



City of Arts & Innovation

COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division

Draft Negative Declaration

WARD: 1

- 1. **Case Number:** P11-0308 (Conditional Use Permit)
- 2. **Project Title:** Wireless Telecommunications Facility
- 3. **Hearing Date:** March 8, 2012
- 4. **Lead Agency:** City of Riverside
Community Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
- 5. **Contact Person:** Kyle Smith, Associate Planner
Phone Number: (951) 826-5220
Email: kjsmith@riversideca.gov
- 6. **Project Location:** 4845 Brockton Avenue, situated on the westerly side of Brockton Avenue, between Homewood Court and Ramona Drive, in the R-1-7000 – Single Family Residential Zone

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

Applicant

Los Angeles SMSA (dba Verizon Wireless)
15505 Sand Canyon, Building D, 1st Floor
Irvine, CA 92592

Property Owner

First United Methodist Church of Riverside
4845 Brockton Ave.
Riverside, CA 92506

8. **General Plan Designation:** MDR – Medium Density Residential

9. **Zoning:** R-1-7000 – Single Family Residential

10. **Description of Project:**

The applicant is requesting a Conditional Use Permit (CUP) to allow the construction of an approximately 50-foot high wireless telecommunications facility camouflaged as a palm tree (monopalm) within a 20-foot by 30-foot lease area. The proposed facility would be located adjacent to two existing mono-palm wireless facilities on the westerly side of the church parking lot. Further, the proposed monopalm would be approximately 820 feet from Brockton Avenue to the southeast, and 400 feet from Palm Avenue to the northwest. The project site is on a ridgeline, approximately 55 feet above Palm Avenue.

The monopalm as proposed will consist of a single antenna array installed at a centerline height of approximately 45 feet above ground level. The antenna array will consist of twelve (12) antennas,

approximately four (4) feet in height, attached to three (3) separate sectors, approximately nine (9) feet in width. The pole of the monopalm will consist of faux bark finish to resemble the texture and color of a palm tree trunk. Faux palm tree fronds are proposed to extend two to four feet beyond the antenna arrays to camouflage the antennas.

The proposal also includes the installation of an approximately 186 square-foot equipment shelter, approximately 10 feet-6 inches in height, within the proposed lease area. The equipment shelter is proposed to accommodate new radio equipment cabinets, as well as supporting cables and utilities. The equipment shelter and monopalm facility will be enclosed by a proposed 6-foot high split-face block wall. A wrought iron gate is proposed along the easterly side of the enclosure for access to the monopalm facility and supporting equipment and utilities. In addition, four live palm trees, approximately 10 feet in height at time of planting, are proposed around the exterior perimeter of the enclosure.

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

The subject approximately 4.4 acre two-parcel project site consists of the First United Methodist Church of Riverside grounds. The church buildings are all clustered towards Brockton Avenue with surface parking situated behind the buildings on the westerly side of the site. The proposed wireless telecommunication facility is to be located between two existing mono-palms, on the western edge of the surface parking lot. The project site is approximately 55 feet above the Palm Avenue grade.

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Church	PF – Public Facilities and Institutional Uses and MDR – Medium Density Residential	R-1-7000 – Single Family Residential Zone
North	Single Family Residential	MDR – Medium Density Residential	R-1-7000 – Single Family Residential and R-1-7000-CR – Single Family Residential Zone and Cultural Resources Overlay Zones
East (across Brockton Ave.)	Central Middle School	PF – Public Facilities and Institutional Uses	PF – Public Facilities Zone
South	Single Family Residential	MDR – Medium Density Residential	R-1-7000 – Single Family Residential Zone and R-1-7000-CR – Single Family Residential Zone and Cultural Resources Overlay Zones
West	Multiple Family Residential and Vacant Parcel across Palm Avenue	MDR – Medium Density Residential and P- Public Parks	R-1-7000 – Single Family Residential Zone and PF – Public Facilities Zone

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

- a. None

13. Documents used and/or referenced in this review:

- a. General Plan 2025
- b. GP 2025 FPEIR

- c. Site Compliance Report prepared by David Charles Cotton, Jr., of Site Safe RF Compliance Experts, dated May 31, 2012
- d. Cultural Resources Records Survey, prepared by Michael Brandman Associates, dated January 19, 2012

14. Acronyms

AICUZ -	Air Installation Compatible Use Zone Study
AQMP -	Air Quality Management Plan
AUSD -	Alvord Unified School District
CDG -	Citywide Design Guidelines
CEQA -	California Environmental Quality Act
CMP -	Congestion Management Plan
EMWD -	Eastern Municipal Water District
EOP -	Emergency Operations Plan
FEMA -	Federal Emergency Management Agency
FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GIS -	Geographic Information System
GP 2025 -	General Plan 2025
LHMP -	Local Hazard Mitigation Plan
MARB/MIP -	March Air Reserve Base/March Inland Port
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MSHCP -	Multiple-Species Habitat Conservation Plan
MVUSD -	Moreno Valley Unified School District
NCCP -	Natural Communities Conservation Plan
OEM -	Office of Emergency Services
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
RPW -	Riverside Public Works
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SKR-HCP -	Stephens' Kangaroo Rat - Habitat Conservation Plan
SWPPP -	Storm Water Pollution Prevention Plan
USGS -	United States Geologic Survey
WMWD -	Western Municipal Water District
WQMP -	Water Quality Management Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

