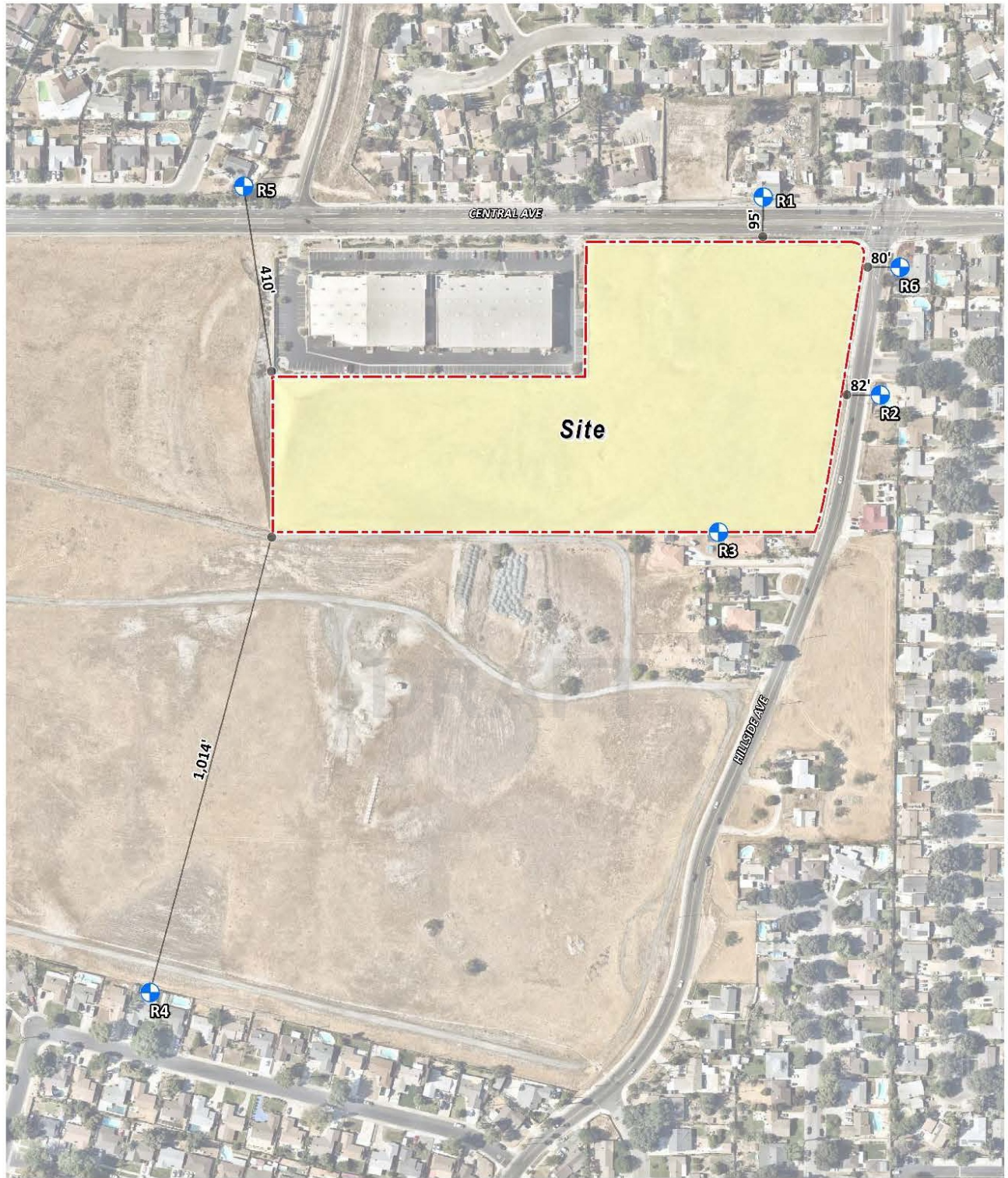
- R1:** **Location R1** represents the residence at 5739 Central Avenue<sup>3</sup>, approximately 95 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R1 is placed at the building façade.
- R2:** **Location R2** represents the residence at 6661 La Jolla Drive, approximately 82 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R2 is placed at the building façade.
- R3:** **Location R3** represents the residence at 6703 Hillside Avenue, approximately 15 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R3 is placed at the building façade.
- R4:** **Location R4** represents the residence at 5943 Glenhurst Street, approximately 1,014 feet southwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R4 is placed at the building façade.
- R5:** **Location R5** represents the residence at 6560 Hollyridge Drive, approximately 410 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R5 is placed at the building façade.
- R6:** **Location R6** represents the residence at 5694 Central Avenue, approximately 80 feet east of the Project site. Receptor R6 is placed in the private outdoor living area (backyard).

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project’s potential LST impacts. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM<sub>10</sub> and PM<sub>2.5</sub> (since PM<sub>10</sub> and PM<sub>2.5</sub> thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM<sub>10</sub> and PM<sub>2.5</sub> is represented by the residence at 6703 Hillside Avenue, approximately 15 feet (5 meters) south of the Project site.

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<sup>3</sup>The sensitive receptor identified as “5739 Central Avenue” in the Project Air Quality Analysis and as “5739 Hollyridge Drive” in the Project Noise Analysis are, for the purposes of analysis, functionally equivalent.





**LEGEND:**



-  Receptor Locations
-  Distance from receiver to Project site boundary (in feet)

NOT TO SCALE  
 Source: Urban Crossroads, Inc.; Applied Planning, Inc.

Figure 3-1  
 Study Area Receptor Locations

Consistent with *LST Methodology*, the nearest industrial/commercial use is used to determine construction and operational LST impacts for emissions of NO<sub>x</sub> and CO, as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at these sites for periods of up to 8 hours. No industrial/commercial uses are nearer the Project site than the residence at 6703 Hillside Avenue. For purposes of analysis, the same site/receptor separation for this residence (approximately 15 feet/5 meters) is employed in evaluation of localized NO<sub>x</sub> and CO emissions at potentially affected industrial/commercial uses.

**Construction-Source Emissions LST Analysis**

Peak daily localized construction-source emissions received at the nearest receptors is summarized at Table 3-6. Applicable SCAQMD LSTs are also presented. As indicated, Project localized construction-source emissions would not exceed applicable LSTs. Project localized construction-source emissions impacts would therefore be less-than-significant.

**Table 3-6  
Maximum Construction-Source Localized Emissions (pounds per day)**

	Pollutant			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Peak Daily Total	36.35	39.92	10.54	5.47
SCAQMD Localized Threshold	270	1,577	13	8
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022.

**Operational-Source Emissions LST Analysis**

LST analyses appropriately consider only emissions generated by on-site sources. In this regard, the Project operational-source emissions LST analysis evaluates emissions that would be generated by on-site stationary/area-sources and also captures emissions that would be generated by on-site traffic. Table 3-7 presents the Project’s maximum potential localized operational-source emissions. Applicable SCAQMD localized significance thresholds are also presented. As indicated, Project operational-source air pollutant emissions would not exceed applicable SCAQMD LSTs and would therefore be less-than-significant.

**Table 3-7  
Maximum Operational-Source Localized Emissions (pounds per day)**

	Pollutant			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
On-site Emissions	<b>1.45</b>	<b>1.84</b>	<b>0.27</b>	<b>0.11</b>
SCAQMD Localized Threshold	270	1,577	4	2
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022.

**Localized CO “Hot Spots”**

Area CO “Hot Spots” are the product of vehicle-source CO emissions that are concentrated by vehicles idling at congested intersections. Adverse CO concentration impacts occur when exceedance of the state one-hour CO concentration standard of 20 ppm, or eight-hour CO concentration standard of 9 ppm occur.

Baseline CO concentrations affecting the region are reflected in the 2003 SCAQMD CO Hot Spot Modeling Analysis. The Hot Spot Modeling Analysis (Modeling Analysis) evaluated CO concentrations at four busy representative Los Angeles intersections under peak morning and afternoon traffic conditions. Even under these congested conditions, the Modeling Analysis did not predict any violation of CO standards, as shown at Table 3-8.

**Table 3-8  
SCAQMD CO Hot Spot Modeling Analysis Results**

Intersection Location	CO Concentrations (ppm)		
	Morning 1-hour	Afternoon 1-hour	8-hour
Wilshire Boulevard/Veteran Avenue	4.6	3.5	3.7
Sunset Boulevard/Highland Avenue	4	4.5	3.5
La Cienega Boulevard/Century Boulevard	3.7	3.1	5.2
Long Beach Boulevard/Imperial Highway	3	3.1	8.4

**Source:** Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022.

Peak carbon monoxide concentrations in the region at the time the Modeling Analysis was conducted were a product of unusual meteorological and topographical conditions, and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection (highest CO generating intersection within the Modeling Analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. The ambient 1-hr and 8-hr CO concentration within the Project Study Area is estimated to be 1.5 ppm and 1.2 ppm, respectively (data from Metropolitan Riverside County station for 2019). Therefore, even if the Project traffic volumes were double or even triple of the traffic volumes generated at the Long Beach Blvd. and Imperial Hwy. intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO Hot Spot at any Study Area intersection.

Traffic volumes generating the CO concentrations for the Modeling Analysis are presented at Table 3-9. The busiest intersection evaluated was the Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The Modeling Analysis estimated that the morning 1-hour CO concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day at the subject intersection, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

**Table 3-9  
SCAQMD CO Hot Spot Modeling Analysis  
Traffic Volumes**

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire Boulevard/Veteran Avenue	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset Boulevard/Highland Avenue	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega Boulevard/Century Boulevard	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach Boulevard/Imperial Highway	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

**Source:** Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment (Urban Crossroads, Inc.) June 22, 2022.



Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

As shown at Table 3-10, the highest Project-source AM/PM trip volumes on road segments in the Study Area are 4,289 vph (AM) and 4,578 vph (PM). Project-source traffic volumes are substantially less than the traffic volumes identified in the Modeling Analysis, or similar parameters employed by the BAAQMD. The Project considered herein would not produce the volume of traffic required to generate a CO Hot Spot in the context of the Modeling Analysis, or traffic volumes employed by the BAAQMD in screening for potential CO Hot Spots. Therefore, CO Hot Spots are not an environmental impact of concern for the Project. Localized air quality impacts related to CO emissions concentrations would therefore be less-than-significant.

**Table 3-10  
Project Traffic Volumes**

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Van Buren Avenue/Central Avenue	2,055/1,705	1,699/2,169	0/0	535/704	4,289/4,578
Driveway 1/Central Avenue	2/7	0/0	789/594	535/705	1,326/1,306
Hillside Avenue/Central Avenue	51/48	0/0	781/599	535/705	1,367/1,352
Hillside Avenue/Driveway 2	239/327	165/164	497/795	776/596	1,677/1,882

Source: *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022.

### Localized Diesel Particulate Matter (DPM) Emissions Impacts

Construction equipment employed in development of the Project, and truck traffic associated with Project operations would generate Diesel Particulate Matter (DPM) emissions. In 1998, the California Air Resources Board (ARB) identified particulate matter from diesel-fueled engines (Diesel Particulate Matter or DPM) as a Toxic Air Contaminant (TAC). In California, diesel engine exhaust has been identified as a carcinogen.

### Carcinogenic Risks

The SCAQMD *CEQA Air Quality Handbook* (1993) states that emissions of TACs are considered significant if a Health Risk Assessment shows an increased carcinogenic risk of greater than 10 incidents per million population. Consistent with the stated SCAQMD *Handbook* cancer risk threshold, for the purposes of this analysis, an increase in cancer risk of 10 incidents per million population is considered significant. Also relevant to the Project HRA, specific guidance in determining health risks from diesel emissions is provided in *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (SCAQMD) 2003.

### Noncarcinogenic Risks

An evaluation of the potential noncarcinogenic effects of chronic exposures was also conducted. Noncarcinogenic adverse health effects are evaluated by comparing a compound’s annual concentration with its toxicity factor or Reference Exposure Level (REL). The REL for diesel particulates was obtained from OEHHA for this analysis. The REL for DPM established by OEHHA is 5 µg/m3 (OEHHA Toxicity Criteria Database, <http://www.oehha.org/risk/chemicaldb/index.asp>).

The SCAQMD has established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a Hazard Index, expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A Hazard Index less of than one (1.0) means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures not exceeding the SCAQMD Hazard Index of 1.0 are considered less-than-significant.

**Risk Exposure: Quantification Results**

**Construction-Source DPM Emissions Impacts**

As substantiated in the Project AQIA/GHGA/HRA, Project construction-source DPM emissions cancer risk impacts at the maximally exposed individual receptor (MEIR) would be 6.87 in one million, which is less than the SCAQMD threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable SCAQMD threshold of 1.0 (Project AQIA/GHGA/HRA, p. 23). As such, the Project construction-source DPM emissions will not cause a significant human health or cancer risk at any potentially affected receptors.

**Operational-Source DPM Emissions Impacts**

As substantiated in the Project AQIA/GHGA/HRA, Project operational-source DPM emissions cancer risk impacts at the MEIR would be 0.33 in one million, which is less than the SCAQMD threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable SCAQMD threshold of 1.0 (Project AQIA/GHGA/HRA, p. 23). As such, the Project operational-source DPM emissions will not cause a significant human health or cancer risk at any potentially affected receptors.

Based on the preceding, the potential for the Project to 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 is considered less-than-significant.

**Sources:** *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.

- c. Expose sensitive receptors to substantial pollutant concentrations?

**3c. Response:**

**Less-Than-Significant Impact:** As concluded in the above discussion of Localized Air Quality Impacts, sensitive receptors nearest the Project site would not be subject to emissions exceeding SCAQMD LSTs. Further, project construction and operations would not result in potentially significant DPM-source health risk impacts. Project construction or operations would not otherwise generate emissions that would expose sensitive receptors to substantial pollutant concentrations.

Based on the preceding, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is considered less-than-significant. Relevant case law (Friant Ranch Case) further supporting these conclusions is summarized below.

**Friant Ranch Case**

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an Environmental Impact Report’s (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided.

As discussed in briefs filed in the Friant Ranch case, correlating a project's criteria air pollutant emissions to specific health impacts is challenging. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes (14) noted that it may be "difficult to quantify health impacts for criteria pollutants." SCAQMD used O<sub>3</sub> as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O<sub>3</sub> "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." (SCAQMD, 2015a, p. 11) Second, "it takes a large amount of additional precursor emissions (NO<sub>x</sub> and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," with a 2012 study showing that "reducing NO<sub>x</sub> by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion." (SCAQMD, 2015a, pp. 12-14)

SCAQMD concluded that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NO<sub>x</sub> or VOC emissions from relatively small projects." (SCAQMD, 2015a, pp. 12-14) The San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NO<sub>x</sub> or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." (SJVUAPCD, 2015, p. 4) Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SO<sub>x</sub>) and NO<sub>x</sub>," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." (SJVUAPCD, 2015, p. 5) The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NO<sub>x</sub>, SO<sub>x</sub>, and VOCs produced by a source.

Most local agencies lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's air quality impact analysis, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation.

The LST analysis presented herein substantiates that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

As the Project's emissions would comply with federal, state, and local air quality standards, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled. Please refer also to the Project Health Risk Assessment which addresses potential cancer risks associated with Project-source DPM emissions.

**Sources:** *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.

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

**3d. Response:**

**Less-Than-Significant Impact.** Temporary and intermittent odor releases may occur during construction of Project uses. Potential construction-source odors include but are not limited to diesel exhaust, asphalt/paving materials, glues, paint, and other architectural coatings. The Project light industrial and office uses do not comprise facilities or operations that would create objectionable odors affecting a substantial number of people. Construction-source and operational-source odor impacts are limited as a byproduct of mandated hazardous/potentially hazardous materials handling plans and provisions of SCAQMD Rule 402. The Project would comply with all SCAQMD Rules regulating and controlling odors and odor sources.

Based on the preceding, the potential for the Project to result in other emissions including odors adversely affecting a substantial number of people is considered less-than-significant.

