1. **Case Number:** P15-0133 (Conditional Use Permit), P16-0105 (Variance)

2. **Project Title:** Agave Wireless Telecommunications Facility

3. **Hearing Date:** April 07, 2016

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

5. **Contact Person:** Brian Norton, Senior Planner
   Phone Number: (951) 826-2308

6. **Project Location:** 2951 Jackson Street, situated on the northeasterly corner of the intersection of Lincoln Avenue and Jackson Street, in the R-1-7000 – Single Family Residential Zone

7. **Project Applicant/Project Sponsor’s Name and Address:**
   - **Property Owner:** Riverside Unified School District
     3380 14th Street
     Riverside, CA 92501
   - **Applicant:** VZW, dba Verizon Wireless
     15505 Sand Canyon Ave, BLDG. D, 1st Fl.
     Irvine, CA 92618
   - **Engineer:** Cortel, LLC
     Andrea Urbas
     1554 Barton Road #355
     Redlands, CA 92373

8. **General Plan Designation:** PF – Public Facilities

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

10. **Description of Project:**

    The applicant is requesting a Conditional Use Permit (CUP) and Variance (VR) to permit the construction of a 68-foot high, co-locatable, wireless telecommunications facility camouflaged as a eucalyptus tree and related 190 square foot equipment enclosure. The proposed lease area is generally situated towards the southerly portion of the property, approximately 58 feet from Lincoln Avenue, 538 feet from Jackson Street and approximately 151 feet, northerly of the closest single family residential. The facility, including all related ground mounted equipment, will be located on-site at grade level.

    The telecommunications structure will consist of two antenna arrays installed at centerline heights of 60 feet and 49 feet above ground level. Antennas will be attached to three separate sectors, each sector will be able to hold up to four antennas. The pole of the telecommunications facility will consist of a faux bark...
finish to resemble the texture and color of a eucalyptus tree trunk. Faux branches and leaves are proposed to extend beyond the antenna arrays for camouflage purposes. All mounted equipment will be painted to match the proposed eucalyptus tree. The 190 square foot equipment enclosure will be constructed within an existing 940 square foot enclosure and will accommodate radio and equipment cabinets.

As part of the project, antennas and mounted equipment on the existing 68 foot tall telecommunications structure, disguised as a palm tree (Crown Castle), will be relocated to the new telecommunications structure (monoeucalyptus). The existing structure (monopalm) will be decommissioned and removed from the site.

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

The project site is approximately 38.70 acres, and is developed with classrooms and athletic fields for Arlington High School.

<table>
<thead>
<tr>
<th>Project Site</th>
<th>Existing Land Use</th>
<th>General Plan Designation</th>
<th>Zoning Designation</th>
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</thead>
<tbody>
<tr>
<td>North</td>
<td>Railroad</td>
<td>RWY - Railroad</td>
<td>RWY - Railroad</td>
</tr>
<tr>
<td>East</td>
<td>Single Family Residential</td>
<td>MDR – Medium Density Residential</td>
<td>R-1-7000 – Single Family Residential</td>
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<tr>
<td>South</td>
<td>Single Family Residential</td>
<td>MDR – Medium Density Residential</td>
<td>R-1-7000 – Single Family Residential</td>
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<td>West</td>
<td>Single Family Residential</td>
<td>MDR – Medium Density Residential</td>
<td>R-1-7000 – Single Family Residential</td>
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</table>