The City of Riverside finds that the proposed project **MAY** have a “potentially significant impact” or “Less Than Significant With Mitigation Incorporated” 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



City of Arts & Innovation

COMMUNITY DEVELOPMENT DEPARTMENT Planning Division

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: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside

document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. 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"/>
<p>1a. Response: <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)</i></p> <p>The proposed camouflaged wireless telecommunications facility will be located approximately 820 feet from Brockton Avenue to the southeast, and 400 feet from Palm Avenue to the northwest. The project site is on a ridgeline, approximately 55 feet above Palm Avenue. None of the surrounding streets are identified in the General Plan 2025 as Scenic and Special Boulevards or Parkways. The applicant is requesting a Conditional Use Permit (CUP) to allow the construction of an approximately 50-foot high wireless telecommunications facility camouflaged as a palm tree (monopalm), within a 20-foot by 30-foot lease area in the rear of a site developed with a church and associated parking lot. The proposed facility would be located adjacent to two existign monopalm facilities on the westerly side of the church parking lot. The proposal also includes the planting of four live palm trees, approximately 10 feet in height at time of planting, around the exterior perimeter of the equipment enclosure. With the recommended conditions of approval that the four new live palm trees be at least 35-feet in height, and that vines be planted along all four sides of the proposed enclosure, this project will have a less than significant impact directly, indirectly, or cumulatively on a scenic vista.</p>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1b. Response: <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City’s Urban Forest Tree Policy Manual, Title 20 – Cultural Resources and, Title 19 – Article V – Chapter 19.100 – Residential Zones - RC Zone)</i></p> <p>Refer to Response 1a. There are no scenic highways within the City that could potentially be impacted. Through compliance and implementation of the applicable provisions in Chapter 19.530 (Wireless Telecommunications Facilities) related to the site location, operation, development and design standards, as well as with the recommended conditions of approval, the proposed project will have a less than significant impact to a scenic resource directly, indirectly or cumulatively.</p>				
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1c. Response: <i>(Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)</i></p> <p>Refer to Response 1a. The proposed project consists of a camouflaged wireless telecommunications facility (monopalm) proposed to be installed on a site currently developed with a church and associated parking lot. Through compliance and implementation of the applicable provisions in Chapter 19.530 (Wireless Telecommunications Facilities) related to the site location, operation, development and design standards for Wireless Telecommunications Facilities, as well as with the recommended conditions of approval, the proposed project will have a less than significant impact to a scenic resource directly, indirectly or cumulatively.</p>				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>1d. Response: <i>(Source: General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)</i></p> <p>The site is not within the Mount Palomar Lighting Area and no new lighting is proposed under this project. No impact directly, indirectly or cumulatively will occur as a result of this project which would adversely affect day or nighttime views</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES:				
<p>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 effect, 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:</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability) The project is located within an urbanized area. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 shows that the project site is not designated as, and is not adjacent to or in proximity to any land classified as, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the project will have no impact directly, indirectly or cumulatively to agricultural uses.</p>				
<p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19) A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR reveals that the project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Moreover, the project site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the project will have no impact directly, indirectly or cumulatively.</p>				
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2c. Response: (Source: GIS Map – Forest Data) The project site is zoned R-1-7000 – Single Family Residential. The proposed wireless telecommunications facility (monopalm) will not result in the rezoning of property intended for forest land, as these facilities are allowed in the R-1-7000 subject to the granting of a Conditional Use Permit and compliance with specific standards. Furthermore, the project is located within an urbanized area where the location of the project site is not located within proximity of any forest land. Therefore, no impacts will occur from this project directly, indirectly or cumulatively.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2d. Response: (Source: GIS Map – Forest Data) The City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland. Therefore, no impacts will occur from this project directly, indirectly or cumulatively.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2e. Response: (Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data) The project is located in an urbanized area of the City, on a site currently developed site. The site is identified as urban/built out land and therefore does not support agricultural resources or operations. The project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. The City of Riverside has no forest land that can support 10-percent native tree cover. Therefore, no impacts will occur from this project directly, indirectly or cumulatively to conversion of Farmland, to non-agricultural use or to the loss of forest land.</p>				
3. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>3a. Response: (Source: South Coast Air Quality Management District’s 2003 Air Quality Management Plan (AQMP)) The proposed wireless telecommunications facility (monopalm) is consistent with the General Plan 2025 Program “Typical Growth Scenario” in all aspects. The Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB) sets forth a comprehensive program that will lead the SCAB into compliance with all Federal and State air quality standards. The City of Riverside is located within the Riverside County sub region of the SCAG projections. The General Plan 2025 FPEIR determined that implementation of the General Plan 2025 would generally meet attainment forecasts and attainment of the standards of the AQMP. Because the proposed project is consistent with air quality policies within the General Plan 2025 and the GP 2025 FPEIR determined the General Plan 2025 to be consistent with the 2003 AQMP, the proposed project will not conflict or obstruct implementation of the applicable air quality plan - AQMP and therefore this project will have no impact directly, indirectly or cumulatively to the implementation of an air quality plan.</p>				
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>3b. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2003 AQMP, URBEMIS 2007 Model, EMFAC 2007 Model) The project will not result in the violation of any ambient air quality standard or contribute substantially to an existing or projected air quality violation because the project is proposed on a previously developed site and does not involve significant construction, grading or earthmoving activities and because the project consists of a wireless telecommunications facility. As such, the project will have a less than significant impact directly, indirectly or cumulatively to ambient air quality or contribute to an existing air quality violation.</p>				
c. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
<p>3c. Response: <i>(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2003 Air Quality Management Plan, URBEMIS 2007 Model, EMFAC 2007 Model)</i></p> <p>Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NO_x and ROG, both ozone precursors, PM-10, PM-2.5, and CO. Although long-term emissions are expected to decrease by 2025, all criteria pollutants remain above the SCAQMD thresholds.</p> <p>The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM-10 and PM-2.5 under State standards, and as a non-attainment area for ozone, carbon monoxide, PM-10, and PM-2.5 under Federal standards.</p> <p>Because the proposed project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. As a result, the proposed project does not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, cumulative air quality emissions impacts are less than significant.</p>				
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>3d. Response: <i>(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2003 Air Quality Management Plan, URBEMIS 2007 Model, EMFAC 2007 Model)</i></p> <p>Short-term impacts associated with construction from General Plan 2025 typical build out will result in increased air emissions from grading, earthmoving, and construction activities. Mitigation Measures of the General Plan 2025 FPEIR requires individual development to employ construction approaches that minimize pollutant emissions (General Plan 2025 FPEIR MM AIR 1- MM AIR 5, e.g., watering for dust control, tuning of equipment, limiting truck idling times). Additionally, the project will not result in the violation of any ambient air quality standard or contribute substantially to an existing or projected air quality violation because the project is proposed on a previously developed site and does not involve substantial grading or earthmoving activities and because the project consists of wireless telecommunications facility (monopalm). Therefore, the project will not expose sensitive receptors to substantial pollutant concentrations and a less than significant impact will occur directly, indirectly or cumulatively from this project.</p>				
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>3e. Response:</p> <p>The project would not expose a substantial number of people to objectionable odors because no odors are anticipated to be generated by the proposed wireless telecommunication facility. Therefore, no impact to creating objectionable odors will occur directly, indirectly or cumulatively.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4a. Response: <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and</i></p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area)</i></p> <p>The project site is located on a previously developed/improved site within an urbanized area and a search of the MSHCP database and other appropriate databases identified no potential for candidate, sensitive or special status species, suitable habitat for such species on site, Federal Species of Concern, California Species of Special Concern, and California Species Animal or Plants on lists 1-4 of the California Native Plant Society (CNPS) Inventory. Therefore, the project will have no impact directly, indirectly and cumulatively on habitat modifications, species identified as a candidate, sensitive, or special status species in local or regional plans, and policies or regulations of the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4b. Response: (Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)</p> <p>The project is located on a previously developed/improved site within an urbanized area where no riparian habitat or other sensitive natural community exists on site or within proximity to the project site. Therefore, the project will have no impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service directly, indirectly and cumulatively.</p>				
<p>c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer)</p> <p>The project is located within in an urbanized area where no federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on site or within proximity to the project site. The project site does not contain any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include USACOE jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly and cumulatively.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4d. Response: (Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage)</p> <p>The project is within in an urbanized area and will not result in a barrier to 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. Therefore, the project will have no impact to wildlife movement directly, indirectly and cumulatively.</p>				
<p>e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual)</p> <p>The construction of the wireless telecommunications facility (monopalm) is subject to MSHCP mitigation fees, City of</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Riverside landscaping design standards and all applicable regional, State and Federal conservation, endangered and threatened species mitigation fees. In addition, the General Plan 2025 includes policies to ensure that future development would not conflict with any local policies or ordinances protecting biological resources, including tree preservation policies. This project has been reviewed against these policies and found to be in compliance with the policies. For these reasons, the project will have no impact directly, indirectly and cumulatively local policies or ordinances protecting biological resources.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4f. Response: <i>(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens’ Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)</i></p> <p>The project site is located on a previously developed/improved site within an urbanized area and will not impact an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly and cumulatively. Therefore, the project will have no impact on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.</p>				
<p>5. CULTURAL RESOURCES.</p> <p>Would the project:</p>				
<p>a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>5a. Response: <i>(Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code, Cultural Resources Records Survey, prepared by Michael Brandman Associates, dated January 19, 2012)</i></p> <p>Pursuant to the findings of the Cultural Resources Records Survey, prepared by Michael Brandman Associates, no prehistoric, archaeological resources or historic properties lie within the project area. The proposed wireless telecommunications facility (monopalm) would be located on a property developed with a church for many years. Therefore, no historic resources as defined in Section 15064.5 of the CEQA Guidelines exist on the site. Thus, less than significant directly, indirectly and cumulatively to historical resources are expected. Additionally, a condition of approval will be required for construction activities to be halted and a qualified archaeologist to be hired should cultural, historical or archaeological items be found during grading and construction activity. If human remains are found during the grading, the Native American Graves Protection Act Guidelines and State law require that construction personnel halt work in the immediate area; leave the remains in place; contact the City Manager, the City Historic Preservation Officer, and the Riverside County Coroner.</p>				