**Sources:** SCAQMD Rule 402; Project Application Materials.

**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:**

**Less-Than-Significant Impact With Mitigation Incorporated.** The Project Site is located in an urbanized area bordered by developed/disturbed properties on all sides. The Project site provides potential habitat for the burrowing owl (Project Burrowing Owl Survey, p. 7). Focused burrowing owl surveys at the Project site were conducted following the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) burrowing owl survey instructions (Project Burrowing Owl Survey, p. 7). No burrowing owls or their sign were detected during the surveys and there was no evidence that any burrowing owls occur onsite (Project Burrowing Owl Survey, p. 10). Further, this species has not been recorded from the Project site in the past. Burrowing owls are presumed absent from the site (Project Burrowing Owl Survey, p. 10). To ensure continued absence of burrowing owls from the site and that owls would not be potentially adversely affected by Project construction activities, the following mitigation measures are incorporated:

*BIO-1 Prior to issuance of the first grading permit, the Applicant shall retain a qualified biologist (Project Biological Monitor). The Project Biological Monitor shall be approved by the City prior to the issuance of the first grading permit*

*BIO-2 Limits of the Project site shall be clearly marked by stakes or other means to ensure that off-site areas are not disturbed by Project construction activities.*

*BIO-3 The Project Biological Monitor shall be on-site during all ground disturbance activities, and shall halt any such activities if, in their professional opinion, such activities will result in adverse effects to protected species.*

No other candidate, sensitive, or special status species have been identified within the Project Site (Project MSHCP Consistency Analysis, pp. 9 – 25). The Project does not propose or require uses or facilities that would result in potentially significant impacts to offsite candidate, sensitive, or special status species.

In addition to Mitigation Measures BIO-1 through BIO-3, above, the Project would be required to comply with applicable provisions of MSHCP Section 6.1.4, *Guidelines Pertaining to the Urban/Wildlands Interface*; Best Management Practices (BMPs) presented at MSHCP Volume I, Appendix C, *Standard Best Management Practices*; and City Conditions of Approval. Compliance with MSHCP Guidelines and BMPs, and City Conditions of Approval would act to ensure that potential direct and indirect impacts to candidate, sensitive, or special status species would remain at levels that would be less-than-significant.

Based on the preceding, with application of mitigation and compliance with MSHCP requirements, and conformance with City Conditions of Approval, the potential for the Project to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species would be less-than-significant.

**Sources:** Western Riverside County Multiple Species Habitat Conservation Plan; Riverside County *Map My County* Geographic Information System; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022 (Project MSHCP Consistency Analysis (IS/MND Appendix B); *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 2022 (Project Burrowing Owl Survey, IS/MND Appendix B); Project Application Materials.

- 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:**

**No Impact:** The Project Site is located in an urbanized area bordered by developed/disturbed properties on all sides. No riparian habitat or other sensitive natural community have been identified within the Project Site (Project MSHCP Consistency Analysis, pp. 9 – 25). The Project does not propose or require uses or facilities that would result in potentially significant impacts to offsite riparian habitat or other sensitive natural community. On this basis, the Project would have no potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community.

**Sources:** Western Riverside County Multiple Species Habitat Conservation Plan; Riverside County *Map My County* Geographic Information System; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022 (IS/MND Appendix B); *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 2022 (Project Burrowing Owl Survey, IS/MND Appendix B); Project Application Materials.

- 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:**

**No Impact:** The Project Site is located in an urbanized area bordered by developed/disturbed properties on all sides. No streams, drainages, jurisdictional areas, or state or federally-protected wetlands have been identified within the Project Site (Project MSHCP Consistency Analysis, pp. 9 – 25). The Project does not propose or require uses or facilities that would result in potentially significant impacts to offsite streams, drainages, jurisdictional areas, state or federally-protected wetlands. On this basis, the Project would have no potential to have a substantial adverse effect on any state or federally-protected wetlands.

**Sources:** Western Riverside County Multiple Species Habitat Conservation Plan; Riverside County *Map My County* Geographic Information System; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022 (IS/MND Appendix B); *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 22 (IS/MND Appendix B); Project Application Materials.

- 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:**

**No Impact.** The Project Site is located in an urbanized area bordered by developed/disturbed properties on all sides. The Project site is not located within any MSHCP Survey Areas, Criteria Cells, Cores, or Linkages. The Project site does not comprise a wildlife nursery site. The Project does not propose or require uses or facilities that would result in potentially significant impacts to any offsite MSHCP Survey Areas, Criteria Cells, Cores, Linkages or wildlife nursery sites (Project MSHCP Consistency Analysis, pp. 9 – 25). On this basis, the Project would have no potential to 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.

**Sources:** Western Riverside County Multiple Species Habitat Conservation Plan; Riverside County *Map My County* Geographic Information System; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022 (IS/MND Appendix B); *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 2022 (IS/MND Appendix B); Project Application Materials.

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

**4e. Response:**

**No Impact.** There are no potentially significant or sensitive biological resources (including, but not limited to, trees subject to a tree preservation policy or ordinance) present within the Project site (Project MSHCP Consistency Analysis, pp. 9 – 25). The Project would be required to comply with applicable provisions of the MSHCP. The Project does not propose or require facilities or uses that conflict with any local policies or ordinances protecting biological resources. Based on the preceding, the potential for the Project to conflict with any local policies or ordinances protecting biological resources is considered less-than-significant.

**Sources:** Western Riverside County Multiple Species Habitat Conservation Plan; Riverside County *Map My County* Geographic Information System; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022 (IS/MND Appendix B); *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 2022 (IS/MND Appendix B); Project Application Materials.

- 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:**

**Less-Than-Significant Impact.** The Project would be required to conform to and implement applicable provisions of the MSHCP, including applicable provisions of MSHCP Section 6.1.4, *Guidelines Pertaining to the Urban/Wildlife Interface* and BMPs presented at MSHCP Volume I, Appendix C, *Standard Best Management Practices*. The only MSHCP survey requirements for the Project are for the burrowing owl. The Project site provides potential habitat for the burrowing owl (Project Burrowing Owl Survey, p. 7). Focused burrowing owl surveys at the Project site were conducted following the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) burrowing owl survey instructions (Project Burrowing Owl Survey, p. 7). No burrowing owls or their sign were detected during the surveys and there was no evidence that any burrowing owls occur onsite (Project Burrowing Owl Survey, p. 10). The Project would also be required to conform to and implement related General Plan 2025 policies including Policy LU-7.4 “Continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).” The Project would be required to conform to applicable provisions of the SKR HCP and with General Plan Policies OS-5.2, “Continue to participate in the MSHCP Program and ensure all projects comply with applicable requirements,” and OS-5.3 “Continue to participate in the Stephens’ Kangaroo Rat (SKR) Habitat Conservation Plan [HCP] including collection of mitigation fees.” The Project Applicant would pay requisite MSHCP and SKR HCP mitigation fees. Based on the preceding, the potential for the Project to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan is considered less-than-significant.

**Sources:** Western Riverside County Multiple Species Habitat Conservation Plan; Riverside County *Map My County* Geographic Information System; *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis Report for the Raptor Court Quanta Project* (Harmsworth Associates) June 2022 (IS/MND Appendix B); *Burrowing Owl Survey Report for the Raptor Court Quanta Project Site* (Harmsworth Associates) June 2022 (IS/MND Appendix B); Project Application Materials.

**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:**

**No Impact.** The Project site is extensively disturbed. Records and field surveys of the Project site conducted as part of the Project Cultural Resources Assessment (*Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* [BCR Consulting LLC] June 22, 2022, IS/MND Appendix H) indicate no presence or potential presence of potentially significant historical resources. On this basis, the Project would have no potential to cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the *CEQA Guidelines*.

**Sources:** GP 2025 FPEIR Table 5.5-A, *Historical Districts and Neighborhood Conservation Areas*; Riverside County Map My County Geographic Information System; *Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* (BCR Consulting LLC) June 22, 2022 (IS/MND Appendix H); Project Application Materials.

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

**5b. Response:**

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**Less-Than-Significant Impact With Mitigation Incorporated.** The Project Cultural Resources Assessment indicates that the Project site may contain potentially significant prehistoric resources . . . “prehistoric materials (including a potential village site) have been identified in the area and possibly within the project site boundaries . . .” (Project Cultural Resources Assessment, p. ii, et al.). Project site-disturbing activities have the potential to adversely affect as yet unknown prehistoric resources that may exist within the Project site in a buried context. This is a potentially significant impact. The following mitigation measures and conditions are incorporated and would reduce this impact to levels that would be less-than-significant.

***CUL-1** Prior to grading permit issuance, if there are any changes to Project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Developer/Applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project site. The City and the Developer/Applicant shall make all attempts to avoid and/or preserve in place as many cultural resources 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: 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 (AMP) or Cultural Resources Monitoring Plan (CRMP) to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the Project site. The plan is to be submitted to the City prior to the issuance of a grading permit. 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 will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;

d. Treatment and final disposition of any cultural 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-4.

**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. 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:

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 cataloging and basic recordation have been completed;

b. If on site reburial is not possible, agreed upon by all parties, 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. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the Project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and interested tribes.

**CUL-4 Cultural Sensitivity Training:** The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

**A STANDARD CONDITION OF APPROVAL WILL INCLUDE THE FOLLOWING – CONSISTENT WITH STATE LAW:**

*Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.*

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

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

**Sources:** GP 2025 FPEIR Figure 5.5-1 - *Archaeological Sensitivity*; GP 2025 FPEIR Figure 5.5-2 - *Prehistoric Cultural Resources Sensitivity*; GP 2025; Riverside County Map My County Geographic Information System; *Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* (BCR Consulting LLC) June 22, 2022 (IS/MND Appendix H); Project Application Materials.

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

**5c. Response:**

**Less-Than-Significant Impact.** No formal cemetery exists within the Project site. Records searches and field surveys do not indicate any potential presence of a formal cemetery. However, as noted above, prehistoric materials (including a potential village site) have been identified in the area and possibly within the Project site boundaries. As required under Mitigation Measures CUI-1 through CUL-4, archaeological monitoring of the site would be conducted throughout site disturbing activities. Should any potentially significant archaeological or paleontological find be encountered (including human remains), work at the Project site would be halted and the find would be evaluated. Should the find be determined to be human remains, as required by California Health and Safety Code Section 7050.5, no further disturbance shall occur until the County Coroner has made a determination regarding the encountered remains pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are found to be prehistoric, the coroner shall coordinate with the California Native American Heritage Commission as required by state law. Based on compliance with these existing regulations, the Project’s potential to disturb human remains is considered less-than-significant.

**Sources:** *Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* (BCR Consulting LLC) June 22, 2022 (IS/MND Appendix H); Project Application Materials.

## 6. ENERGY

### Would the project:

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

#### 6a. Response: Less-Than-Significant Impact.

##### Background and Introduction

*CEQA Guidelines* (Guidelines) Appendix F *Energy Conservation* establishes parameters and context for determining whether a project would result in the inefficient, wasteful, and unnecessary consumption of energy. Guidelines Section 15126.2 *Consideration and Discussion of Significant Environmental Impacts*, as amended December 28, 2018, recognizes the need to consider Guidelines Appendix F *Energy Conservation* when analyzing project impacts. In this regard, Guidelines Section 15126.2 (b), excerpted below, provides the following direction:

***Energy Impacts.** If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR [MND] shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. (Guidance on information that may be included in such an analysis is presented in Guidelines Appendix F.) This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities in the discretion of the lead agency.*

The analysis presented here conforms to Guidelines Section 15126.2 (b) guidance. In summary, the Project would provide for, and promote, energy efficiencies consistent with applicable state or federal standards and regulations. The Project would also conform to City of Riverside energy efficiency and energy conservation measures. As supported by the following discussions, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy, and potential Project impacts in these regards would be less-than-significant. Further, energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy-producing or energy transmission facilities. The Project would not create or otherwise result in a potentially significant impact affecting energy resources or energy delivery systems.

##### EXISTING CONDITIONS

Existing conditions providing general context for the Project energy demands are presented below. The following discussions are summarized from: *Final 2020 Integrated Energy Policy Report Update* (CEC) March 2021. See also: <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update>.

##### Electricity

The California Energy Commission (CEC) provides forecasts for electricity and natural gas demand every two years as part of the Integrated Energy Policy Report (IEPR) process. The forecasts include 3 energy demand cases (high, low, and middle) designed to capture a reasonable range of demand outcomes over the next 10 years. The high energy

demand case incorporates relatively high economic/demographic growth, relatively low electricity and natural gas rates, and relatively low committed efficiency program, self-generation, and climate change impacts. The low energy demand case includes lower economic/demographic growth, higher assumed rates, and higher committed efficiency program and self-generation impacts. The mid case uses input assumptions at levels between the high and low cases. The forecasts include estimates of the effects of new legislation and trends in electric consumption such as the use of zero-emission automobiles. IEPR data indicates relatively stable consumption rates from 2005 through 2018, with an increase in consumption beginning in 2020.

City of Riverside Public Utilities is the electrical utility provider for the City. City of Riverside Public Utilities also provides information on energy efficiency/energy conservation, rotating outages, public safety, and emergency/hazard response plans to ensure non-interference with electrical utility lines.

### **Transportation Energy**

California is home to 30 million registered cars, trucks, buses, and other motorized on-road vehicles. The state's history has been, in part, a history of the automobile and the associated impacts on personal mobility, land-use planning, and air quality. In recognition of these challenges, California has enacted a suite of policies and goals to shift the transportation sector toward cleaner, sustainable fuels and more efficient technology vehicles. IEPR data indicates very stable consumption rates for jet fuel and diesel through 2030. Gasoline consumption is forecasted to decline through 2030.

### **Natural Gas**

Natural gas provides energy to heat homes, cook food, and generate electricity. Currently in California, natural gas serves more than 10.5 million homes, about 445,000 businesses, about 37,000 factories and industrial consumers, and more than 640 electric generating units. The greatest consumers of natural gas in decreasing order are electric power generation, residential, industrial, mining, commercial, and other. In California since 1990, natural gas demand has remained relatively flat in all but the electric power sector which has steadily increased.

IEPR data generally shows a decreasing reliance on natural gas through 2024. The CEC indicates increased reliance on natural gas for power generation between 2024 and 2026 due to expiration of long-term power supply contracts (purchase agreements) with coal facilities outside California.

Southern California Gas Company (The Gas Company) provides natural gas to the City. The Gas Company also provides customers with appliance services, an energy efficiency and rebate program, and information on emergency preparedness and air quality.

### **PROJECT ENERGY DEMANDS AND ENERGY EFFICIENCY/CONSERVATION MEASURES**

Estimated energy demands of Project construction and Project operations are summarized in the following discussions. Project design features and operational programs, as well as regulations that promote energy conservation and energy conservation are also identified. The Project in total would be required to comply with incumbent performance standards established under the Building Energy Efficiency Standards contained in the California Code of Regulations (CCR), Title 24, Part 6 (Title 24, Energy Efficiency Standards). Also, developers and owners/tenants have vested financial incentives to avoid imprudent energy consumption practices. In this regard, there is growing recognition among developers and owners/tenants that efficient and sustainable construction and operational practices yield both environmental and economic benefits. On this basis, and as further supported by the following discussions, the Project would not result in or cause wasteful, inefficient, and unnecessary consumption of energy.

## CONSTRUCTION ENERGY CONSUMPTION ESTIMATES AND ENERGY EFFICIENCY/CONSERVATION MEASURES

### **Construction Fuel/Power Consumption Estimates**

Energy consumption in support of or related to Project construction would include electricity consumption by various equipment and tools; diesel fuel consumed by construction equipment and construction vendor trips; and gasoline consumed by construction worker commutes. As presented in the Project AQIA/GHGA/HRA, over the approximately 16-month construction period:

- Project construction activities would consume approximately 163,624 kWh of electricity (Project AQIA/GHGA/HRA, p. 47).
- Project construction equipment operations would consume approximately 67,674 gallons of diesel fuel (Project AQIA/GHGA/HRA, p. 49).
- Project construction worker commutes would consume approximately 35,525 gallons of gasoline (Project AQIA/GHGA/HRA, p. 50).
- Project construction vendor trips would consume approximately 89,943 gallons of diesel fuel (Project AQIA/GHGA/HRA, p. 51).

Diesel fuel and gasoline for construction activities would be provided by existing area vendors. Construction electricity demands would be provided through connection to existing City services.

Project construction activities would comprise temporary, single-event demands for diesel fuel and electricity and would not require on-going or permanent commitment of fuel for these purposes.

### **Construction Energy Efficiency/Conservation Measures**

Equipment and vehicles used during Project construction would conform to CARB regulations and California emissions standards, and would demonstrate related fuel efficiencies. There are no unusual Project characteristics or construction processes that would require the use of vehicles or equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to incumbent power/fuel efficiency standards. The Project would also implement applicable efficiency/conservation measures provisions of the *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (Climate Action Plan). Project construction activities would therefore not result in inefficient, wasteful, or unnecessary consumption of power or fuel.