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

Riverside Unified School District

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

a. General Plan 2025
b. GP 2025 FPEIR

14. Acronyms

AICUZ - Air Installation Compatible Use Zone Study
AQMP - Air Quality Management Plan
AUSD - Alvord Unified School District
CEQA - California Environmental Quality Act
CMP - Congestion Management Plan
EIR - Environmental Impact Report
EMWD - Eastern Municipal Water District
EOP - Emergency Operations Plan
FEMA - Federal Emergency Management Agency
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>FPEIR</td>
<td>GP 2025 Final Programmatic Environmental Impact Report</td>
</tr>
<tr>
<td>GIS</td>
<td>Geographic Information System</td>
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<td>GhG</td>
<td>Green House Gas</td>
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<td>GP 2025</td>
<td>General Plan 2025</td>
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<td>IS</td>
<td>Initial Study</td>
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<td>LHMP</td>
<td>Local Hazard Mitigation Plan</td>
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<td>MARB/MIP</td>
<td>March Air Reserve Base/March Inland Port</td>
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<td>MJPA-JLUS</td>
<td>March Joint Powers Authority - Joint Land Use Study</td>
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<tr>
<td>MSHCP</td>
<td>Multiple-Species Habitat Conservation Plan</td>
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<tr>
<td>MVUSD</td>
<td>Moreno Valley Unified School District</td>
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<tr>
<td>NCCP</td>
<td>Natural Communities Conservation Plan</td>
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<td>OEM</td>
<td>Office of Emergency Services</td>
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<td>OPR</td>
<td>Office of Planning &amp; Research, State</td>
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<tr>
<td>PEIR</td>
<td>Program Environmental Impact Report</td>
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<td>PW</td>
<td>Public Works, Riverside</td>
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<td>RCALUC</td>
<td>Riverside County Airport Land Use Commission</td>
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<td>RCALUCP</td>
<td>Riverside County Airport Land Use Compatibility Plan</td>
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<td>RCP</td>
<td>Regional Comprehensive Plan</td>
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<td>RCTC</td>
<td>Riverside County Transportation Commission</td>
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<td>RMC</td>
<td>Riverside Municipal Code</td>
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<td>RPD</td>
<td>Riverside Police Department</td>
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<td>Riverside Public Utilities</td>
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<td>Regional Transportation Improvement Plan</td>
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<td>RUSD</td>
<td>Riverside Unified School District</td>
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<td>SCAG</td>
<td>Southern California Association of Governments</td>
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<td>SCAQMD</td>
<td>South Coast Air Quality Management District</td>
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<td>SCH</td>
<td>State Clearinghouse</td>
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<td>SKR-HCP</td>
<td>Stephens' Kangaroo Rat - Habitat Conservation Plan</td>
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<td>SWPPP</td>
<td>Storm Water Pollution Prevention Plan</td>
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<td>USGS</td>
<td>United States Geologic Survey</td>
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<td>WMWD</td>
<td>Western Municipal Water District</td>
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<td>WQMP</td>
<td>Water Quality Management Plan</td>
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</tbody>
</table>
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 “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature ___________________________________________ Date ________________
Printed Name & Title ____________________________________ For ___ City of Riverside
EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

   b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) The explanation of each issue should identify:

a. the significance criteria or threshold, if any, used to evaluate each question; and

b. the mitigation measure identified, if any, to reduce the impact to less than significance.
**ISSUES (AND SUPPORTING INFORMATION SOURCES):**

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
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<th>No Impact</th>
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1. **AESTHETICS.**

Would the Project:

| a. Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☒ | ☐ |

1a. **Response:** *(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)*

The proposed 68-foot high wireless telecommunications facility may have an effect on scenic views or scenic vistas. However, the applicant is proposing the telecommunications facility to be disguised as a eucalyptus tree (monoeucalyptus). The height of the monoeucalyptus is generally consistent with existing structures in the immediate area and the design of the monoeucalyptus will match and blend with existing mature trees in the immediate area. In addition, the applicant has reflected three live eucalyptus trees, in proximity of the telecommunications facility to further blend the facility in with its surroundings. Therefore, the project as conditioned will have a **less than significant impact** directly, indirectly and cumulatively on scenic vistas in the area.

1b. **Response:** *(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City’s Urban Forest Tree Policy Manual)*

There are no scenic highways within the City that could potentially be impacted. Further, there are no trees, rock outcroppings, and historic buildings which could be potentially impacted as a result of this project. 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.

1c. **Response:** *(Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)*

The proposed project consists of a telecommunications facility disguised as a eucalyptus tree. The design of the monoeucalyptus will match and blend with existing mature trees in the immediate area. In addition, the applicant has been conditioned to provide live trees planted within proximity of the telecommunications facility, to visually integrate the facility with its surroundings. Therefore, the project as proposed will not degrade the existing visual character of the area and will have a **less than significant impact** directly, indirectly or cumulatively to the visual character of the immediate vicinity.

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

No new lighting is proposed under this project. Therefore, no impact directly, indirectly or cumulatively will occur as a result of this project which will adversely affect day or nighttime views.
### ISSUES (AND SUPPORTING INFORMATION SOURCES):

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#### 2. AGRICULTURE AND FOREST RESOURCES:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the Project:

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

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2a. Response: *(Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability)*

The Project is identified as being in an urban and built up land area of the City in an existing development. Therefore, the Project will have **no impact** directly, indirectly or cumulatively on agricultural uses.