<p>b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>5b. Response: <i>(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D – Cultural Resources Study, Cultural Resources Records Survey, prepared by Michael Brandman Associates, dated January 19, 2012)</i></p> <p>Pursuant to the findings of the Cultural Resources Records Survey, prepared by Michael Brandman Associates, no prehistoric, archaeological resources or historic properties lie within the project area. The proposed wireless telecommunications facility (monopalm) would be located on a property developed with a church for many years. Therefore, no historic resources as defined in Section 15064.5 of the CEQA Guidelines exist on the site. Thus, less than significant directly, indirectly and cumulatively to historical resources are expected. Additionally, a condition of approval will be required for construction activities to be halted and a qualified archaeologist to be hired should cultural, historical or archaeological items be found during grading and construction activity. If human remains are found during the grading, the Native American Graves Protection Act Guidelines and State law require that construction personnel halt work in the immediate area; leave the remains in place; contact the City Manager, the City Historic Preservation Officer, and the Riverside County Coroner.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>5c. Response: (Source: General Plan 2025 Policy HP-1.3, Cultural Resources Records Survey, prepared by Michael Brandman Associates, dated January 19, 2012)</p> <p>Pursuant to the findings of the Cultural Resources Records Survey, prepared by Michael Brandman Associates, no prehistoric, archaeological resources or historic properties lie within the project area. The proposed wireless telecommunications facility (monopalm) would be located on a property developed with a church for many years. Therefore, no historic resources as defined in Section 15064.5 of the CEQA Guidelines exist on the site. Thus, less than significant directly, indirectly and cumulatively to historical resources are expected. Additionally, a condition of approval will be required for construction activities to be halted and a qualified archaeologist to be hired should cultural, historical or archaeological items be found during grading and construction activity. If human remains are found during the grading, the Native American Graves Protection Act Guidelines and State law require that construction personnel halt work in the immediate area; leave the remains in place; contact the City Manager, the City Historic Preservation Officer, and the Riverside County Coroner.</p>				
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>5d. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Cultural Resources Records Survey, prepared by Michael Brandman Associates, dated January 19, 2012)</p> <p>Pursuant to the findings of the Cultural Resources Records Survey, prepared by Michael Brandman Associates, no prehistoric, archaeological resources or historic properties lie within the project area. The proposed wireless telecommunications facility (monopalm) would be located on a property developed with a church for many years. Therefore, no historic resources as defined in Section 15064.5 of the CEQA Guidelines exist on the site. Thus, less than significant directly, indirectly and cumulatively to historical resources are expected. Additionally, a condition of approval will be required for construction activities to be halted and a qualified archaeologist to be hired should cultural, historical or archaeological items be found during grading and construction activity. If human remains are found during the grading, the Native American Graves Protection Act Guidelines and State law require that construction personnel halt work in the immediate area; leave the remains in place; contact the City Manager, the City Historic Preservation Officer, and the Riverside County Coroner.</p>				
6. GEOLOGY AND SOILS.				
Would the project:				
a. Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>6i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report)</p> <p>Seismic activity is to be expected in Southern California. In the City of Riverside, there are no Alquist-Priolo zones. The project site does not contain any known fault lines and the potential for fault rupture or seismic shaking is low. Compliance with the California Building Code regulations will ensure a less than significant impact related to strong seismic ground will occur directly, indirectly and cumulatively.</p>				
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>6ii. Response: (Source: General Plan 2025 FPEIR Appendix E – Geotechnical Report)</p> <p>The San Jacinto Fault Zone located in the northeastern portion of the City, or the Elsinore Fault Zone, located in the southern</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>portion of the City's Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause intense ground shaking. Because the proposed project will be required to comply with California Building Code regulations, impacts associated with strong seismic ground shaking will have a less than significant impact directly, indirectly and cumulatively.</p>				
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>6iii. Response: <i>(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report)</i></p> <p>The project site is located in an area with moderate potential for liquefaction as depicted in the General Plan 2025 Liquefaction Zones Map - Figure PS-2. Compliance with the California Building Code regulations will ensure that impacts related to seismic-related ground failure, including liquefaction, would have a less than significant impact directly, indirectly and cumulatively.</p>				
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>6iv. Response: <i>(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code)</i></p> <p>The project site and its surroundings have generally flat topography and are not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 Program Final PEIR. Therefore, there will be no impact related to landslides directly, indirectly and cumulatively.</p>				
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>6b. Response: <i>(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code)</i></p> <p>The project does not involve substantial development, grading activities, or structures that would result in soil erosion or the loss of topsoil. As such, the project will have no impact resulting in substantial soil erosion or loss of topsoil directly, indirectly or cumulatively.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>6c. Response: <i>(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report)</i></p> <p>The project is not located on a geologic unit or soil that is unstable and will not cause soil to become unstable, as the project does not involve substantial development, grading activities, or structures. As such, the project will have no impact resulting in a geologic unit or soil becoming unstable resulting in an in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse either directly, indirectly or cumulatively.</p>				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>6d. Response: <i>(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)</i></p> <p>Expansive soil is defined under <i>California Building Code</i>. The soil type of the subject site is Buren (See Figure 5.6-4 – Soils of the General Plan 2025 Program Final PEIR. Compliance with the applicable provisions of the City's Subdivision Code – Title 18 and the California Building Code with regard to soil hazards related to the expansive soils will be reduced to a less than significant impact level for this project directly, indirectly and cumulatively.</p>				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>6e. Response: <i>(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)</i></p> <p>The proposed project does not need to dispose waste water as it consists of the installation of a wireless telecommunications facility (monopalm). Therefore, the project will have no impact.</p>				
<p>7. GREENHOUSE GAS EMISSIONS.</p> <p>Would the project:</p>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>7a. Response:</p> <p>The proposed project will not result in a net increase in GhG emissions as it consists of a wireless telecommunications facility (monopalm) and no emissions would result from this proposal. The project will also comply with the City’s General Plan policies and statewide Building Code requirements designed to reduce GhG emissions. Since the project will not result in a net increase in GhG emissions, it will not interfere with the State’s goals of reducing greenhouse gas emissions to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GhG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Therefore, this project will have no impact with respect to GhG emissions.</p>				