Additionally, certain incidental construction-source energy efficiencies would likely accrue through implementation of California regulations. More specifically, California Code of Regulations Title 13, Motor Vehicles, section 2449(d)(3) *Idling*, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Indirect construction energy efficiencies and energy conservation would be achieved through the use of recycled/recyclable materials and related procedures, and energy efficiencies realized from bulk purchase, transport and use of construction materials. Use of recycled and recyclable materials and use of materials in bulk also reduces energy demands associated with preparation and transport of construction materials as transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations.

### **Construction Waste Management Plan**

A Project Construction Waste Management Plan would be required consistent with Section 5.408.1.1 of the CALGreen Code. Consistent with Section 5.408, *Construction Waste Reduction, Disposal, and Recycling* of the California Green Building Standards Code (CALGreen Code), as adopted by the City, the Project would be required to recycle or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste.

## **OPERATIONAL ENERGY CONSUMPTION AND ENERGY EFFICIENCY/CONSERVATION MEASURES**

### **Operational Energy Consumption**

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities). As presented in the Project AQIA/GHGA/HRA:

- Vehicles accessing the Project site activities would also consume approximately 59,189 gallons of fuel annually (Project AQIA/GHGA/HRA, p. 52). Fuel consumption would be approximately 25 percent diesel/75 percent gasoline.
- Project building and site operations would consume approximately 973,131 kBTU natural gas annually (Project AQIA/GHGA/HRA, p. 52).
- Project building and site operations would consume approximately 668,952 kWh electricity annually (Project AQIA/GHGA/HRA, p. 53).

### **Operational Energy Efficiency/Conservation Measures**

#### **Facilities Energy Demand Efficiencies**

The Project would meet or surpass standards established under the California Code Title 24, Part 6 (the California Energy Code) and California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City. The Project would also implement applicable efficiency/conservation measures provisions of the CAP Update.

#### **Enhanced Vehicle Fuel Efficiencies**

Potential maximum vehicle fuel consumption from vehicles accessing the Project would occur under Project Opening Year (2023) Conditions. Under future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation. Average fuel economies of vehicles accessing the Project site can also be expected to improve over time in response to fuel economy and emissions standards imposed on newer vehicles entering the transportation system.

#### **Project Design and Access**

The Project proposes light industrial uses within an urbanizing context, proximate to, and readily accessible from regional and local roadways. In these regards, the Project setting proximate to transportation corridors facilitates access to the Project generally.

#### **Alternative Transportation Modes**

Availability of alternative transportation modes described below would act to generally reduce commuter-related fuel consumption.

#### ***Bus Service***

Riverside Transit Authority (RTA) is the public transit agency serving the Project area and the City generally. RTA transit route maps and schedules are available at: <http://www.riversidetransit.com/index.php/riding-the-bus/maps->

[schedules](#). Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. The Applicant would work in conjunction with RTA to potentially accommodate bus service to the site.

**Trails and Bikeway System**

In an effort to promote alternative modes of transportation, the City has implemented the *City of Riverside Bicycle Master Plan*. The Project Site Plan Concept provides for bike racks at each office entry. Final Project designs would be required to provide internal and perimeter pedestrian and bicycle amenities consistent with City Conditions of Approval.

**Pedestrian Access**

Pedestrian walkways would be provided within the Project site with connections to existing and future walkways along adjacent Central Avenue and Hillside Avenue. The Project would facilitate and would not obstruct City goals and policies to provide efficient and safe pedestrian access.

**Landscaping Energy Efficiencies**

Drought-tolerant plants would be used where appropriate. Project landscaping would be required to conform to City requirements presented in the *City of Riverside Public Works Landscape Specifications and Guidelines*. See also: <https://riversideca.gov/publicworks/trees/pdf/PUBLIC%20WORKS%20LANDSCAPE%20SPEC%20GUIDELINES%20REVISED%2012-2017.pdf>

**Solid Waste Diversion/Recycling**

The Project would be required to comply with applicable State of California and City solid waste diversion/recycling rules and regulations. These laws and regulations include but are not limited to: State AB 939, State AB 341; State AB 1826; and CALGreen Code Section 5.408, *Construction Waste Reduction, Disposal, and Recycling*. In combination, these laws and regulations act to reduce the amount of solid waste transported to, and disposed at area landfills. Corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations would likely result.

**CONCLUSION**

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy, and potential Project impacts in these regards would be less-than-significant. Further, energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy-producing or energy transmission facilities and would not create or otherwise result in a potentially significant impact affecting energy resources or energy delivery systems. On this basis, the potential for the Project to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources is considered less-than-significant.

**Sources:** *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.

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

**6b. Response:**

**Less-Than-Significant Impact.** The discussion at IS/MND Checklist Item 8. *Greenhouse Gas Emissions* summarizes Project consistency with Climate Action Plan measures and plans that act to reduce energy consumption and thereby minimize GHG emissions. These same measures comprise state and local plans for renewable energy or energy efficiency that would be applicable to the Project. As substantiated at IS/MND Checklist Item 8. *Greenhouse Gas Emissions*, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The potential for the Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency is therefore considered less-than-significant. Please refer also to the discussions presented at IS/MND Checklist Item 8. *Greenhouse Gas Emissions*, and the detailed discussions of Project energy efficiency/energy conservation consistency presented at Project AQIA/GHGA/HRA Table 15: *RRG CAP Project Consistency*.

**Sources:** *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.

**7. GEOLOGY AND SOILS.**

Would the project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

**7i. Response:**

**Less-Than-Significant Impact.** The Project site is not located within an Alquist-Priolo zone. Earthquake faults nearest the Project site include the San Jacinto-San Bernardino Fault, located approximately 10.6 miles west of the Project site; and the San Jacinto-San Jacinto Valley Fault, located approximately 11.4 miles west of the Project site. Considering the distance of active and potentially active faults relative to the Project site, the potential for surface fault rupture at the site is expected to be low and a surface fault rupture hazard evaluation is not mandated for the Project site.

The California Building Code requires design, engineering, and construction methods that minimize the effects of earthquake on structures. As part of the City’s standard review and approval of development projects, any new development must provide a geotechnical study for review and approval by the City Engineer, and comply with the requirements of the approved geotechnical report, and applicable provisions of the City of Riverside Building Code and California Building Code (CBC). Compliance with these requirements ensures that potential strong seismic groundshaking impacts remain at levels that are less-than-significant.

**Sources:** *Riverside County Map My County Geographic Information System; Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (IS/MND Appendix C); Project Application Materials.

ii. Strong seismic ground shaking?



**7ii. Response:**

**Less-Than-Significant Impact.** The Project site is not located within an Alquist-Priolo zone. Earthquake faults nearest the Project site include the San Jacinto-San Bernardino Fault, located approximately 10.6 miles west of the Project site; and the San Jacinto-San Jacinto Valley Fault, located approximately 11.4 miles west of the Project site. Considering the distance of active and potentially active faults relative to the Project site, the potential for surface fault rupture at the site is expected to be low and a surface fault rupture hazard evaluation is not mandated for the Project site.

The California Building Code requires design, engineering, and construction methods that minimize the effects of earthquake on structures. As part of the City’s standard review and approval of development projects, any new development must provide a geotechnical study for review and approval by the City Engineer, and comply with the requirements of the approved geotechnical report, and applicable provisions of the City of Riverside Building Code and California Building Code (CBC). Compliance with these requirements ensures that potential strong seismic groundshaking impacts remain at levels that are less-than-significant.

**Sources:** *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Riverside Airport - Raptor Court, Proposed Industrial Development, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California – Update of Current Surface Conditions and New Code Required Seismic Design Parameters* (John R. Byerly, Inc.) October 26, 2021 (IS/MND Appendix C); Project Application Materials.

iii. Seismic-related ground failure, including liquefaction?

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**7iii. Response:**

**Less-Than-Significant Impact.** The Project site is located in an area with low potential for liquefaction. Recommendations and specifications set forth in: *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (collectively the Project Geotechnical Investigation, IS/MND Appendix C) require remedial grading to remove and recompact all existing artificial fill and loose natural soil. At the completion of remedial grading, the subject would be underlain by dense fill, dense natural soil, and dense bedrock. On this basis, the Project Geotechnical Investigation concluded that the potential for liquefaction at the site would be low. The California Building Code requires design, engineering, and construction methods that minimize the effects of earthquake on structures. As part of the City’s standard review and approval of development projects, any new development must provide a site and development-specific geotechnical study for review and approval by the City Engineer, and comply with the requirements of the final approved geotechnical report, and applicable provisions of the City of Riverside Building Code and California Building Code (CBC). Compliance with these requirements ensures that potential seismic-related ground failure impacts remain at levels that are less-than-significant.

**Sources:** General Plan 2025 Figure PS-1 – *Regional Fault Zones*, Figure PS-2 – *Liquefaction Zones*; General Plan 2025 FPEIR Figure PS-3 – *Soils with High Shrink-Swell Potential*; *Riverside County Map My County Geographic Information System*; *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (IS/MND Appendix C) Project Application Materials.

iv. Landslides?

**7iv. Response:**

**No Impact.** The Project site and surrounding properties exhibit little or no topographic relief or other features that would indicate a potential for landsliding. There is no evidence of recent or historic landslides affecting the Project site or vicinity properties. Based on the preceding, the Project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving landslides.

**Sources:** Riverside County *Map My County* Geographic Information System; *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (IS/MND Appendix C); Project Application Materials.

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

**7b. Response:**

**Less-Than-Significant Impact.** Construction activities associated with the Project will temporarily expose underlying soils, thereby increasing their susceptibility to erosion until the Project is fully implemented. Potential erosion impacts incurred during construction activities are maintained at below the level of significance through the Project’s mandated compliance with a City-approved Storm Water Pollution Prevention Plan (SWPPP) and compliance with SCAQMD Rules that prohibit grading activities and site disturbance during high wind events. At Project completion, potential soil erosion impacts in the area will be resolved, as pavement, roads, buildings, and landscaping are established, overcovering previously exposed soils. The implemented Project Water Quality Management Plan (WQMP) acts to preclude substantial soil erosion or the loss of topsoil over the life of the Project. The Project WQMP is presented at IS/MND Appendix E.

Preliminary grading concepts developed for the Project indicate up to approximately 187,200 cubic yards (CY) raw cut, and 8,700 CY raw fill.<sup>4</sup> Required cut/fill within the Project area will establish suitable building pads and facilitate efficient site drainage. Perimeter retaining walls and manufactured slopes implemented by the Project would be required to conform to City building code standards, acting to ensure slope stability and that slopes constructed by the Project would not contribute to potential erosion hazards.

Based on the preceding, the potential for the Project to result in substantial soil erosion or the loss of topsoil is considered less-than-significant.

**Sources:** Riverside County *Map My County* Geographic Information System; *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (IS/MND Appendix C); Project Application Materials.

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?

<sup>4</sup>Net 178,500 cy export per Project Conceptual Grading Plan (WestLAND Group, Inc.) June 13, 2022. The Project Conceptual Grading Plan is part of the Project Application Materials, on file with the City of Riverside.

**7c. Response:**

**Less-Than-Significant Impact.** The Project Geotechnical Investigation concluded that the site is appropriate for development of one- and two-story industrial buildings of masonry or concrete tilt-up construction, such as would be implemented under the Project, provided that design and construction occur in compliance with the requirements presented within the Investigation. The Project would be required to comply with requirements of the final City-approved final geotechnical report, and applicable provisions of the City Building Code and CBC, to include design- and site-appropriate means to avoid or minimize any expansive soils concerns that may be encountered. The Project would be required to comply with recommendations of the final City-approved final geotechnical report including but not limited to subsequent and on-going review of site conditions during Project construction with any necessary responsive revisions to Project design(s) and construction protocols.

Based on the preceding, the potential for the Project to 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; or be located on expansive soil is less-than-significant.

**Sources:** Riverside County *Map My County* Geographic Information System; *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (IS/MND Appendix C); Project Application Materials.

- 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:**

**Less-Than-Significant Impact.** The Project Geotechnical Investigation concluded that the site is appropriate for development of one- and two-story industrial buildings of masonry or concrete tilt-up construction, such as would be implemented under the Project, provided that design and construction occur in compliance with the requirements presented within the Investigation. The Project would be required to comply with requirements of the final City-approved final geotechnical report, and applicable provisions of the City Building Code and CBC, to include design- and site-appropriate means to avoid or minimize any expansive soils concerns that may be encountered. The Project would be required to comply with recommendations of the final City-approved final geotechnical report including, but not limited to, subsequent and on-going review of site conditions during Project construction with any necessary responsive revisions to Project design(s) and construction protocols.

Based on the preceding, the potential for the Project to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code is less-than-significant.

**Sources:** Riverside County *Map My County* Geographic Information System; *Soils Investigation Industrial Subdivision, Tentative Parcel Map No. 35901* (John R. Byerly, Inc.) February 12, 2008; *Soils Investigation, Riverside Airport – Raptor Court Quanta Project, Southwest Corner of Hillside Avenue and Central Avenue, Riverside, California* (John R. Byerly, Inc.) June 22, 2022 (IS/MND Appendix C); Project Application Materials.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**7e. Response:**

**No Impact.** The Project would connect to the City’s existing sanitary sewer system. The Project does not propose or require use of septic tanks or alternative wastewater disposal systems. On this basis, the Project would have no potential to be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, or otherwise be adversely affected by soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

**Source:** Project Application Materials.

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

**7f. Response:**

**Less-Than-Significant Impact With Mitigation Incorporated.** The Project site comprises disturbed property within an urbanized area. No unique paleontological resources or geologic features are known to exist within the Project site or in the Project vicinity. There is however the potential for as-yet unknown subsurface paleontological resources to present within the Project site. Mitigation Measures GEO-1, GEO-2 are incorporated to ensure that the potential for the Project to destroy a unique paleontological resource or site directly or indirectly, or destroy a unique geologic feature directly or indirectly would remain at levels that would be less-than-significant.

*GEO-1 Prior to issuance of the first grading permit, the Applicant shall retain a qualified Paleontological Monitor (Project Paleontological Monitor). The Project Paleontological Monitor shall be approved by the City prior to the issuance of the first grading permit.*

*The Project Paleontological Monitor shall be on call during all grading and other ground-disturbing activities in native sediments.*

*GEO-2 The Project Paleontological Monitor shall develop an acceptable monitoring and fossil remains treatment plan (Paleontological Management Treatment Plan - PMTP) for construction-related activities that could disturb potential unique paleontological resources within the Project area. Minimum provisions of the PMTP are outlined below:*

- The Project Paleontological Monitor shall be trained and equipped to allow the timely removal of fossils with minimal construction delay, to the site full-time during the interval of earth-disturbing activities.*
- Should fossils be found within an area being cleared or graded, divert earth-disturbing activities elsewhere until the monitor has completed salvage. If construction personnel make the discovery, the grading contractor shall immediately divert construction and notify the monitor of the find.*
- The Project Paleontological Monitor shall prepare, identify, and curate all recovered fossils for documentation in a Paleontological Monitor Report. Recovered fossils shall be transferred to an appropriate depository facility.*
- At the conclusion of site-disturbing activities, the Paleontological Monitor Report shall be submitted to the City of Riverside. A copy of the Paleontological Monitor Report shall accompany any recovered fossils to the designated depository facility.*

Sources: Riverside County *Map My County* Geographic Information System; Project Application Materials.

**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:**

**Less-Than-Significant Impact.**

The Project site is vacant and undeveloped, and is not a source of GHG emissions.

The Project would be required to comply with applicable provisions of the *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (Climate Action Plan) (City of Riverside) January 2016. The Climate Action Plan establishes GHG emissions reductions targets and identifies measures to achieve those targets. The Climate Action Plan does not however establish quantitative project-level GHG emission significance thresholds.

In its most recent guidance, the SCAQMD Working Group has proposed a GHG emissions screening-level threshold of 3,000 metric tons of carbon dioxide equivalent per year (MTCO<sub>2</sub>e/year) for all land use types. Projects that generate GHG emissions of less than 3,000 MTCO<sub>2</sub>e/year would not be considered substantive sources of GHG emissions. This category of projects would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. For the purposes of this analysis, GHG emissions not exceeding the SCAQMD 3,000 MTCO<sub>2</sub>e/year screening-level would be less-than-significant. Project annual GHG Emissions are summarized at Table 8-1.