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

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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; therefore, the Project will have **no impact** directly, indirectly or cumulatively.

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))?

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2c. Response: *(Source: GIS Map – Forest Data)*

The subject site is zoned R-1-7000 – Single Family Residential and does not contain forest land. Further, 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.
### ISSUES (AND SUPPORTING INFORMATION SOURCES):  

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<tr>
<td>d. Result in the loss of forest land or conversion of forest land to non-forest use?</td>
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#### 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.

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

#### 2e. Response: *(Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, 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 in an existing development. Additionally, the site is identified as urban and 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. 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 conversion of forest land to non-forest use.

### 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? | ☐ | ☐ | ☐ | ☒ |

#### 3a. Response: *(Source: South Coast Air Quality Management District’s 2007 Air Quality Management Plan (AQMP))*  
The proposed wireless telecommunications facility 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. The General Plan 2025 contains policies to promote mixed use, pedestrian-friendly communities that serve to reduce air pollutant emissions over time and this Project is consistent with these policies. Because the proposed Project is consistent with the 2007 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.

| b. Violate any air quality standard or contribute substantially to an existing or Projected air quality violation? | ☐ | ☐ | ☒ | ☐ |

#### 3b. Response: *(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2007 AQMP, CaLEEMod Model)*  
An Air Quality Model was conducted using CaLEEMod. The results of the air quality model showed that the proposed project would generate emissions far lower than the SCAQMD thresholds for significance for air quality emissions and it was determined to be **less than significant** directly, indirectly and cumulatively to ambient air quality and will not contribute to an existing air quality violation.

| 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 quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | ☐ | ☐ | ☒ | ☐ |
### ISSUES (AND SUPPORTING INFORMATION SOURCES):

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</table>
| 3c. Response:  
(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2007 Air Quality Management Plan, CalEEMod Model)  
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.  
The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM-10 and PM-2.5 under State standards, and as a non-attainment area for ozone, carbon monoxide, PM-10, and PM-2.5 under Federal standards. Because the proposed Project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the Project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. As 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. Further per the response in 3B above, an air quality model conducted using CaLEEMod found the project emissions (short-term and long-term) to the SCAQMD daily thresholds and shows that established thresholds will not be exceeded. Therefore, cumulative air quality emissions impacts are less than significant.  
d. Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☑ | ☑ | ☑ |
| 3d. Response:  
(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2007 Air Quality Management Plan)  
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 (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. 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.  
e. Create objectionable odors affecting a substantial number of people? | ☐ | ☑ | ☑ | ☐ |
| 3e. Response:  
The Project will not expose a substantial number of people to objectionable odors because no odors are anticipated to be generated by the proposed use. Therefore, no impact to creating objectionable odors will occur directly, indirectly or cumulatively. |

### 4. BIOLOGICAL RESOURCES.

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

4a. Response:  
(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area)
### ISSUES (AND SUPPORTING INFORMATION SOURCES):

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The project site is located within an urban built-up area and is primarily surrounded by existing development. 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. Thus there is little chance that any Federally endangered, threatened, or rare species or their habitats could persist in this area. Therefore, no impact directly, indirectly and cumulatively will occur to federally endangered threatened, or rare species or their habitats.

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

| ☐ | ☐ | ☐ | ☒ |

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

The project is located on a fully developed site and is not identified as being within any MSHCP Criteria Cells or those that would affect riparian habitat or other sensitive natural community identified in local or regional plans. Therefore, the Project will have no impact directly, indirectly and cumulatively will occur related to any riparian habitat or other sensitive natural community with implementation of the proposed project.

**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?**

| ☐ | ☐ | ☐ | ☒ |

**4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer)**

The Project is located within 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 discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include USACOE jurisdictional drainages or wetlands. Therefore, the proposed Project will have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly and cumulatively.

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

| ☐ | ☐ | ☐ | ☒ |

**4d. Response: (Source: MSHCP, General Plan 2025 –Figure OS-7)**

The Project site is located within an urban built-up area and is not within an MSHCP linkage area. Further, no candidate, sensitive, species of concern, or special status species or suitable habitat for such species occurs on site and no additional surveys or mitigation measures are required. Therefore, there is little chance that the Project would interfere 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. Therefore, no impact directly, indirectly and cumulatively will occur related 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 will occur with implementation of the proposed Project.