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7b. Response:</p> <p>The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim Greenhouse Gas (GhG) threshold. As indicated in Question A, above, the project would comply with the City’s General Plan policies and State Building Code provisions designed to reduce GhG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction of the wireless telecommunications facility (monopalm) and, as demonstrated in the Climate Change Analysis, will not interfere with the State’s goals of reducing GhG emissions to 1990 levels by the year 2020 as stated in the AB 32 and an 80 percent reduction in GhG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Based upon the prepared Climate Change Analysis for this project and the discussion above, the project will not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GhG and thus a less than significant impact will occur directly, indirectly and cumulatively in this regard.</p>				
<p>8. HAZARDS & HAZARDOUS MATERIALS.</p> <p>Would the project:</p>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8a. Response: <i>(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM’s Strategic Plan)</i></p> <p>The proposed project does not involve the transport, use, or disposal of any hazardous materials because the project is a wireless telecommunications facility (monopalm). As such, the project will have no impact related to the transport, use or disposal of any hazardous materials either direct, indirectly, or cumulatively.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>8b. Response: <i>(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM’s</i></p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Strategic Plan</i></p> <p>As the proposed project consists of a wireless telecommunications facility (monopalm), the applicant provided a Radio Frequency Emission analysis prepared by a professional. The analysis certified that the proposed project will not at any time exceed current FCC adopted standards for human exposure to RF (Radio Frequency Radiation Exposure Standards) fields. Compliance with all applicable Federal, State and local laws related to the transportation, use and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use and storage to a less that significant impact directly, indirectly and cumulatively.</p>				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8c. Response: <i>(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)</i></p> <p>The proposed project is located approximately 0.1 miles from the nearest school (Central Middle School). The project does not involve emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste. However, as the proposed project is a wireless telecommunications facility, the applicant provided a Radio Frequency Emission analysis prepared by a professional. The analysis certified that the proposed project will not at any time exceed current FCC adopted standards for human exposure to RF (Radio Frequency Radiation Exposure Standards) fields. Therefore, no impacts would result from this project.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8d. Response: <i>(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)</i></p> <p>A review of hazardous materials site lists compiled pursuant to Government Code Section 65962.5 found that the project site is not included on any such lists. Therefore, the project would have no impact to creating any significant hazard to the public or environment directly, indirectly or cumulatively.</p>				
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8e. Response: <i>(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005))</i></p> <p>The project site is not located within any airport land use plan area or compatibility zone. Therefore, the project will have no impact resulting in a safety hazard for people residing or working in the project area directly, indirectly or cumulatively.</p>				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8f. Response: <i>(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999) and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005))</i></p> <p>Because the proposed project is not located within proximity of a private airstrip, and does not propose a private airstrip, the project will not expose people residing or working in the City to excessive noise levels related to a private airstrip and would have no impact directly, indirectly or cumulatively.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8g. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM’s Strategic Plan)</p> <p>The project will result in minimal physical alterations to the project site and as such will not impair implementation or physically interfere with an adopted emergency plan. Therefore, no impact, either directly, indirectly or cumulatively to an emergency response or evacuation plan will occur.</p>				
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>8h. Response: (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, City of Riverside’s EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan)</p> <p>The proposed project is located in an urbanized area where no wildlands exist and the property is not located within a Very High Fire Severity Zones (VHFSZ) or adjacent to wildland areas or a VHFSZ; therefore no impact regarding wildland fires either directly, indirectly or cumulatively from this project will occur.</p>				
9. HYDROLOGY AND WATER QUALITY.				
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9a. Response: (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water)</p> <p>The proposed project is located within the Santa Ana River Watershed (see GP 2025 FPEIR Figure 5.8-1). The project will result in minimal physical alterations to the project site (i.e. grading, ground disturbance, structures or paving) and does not involve any use that would have any effect on water quality or be affected by water quality standards or waste discharge requirements because the project involves construction of a wireless telecommunications facility (monopalm). Therefore, the project will have no impact directly, indirectly or cumulatively to any water quality standards or waste discharge.</p>				
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan, WMWD Urban Water Management Plan)</p> <p>The proposed project is located within the Riverside South Supply Basin. The project will not directly or indirectly deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level as no physical alterations to the project site (i.e. grading, ground disturbance, structures or paving) are proposed because the project involves construction of a wireless telecommunications facility (monopalm). Therefore, the project will have no impact directly, indirectly or cumulatively to groundwater supplies.</p>				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9c. Response: (Source:)				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The project will result in minimal physical alterations to the project site (i.e. through grading, ground disturbance, structures or paving) and would not significantly alter the existing drainage patterns of the site because the project consists of construction of a wireless telecommunications facility (monopalm) within a lease area on a site currently developed with a church. Therefore, no erosion or siltation on- or off-site will occur. Therefore, the project will have no impact directly, indirectly or cumulatively to existing drainage patterns.</p>				
<p>d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9d. Response: (Source:) The project will result in minimal activity or physical alteration of the site or surrounding area, (i.e. through grading, ground disturbance, structures or additional paving) and would not significantly alter the existing drainage pattern of the site, alter of the course of stream or river, or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site because the project consists of construction of a wireless telecommunications facility (monopalm). Therefore, no flooding on or off-site as a result of the project will occur and there will be no impact directly, indirectly or cumulatively that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.</p>				