**Table 8-1  
Annual Project GHG Emissions (Metric Tons per Year)**

Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> EQ
Construction Emissions (30-Year Amortization)	60.43	6.20E-03	4.91E-03	62.05
Maintenance, Landscaping, etc.	0.02	4.00E-05	0.00	0.02
Building Energy Consumption	291.63	0.01	2.16E-03	292.56
Project Traffic	526.64	0.03	3.01E-02	536.26
On-Site Equipment	50.75	0.02	0.00	51.16
Waste Management	15.81	0.93	0.00	39.17
Water Use	105.39	0.50	0.01	121.52
<b>Total CO<sub>2</sub>e (All Sources)</b>	<b>1,102.73</b>			

Source: *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022.

As presented at Table 8-1, the Project would generate approximately 1,102.73 MTCO<sub>2</sub>e/yr. Project GHG emissions therefore would not exceed the screening threshold of 3,000 MTCO<sub>2</sub>e/yr. GHG emissions not exceeding 3,000 MTCO<sub>2</sub>e/yr. screening threshold would not result in a significant impact on the environment. On this basis, the potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment would be less-than-significant.

**Sources:** *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (City of Riverside) January 2016; *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.

- 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:**

**Less-Than-Significant Impact.** As summarized below, the Project would be consistent with the *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (Climate Action Plan) and by extension would be consistent with and would not conflict with any other applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

**Climate Action Plan Consistency**

The Climate Action Plan identifies GHG emissions sources, presents current and future GHG emissions estimates, identifies a GHG reduction target for future years, and provides strategic policies and actions to reduce GHG emissions from energy, transportation, land use, water use, and waste sectors. The Climate Action Plan is consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies of the State of California. The Climate Action Plan is also consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies implemented by the Western Riverside Council of Governments (WRCOG). The Climate Action Plan can be accessed at:

<https://corweb.riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/other-plans/2016%20Riverside%20Restorative%20Growthprint%20Economic%20Proposerity%20Action%20Plan%20and%20Climate%20Action%20Plan.pdf>

The Climate Action Plan’s existing and projected GHG inventories are based on land use designations and buildout of the City reflected in the City of Riverside General Plan. The Project is consistent with the land use designation and projected buildout conditions presented in the General Plan. Since the Project is consistent with the buildout conditions reflected under the General Plan, the Project by extension would not result in GHG emissions beyond those considered and addressed in the Climate Action Plan.

All development in the City, including the Project, is required to conform to all City-adopted policies including those presented in the Climate Action Plan. The City, through established design and development review processes, would ensure that applicable Climate Action Plan GHG-reducing strategies would be incorporated in the Project. Please refer also to detailed discussions of Project energy efficiency/energy conservation consistency presented at Project AQIA/GHGA/HRA Table 15: *RRG CAP Project Consistency*.

Based on the preceding, the potential for the Project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be less-than-significant.

**Sources:** *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (City of Riverside) January 2016; *Raptor Court Quanta Project Air Quality, Greenhouse Gas, Energy, and Health Risk Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix A); Project Application Materials.

**9. HAZARDS & HAZARDOUS MATERIALS.**

Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**9a. Response:**

**Less-Than-Significant Impact.** During the normal course of construction activities, there would be limited transport and use of potentially hazardous materials (e.g., gasoline, diesel fuel, paints, solvents, fertilizer, etc.) to and from the Project site. The Project would be required to comply with Hazardous Materials Management Plans and regulations addressing the transport, use, storage and disposal of these materials.

Operation of the Project could involve the temporary storage and handling of potentially hazardous materials such as detergents, pesticides, fertilizers, or paint products that are pre-packaged for distribution and use. These materials are typical of those used in light industrial and office occupancies and would be employed for routine cleaning, maintenance, and landscaping activities. This type of storage, transfer, use and disposal of potentially hazardous materials is extensively regulated at the local, state and federal levels. Amounts of these materials that are stored and used on site would be subject to guidelines and restrictions established under the required Hazardous Materials Management Act Business Plan that would be implemented by the Project.

The Project would also implement an on-site fueling station with two fuel points. Fuel storage at the Project site would comprise one (1) 10,000-gallon double-walled fuel Aboveground Storage Tank (AST), and one (1) 2,000-gallon double-walled fuel AST.<sup>5</sup> All Project ASTs would be required to conform with provisions of the Aboveground Petroleum Storage Act (see: <https://riversideca.gov/fire/divisions/prevention/aboveground-petroleum-storage-act>). Project ASTs would include an advanced monitoring system for leak detection. All fuel stored at the Project site would be available only to equipment and vehicles owned by, or otherwise under control of, the Applicant/owner. Based on information provided by the Applicant, fuel throughput at this facility would not exceed 1,000 gallons per day or 365,000 gallons per year. In context, fuel throughput for a typical commercial fuel station is expressed in terms of multiple millions of gallons per year.

Pursuant to SCAQMD Rule 461, *Gasoline Storage and Dispensing*, the Project fueling station would be required to include an enhanced vapor recovery and diagnostic system. The purpose of this system is to collect and store gasoline vapors during both bulk deliveries and vehicle operations. Fuel dispensing systems are required to include dripless nozzles that seal to the vehicle during filling. A vacuum system forces the vapors created by the vehicle filling back to the Project fuel storage tanks. The storage tank is vented by a mechanical filtration system that scrubs and neutralizes the vapors before their release. Similarly, during bulk delivery operations, the delivery truck’s filling tubes are sealed to the storage tank and all vapors are returned to the Project fuel storage tanks. This process stems the release of vapors. The vapors created by the filling operation are then subject to mechanical scrubbing and neutralization prior to release. The final component of the vapor recovery process is the diagnostic system. This electronic system provides 24-hour monitoring of the vapor recovery system, including collection of vapors during fueling operations and assurances that vapors in the Project fuel storage tanks are not leaking. The system identifies failures automatically, notifies the station operator, and reduces emissions by early detection and prompt repair.

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<sup>5</sup> Although no manufacturer has been identified to date, a typical 10,000-gallon (double-walled) aboveground storage tank is 28 feet long, 10 foot wide, 10 foot tall and weighs approximately 16,000 (dry weight) pounds. A typical 2,000-gallon (double-walled) aboveground storage tank is 12 feet long, 5 feet wide, 5.5 feet tall and has a dry weight of 3,700 pounds.

It is also anticipated that the Project would provide limited temporary storage of used oil and used antifreeze. Used oil and antifreeze would be temporarily stored on-site in 50-gallon drums and would be transported by a qualified professional third party vendor for recycling to designated licensed recycling facilities within the City of Riverside and/or County of Riverside.<sup>6</sup>

The Project would be required to comply with federal, state and local regulations and policies addressing transport, use, and disposal of hazardous materials. Compliance with federal, state, and local regulations concerning hazardous materials and/or waste precludes or reduces the potential for creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials to levels that would be less-than-significant.

**Sources:** General Plan 2025, *Public Safety Element*; GP 2025 FPEIR; *California Health and Safety Code*; *Code of Federal Regulations Title 49*; California Safety and Health (Cal/OSHA) Regulations, Section 2540.7, *Gasoline Dispensing and Service Stations*; California Fire Code Chapter 38, *Liquefied Petroleum Gases*; Resource Conservation and Recovery Act (RCRA); *California Building Code*; *Riverside Fire Department Emergency Operations Plan*; *County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP)*; *City of Riverside LHMP*; SCAQMD Rule 461, *Gasoline Storage and Dispensing*; Project Application Materials.

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

**9b. Response:**

**Less-Than-Significant Impact.** The Project Phase I ESA (*Phase I Environmental Assessment, Cleared 12.44 Acre Parcels of Land [Raptor Court Quanta Project], 5750 Central Avenue and 6639 Hillside Avenue, Riverside, California* (HEI Corporation) March 22, 2018, IS/MND Appendix D) evaluates the potential for the Project site to be adversely affected by onsite and offsite recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs). In summary, the Project Phase I ESA concluded that there was no evidence of recognized environmental conditions at the Project site; and that no further action [regarding hazards investigation or hazards remediation] is required (Project Phase I ESA, p. 18) On this basis, existing conditions at or affecting the Project site do not comprise a significant hazard to the public or the environment.

The Project proposes conventional light industrial and office development. The Project uses do not propose or require facilities or operations that would result in a reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed above at Checklist Item 9a, the Project would be required to comply with federal, state and local regulations and policies addressing transport, use, and disposal of hazardous materials. Compliance with federal, state, and local regulations concerning hazardous materials and/or waste precludes or reduces the potential for creation of 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 to levels that would be less-than-significant.

**Sources:** General Plan 2025, *Public Safety Element*; GP 2025 FPEIR; *California Health and Safety Code*; *Code of Federal Regulations Title 49*; California Safety and Health (Cal/OSHA) Regulations, Section 2540.7, *Gasoline Dispensing and*

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<sup>6</sup>The storage, use, and disposal/recycling of fuel, oil, antifreeze and other hazardous or potentially hazardous materials are common activities within most urbanized communities. A stringent regulatory system has evolved around the gasoline dispensing and vehicle maintenance and repair facilities. The Applicant would comply with all local, regional, and state regulations addressing Project storage, use, and disposal/recycling of hazardous or potentially hazardous materials.



*Service Stations; California Fire Code Chapter 38, Liquefied Petroleum Gases; Resource Conservation and Recovery Act (RCRA); California Building Code; Riverside Fire Department Emergency Operations Plan; County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP); City of Riverside LHMP; Phase I Environmental Assessment, Cleared 12.44 Acre Parcels of Land [Raptor Court Quanta Project], 5750 Central Avenue and 6639 Hillside Avenue, Riverside, California (HEI Corporation) March 22, 2018 (IS/MND Appendix D); Project Application Materials.*

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**9c. Response:**

**Less-Than-Significant Impact.** The Project site is not located within one-quarter mile of an existing or proposed school. Schools nearest the Project site include the Harvest Christian School, Adams Elementary School, and Madison Elementary School located approximately 2,000 feet southwest of the Project site.

The Project does not propose or require substantive handling of hazardous or acutely hazardous materials, substances, or waste. Moreover, transport, use, and disposal of hazardous materials associated with the Project are subject to extensive local, state, and federal regulations, and are not considered sources of potentially significant hazardous materials or hazardous emissions. On this basis, the potential for the Project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school is less-than-significant.

**Sources:** General Plan 2025, *Public Safety Element*; GP 2025 FPEIR; *California Health and Safety Code; Code of Federal Regulations Title 49; California Safety and Health (Cal/OSHA) Regulations, Section 2540.7, Gasoline Dispensing and Service Stations; California Fire Code Chapter 38, Liquefied Petroleum Gases; Resource Conservation and Recovery Act (RCRA); California Building Code; Riverside Fire Department Emergency Operations Plan; County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP); City of Riverside LHMP; Project Application Materials.*

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**9d. Response:**

**No Impact.** Review of available information indicates that Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Nor are there Government Code Section 65962.5-listed sites within the Phase I Radius Report(s). Accordingly, there is no potential for the Project to 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, create a significant hazard to the public or the environment.

**Sources:** General Plan 2025 Figure PS-5 – *Hazardous Waste Sites*; GP 2025 FPEIR Table 5.7-A – *CERCLIS Facility Information*; GP 2025 FPEIR Figures 5.7-B – *Regulated Facilities in TRI Information*, 5.7-C – *DTSC EnviroStor Database Listed Sites*; EPA Superfund database; DTSC EnviroStor database; *Phase I Environmental Assessment, Cleared 12.44 Acre Parcels of Land, 5750 Central Avenue and 6639 Hillside Avenue, Riverside, California (HEI Corporation) March 22, 2018 (IS/MND Appendix D); Project Application Materials.*

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

**9e. Response:**

**Less-Than-Significant Impact.** The Project is located within the Extended Approach/Departure Zone and Inner Approach/Departure Zone (Compatibility Zones C and B1, respectively) of the Riverside Municipal Airport (Airport). The Project is consistent with development of the Project site anticipated under the City General Plan. Additionally, development and operation of the Project would be required to conform with provisions of the City Municipal Code. The City of Riverside Municipal Code is consistent with the Riverside County Municipal Airport Land Use Compatibility Plan (ALUCP). Project consistency with the ALUCP and compatibility with the Airport is presented in detail within *Riverside Airport Compatibility Assessment – Proposed Raptor Court Quanta Project* (Johnson Aviation Consulting) September 8, 2022, IS/MND Appendix J. On this basis, it is not anticipated that the Project would conflict with the ALUCP and thereby result in a safety hazard or excessive noise for people residing or working in the Project area.

It is also noted that, due to its proximity to the Riverside Municipal Airport, the Project has been reviewed by the Federal Aviation Administration (FAA) and received a Determination of No Hazard to Air Navigation. The Determination applies to all Project buildings. In addition to the Project facilities complying with the FAA’s airspace determination, ongoing Project operations would require coordination with the Riverside Municipal Airport staff and the FAA’s local air traffic control tower staff at the FAA’s Riverside Municipal Airport Traffic Control Tower (ATCT).

With respect to crane/boom testing or training that may occur at the Project site, anytime the Project operator intends to test truck cranes/booms extending greater than 100 feet above ground level, the Project operator would be required to notify the Airport staff and FAA ATCT manager of the time and duration of the test at least 30 minutes prior to commencing the test.<sup>7</sup> At the end of the truck boom/crane test, the Project operator would be required to notify the Airport staff and FAA ATCT manager of the test completion verifying the boom/crane is lowered. Either the Airport staff or the FAA ATCT manager can withhold authorization for boom/crane tests or cancel boom/crane tests with or without cause. The FAA’s review and the associated conditions imposed would ensure that the Project design or Project operations would not conflict with or obstruct aircraft or airport activities, and thereby result in potentially significant safety hazards or excessive noise that would adversely affect people residing or working in the Project area. The Applicant would be required to comply with all FAA conditions, thereby ensuring that potential aircraft/airport-related safety hazards and noise impacts are maintained at levels that are less-than-significant.

The Project also proposes above-ground fuel tanks (ASTs) for storage of diesel fuel and gasoline, and a fueling island for Quanta vehicles. All Project ASTs would be required to conform with provisions of the Aboveground Petroleum Storage Act (see: <https://riversideca.gov/fire/divisions/prevention/aboveground-petroleum-storage-act>).

The Project ASTs would also be required to conform with City of Riverside Zoning Code Chapter 19.480, which provides standards for private, above-ground fuel tanks and fuel systems. To comply with the City’s Zoning Code, the Uniform Fire Code, and applicable Riverside ALUCP policies, above ground fuel tanks will be located within ALUCP Zone C. Fuel storage at the Project site would comprise one (1) 10,000-gallon double-walled fuel tank, and one (1) 2,000-gallon double-

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<sup>7</sup> The Project tenant (s) will be responsible for submitting an FAA Form 7460/1 for each instance that a crane or other piece of equipment is elevated above and existing on-site building. The FAA Form 7460/1 governs objects that may impact navigable airspace protected by Code of Federal Regulations, Part 77.

walled fuel tank.<sup>8</sup> Fuel tanks would be low-profile (less than 10 feet in height), steel-reinforced concrete vault designs. Project ASTs would include an advanced monitoring system for leak detection. All fueling on the site would be privately controlled by Quanta and exclusively for Quanta vehicles. No public fueling would be allowed.

The proposed fuel tank locations would comply with all the City’s siting, sizing, and fire protection requirements. As concrete vault fuel tanks within ALUCP Zone C, the Project AST designs would surpass the basic requirements for the risk of damage or upset during an aircraft collision. Therefore, the Project ASTs would be consistent with the safety and hazard protection policies and requirements associated with the Riverside Municipal Airport operations.

It is also anticipated that the Project would provide limited temporary storage of used oil and used antifreeze. Used oil and antifreeze would be temporarily stored on-site in 50-gallon drums and would be transported by a qualified professional third party vendor for recycling to designated licensed recycling facilities within the City of Riverside and/or County of Riverside.<sup>9</sup>

**Sources:** General Plan 2025 Figure PS-6 – *Airport Safety Zones and Influence Areas, Riverside County ALUCP – West County Airports Background Data*, March 2005; *Riverside Airport Compatibility Assessment – Proposed Raptor Court Quanta Project* (Johnson Aviation Consulting) September 8, 2022 (IS/MND Appendix J); Project Application Materials.