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

| ☐ | ☐ | ☐ | ☒ |
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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)

Implementation of the proposed Project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the Project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.

Any Project within the City of Riverside’s boundaries that proposes planting a street tree within the City right-of-way must follow the Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. No trees under the applicant’s project are proposed to be planted or removed from the City right-of-way; therefore the project will have no impacts related to protecting biological resources.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens’ Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)

The proposed Project is not located with in an MSHCP Cell. The project consists of the construction of a wireless telecommunication facility on the subject site which is fully developed with a warehouse facility. Therefore, no impacts directly, indirectly and cumulatively related to the proposed project are expected.

5. CULTURAL RESOURCES.

Would the Project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?

5a. Response: (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code)

As required under State Law (AB52), notices were sent to Native American Tribes that requested notification of projects, on October 06, 2015. Two tribes, Agua Caliente Band of Cahuilla Indians and Morongo Band of Mission Indians both responded with no mitigation measures, as the project was outside their boundaries, but within their traditional use areas. Morongo Band of Mission Indians requested standard conditions be added. 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. Therefore, impacts to historical resources are less than significant directly, indirectly and cumulatively.

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

5b. Response: (Source: GP 2025 FPEIR Figure 5.5-I - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D – Cultural Resources Study)

The Project does not involve substantial development, grading activities, or structures that would result in impacts to historic resources as defined in Section 15064.5 of the CEQA Guidelines. 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
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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. Therefore, impacts to historical resources are **less than significant** directly, indirectly and cumulatively. In addition, the Federal Government requires new wireless telecommunications facilities to go through Section 106 review before proceeding to a construction phase. To adhere with AB52, notification was routed to tribes requesting consultation under the Assembly Bill. Two responses was received in relation to the project, see discussion in 5a above.

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

| ☐ | ☐ | ☒ | ☐ |

5c. **Response:** *(Source: General Plan 2025 Policy HP-1.3)*

The Project does not involve substantial development, grading activities, or structures that would result in impacts to historic resources as defined in Section 15064.5 of the CEQA Guidelines. However, 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. Therefore, impacts to historical resources are **less than significant** directly, indirectly and cumulatively.

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

| ☐ | ☐ | ☒ | ☐ |

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

The proposed wireless telecommunications facility (monoeucalyptus) is proposed to be constructed on a property that has been previously disturbed. 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. With implementation of the recommended condition of approval, **less than significant impacts** are expected.

### 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.

| ☐ | ☐ | ☐ | ☒ |

6i. **Response:** *(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report)*

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 faults and the potential for fault rupture or seismic shaking is low. Compliance with the California Building Code regulations will ensure that **no impacts** related to strong seismic ground will occur directly, indirectly and cumulatively.

ii. Strong seismic ground shaking?

| ☐ | ☐ | ☐ | ☒ |

6ii. **Response:** *(Source: General Plan 2025 FPEIR Appendix E – Geotechnical Report)*

The San Jacinto Fault Zone located in the northeastern portion of the City and the Elsinore Fault Zone, located in the southern portion of the City’s Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause intense
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- **iii. Seismic-related ground failure, including liquefaction?**
  - **6iii. Response:** *(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report)*
  
The project site is located in an area with low potential for liquefaction as depicted in the General Plan 2025 Liquefaction Zones Map – Figure PS-2. 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.

- **iv. Landslides?**
  - **6iv. Response:** *(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)*
  
The Project site and its surroundings feature 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.

- **b. Result in substantial soil erosion or the loss of topsoil?**
  - **6b. Response:** *(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code)*
  
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.

- **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?**
  - **6c. Response:** *(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report)*
  
The Project is not located on a geologic unit or soil (Arlington 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 less than significant impacts 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.

- **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?**
  - **6d. Response:** *(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)*
  
Expansive soil is defined under California Building Code. The soil type of the subject site is defined as Arlington (See Figure 5.64 – Soils of the General Plan 2025 Program Final PEIR,) which is known to have a low-moderate shrink-swell potential. Compliance with the recommendations of the soils report and 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.