<p>e. 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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9e. Response: (Source:) The project will result in minimal physical alteration of the site or surrounding area, (i.e. through grading, ground disturbance, structures or additional paving) and would not significantly create or contribute runoff water which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff because the project consists of construction of a wireless telecommunications facility (monopalm). Therefore, the project will not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and there will be no impact directly, indirectly or cumulatively.</p>				
<p>f. Otherwise substantially degrade water quality?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9f. Response: The project will result in minimal physical alteration of the site or surrounding area, (i.e. through grading, ground disturbance, structures or additional paving) and would not significantly create or contribute runoff water which would substantially degrade water quality because the project consists of construction of a wireless telecommunications facility (monopalm). Therefore, the project will not degrade water quality and there will be no impact directly, indirectly or cumulatively.</p>				
<p>g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9g. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps) A review of National Flood Insurance Rate Map (Map Number 06065C0715G Effective Date August 28, 2008) and Figure 5.8-2 -- Flood Hazard Areas of the General Plan Program FPEIR, shows that the project is not located within or near a 100-year flood hazard area and the project does not involve the construction of housing. There will be no impact caused by this project directly, indirectly or cumulatively as it will not place housing within a 100-year flood hazard area.</p>				
<p>h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9h. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps) The project site is not located within or near a 100-year flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 060065C0710G Effective Date August 28, 2008). Therefore, the project will not place a structure within a 100-year flood hazard area that would</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
impede or redirect flood flows and no impact will occur directly, indirectly or cumulatively.				
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9i. Response: <i>(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps)</i> The project site is not located within or near a flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 060065C0710G Effective Date August 28, 2008) or subject to dam inundation as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas. Therefore, the project will not place a structure within a flood hazard or dam inundation area that would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam and therefore no impact directly, indirectly or cumulatively will occur.				
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9j. Response: <i>(Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)</i> Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis will occur directly, indirectly or cumulatively. Additionally, the proposed project site and its surroundings have generally flat topography and are within an urbanized area, not within proximity to Lake Mathews, Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain Area or any of the 9 arroyos which transverse the City and its sphere of influence.				
10. LAND USE AND PLANNING:				
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10a. Response: <i>(Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers)</i> The proposal to construct a wireless telecommunications facility (monopalm) on a site currently developed with a church will not divide an established community. The project is an infill project currently served by fully improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or affect an established community. Further, the project as conditioned will be consistent with the General Plan 2025, the Zoning Code, and the Citywide Design and Sign Guidelines. Therefore, no impact directly, indirectly or cumulatively to an established community will occur.				
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10b. Response: <i>(Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines)</i> Although the project is located within the boundaries of the MSHCP it has been designed to be consistent with the plan. As well, with the recommended conditions of approval, the project is consistent with the General Plan 2025 and it is not a project of Statewide, Regional or Areawide Significance. Further, this proposal is in compliance with a majority of the development standards set forth in the Zoning Code for Wireless Telecommunications Facilities. Application of these standards would ensure that the project would not have a detrimental impact on adjacent land uses. Through review of the CUP, specific variances would also be considered. In the judgment of the Planning Division, the potential environmental impacts of any variance should be considered less than significant, given that a process for the consideration of variances is specified in the City’s Municipal Code. Based on the above-referenced information, the proposed Conditional Use Permit to allow a wireless communication facility would not result in significant adverse environmental impacts. Thus, less than significant impacts will result from this project.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10c. Response: <i>(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens’ Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)</i> See Response 4f above.				
11. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11a. Response: <i>(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)</i> The project does not involve extraction of mineral resources or grading activity. No mineral resources have been identified on the project site and there is no historical use of the site or surrounding area for mineral extraction purposes. The project site is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the General Plan 2025, specific plan or other land use plan. Therefore, the project will have no impact on mineral resources directly, indirectly or cumulatively.				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11b. Response: <i>(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)</i> The GP 2025 FPEIR determined that there are no specific areas within the City or Sphere Area which have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The proposed project is consistent with the General Plan 2025. Therefore, there is no impact .				
12. NOISE.				
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12a. Response: <i>(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code)</i> The proposed project does not involve uses or activities that would increase ambient noise levels as the project involves construction of a wireless telecommunications facility (monopalm). Therefore, the project will have no impact on the exposure of persons to or the generation of noise levels in excess of established City standards either directly, indirectly or cumulatively.				
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12b. Response: <i>(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G)</i>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p style="text-align: center;"><i>– Noise Existing Conditions Report</i></p> <p>The proposed project does not involve uses or activities that would result in any exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. However, short term construction activities may result in incremental increases in groundborne vibration and noise in the immediate area. Therefore, the project will have a less than significant impact on the exposure of persons to or the generation of excessive groundborne vibration or groundborne noise levels either directly, indirectly or cumulatively.</p>				