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

**9f. Response:**

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**Less-Than-Significant Impact.** The Project does not propose designs or require activities that would interfere with any identified emergency response or emergency evacuation plan. The City of Riverside has a developed roadway network which provides emergency access and evacuation routes. Access to this existing roadway network will be provided to the Project site via connection to abutting Central and Hillside Avenues. On-going coordination with the local fire and police departments during construction will ensure that potential interference with emergency response and evacuation efforts are avoided. Additionally, the Project would implement a City-approved Construction Area Traffic Management Plan (please refer to IS/MND Section 2.0, *Project Description*, 2.4.7, *Construction Area Traffic Management Plan*). The Construction Area Traffic Management Plan would minimize the potential for Project construction activities to impair or obstruct emergency response and evacuation efforts.

The City’s Emergency Operation Plan (EOP) comprises the City’s primary emergency response and emergency management program. The EOP is updated regularly to respond to evolving emergency concerns and changing conditions within the City and surrounding areas. The Project does not propose or require uses or facilities that would interfere with or obstruct the EOP.

Based on the preceding, the potential for the Project to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan is less-than-significant.

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<sup>8</sup> Although no manufacturer has been identified to date, a typical 10,000-gallon (double-walled) aboveground storage tank is 28 feet long, 10 foot wide, 10 foot tall and weighs approximately 16,000 (dry weight) pounds. A typical 2,000-gallon (double-walled) aboveground storage tank is 12 feet long, 5 feet wide, 5.5 feet tall and has a dry weight of 3,700 pounds.

<sup>9</sup>The storage, use, and disposal/recycling of fuel, oil, antifreeze and other hazardous or potentially hazardous materials are common activities within most urbanized communities. A stringent regulatory system has evolved around the gasoline dispensing and vehicle maintenance and repair facilities. The Applicant would comply with all local, regional, and state regulations addressing Project storage, use, and disposal/recycling of hazardous or potentially hazardous materials.

**Sources:** General Plan 2025, *Public Safety Element*; GP 2025 FPEIR Chapter 7.5.7 – *Hazards and Hazardous Materials*; City of Riverside EOP; Project Application Materials.

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

**9g. Response:**

**Less-Than-Significant Impact.** The Project site is not located within or proximate to a designated “Fire Hazard” area. The Project does not propose or require uses or facilities that would otherwise expose people or structures to a significant risk of loss, injury or death involving wildland fires.

The Project site design and all Project facilities would be subject to City of Riverside Fire Department requirements and would be required to conform to fire code standards – acting to reduce fire hazards generally. Moreover, the Project site and surrounding areas are provided fire protection services by the City of Riverside Fire Department, further reducing fire hazard risks.

Based on the preceding, the potential for the Project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires is considered less-than-significant.

**Sources:** General Plan 2025 *Figure PS-7 – Fire Hazard Areas*; Riverside County *Map My County* Geographic Information System; Project Application Materials.

**10. HYDROLOGY AND WATER QUALITY.**

Would the project:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**10a. Response:**

**Less-Than-Significant Impact.** Compliance with applicable existing City Stormwater Pollution Prevention Programs (SWPPPs); National Pollution Discharge Elimination System (NPDES) permitting requirements; and mandated Water Quality Management Plan (WQMP) requirements would minimize the potential for the Project to substantively contribute additional polluted runoff during Project construction, or over the operational life of the Project. The Project SWPPP; design, construction, and operation of the Project stormwater management system; and development and implementation of the Project WQMP would conform to applicable City and Regional Water Quality Control Board (RWQCB) requirements.

Under the State Construction General Permit Order (Construction General Permit), “[d]ischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the Construction General Permit for Discharges of Storm Water Associated with Construction Activity” (California State Water Resources Control Board, “Construction Stormwater General Permits”). The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD). The Project would be required to comply with SWPPP provisions stipulated under the Construction General Permit.

Prior to the issuance of development permits, the Applicant would be required to develop and submit a Final Hydrology Report, Water Quality Management Plan (WQMP), subject to review and approval by the City. Best Management Practices (BMPs) implemented under the approved WQMP would include both structural and non-structural control methods. Structural controls used to manage storm water pollutant levels typically include detention basins, oil/grit separators, and porous pavement. Non-structural controls focus on controlling pollutants at the source, generally through implementing erosion and sediment control plans.

Design, configuration, and locations of proposed stormwater management system improvements would be reviewed and approved by the City and RWQCB prior to, or concurrent with, application for grading permits. All Project stormwater management system improvements would be constructed by the Project Applicant, or would otherwise be assured (via Project Conditions of Approval or other means established by the Lead Agency) to be in place and operational prior to issuance of the first Certificate of Occupancy for the Project.

The implemented Project stormwater management system; compliance with applicable regulations and water quality standards; compliance with NPDES permitting requirements, compliance with WQMP requirements, and the implemented Project BMPs would minimize the potential for the Project to violate any water quality standards or waste discharge requirements. Impacts in this regard are therefore considered less-than-significant.

**Sources:** *Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); California State Water Resources Control Board. "Construction Stormwater General Permits." *California Waterboards*, 11 Aug. 2020, [www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.html](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.html); Project Application Materials.

- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

**10b. Response:**

**Less-Than-Significant Impact.** The Project would not contribute to groundwater depletion, nor discernibly interfere with groundwater recharge. Water is provided throughout the City by Riverside Public Utilities (RPU). The Project uses are consistent with the 2025 General Plan. Water demands under 2025 General Plan Buildout Conditions are reflected in the *2015 Urban Water Management Plan for Riverside Public Utilities, Water Division* (2015 UWMP) (Water Systems Consulting, Inc.) June 2016. By extension, the Project water demands are accounted for in the 2015 UWMP. Groundwater that may be consumed by the Project and the City as a whole is recharged pursuant to RPU policies and programs articulated in the 2015 UWMP. There are no designated groundwater recharge areas within the Project site. The Project would not otherwise affect designated recharge areas.

Direct additions or withdrawals of groundwater are not proposed by or required by the Project. Further, construction proposed by the Project will not involve substructures or other intrusions at depths that would significantly impair or alter the direction or rate of flow of groundwater. Additionally, as substantiated herein, the Project would not result in adverse impacts to water supplies including groundwater supplies. See also: Discussion at IS Checklist Item 19. *Utilities and Service Systems*. Based on the preceding, the potential for the Project to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin is less-than-significant.

**Sources:** *2015 Urban Water Management Plan for Riverside Public Utilities, Water Division* (Water Systems Consulting, Inc.) June 2016; Project Application Materials.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on-or-off-site?

**10c. i. Response:**

**Less-Than-Significant Impact.** Existing east trending drainage patterns would be maintained under the developed Project. The Project does not propose or require alteration of the course(s) of any streams or rivers.

Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project’s mandated compliance with a City-approved SWPPP and compliance with SCAQMD [fugitive dust] Rules that prohibit grading activities and site disturbance during high wind events. Additionally, a Grading and Drainage Plan must be approved by the Building Official and City Engineer prior to issuance of grading permits.

As proposed under the Project stormwater management concept, developed stormwaters within the Project site would be directed generally east toward Hillside Avenue. The Project would construct all necessary storm drain improvements and storm drain connections within Hillside Avenue consistent with City requirements. All Project stormwater management systems and improvements would be development-specific and localized to the Project area.

The rate and amount of surface water runoff from the developed Project site would be controlled via the Project stormwater management system and Project WQMP so as to preclude substantial erosion, siltation, flooding, exceedance of stormwater drainage system capacities, or contribution of substantial additional pollutants. All Project stormwater management system improvements and the Project WQMP are subject to review and approval by the City.

The Project site is not located within a designated flood zone and is not subject to substantial flood flows. The Project does not propose uses or facilities that would otherwise impede or redirect flood flows.

Based on the preceding, the Project’s potential to: substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows is less-than-significant.

**Sources:** *Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); Project Application Materials.

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

**10c. ii. Response:**

**Less-Than-Significant Impact.** Existing east trending drainage patterns would be maintained under the developed Project. The Project does not propose or require alteration of the course(s) of any streams or rivers.

Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a City-approved SWPPP and compliance with SCAQMD [fugitive dust] Rules that prohibit grading activities and site disturbance during high wind events. Additionally, a Grading and Drainage Plan must be approved by the Building Official and City Engineer prior to issuance of grading permits.

As proposed under the Project stormwater management concept, developed stormwaters within the Project site would be directed generally east toward Hillside Avenue. The Project would construct all necessary storm drain improvements and storm drain connections within Hillside Avenue consistent with City requirements. All Project stormwater management systems and improvements would be development-specific and localized to the Project area.

The rate and amount of surface water runoff from the developed Project site would be controlled via the Project stormwater management system and Project WQMP so as to preclude substantial erosion, siltation, flooding, exceedance of stormwater drainage system capacities, or contribution of substantial additional pollutants. All Project stormwater management system improvements and the Project WQMP are subject to review and approval by the City.

The Project site is not located within a designated flood zone and is not subject to substantial flood flows. The Project does not propose uses or facilities that would otherwise impede or redirect flood flows.

Based on the preceding, the Project's potential to: substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows is less-than-significant.

**Sources:** *Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); Project Application Materials.

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

**10c. iii. Response:**

**Less-Than-Significant Impact.** Existing east trending drainage patterns would be maintained under the developed Project. The Project does not propose or require alteration of the course(s) of any streams or rivers.

Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a City-approved SWPPP and compliance with SCAQMD [fugitive dust] Rules that prohibit grading activities and site disturbance during high wind events. Additionally, a Grading and Drainage Plan must be approved by the Building Official and City Engineer prior to issuance of grading permits.

As proposed under the Project stormwater management concept, developed stormwaters within the Project site would be directed generally east toward Hillside Avenue. The Project would construct all necessary storm drain improvements and storm drain connections within Hillside Avenue consistent with City requirements. All Project stormwater management systems and improvements would be development-specific and localized to the Project area.

The rate and amount of surface water runoff from the developed Project site would be controlled via the Project stormwater management system and Project WQMP so as to preclude substantial erosion, siltation, flooding, exceedance of stormwater drainage system capacities, or contribution of substantial additional pollutants. All Project stormwater management system improvements and the Project WQMP are subject to review and approval by the City.

The Project site is not located within a designated flood zone and is not subject to substantial flood flows. The Project does not propose uses or facilities that would otherwise impede or redirect flood flows.

Based on the preceding, the Project’s potential to: substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows is less-than-significant.

**Sources:** *Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); Project Application Materials.

iv. Impede or redirect flood flows?

**10c. iv. Response:**

**Less-Than-Significant Impact.** Existing east trending drainage patterns would be maintained under the developed Project. The Project does not propose or require alteration of the course(s) of any streams or rivers.

Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project’s mandated compliance with a City-approved SWPPP and compliance with SCAQMD [fugitive dust] Rules that prohibit grading activities and site disturbance during high wind events. Additionally, a Grading and Drainage Plan must be approved by the Building Official and City Engineer prior to issuance of grading permits.

As proposed under the Project stormwater management concept, developed stormwaters within the Project site would be directed generally east toward Hillside Avenue. The Project would construct all necessary storm drain improvements and storm drain connections within Hillside Avenue consistent with City requirements. All Project stormwater management systems and improvements would be development-specific and localized to the Project area.

The rate and amount of surface water runoff from the developed Project site would be controlled via the Project stormwater management system and Project WQMP so as to preclude substantial erosion, siltation, flooding, exceedance of stormwater drainage system capacities, or contribution of substantial additional pollutants. All Project stormwater management system improvements and the Project WQMP are subject to review and approval by the City.

The Project site is not located within a designated flood zone and is not subject to substantial flood flows. The Project does not propose uses or facilities that would otherwise impede or redirect flood flows.

Based on the preceding, the Project’s potential to: substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows is less-than-significant.



**Sources:** GP 2025 FPEIR Chapter 7.5.8 – *Hydrology and Water Quality; Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); Project Application Materials.

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

**10d. Response:**

**No Impact.** The Project site is not located near any bodies of water or water storage facility that would be considered susceptible to seiche. Nor is the Project site located proximate to coastal waters, and as such, is not subject to tsunami hazards. No slopes of significance have been identified on or near the Project site, and the Project site has not historically been affected by mudflows. Impacts related to tsunami, seiche, or mudflow hazards would not affect the Project.

**Sources:** GP 2025 FPEIR Chapter 7.5.8 – *Hydrology and Water Quality; Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); Project Application Materials.

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

**10e. Response:**

**Less-Than-Significant Impact.** The Project would implement water quality control measures consistent with City and RWQCB requirements. The Project would therefore not result in potentially adverse water quality impacts and would not conflict with or obstruct implementation of a water quality control plan, in this instance, the Water Quality Control Plan for the Santa Ana Region. The Project does not propose or require direct withdrawal of groundwater. Neither would the Project adversely affect designated groundwater recharge areas or groundwater recharge facilities. The Project does not propose uses or activities that would conflict with a sustainable groundwater management plan. The Project would implement Low Impact Development (LID) measures facilitating infiltration of treated stormwaters to the groundwater table. Based on the preceding, the potential for the Project to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan is less-than-significant.

**Sources:** *Preliminary Hydrology and Hydraulics Study for Raptor Court Quanta Project, City of Riverside, California* (JLC Engineering & Consulting, Inc.) June 13, 2022; *Project Specific Water Quality Management Plan, Raptor Court Quanta Project* (JLC Engineering & Consulting, Inc.) June 13, 2022 (IS/MND Appendix E); Project Application Materials.

**11. LAND USE AND PLANNING:**

Would the project:

- a. Physically divide an established community?

**11a. Response:**

**No Impact.** The Project proposes construction of conventional contemporary light industrial/office uses. No established communities exist within the subject site, nor does the Project propose elements or activities that would disrupt or divide an established community. The Project light industrial/office uses are compatible with vicinity land uses. There would be no potential for the Project to physically divide an established community.

**Sources:** General Plan 2025, *Land Use and Urban Design Element*; Google Earth Images; Riverside County *Map My County* Geographic Information System; Project Application Materials.

- 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:**

**Less-Than-Significant Impact.** The City of Riverside General Plan Land Use designation of the Project site is B/OP (Business/Office Park). The Project site is zoned BMP (Business and Manufacturing Park). Light industrial development proposed by the Project is allowed under the Project site’s existing General Plan Land Use designation. The Project uses are permitted or conditionally permitted under the site’s current Zoning designation. Conditionally permitted uses will be assessed for compatibility through the discretionary review process. The Project does not propose or require amendment of the site’s existing General Plan Land Use or Zoning designations. The Project does not otherwise propose or require uses or activities that could potentially conflict with an applicable land use plan, policy, or regulation.

Based on the preceding, the potential for the Project to 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 is less-than-significant.

**Sources:** General Plan 2025, Figure LU-10 – *Land Use Policy Map*, Table LU-5 – *Zoning/General Plan Consistency Matrix*, City of Riverside Zoning Map; City of Riverside Zoning Code; Project Application Materials.

**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:**

**No Impact.** The Project site is not designated as a State Aggregate Resources Area, a locally important source of mineral resources, or as a valuable mineral resource recovery site. Nor does the Project propose or require uses or activities that would affect off-site mineral resources. The Project would have no impact on the availability of known mineral resources.

**Sources:** General Plan 2025 Figure – OS-1 – *Mineral Resources*; Project Application Materials.

- 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:**

**No Impact.** The Project site is not designated as a State Aggregate Resources Area, a locally important source of mineral resources, or as a valuable mineral resource recovery site. Nor does the Project propose or require uses or activities that would affect off-site mineral resources. The Project would have no impact on the availability of known mineral resources.

**Sources:** General Plan 2025 Figure – OS-1 – *Mineral Resources*; Project Application Materials.

**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:**

**Less-Than-Significant Impact.**

**Overview**

The Project proposes conventional light industrial/office development within an urban context. Project construction activities would result in temporary and intermittent increases in area noise levels. Project operations would result in permanent increases in area noise levels. Temporary and intermittent Project construction-source noise impacts would be less-than-significant. Long-term operational-source noise impacts would also be less-than-significant. Substantiating discussions are provided below.

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**Noise Impact Significance Criteria**

The significance criteria presented at Table 13-1 were employed in evaluating the Project potential noise/vibration impacts. These significance criteria are based on available City standards. In instances where City standards do not exist, criteria reflect best management practices and standards of relevant state and federal noise impact analysis guidance. Please refer also to Project Noise Impact Analysis Section 4, *Significance Criteria*. Project noise levels exceeding the criteria presented at Table 13-1 would be considered potentially significant impacts.