- **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?**
  - **6e. Response:** *(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)*
  
Expansive soil is defined under California Building Code. The soil type of the subject site is defined as Arlington (See Figure 5.64 – Soils of the General Plan 2025 Program Final PEIR,) which is known to have a low-moderate shrink-swell potential. Compliance with the recommendations of the soils report and 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.
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<tr>
<td>6e. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)</td>
<td>The proposed Project will be served by sewer infrastructure. Therefore, the Project will have no impact.</td>
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7. GREENHOUSE GAS EMISSIONS.
Would the Project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?  
   - No

7a. Response:
The proposed Project involves the construction of a wireless telecommunications facility. The Project is consistent with the City’s General Plan 2025 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. Projects that are consistent with the Projections of employment and population forecasts identified by the SCAG are considered consistent with the AQMP growth Projections, since these forecast numbers were used by SCAG's modeling section to forecast travel demand and air quality for planning activities such as the RTP, the SCAQMD’s AQMP, RTIP, and the Regional Housing Plan. This Project is consistent with the Projections of employment and population forecasts identified by the SCAG that are consistent with the General Plan 2025 “Typical Growth Scenario.” Therefore, this Project will have less than significant impacts with respect to GHG emissions.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?
   - No

7b. Response:
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 2025 policies and State Building Code provisions designed to reduce GHG emissions. In addition, the Project would comply with all SCAQMD applicable rules and regulations during construction and 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 on 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.

8. HAZARDS & HAZARDOUS MATERIALS.
Would the Project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?  
   - No

Some hazardous materials will be used during construction and maintenance. However, the construction and maintenance of equipment will not be maintained or fueled on site. Any spills related to the regular use of construction materials will be contained through best management practices as to not create a significant hazard to the public or the environment. As such, the Project will have a less than significant impact related to the transport, use, or disposal of any hazardous material either directly, indirectly and cumulatively.

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?  
   - No
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Some hazardous materials will be used during construction and maintenance. However, construction and maintenance equipment will not be maintained or fueled on site. Any spills related to the regular use of construction materials will be contained through best management practices as to not 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. As such, the Project will have **less than significant impact** related to the transport, use, or disposal of any hazardous material either directly, indirectly and cumulatively.

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

#### 8c. Response: *(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)*

The project site is located on the grounds of an existing High School. The project involves the construction of a telecommunications facility, to replace an existing on-site facility (monopalm). The Proposed Project will comply with Rule 403, which prohibits fugitive dust from construction activities that results in emissions that are visible in the atmosphere beyond the property line where construction is occurring. The Proposed Project’s construction emissions will be below both the SCAQMD’s regional significance thresholds and the Localized Significance Thresholds (LSTs) for all pollutants for each phase of construction (SRA 2011). Operational emissions will result from periodic inspection and maintenance activities. Personnel will not be required on a daily basis to maintain and operate the proposed Project. A small number of personnel may be required during brief periods when certain maintenance operations must be performed. Operational emissions will be less than construction emissions. The Proposed Project will not conflict with or obstruct implementation of the applicable air quality management plan. Impacts from hazardous emissions within one-quarter mile of an existing or proposed school would be less than significant.

During construction hazardous materials may be used during construction and maintenance activities. However, construction and maintenance vehicles will not be maintained or fueled on site. The release of any spills to the environment will be prevented through best management practices. Therefore impacts from the handling of hazardous or acutely hazardous materials, substances, or waste greater than one-quarter mile of an existing or proposed school will be **less than significant** directly, indirectly or cumulatively.

| 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? | ☐ | ☐ | ☒ | ☑ |

#### 8d. Response: *(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)*

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.

| 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? | ☐ | ☐ | ☒ | ☑ |
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#### 8e. Response: *(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUPC 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))*

The Project site is not located within the Riverside County Airport Land Use Compatibility Plan (RCALUP) which requires an aeronautical study for objects greater than 100 feet in height. The proposed telecommunications facility as submitted has an ultimate height of 68 feet. The proposed wireless facility meets all of the compatibility criteria through Title 19 of the Zoning Code. 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.

#### 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?

| ☐ | ☐ | ☐ | ☒ |

#### 8f. Response: *(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUPC)*

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.

#### g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

| ☐ | ☐ | ☐ | ☒ |

#### 8g. Response: *(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s EOP, GP Figure PS 8.1 – Evacuation Routes, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM’s Strategic Plan)*

The Project will not result in minimal physical alterations to the subject site; as such the project 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.

#### 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?

| ☒ | ☐ | ☐ | ☐ |

#### 8h. Response: *(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002 [http://intranet/Portal/uploads/Riv City EOP complete.pdf], Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan)*

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 Zone (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.