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>12c. Response: <i>(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code)</i></p> <p>The proposed project does not involve uses or activities that would result in a substantial permanent increase ambient noise levels in the project vicinity above levels existing without the project because the project consists of construction of a wireless telecommunications facility (monopalm). Therefore, this project will have no impact on existing noise levels directly, indirectly or cumulatively.</p>				
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>12d. Response: <i>(Source: FPEIR Table 5.11-J – Construction Equipment Noise Levels, Appendix G – Noise Existing Conditions Report)</i></p> <p>The primary source of temporary or periodic noise associated with the proposed project is from construction activity and maintenance work. Both the General Plan 2025 and the Municipal Code Title 7 (Noise Code) limit construction activities to specific times and days of the week and during those specified times, construction activity is subject to the noise standards provided in Title 7 of the City’s Municipal Code. Considering the short-term nature of construction and the provisions of the Noise Code, the temporary and periodic increase in noise levels due the construction which may result from the project are considered less than significant directly, indirectly and cumulatively.</p>				
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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>12e. Response: <i>(Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUCP, March Air Reserve Base/March inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005))</i></p> <p>The proposed project is not located within an airport land use plan or within two miles of a public airport or public use airport and as such will have no impact on people residing or working in the project area to excessive noise levels either directly, indirectly or cumulatively.</p>				
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>12f. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999) and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005))</p> <p>Per the GP 2025 Program FPEIR, there are no private airstrips within the City that would expose people working or residing in the City to excessive noise levels. Because the proposed project is not located within proximity of a private airstrip, and does not propose a private airstrip, the project will not expose people residing or working in the City to excessive noise levels related to a private airstrip and would have no impact directly, indirectly or cumulatively.</p>				
13. POPULATION AND HOUSING.				
Would the project:				
a. Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>13a. Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections–2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG’s RCP and RTP)</p> <p>The project is in an urbanized area and does not propose new homes or businesses that would directly induce substantial population growth, and does not involve the addition of new roads or infrastructure that would indirectly induce substantial population growth because the project consists of the construction of a wireless telecommunications facility (monopalm). Therefore, this project will have no impact on population growth either directly or indirectly.</p>				
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>13b. Response: (Source: CADME Land Use 2003 Layer)</p> <p>The project will not displace existing housing, necessitating the construction of replacement housing elsewhere because the project site is proposed on a previously improved commercial site that has no existing housing that will be removed or affected by the proposed project. Therefore, there will be no impact on existing housing either directly, indirectly or cumulatively.</p>				
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>13c. Response: (Source: CADME Land Use 2003 Layer)</p> <p>The project will not displace any people, necessitating the construction of replacement housing elsewhere because the project site is proposed on a previously improved site that has no existing housing or residents that will be removed or affected by the proposed project. Therefore, this project will have no impact on people, necessitating the need for replacement housing either directly, indirectly or cumulatively.</p>				
14. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)</p> <p>Adequate fire facilities and services are provided by Station 1 located at 3420 Mission Inn Avenue serve this project.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Therefore, this project will not result in the intensification of land use and there will be no impact on the demand for additional fire facilities or services either directly, indirectly or cumulatively.				
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14b. Response: <i>(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)</i></p> <p>Adequate police facilities and services are provided by the North Neighborhood Policing Center to serve this project. Therefore, this project will not result in the intensification of land use and there will be no impact on the demand for additional police facilities or services either directly, indirectly or cumulatively.</p>				
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14c. Response: <i>(Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-3 – AUSD Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Student Generation for RUSD and AUSD By Education Level, and Figure 5.13-4 – Other School District Boundaries)</i></p> <p>The project is a non-residential use that will not involve the addition of any housing units that would increase numbers of school age children. Therefore, there will be no impact on the demand for additional school facilities or services either directly, indirectly or cumulatively.</p>				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14d. Response: <i>(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)</i></p> <p>The project is a non-residential use that will not involve the addition of any housing units that would increase the population. Therefore, there will be no impact on the demand for additional park facilities or services either directly, indirectly or cumulatively.</p>				
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14e. Response: <i>(Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)</i></p> <p>Adequate public facilities and services, including libraries and community centers, are provided in the Downtown Neighborhood to serve this project. As the proposal consists of the installation of a wireless telecommunication facility, there will be no impacts on the demand for additional public facilities or services either directly, indirectly or cumulatively.</p>				
15. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>15a. Response: <i>(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)</i></p> <p>The project will not result in an intensification of land use and therefore, there will be no impact on the demand for additional recreational facilities either directly, indirectly or cumulatively.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>15b. Response:</p> <p>The project will not include new recreational facilities or require the construction or expansion of recreational facilities; therefore, there will be no impact directly, indirectly or cumulatively.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. TRANSPORTATION/TRAFFIC. Would the project result in:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG’s RTP)</p> <p>The project site is located on a previously developed/improved site where no increase in intensity of use resulting in any measureable increase in traffic would occur and therefore no impact directly, indirectly or cumulatively to the capacity of the existing circulation system will occur.</p>				