**Table 13-1  
Noise Impact Significance Criteria**

Analysis Scenario	Condition(s)	Significance Criteria	
		Daytime	Nighttime
Off-Site Traffic	If ambient is < 55 dBA CNEL <sup>1</sup>	≥ 5 dBA CNEL Project increase	
	If ambient is 55 - 60 dBA CNEL <sup>1</sup>	≥ 3 dBA CNEL Project increase	
	If ambient is 60 - 65 dBA CNEL <sup>1</sup>	≥ 2 dBA CNEL Project increase	
	If ambient is > 65 dBA CNEL <sup>1</sup>	≥ 1 dBA CNEL Project increase	
On-Site Traffic	Exterior Noise Compatibility <sup>2</sup>	See Exhibit 3-A	
	Interior Noise Level Standard <sup>3</sup>	50 dBA L <sub>eq</sub>	
Operations	Exterior Noise Level Standard <sup>4</sup>	55 dBA L <sub>eq</sub>	45 dBA L <sub>eq</sub>
	Interior Noise Level Standard <sup>5</sup>	45 dBA L <sub>eq</sub>	35 dBA L <sub>eq</sub>
	If ambient is < 55 dBA L <sub>eq</sub> <sup>1</sup>	≥ 5 dBA L <sub>eq</sub> Project increase	
	If ambient is 55 - 60 dBA L <sub>eq</sub> <sup>1</sup>	≥ 3 dBA L <sub>eq</sub> Project increase	
	If ambient is 60 - 65 dBA L <sub>eq</sub> <sup>1</sup>	≥ 2 dBA L <sub>eq</sub> Project increase	

	If ambient is > 65 dBA L <sub>eq</sub> <sup>1</sup>	≥ 1 dBA L <sub>eq</sub> Project increase	
Construction	Exempt from the exterior noise level standards between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. <sup>6</sup>		
	Noise Level Threshold <sup>1</sup>	80 dBA L <sub>eq</sub>	70 dBA L <sub>eq</sub>
	Vibration Threshold <sup>7</sup>	0.3 PPV (in/sec)	n/a
<p><b>Source:</b> <i>Raptor Court Quanta Project Noise and Vibration Analysis</i> (Urban Crossroads, Inc.) June 22, 2022.</p> <p><b>Notes:</b></p> <p><sup>1</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.</p> <p><sup>2</sup> City of Riverside General Plan Noise Element, Figure N-10.</p> <p><sup>3</sup> State of California Green Building Standards Code 5.507.</p> <p><sup>4</sup> City of Riverside Municipal Code, Title 7 Noise Control, Section 7.25.010 (A). Section 7.25.010 (B) indicates that if the existing ambient noise level already exceeds any of the exterior noise level limit categories, then the standard shall be increased in five decibel increments in each category as appropriate to encompass the ambient noise level.</p> <p><sup>5</sup> City of Riverside Municipal Code, Title 7 Noise Control, Section 7.30.015 (A). Section 7.25.015 (B) indicates that if the measured interior ambient noise level exceeds that permissible within the first two noise limit categories in this section, the allowable noise exposure standard shall be increased in five decibel increments in each category as appropriate to reflect the interior ambient noise level.</p> <p><sup>6</sup> City of Riverside Municipal Code Section 7.35.020(G).</p> <p><sup>7</sup> Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19.  “Daytime” = 7:00 a.m. to 10:00 p.m.; “Nighttime” = 10:00 p.m. to 7:00 a.m.</p>			

### Sensitive Receptors

Noise-sensitive receptors are defined as land uses or occupancies that could be adversely affected by unwanted sound. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Sensitive receptor locations (R1 – R5) that could be potentially affected by Project-source noise are summarized at Table 13-2.

**Table 13-2**  
**Sensitive Receptor Locations**

Location	Description
R1	Location R1 represents the residence at 5739 Hollyridge Drive <sup>10</sup> , approximately 95 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R1 is placed at the building façade.
R2	Location R2 represents the residence at 6661 La Jolla Drive, approximately 82 feet east of the Project site. Receptor R2 is placed in the private outdoor living area (backyard).
R3	Location R3 represents the residence at 6703 Hillside Avenue, approximately 15 feet south of the Project site. Receptor R3 is placed in the private outdoor living area (backyard).
R4	Location R4 represents the residence at 5943 Glenhurst Street, approximately 1,014 feet southwest of the Project site. Receptor R4 is placed in the private outdoor living area (backyard).
R5	Location R5 represents the residence at 6560 Hollyridge Drive, approximately 410 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R5 is placed at the building façade.
R6	Receiver R6 represents the existing noise sensitive residence at 5694 Central Avenue, approximately 80 feet east of the Project site. Receiver R6 is placed in the private outdoor living area (backyard).

**Source:** *Raptor Court Quanta Project Noise and Vibration Analysis* (Urban Crossroads, Inc.) June 22, 2022.

<sup>10</sup> The sensitive receptor identified as “5739 Central Avenue” in the Project Air Quality Analysis and as “5739 Hollyridge Drive” in the Project Noise Analysis are, for the purposes of analysis, functionally equivalent.

### Ambient Conditions

Incremental noise impacts of the Project have been evaluated in the context of ambient noise conditions. Ambient noise levels at the Project site are largely defined by noise generated by traffic along area roads, and noise resulting from operations of the Riverside Municipal Airport. Ambient noise levels recorded at proximate sensitive receptors are summarized at Table 13-3.

**Table 13-3**  
**24-Hour Ambient Noise Level Measurements**

Location	Description	Energy Average Noise Level (dBA L <sub>eq</sub> )	
		Daytime	Nighttime
L1	Located northwest of the Project site near single-family residence at 5935 Central Avenue.	73.1	69.4
L2	Located south of the Project site near single-family residence at 6741 Hillside Avenue.	61.6	56.5
L3	Located southwest of the Project site near single-family residence at 5955 Glenhurst Street.	52.5	45.0

Source: *Raptor Court Quanta Project Noise and Vibration Analysis* (Urban Crossroads, Inc.) June 22, 2022.

Notes: "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

### Construction-Source Noise Impacts

Project construction noise-generating activities would include: site preparation, grading, building construction, architectural coating and paving. Project construction-source noise has the potential to result in a substantial temporary or periodic increase in ambient noise levels. The Project would not otherwise result in sources of potentially substantial temporary or periodic noise.

The Project Noise Impact Analysis substantiates that at potentially affected receivers, the maximum Project construction-source noise levels would range from 40.7 dBA L<sub>eq</sub> to 65.7 dBA L<sub>eq</sub> (Project Noise Impact Analysis, p. 46). The received noise levels would not exceed the 80 dBA L<sub>eq</sub> threshold condition identified at Table 13-1. Construction-source noise impacts would therefore be less-than-significant.

### Operational-Source Noise Impacts

Project operational noise sources would include noise generated by on-site activities (stationary/area sources) and noise generated by Project traffic (vehicular sources). As discussed below, Project stationary/area-source noise and Project vehicular-source would not result in or cause an increase in ambient noise levels in excess of applicable standards. Project operational-source noise impacts would therefore be less-than-significant.

### Stationary/Area-Source Noise Impacts

Stationary/area-source noise would be generated by truck movements, roof-top air conditioning units, commuter vehicle parking, fueling station activities, fleet maintenance, material movement and storage, truck washing/truck wash tunnel operations, trash enclosure activities, fleet vehicle movements and parking (including backup alarms and horn testing) and crane testing training exercises. The Project Noise Impact Analysis substantiates that at potentially affected receivers, Project stationary/area-source noise levels would range from 37.2 to 51.8 dBA L<sub>eq</sub> during the daytime and 37.2 to 51.8 dBA L<sub>eq</sub> during the nighttime (Project Noise Impact Analysis, pp. 38, 39). As discussed below, the Project Noise Impact Analysis further substantiates that Project stationary/area-source noise when added to ambient conditions would not cause or result in exceedance of applicable thresholds. Per the criteria at Table 13-1, depending on the ambient condition, incremental operational/area-source noise contributions of 1 – 5 dBA L<sub>eq</sub> would be within acceptable threshold parameters.

The daytime ambient condition at certain potentially affected receivers already exceeds the City daytime standard of 55 dBA Leq, ranging from 52.5 dBA Leq to 73.1 dBA Leq (Project Noise Impact Analysis, p. 26). With the Project noise contributions added, the daytime noise levels would range from 52.5 dBA Leq to 73.1 dBA Leq. Under daytime conditions, incremental Project stationary/area-source noise contributions would not exceed the applicable incremental thresholds of 1 – 5 dBA Leq (Project Noise Impact Analysis, p. 42). Impacts would therefore be less-than-significant.

The nighttime ambient condition at certain potentially affected receivers already exceeds the City 45 dBA Leq nighttime exterior noise standard. More specifically, ambient nighttime noise levels at potentially affected receivers range from 45.0 dBA Leq to 69.4 dBA Leq (Project Noise Impact Analysis, p. 26). Under nighttime conditions, incremental Project stationary/area-source noise contributions would not exceed the applicable incremental thresholds of 1 – 5 dBA Leq (Project Noise Impact Analysis, p. 42). Impacts would therefore be less-than-significant.

**Vehicular-Source Noise Impacts**

Per the criteria at Table 13-1, depending on the ambient condition, incremental vehicular-source noise contributions of 1.0 – 2.0 dBA CNEL would be within acceptable threshold parameters. Project traffic would generate a noise level increase of less than 1.1 dBA CNEL on the Study Area roadway segments. Project vehicular-source noise contributions would not result in unacceptable incremental increases in exterior noise conditions (Project Noise Impact Analysis, p. 40). Project vehicular-source noise impacts would therefore be less-than-significant.

**Sources:** *Raptor Court Quanta Project Noise and Vibration Analysis* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix F); Project Application Materials.

- b. Generation of excessive groundborne vibration or groundborne noise levels?

**13b. Response:**

**Less-Than-Significant Impact.** Project construction activities could result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. The Project would not otherwise be a source of vibration.

The Project Noise Impact Analysis noise analysis substantiates that at potentially affected receivers, the maximum received Project construction-source vibration levels would range from 0.000 Peak Particle Velocity (PPV, inches/second), to 0.191 PPV (Project Noise Impact Analysis, p. 48). The received vibration levels would not exceed the 0.03 PPV insignificance threshold identified at Table 13-1. Vibration Impacts would therefore be less-than-significant.

**Sources:** *Raptor Court Quanta Project Noise and Vibration Analysis* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix F); Project Application Materials.

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

**13c. Response:**

**Less-Than-Significant Impact.** The Project is located within the Extended Approach/Departure Zone and Inner Approach/Departure Zone (Compatibility Zones C and B1, respectively) of the Riverside Municipal Airport (Airport). The Project is consistent with development of the Project site anticipated under the City General Plan. Additionally, development and operation of the Project would be required to conform with provisions of the City Municipal Code. The City of Riverside Municipal Code is consistent with the Riverside County Municipal Airport Land Use Compatibility Plan (ALUCP). Project consistency with the ALUCP and compatibility with the Airport is presented in detail within *Riverside Airport Compatibility Assessment – Proposed Raptor Court Quanta Project* (Johnson Aviation Consulting) September 8, 2022, IS/MND Appendix J. On this basis, it is not anticipated that the Project would conflict with the ALUCP and thereby result in a safety hazard or excessive noise for people residing or working in the Project area. Similarly, as noted in the Project Noise Impact Analysis, per “ALUCP compatibility criteria, *noise is a factor to be considered in that slight interference with outdoor activities may occur. Conventional construction methods will eliminate most noise intrusions upon indoor activities* (Project Noise Impact Analysis, p. 24). Please refer also to the discussion at Checklist Item 9e. Based on the preceding, the potential for the Project to expose people residing or working in the project area to excessive noise levels associated with airport facilities or airport operations is considered less-than-significant.

**Sources:** General Plan 2025 Figure PS-6 – *Airport Safety Zones and Influence Areas, Riverside County ALUCP – West County Airports Background Data*, March 2005; *Riverside Airport Compatibility Assessment – Proposed Raptor Court Quanta Project* (Johnson Aviation Consulting) September 8, , 2022 (IS/MND Appendix J); *Raptor Court Quanta Project Noise and Vibration Analysis* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix F); Project Application Materials.

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**14. POPULATION AND HOUSING.**

Would the project:

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**14a. Response:**

**Less-Than-Significant Impact.**

**Direct Population Growth Inducement**

The Project does not propose residential uses and would not contribute measurably to direct population growth.

**Indirect Growth Inducement**

Project development could result in indirect population growth through creation of additional jobs. In general terms, job creation furthers growth via wages, salaries and general fiscal benefits; increased demands for housing; and increased demand for consumer goods and services. Jobs created by or resulting from the Project would be typical of area employment opportunities, and would be filled by the local residents with no substantial increase in population. The Project does not propose or require extension of roads or other infrastructure that would induce substantial unplanned growth.

**Consistency with Population Growth Projections**

SCAG population growth projections reflect assumptions and development scenarios incorporated in local plans including City general plans. As demonstrated in the preceding discussions, the Project is consistent with development anticipated under the General Plan and would not induce or generate growth beyond that reflected in the General Plan. Accordingly, the Project would not result in growth not already anticipated within SCAG population growth projections for the region.

As supported by the preceding discussions, the Project would not directly or indirectly induce substantial unplanned population growth. Impacts in these regards would be less-than-significant.

**Sources:** General Plan 2025 Table LU-3 – *Land Use Designations*; GP 2025 FPEIR Table 5.12-A – *SCAG Population and Households Forecast*, Table 5.12-B – *General Plan Population and Employment Projections–2025*, Table 5.12-C – *2025 General Plan and SCAG Comparisons*, Table 5.12-D – *General Plan Housing Projections 2025*, Google Earth Images; Project Application Materials.

- b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**14b. Response:**

**No Impact.** No housing exists within the Project site. The Project site not designated for development with residential uses. The Project does not propose or require uses or facilities that would result in displacement of persons or requirements for replacement housing. The Project would have no potential to displace substantial numbers of existing people or housing or necessitate the construction of replacement housing elsewhere.

**Sources:** General Plan 2025 Table LU-3 – *Land Use Designations*; City of Riverside Zoning Code; City of Riverside Zoning Map; Riverside County *Map My County* Geographic Information System; Project Application Materials.

**15. PUBLIC SERVICES.**

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- a. Fire protection?

**15a. Response:**

**Less-Than-Significant Impact.** Fire suppression and emergency response services are provided by the City of Riverside Fire Department (Fire Department). The Project would incrementally contribute to area-wide demands for fire suppression and emergency response services. However, the context and limited scope of the Project (infill urban development comprising a maximum of 75,000 square feet of light industrial and office uses on 12.84 acres) would not substantially contribute to demands for fire protection services.

The Project’s incremental demands for fire protection services are diminished through compliance with City and Fire Department fire prevention/fire suppression design and construction requirements. To these ends, the Project is required to comply with agency-specific criteria outlined in the Project Conditions of Approval. The Project would comply with these Conditions of Approval and subsequent Fire Department requirements that may be identified through the City’s final site plan and plan check/building permit review processes. Compliance with these requirements reduces potential demands for, and impacts on, fire protection and emergency response services.

Additionally, the Project would be required to comply with all applicable federal, state, and local regulations governing fire resistant designs, fire suppression systems, adequate fire access, fire flows, and number and locations of hydrants. In combination, these preventive design measures act to reduce demands for fire protection services and reduce adverse effects



of fires.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts is considered less-than-significant.

**Sources:** Project Application Materials.

b. Police protection?

**15b. Response:**

**Less-Than-Significant Impact.** Police protection services for the Project area are provided by the City of Riverside Police Department. The Project would incrementally contribute to area-wide demands for police protection services. However, the context and limited scope of the Project (infill urban development comprising a maximum of 75,000 square feet of light industrial and office uses on 12.84 acres) would not substantially contribute to demands for police protection services.

The Project's incremental demands for police protection services are diminished through compliance with City and Police Department site and building safety/security design and construction requirements. To these ends, the Project is required to comply with agency-specific criteria outlined in the Project Conditions of Approval. The Project would comply with these Conditions of Approval and subsequent Police Department requirements that may be identified through the City's final site plan and plan check/building permit review processes. Compliance with these requirements reduces potential demands for, and impacts on, police protection services.

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Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered police protection facilities, the construction of which could cause significant environmental impacts is considered less-than-significant.

**Sources:** Project Application Materials.

c. Schools?