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG’s RTP)</p> <p>The project site does not include a state highway or principal arterial within Riverside County’s Congestion Management Program (CMP) and the project is consistent with the Transportation Demand Management/Air Quality components of the Program; therefore, there is no impact either directly, indirectly or cumulatively to the CMP.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16c. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999)and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)</p> <p>The project will not change air traffic patterns, increase air traffic levels or change the location of air traffic patterns. It is not located within an airport influence area. As such, this project will have no impact directly, indirectly or cumulatively on air traffic patterns.</p>				
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16d. Response: (Source: Project Site Plans, Lane Striping and Signing Plans)</p> <p>The project is located on a site that is currently developed, with all site improvements in place, and where minimal site modifications will occur. The on site improvements are very minor and would not result in hazards due to design features such as driveways, intersection improvements, etc.). In addition, the proposed use is compatible with other uses on the site.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
As such, the project will have no impact on increasing hazards through design or incompatible uses either directly, indirectly or cumulatively.				
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16e. Response: <i>(Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code)</i></p> <p>The project is located on a site that is currently developed, with all site improvements in place, and where no site modifications are proposed that would affect emergency access; therefore there will be no impact directly, indirectly or cumulatively to emergency access.</p>				
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16f. Response: <i>(Source: FPEIR, General Plan 2025 Land Use and Urban Design, Circulation and Community Mobility and Education Elements, Bicycle Master Plan, School Safety Program – Walk Safe! – Drive Safe!)</i></p> <p>The project is located on a site that is currently developed, with all site improvements in place, and where no site modifications will occur that would result in conflicts with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks). As such, the project will have no impact directly, indirectly or cumulatively on adopted policies, plans, or programs supporting alternative transportation.</p>				
17. UTILITIES AND SYSTEM SERVICES.				
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>17a. Response: <i>(Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)</i></p> <p>The project will not exceed wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). The project is located on a site that is currently developed, with all site improvements in place, and where minimal site modifications are proposed that would affect wastewater treatment; therefore there will be no impact directly, indirectly or cumulatively to wastewater treatment.</p>				
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>17b. Response: <i>(Source: General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR.)</i></p> <p>The project will not result in the construction of new or expanded water or wastewater treatment facilities. The project is consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). Therefore, the project will have no impact resulting in the construction of new water or wastewater treatment facilities or the expansion of existing facilities directly, indirectly or cumulatively.</p>				
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>17c. Response: <i>(Source: FPEIR Figure 5.16-2 - Drainage Facilities)</i></p> <p>The project is located on a previously developed/improved site within an urbanized area where no increase in impervious surfaces will occur that would require or result in the construction of new storm water drainage facilities or expansion of</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
existing facilities. Therefore, the project will have no impact resulting in the construction of new storm water drainage facilities or the expansion of existing facilities directly, indirectly or cumulatively.				
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17d. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, RPU Master Plan, and Highgrove Water District Master Plan)				
The project will not exceed expected water supplies. The project is consistent with the General Plan 2025 Typical Growth Scenario where future water supplies were determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I and 5.16-J of the General Plan 2025 Final PEIR). Therefore, the project will have no impact resulting in the insufficient water supplies either directly, indirectly or cumulatively.				
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17e. Response: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, Wastewater Integrated Master Plan and Certified EIR)				
The project will not exceed wastewater treatment requirements of (Regional Water Quality Control Board). The project is consistent with the General Plan 2025 Typical Growth Scenario where future wastewater generation was determined to be adequate (see Table 5.16-K of the General Plan 2025 Final PEIR). Further, the current Wastewater Treatment Master Plan anticipates and provides for this type of project. Therefore, no impact to wastewater treatment directly, indirectly or cumulatively will occur.				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17f. Response: (Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)				
The project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR). Therefore, no impact to landfill capacity will occur directly, indirectly or cumulatively.				
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17g. Response: (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)				
The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. The City is currently achieving a 60% diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50% of non-hazardous construction and demolition debris for all projects and 100% of excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed project must comply with the City’s waste disposal requirements as well as the California Green Building Code and as such would not conflict with any Federal, State, or local regulations related to solid waste. Therefore, no impacts related to solid waste statues will occur directly, indirectly or cumulatively.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18a. Response: <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code)</i>				
Potential impacts related to habitat of fish or wildlife species were discussed in the Biological Resources Section of this Initial Study, and were all found to be less than significant. Additionally, potential impacts to cultural, archaeological and paleontological resources related to major periods of California and the City of Riverside’s history or prehistory were discussed in the Cultural Resources Section of this Initial Study, and were found to be less than significant .				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18b. Response: <i>(Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)</i>				
Because the project is consistent with the General Plan 2025, no new cumulative impacts are anticipated and therefore cumulative impacts of the proposed project beyond those previously considered in the GP 2025 FPEIR are less than significant .				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18c. Response: <i>(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)</i>				
Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology & water quality, noise, population and housing, hazards and hazardous materials, and traffic sections of this initial study and found to be less than significant for each of the above sections. Based on the analysis and conclusions in this initial study, the project will not cause substantial adverse effects, directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed project are less than significant .				

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