**15c. Response:**

**Less-Than-Significant Impact.** Development of the Project light industrial and office uses would not substantively affect the City resident population, and would not demonstrably affect demands for population-driven demands for school services. Mandated school impact fees would be paid acting to offset Project-source incremental demands on school services. Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered school facilities is considered less-than-significant.

**Sources:** Project Application Materials.

d. Parks?

**15d. Response:**

**Less-Than-Significant Impact.** Development of the Project light industrial and office uses would not substantively affect the City resident population, and would not demonstrably affect population-driven demands for park services or parks facilities.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered park facilities is considered less-than-significant.

**Sources:** Project Application Materials.

- e. Other public facilities?

**15e. Response:**

**Less-Than-Significant Impact.** Development of the Project would require established public agency oversight including, but not limited to, various plan check and permitting actions by the City. Impacts of the Project would fall within routine tasks of these agencies/departments and are paid for via plan check and inspection fees. Impacts of the Project would therefore not be of such magnitude that new or physically altered facilities would be required. On this basis, the potential for the Project to result in substantial adverse physical impacts associated with new or physically “other” public facilities is therefore considered less-than-significant.

**Sources:** Project Application Materials.

**16. RECREATION.**

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**16a. Response:**

**Less-Than-Significant Impact.** Development of the Project light industrial and office uses would not substantively affect the City resident population, and would not demonstrably affect population-driven use of neighborhood and regional parks or other recreational facilities services.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the increased use of existing neighborhood and regional parks or other recreational facilities is considered less-than-significant.

**Sources:** Project Application Materials.

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

**16b. Response:**

**Less-Than-Significant Impact.** The Project does not propose or require recreational facilities. Development of the Project light industrial and office uses would not substantively affect the City resident population, and would not demonstrably affect population-driven demands for recreational facilities.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the construction or expansion of recreational facilities is considered less-than-significant.

**Sources:** Project Application Materials.

**17. TRANSPORTATION**

Would the project result in:

- a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

**17a. Response:**

**Less-Than-Significant Impact.** The Project does not propose elements or aspects that would conflict with adopted alternative transportation policies. Transit services are currently provided to the City and the Project vicinity by the Riverside Transit agency (RTA). On a long-term basis, the Project may result in increased demand for public transportation as increased employment opportunities become available onsite. Transit agencies routinely review and adjust their ridership schedules to accommodate shifts in demand for services. As part of the City’s standard development review processes, the need for transit-related facilities, bicycle, and pedestrian access would be coordinated between the City and the Applicant.

Development of the City pursuant to the General Plan is reflected in Southern California Association of Governments (SCAG) planning efforts and policies including: *The 2016 – 2040 Regional Transportation Plan/ Sustainable Communities Strategy, 2016 – 2040 RTP/SCS* (SCAG) April 2016, as well as the recently adopted *2020 – 2045 RTP/SCS, Connect SoCal*, (SCAG) September 2020. The Project is consistent with the General Plan and by extension is reflected in SCAG planning efforts and policies.

All Project circulation system improvements including roadways, sidewalks, and trails (as applicable) would be designed and constructed consistent with City standards.

Pedestrian walkways would be provided within the Project site with connections to existing and future walkways along adjacent Central Avenue and Hillside Avenue. The Project would facilitate and would not obstruct City goals and policies to provide efficient and safe pedestrian access. The Project would accommodate and would not interfere with the *City of Riverside Bicycle Master Plan*. The Project Site Plan Concept provides for bike racks at each office entry. Final Project designs would be required to provide internal and perimeter pedestrian and bicycle amenities consistent with City Conditions of Approval.

Lastly, as demonstrated in the Project Trip Generation Estimate, the Project would generate fewer than 100 peak hour trips (both in actual vehicles and Passenger Car Equivalent [PCE]). On this basis, and consistent with the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City of Riverside) May 2020 (City Guidelines), a Level of Service (LOS) analysis is not required for the Project. This indicates that the Project would not generate or result in traffic volumes that would adversely affect operational characteristic of the City circulation systems, require substantial alteration of the City roadway circulation system, or result in the need for circulation system improvements not already planned for and reflected in the City General Plan Circulation and Community Mobility Element.

Based on the preceding, the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities would be less-than-significant.

**Sources:** General Plan 2025 Table LU-3 – *Land Use Designations*; Riverside Transit Agency Route Information – <https://www.riversidetransit.com/index.php/route-info>; *City of Riverside Bicycle Master Plan*; *2016 – 2040 Regional Transportation Plan/ Sustainable Communities Strategy* (SCAG) April 2016; *2020 – 2045 Regional Transportation Plan/ Sustainable Communities Strategy, Connect SoCal* (SCAG) September 2020; City of Riverside General Plan, *Circulation and Community Mobility Element*; *Raptor Court Trip Generation Assessment* (Urban Crossroads, Inc.) June 2022; Project Application Materials.

- b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

**17b. Response:**

**Less-Than-Significant Impact.** *CEQA Guidelines* Section 15064.3 establishes Vehicle Miles Traveled (VMT) as the appropriate metric for evaluation of project transportation impacts. As provided for under *CEQA Guidelines* Section 15064.3 (b) (4) “[a] lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure.” The City of Riverside [lead agency] has adopted VMT analytic protocols, VMT screening tools, and VMT impact thresholds. See: *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City of Riverside) May 2020 and updates (City Guidelines). Consistent with *CEQA Guidelines* Section 15064.3 requirements, and City VMT analysis requirements, evaluation of the Project’s potential VMT impacts is presented below. Please refer also to: *Raptor Court Quanta Project Vehicle Miles Traveled (VMT) Analysis* (Urban Crossroads, Inc.) September 15, 2022 (Project VMT Analysis) presented at IS/MND Appendix G.

**City VMT Impact Threshold**

The City Guidelines identifies the Riverside County Transportation Model (RIVCOM) as the appropriate tool for conducting VMT analysis for land use projects in the City. RIVCOM performance modeling indicates that the City of Riverside Baseline (year 2022) average VMT condition is 32.15 VMT per employee (Project VMT Analysis, p. 4). The City has established 15% below the Baseline condition as the VMT impact significance threshold for new development projects. Expressed otherwise, development projects that result in >85 percent of the City VMT Baseline condition would result in a potentially significant VMT impact.

**Project VMT Impact**

To facilitate VMT analyses, the City Guidelines establish screening steps or criteria to assist in identifying projects that would presumptively have less-than-significant VMT impacts, and therefore do not warrant detailed VMT Analysis. The Project does not qualify under any City Guidelines VMT screening criteria. Accordingly, and consistent with City Guidelines requirements, VMT analysis of the Project is presented below.

VMT impacts for the Project uses are based on a home-based work (HBW) VMT per employee efficiency metric. The Applicant indicates that the Project would generate 100 – 164 jobs. For the purposes of the Project VMT Analysis, an upper range estimate of 164 employees has been used. This is also consistent with employee estimates derived from Institute of Transportation Engineer (ITE) Trip Generation rates for the Project.

RIVCOM was utilized to calculate Project-generated VMT, and that value was then divided by the Project’s employment estimate to derive Project-generated VMT per employee. Project-generated VMT per employee was calculated for both the base year model (2018) and cumulative year model (2045). Straight-line linear interpolation was then used to determine the Project’s Baseline (year 2022) VMT per employee. Table 17-1 presents home-based work (HBW) VMT as calculated from RIVCOM for the Project’s land uses, the number of Project employees, and Project VMT per employee. Project VMT per employee estimates are compared to the City Baseline VMT/Employee Condition.

**Table 17-1  
Project VMT Per Employee vs. City Baseline VMT/Employee Condition**

Total Project Employees	164
Total Project VMT	3,459
Project Baseline (year 2022) VMT / Employee	21.09
City Baseline (year 2022) VMT / Employee Condition	32.15
Project Reduction in VMT Compared to Baseline Condition	(34.4 %)

**Source:** *Raptor Court Quanta Project Vehicle Miles Traveled (VMT) Analysis* (Urban Crossroads, Inc.) September 15, 2022.

As indicated at Table 17-1, Project HBW VMT/Employee represents a 34.4 percent reduction in VMT when compared to the Baseline condition. As noted above, the City has established 15% below the Baseline condition as the VMT impact significance threshold for new development projects. Project VMT would not exceed this threshold – Project VMT impacts are therefore considered less-than-significant.

**Cumulative VMT Impact Considerations**

Per the City Guidelines, “cumulative no project [conditions] shall reflect the adopted RTP/SCS; as such, if a project is consistent with the regional RTP/SCS, the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence (City Guidelines, p. 28). The Project land use is consistent with the City General Plan and the City General Plan is reflected in the current RTP/SCS. By extension, the Project is consistent with the current RTP/SCS. The Project’s cumulative VMT impact is therefore less-than-significant.

Moreover, the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December of 2018) (Technical Advisory) notes that “. . . metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact” (Technical Advisory, p. 6). As substantiated herein, the Project-level VMT impacts are less-than-significant per the City’s efficiency-based threshold (VMT/employee), and per the Technical Advisory guidance, the Project cumulative VMT impacts would also be less-than-significant.

Based on the preceding, the potential for the Project to conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) is considered less-than-significant.

**Sources:** *Raptor Court Quanta Project Vehicle Miles Traveled (VMT) Analysis* (Urban Crossroads, Inc.) September 15, 2022 (IS/MND Appendix G); Project Application Materials.

- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

**17c. Response:**

**Less-Than-Significant Impact.** The Project is located within the Extended Approach/Departure Zone (Compatibility Zone C and B1) of the Riverside Municipal Airport. The Project is consistent with development of the Project site anticipated under the City General Plan. Additionally, development and operation of the Project would be required to conform with provisions of the City Municipal Code. The City of Riverside Municipal Code is consistent with the Riverside County Municipal Airport Land Use Compatibility Plan (ALUCP). On this basis, it is not anticipated that the Project would conflict with the ALUCP and thereby result in a safety hazard or excessive noise for people residing or working in the Project area.

It is also noted that, due to its proximity to the Riverside Municipal Airport, the Project generally is subject to review by the Federal Aviation Administration (FAA). FAA review and any associated conditions imposed would ensure that the Project design or Project operations would not conflict with or obstruct aircraft or airport activities, and thereby result in potentially significant safety hazards or excessive noise that would adversely affect people residing or working in the Project area. The Applicant would be required to comply with all FAA conditions, thereby ensuring that potential aircraft/airport-related safety hazards and noise impacts are maintained at levels that are less-than-significant. The Project does not propose or require facilities or uses that would result in or necessitate any changes in air traffic patterns or an increase in air traffic levels. Moreover, the Project is subject to potential review by the ALUC. The Applicant would be required to comply with conditions (if any) imposed by the ALUC. Based on the preceding, the potential for the Project to result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks is considered less-than-significant. Please refer also to the discussion presented at Checklist Item 9e.

**Sources:** General Plan 2025 Figure PS-6 – *Airport Safety Zones and Influence Areas, Riverside County ALUCP – West County Airports Background Data*, March 2005; Project Application Materials.

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

**17d. Response:**

**Less-Than-Significant Impact.** The Project does not propose elements or aspects that would substantially increase transportation/traffic hazards. Moreover, all improvements under the Project would be designed and implemented consistent with recommendations of the TIA (see: TIA Section 1.6, *Recommendations*) and City traffic engineering and safety standards, thereby minimizing the potential to result in or cause hazardous traffic/transportation conditions.

The Project would generate urban traffic comparable to and compatible with the vehicle mix and vehicle categories present within the area roadway system. The Project uses would therefore not cause or result in incompatible vehicle movements or traffic that would substantively increase hazards.

Additionally, pursuant to the Project Construction Traffic Management Plan (please refer to IS/MND Section 2, *Project Description, 2.4.7 Construction Area Traffic Management Plan*), the Project would be required to maintain appropriate access during construction activities.

Lastly, as demonstrated in the Project Trip Generation Estimate, the Project would generate fewer than 100 peak hour trips (both in actual vehicles and Passenger Car Equivalent [PCE]). On this basis, and consistent with the *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City of Riverside) May 2020 (City Guidelines), a Level of Service (LOS) analysis is not required for the Project. This indicates that the Project would not generate or result in traffic volumes that would adversely affect operational characteristic of the City circulation systems, require substantial alteration of the City roadway circulation system, or result in the need for circulation system improvements not already planned for and reflected in the City General Plan, *Circulation and Community Mobility Element*. Based on the preceding, the potential for the Project to substantially increase hazards due to a geometric design feature or incompatible uses is considered less-than-significant.

**Sources:** *Raptor Court Trip Generation Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix G); Project Application Materials.

- e. Result in inadequate emergency access?

**17e. Response:**

**Less-Than-Significant Impact.** The Project does not propose or require elements or aspects that would intrinsically increase transportation/traffic hazards or restrict emergency access. Further, the Project does not require modification of the area roadways circulation system not already anticipated and planned for in the City General Plan *Circulation and Community Mobility Element*.

In conjunction with the approval of building permits, the City would review all Project designs and plans to assure compliance with applicable emergency access and safety requirements and thereby preclude or resolve any potential emergency access concerns. The potential for the Project to substantially increase hazards due to a design feature or result in inadequate emergency access is therefore less-than-significant. Please refer also to related discussions at Checklist Item 9. *Hazards and Hazardous Materials, f) [potential to] Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*

**Sources:** *Raptor Court Quanta Project Trip Generation Assessment* (Urban Crossroads, Inc.) June 22, 2022 (IS/MND Appendix G); Project Application Materials.

**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
 

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**18a. Response:**

**Less-Than-Significant Impact With Mitigation Incorporated.** Within the Project site, there are no known Tribal Cultural Resources (TCRs) or other resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined at Public Resources Code section 5020.1(k). Nor does the Project propose or require uses or activities that would adversely affect off-site TCRs.

Tribal Resources Consultation (Consultation) with requesting Tribes has been initiated as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*. Pursuant to the Consultation process, if potentially significant impacts to TCRs are identified, the City and affected Tribe(s) will mutually agree to measures that would avoid or mitigate these impacts. Alternatively, affected parties acting good faith and after reasonable effort, may conclude that a mutual agreement cannot be reached. Protective Mitigation Measures developed in consultation with potentially affected Tribes have been incorporated in this IS/MND. These measures that would act to avoid or minimize potential impacts to cultural resources and TCRs.

Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a tribal cultural resource as defined at Public Resources Code 5020.1(k) is less-than-significant. Please refer also to Mitigation Measures CUL-1 through CUL-4.

**Sources:** *AB 52, Gatto. Native Americans: California Environmental Quality Act; Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* (BCR Consulting LLC) June 22, 2022 (IS/MND Appendix H); Project Application Materials.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**18b. Response:**

**Less-Than-Significant Impact With Mitigation Incorporated.** Within the Project site, there are no known Tribal Cultural Resources (TCRs) or other resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined at Public Resources Code section 5024.1 (c). Nor does the Project propose or require uses or activities that would adversely affect off-site TCRs.

Tribal Resources Consultation (Consultation) with requesting Tribes has been initiated as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*. Pursuant to the Consultation process, if potentially significant impacts to TCRs are identified, the City and affected Tribe(s) will mutually agree to measures that would avoid or mitigate these impacts. Alternatively, affected parties acting in good faith and after reasonable effort, may conclude that a mutual agreement cannot be reached. Protective Mitigation Measures developed in consultation with potentially affected Tribes have been incorporated in this IS/MND. These measures would act to avoid or minimize potential impacts to cultural resources and TCRs.

Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a tribal cultural resource as defined at Public Resources Code 5024.1(c) is less-than-significant. Please refer also to Mitigation Measures CUL-1 through CUL-4.

**Sources:** *AB 52, Gatto. Native Americans: California Environmental Quality Act; Cultural Resources Assessment, Raptor Court Quanta Project, City of Riverside, Riverside County, California* (BCR Consulting LLC) June 22, 2022 (IS/MND Appendix H); Project Application Materials.

**19. UTILITIES AND SYSTEM SERVICES.**

Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

**19a. Response:**

**Less-Than-Significant Impact.** The Project would require only localized modification of area utilities and infrastructure systems. Impacts associated with localized improvement or alteration of infrastructure systems necessary to support the Project are consistent with, and are addressed within the scope of other infrastructure impact analyses presented herein. As discussed herein, these impacts are determined to be less-than-significant. The Project does not propose or require new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Based on the preceding, the potential for the Project to require new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.



Sources: Project Application Materials.

- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

**19b. Response:**

**Less-Than-Significant Impact.** The Project uses are consistent with the 2025 General Plan. Water demands under 2025 General Plan Buildout Conditions are reflected in the *2015 Urban Water Management Plan for Riverside Public Utilities, Water Division* (2015 UWMP) (Water Systems Consulting, Inc.) June 2016. By extension, the Project water demands are accounted for in the 2015 UWMP. The 2015 UWMP substantiates that there are sufficient water supplies available to serve the City (including the Project) and reasonably foreseeable future development during normal, dry, and multiple dry years. The Applicant would be required to provide a “Will-Serve” letter from EMWD prior to the issuance of the first building permit. Based on the preceding, the potential for the Project to result in or be adversely affected by insufficient water supplies is considered less-than-significant.

Sources: *2015 Urban Water Management Plan for Riverside Public Utilities, Water Division* (Water Systems Consulting, Inc.) June 2016; Project Application Materials.

- 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?

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**19c. Response:**

**Less-Than-Significant Impact.** The Project would generate additional demands for wastewater treatment services. The Project uses are consistent with development of the site anticipated under the 2025 General Plan and wastewater volumes generated by the Project are accounted for and reflected in current and programmed Riverside Regional Water Quality Control Plant (RWQCP) wastewater treatment facilities planning. That is, RWQCP wastewater treatment facilities construction and planning reflects development of the City pursuant to the 2025 General Plan. Because the Project land uses and development intensities are consistent with the 2025 General Plan, the Project’s incremental wastewater treatment demands are reflected in RWQCP current and planned wastewater treatment facilities improvements.

Further, the FPEIR determined that wastewater treatment demands associated with the buildout of the 2025 General Plan would be less-than-significant. The wastewater increment generated by the Project is reflected in that determination. The potential for the Project to exceed current or anticipated wastewater treatment capacities is therefore considered less-than-significant.

Sources: 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*, Project Application Materials.

- d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

**19d. Response:**

**Less-Than-Significant Impact.** The Project land uses are consistent with the General Plan 2025. The FPEIR determined that the potential for buildout of the City pursuant to the 2025 General Plan to generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals would be less-than-significant. By extension, the Project’s impacts in these regards would be similarly less-than-significant.

**Sources:** FPEIR Table 5.16-A – *Existing Landfills*, Table 5.16-M – *Estimated Future Solid Waste Generation from the Planning Area*; Project Application Materials.

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

**19e. Response:**

**Less-Than-Significant Impact.** The City has implemented programs to ensure compliance with statewide solid waste source reduction targets of 50% or more. As of 2021 the City of Riverside realized 69% diversion of municipal waste that would otherwise be landfilled. The Project would be required to comply with applicable City and state waste diversion and recycling mandates. Moreover, the Project would implement conventional light industrial and office uses and would not establish uses or activities that would conflict with or obstruct local, state and federal solid waste management regulations. All solid waste generated by the Project would be collected and disposed of as part of the City’s municipal waste stream. In this latter regard, solid waste management services are provided throughout the City including collection and transfer of refuse, greenwaste, and bulky items. Recycling services are also provided.

Based on the preceding, the potential for the Project to conflict with or obstruct federal, state, and local statutes and regulations related to solid waste is less-than-significant.

**Sources:** City of Riverside Trash and Recycling: <https://riversideca.gov/publicworks/trash/rate-increase.asp>; *California Integrated Waste Management Board 2002 Landfill Facility Compliance Study*; Project Application Materials.

**20. WILDFIRE**

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

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

**20a. Response:**

**No Impact.** The Project site is not located within or proximate to a designated “Fire Hazard” area. The Project does not propose or require uses or facilities that would otherwise expose people or structures to a significant risk of loss, injury or death involving wildfire.

The Project proposes conventional light industrial and office uses in an area of the City that is developed with urban uses. The Project site abuts and is provided direct access to improved and City-maintained Central Avenue and Hillside Avenue. Access to the developed Project would be provided consistent with City of Riverside Fire Department requirements. There are no adopted emergency response plans or emergency evacuation plans that would be adversely affected by the Project. Additionally, the Project would implement fire hazard protection and suppression measures stipulated by the City of Riverside Fire Department through the Project Conditions of Approval.

Based on the preceding, the Project has no potential to substantially impair an adopted emergency response plan or emergency evacuation plan within a state responsibility area or within lands classified as very high fire hazard severity zones.

**Sources:** Riverside County *Map My County* Geographic Information System; Project Application Materials.

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

**20b. Response:**

**No Impact.** The Project site is not located within a designated “High Fire Hazard” area. Nor is the Project site or vicinity properties classified as very high fire hazard severity zones. There are no prevailing conditions (slope, winds, and other factors) that would exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would implement fire hazard protection and suppression measures stipulated by the City of Riverside Fire Department through the Project Conditions of Approval. Based on the preceding, there is no potential to expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to location within or proximate to a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones.

**Sources:** Riverside County *Map My County* Geographic Information System; Project Application Materials.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

**20c. Response:**

**No Impact.** The Project site is not located within a designated “High Fire Hazard” area. Nor is the Project site or vicinity properties classified as very high fire hazard severity zones. The Project proposes conventional light industrial and office uses in an urbanized area of the City. The Project site abuts and is provided direct access to improved and City-maintained Central Avenue and Hillside Avenue. Access to the Project would be provided consistent with City of Riverside Fire Department requirements. All utilities and services are currently available to the Project site. Potential Project impacts associated with localized infrastructure improvements and connections to utilities and services is addressed under relevant topical issues within this IS/MND.

The Project does not propose or require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Based on the preceding, the Project has no potential to require the installation or maintenance of associated infrastructure within a State or Federal Responsibility Area, or within lands that are classified as very high fire hazard severity zones that may result in temporary or ongoing impacts to the environment. Please refer also to related discussions presented at Checklist Item 9. (g).

**Sources:** Riverside County *Map My County* Geographic Information System; Project Application Materials.

- 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:**

**No Impact.** The Project site is not located within a designated “High Fire Hazard” area. Nor is the Project site or vicinity properties classified as very high fire hazard severity zones. The Project site is generally level without significant gradients. The Project site slopes gradually downward in an east/southeast direction. Adjacent properties evidence similar gradual slopes and do not evidence landslides or the potential to result in landslides. The Project site and surrounding properties do not lie within a designated flood hazard area.

The Project stormwater management concept maintains prevailing east-to-southeast drainage patterns. These patterns would not be affected by wildfires or wildfire prevention/suppression measures. All Project stormwater management system improvements would be subject to City review and approval.

Additionally, the Project would implement fire hazard protection and suppression measures stipulated by the City of Riverside Fire Department through the Project Conditions of Approval.

Based on the preceding, the Project has no potential to 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 within a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones. Please refer also to related discussions presented at Checklist Item 9. (g).

**Sources:** Riverside County *Map My County* Geographic Information System; Project Application Materials.

**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:**

**Less-Than-Significant With Mitigation Incorporated.** Certain biological resources described at Initial Study Checklist Item 4. *Biological Resources* may be adversely affected by the Project. Additionally, as yet unknown cultural resources, and as yet unknown paleontological resources could be affected by the Project. This IS/MND incorporates mitigation that reduces potential biological resources impacts, potential cultural resources impacts, and potential paleontological resources impacts to levels that would be less-than-significant. See: Mitigation Measures BIO-1 through BIO-3, CUL-1 through CUL-4, GEO-1 through GEO-2. On this basis, within the application of mitigation, the potential for the Project 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 endangered plant or animal or eliminate important examples of the major periods of California history or prehistory would be less-than-significant.

**Sources:** Please refer to the previously-cited sources in this Initial Study.

- 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:**

**Less-Than-Significant Impact With Mitigation Incorporated.** As substantiated herein, no significant or potentially significant unmitigable long-term environmental effects of the Project have been identified. Mitigation measures identified in this IS/MND reduce all potentially significant impacts to levels that would be less-than-significant. See: Mitigation Measures BIO-1 through BIO-3, CUL-1 through CUL-4, and GEO-1 through GEO-2.

There are no known past, current, or probable future related projects that would interact with the Project and thereby result in cumulatively considerable impacts. The Project’s mitigated impacts are therefore individually limited and are not cumulatively considerable. On this basis, with the application of mitigation, the Project would not result in impacts that are individually limited, but cumulatively considerable.

**Sources:** Please refer to the previously-cited sources in this Initial Study.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

**21c. Response:**

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**Less-Than-Significant Impact With Mitigation Incorporated.** As substantiated herein, all Project environmental impacts would be less-than-significant or would be or less-than-significant as mitigated. The Project would therefore not result in environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

**Sources:** Please refer to the previously-cited sources in this Initial Study.

**Note:** Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d

<b>Mitigation Monitoring and Reporting Program</b>					
<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
<b>Biological Resources</b>	<i><b>BIO-1</b> Prior to issuance of the first grading permit, the Applicant shall retain a qualified biologist (Project Biological Monitor). The Project Biological Monitor shall be approved by the City prior to the issuance of the first grading permit.</i>	Project Biological Monitor shall be retained and approved by the City prior to issuance of the first grading permit.	Applicant.	Planning Division.	Project Biological Monitor shall be approved prior to the issuance of the first grading permit.
	<i><b>BIO-2</b> Limits of the Project site shall be clearly marked by stakes or other means to ensure that off-site areas are not disturbed by Project construction activities.</i>	Prior to commencement of site-disturbing activities.	Contractors; Project Biological Monitor.	Project Biological Monitor; Planning Division; Building & Safety Division.	Field verification and documentation by Project Biological Monitor, with oversight by City representatives. Documentation shall be included in Project Biological Monitor Monitoring Report. Project Biological Monitor Monitoring Report documenting monitoring activities and monitoring results shall be provided to the City within 60 days of completion of grading, excavation and ground-disturbing activities at the site.

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

**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i><b>BIO-3</b> The Project Biological Monitor shall be on-site during all ground disturbance activities, and shall halt any such activities if, in their professional opinion, such activities will result in adverse effects to protected species.</i></p>	<p>On-going throughout site-disturbing activities.</p>	<p>Contractors; Project Biological Monitor.</p>	<p>Project Biological Monitor; Planning Division.</p>	<p>Field monitoring by Project Biological Monitor. Documentation of any halt work actions and resolution of those actions shall be included in Project Biological Monitor Monitoring Report. Project Biological Monitor Monitoring Report documenting monitoring activities and monitoring results shall be provided to the City within 60 days of completion of grading, excavation and ground-disturbing activities at the site.</p>

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**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
<p><b>Cultural Resources</b></p>	<p><i>CUL-1 Prior to grading permit issuance, if there are any changes to Project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Developer/Applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project site. The City and the Developer/Applicant shall make all attempts to avoid and/or preserve in place as many cultural resources 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.</i></p>	<p>Prior to Grading Permit.</p>	<p>Applicant.</p>	<p>Planning Division and Public Works Department.</p>	<p>The Applicant shall notify the City.</p>

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**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i><b>CUL-2 Archaeological:</b> 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.</i></p> <p><i>1. The Project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan (AMP) or Cultural Resources Monitoring Plan (CRMP) to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the Project site. The plan is to be submitted to the City prior to the issuance of a grading permit. Details in the plan shall include:</i></p> <p><i>a. Project grading and development scheduling;</i></p> <p><i>b. The development of a rotating or simultaneous schedule in coordination with the</i></p>	<p>Prior to Grading Permit.</p>	<p>Applicant.</p>	<p>Planning Division and Public Works Department.</p>	<p>Submission of an Archaeological Monitoring Plan.</p>

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**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i>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;</i></p> <p><i>c. The protocols and stipulations that the Applicant, tribes, and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;</i></p> <p><i>d. Treatment and final disposition of any cultural resources, sacred sites, and human remains if discovered on the Project site; and</i></p> <p><i>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure CUL-</i></p>				

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<i>Mitigation Monitoring and Reporting Program</i>					
<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	4.				
	<p><i><b>CUL-3 Treatment and Disposition of Cultural Resources:</b> 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:</i></p> <p><i>1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</i></p>	During construction.	Contractors; Project Archaeological Monitor; Native American Monitor(s).	Planning Division.	Submission of a Phase IV Monitoring Report.

**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p>2. <i>Temporary Curation and Storage:</i>  <i>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</i></p> <p>3. <i>Treatment and Final Disposition:</i>  <i>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:</i></p> <p>a. <i>Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and</i></p>				

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**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i>provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</i></p> <p><i>b. If on site reburial is not possible, agreed upon by all parties, 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;</i></p> <p><i>c. 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</i></p>				

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***Mitigation Monitoring and Reporting Program***

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i>completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and interested tribes.</i></p>	<p style="font-size: 48px; opacity: 0.5;">DRAFT</p>			

**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i><b>CUL-4 Cultural Sensitivity Training:</b> The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder’s contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</i></p>	<p>Prior to Grading Permit.</p>	<p>Contractors; Project Archaeological Monitor; Native American Monitor(s).</p>	<p>Planning Division, Building and Safety and Public Works Department.</p>	<p>Cultural Resources Sensitivity Training shall be completed by Contractor(s), Project Archaeological Monitor; Native American Monitor(s) Documentation of Cultural Resources Sensitivity Training shall be included in Project Archaeological Monitor Monitoring Report. The Project Archaeological Monitoring Report documenting monitoring activities and monitoring results shall be provided to the City within 60 days of completion of grading, excavation and ground-disturbing activities at the site.</p>
	<p><b>A STANDARD CONDITION OF APPROVAL WILL INCLUDE THE FOLLOWING – CONSISTENT WITH STATE LAW:</b>  <i>Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction</i></p>	<p>Per Project Conditions of Approval</p>	<p>Per Project Conditions of Approval</p>	<p>Per Project Conditions of Approval</p>	<p>Per Project Conditions of Approval</p>

**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i>contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community &amp; Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be</i></p>				

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**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
	<p><i>overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.</i></p> <p><i>The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.</i></p> <p><i>According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).</i></p>				

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**Mitigation Monitoring and Reporting Program**

<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Implementation Responsibility</b>	<b>Responsible Monitoring Party(ies)<sup>1</sup></b>	<b>Monitoring/Reporting</b>
<p><b>Geology and Soils</b></p>	<p><i><b>GEO-1</b> Prior to issuance of the first grading permit, the Applicant shall retain a qualified Paleontological Monitor (Project Paleontological Monitor). The Project Paleontological Monitor shall be approved by the City prior to the issuance of the first grading permit.</i></p> <p><i>The Project Paleontological Monitor shall be on call during all grading and other ground-disturbing activities in native sediments.</i></p> <p><i><b>GEO-2</b> The Project Paleontological Monitor shall develop an acceptable monitoring and fossil remains treatment plan (Paleontological Management Treatment Plan - PMTP) for construction-related activities that could disturb potential unique paleontological resources within the Project area. Minimum provisions of the PMTP are outlined below:</i></p> <ul style="list-style-type: none"> <li><i>• The Project Paleontological Monitor shall be trained and equipped to allow the timely removal of fossils with minimal construction delay, to the</i></li> </ul>	<p>Project Paleontological Monitor shall be retained prior to issuance of the first grading permit.</p> <p>On-going monitoring during ground disturbing activities.</p>	<p>Contractors; Project Paleontological Monitor.</p>	<p>Contractors; Project Paleontological Monitor; Planning Division; Building &amp; Safety Division.</p>	<p>The Project Paleontological Monitoring Report documenting monitoring activities and monitoring results shall be submitted to the City within 60 days of completion of grading, excavation and ground-disturbing activities at the site.</p>

**Mitigation Monitoring and Reporting Program**

Impact Category	Mitigation Measures	Implementation Timing	Implementation Responsibility	Responsible Monitoring Party(ies) <sup>1</sup>	Monitoring/Reporting
	<p><i>site full-time during the interval of earth-disturbing activities.</i></p> <ul style="list-style-type: none"> <li>• <i>Should fossils be found within an area being cleared or graded, divert earth-disturbing activities elsewhere until the monitor has completed salvage. If construction personnel make the discovery, the grading contractor shall immediately divert construction and notify the monitor of the find.</i></li> <li>• <i>The Project Paleontological Monitor shall prepare, identify, and curate all recovered fossils for documentation in a Paleontological Monitor Report. Recovered fossils shall be transferred to an appropriate depository facility.</i></li> <li>• <i>At the conclusion of site-disturbing activities, the Paleontological Monitor Report shall be submitted to the City of Riverside. A copy of the Paleontological Monitor Report shall accompany any recovered fossils to the designated depository facility.</i></li> </ul>				

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