#### 9. HYDROLOGY AND WATER QUALITY.

Would the Project:

#### a. Violate any water quality standards or waste discharge requirements?

| ☐ | ☐ | ☐ | ☒ |

#### 9a. Response: *(Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water)*

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, structure 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. Therefore, the Project will have **no impact** directly, indirectly or cumulatively to any water quality standards or waste discharge.

#### 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

| ☐ | ☐ | ☒ | ☐ |
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<td>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?</td>
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**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)*

The proposed Project is located within the Riverside South basin. This proposed Project involves the construction of a wireless telecommunications facility with minimal landscaping. The Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge given the minimal area of the site to be improved (200 square feet) with antenna structure and related ground mounted equipment, the project will have little demand for water. Therefore, there will be a **less than significant impact** to groundwater supplies and recharge either directly, indirectly or cumulatively.

**9c. Response:**

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 involves the construction of a wireless telecommunications facility involving improvement of small portion of the site (300 square feet) with an antenna structure, minimal erosion or siltation on- or off-site will occur. Therefore, the Project will have a **less than significant impact** directly, indirectly or cumulatively to existing drainage patterns.

**9d. Response:**

The Project will not directly or indirectly result in any activity or physical alteration of the site or surrounding area, (i.e. through grading, ground disturbance, structures or additional paving) that would alter the existing drainage pattern of the site, alter 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 a wireless telecommunications facility involving improvement of small portion of the site (300 square feet) with an antenna structure. 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.

**9e. Response:** *(Source: Preliminary Grading Plan)*

The Project will not directly or indirectly result in any activity or physical alteration of the site or surrounding area (i.e. through grading, ground disturbance, structures or additional paving) that would 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 because the Project consists of a wireless telecommunications facility involving improvement of small portion of the site (300 square feet) for an antenna structure. 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.

**9f. Response:**

The Project will not directly or indirectly result in any activity or physical alteration of the site or surrounding area, (i.e. through grading, ground disturbance, structures or additional paving) that would 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 and there will be **no impact** directly, indirectly or cumulatively.
<table>
<thead>
<tr>
<th>ISSUES (AND SUPPORTING INFORMATION SOURCES):</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>would substantially degrade water quality because the Project consists of the construction of a wireless telecommunications facility involving improvement of small portion of the site (300 square feet) with an antenna structure. Therefore, the Project will not degrade water quality and there will be <strong>no impact</strong> directly, indirectly or cumulatively.</td>
<td>☐</td>
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</tr>
<tr>
<td><strong>g.</strong> 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?</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
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</tr>
<tr>
<td><strong>9g. Response:</strong> ([Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Zone X, Map Number 06065C0065G, effective August 28, 2008]) A review of National Flood Insurance Rate Map (Map Number 06065C0720G 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 flood hazard area, and does not involve the construction of housing. Further, the subject site is within Zone X, which indicates the site is outside the 0.2% annual flood chance. There will be <strong>less than a significant impact</strong> caused by this Project directly, indirectly or cumulatively as it will not place housing within a 100-year flood hazard area.</td>
<td>☐</td>
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<tr>
<td><strong>h.</strong> Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td><strong>9h. Response:</strong> ([Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Zone X, Map Number 06065C0720G, effective August 28, 2008]) 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 06065C0720G Effective Date August 28, 2008). Further, the subject site is within Zone X, which indicates the site is outside the 0.2% annual flood chance. Therefore, the Project will not place a structure within a 100-year flood hazard area that would impede or redirect flood flows and <strong>less than significant impact</strong> will occur directly, indirectly or cumulatively.</td>
<td>☒</td>
<td>☒</td>
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<tr>
<td><strong>i.</strong> 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?</td>
<td>☒</td>
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<tr>
<td><strong>9i. Response:</strong> ([Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Zone X, Map Number 06065C0720G, effective August 28, 2008]) 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 06065C0720G 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 <strong>less than significant impact</strong> directly, indirectly or cumulatively will occur.</td>
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<td><strong>j.</strong> Inundation by seiche, tsunami, or mudflow?</td>
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<tr>
<td><strong>9j. Response:</strong> ([Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality]) Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, <strong>no impacts</strong> due to tsunamis will occur directly, indirectly or cumulatively.</td>
<td>☒</td>
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</table>

10. **LAND USE AND PLANNING:**

Would the Project:

<table>
<thead>
<tr>
<th>Would the Project:</th>
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<th>Less Than Significant With Mitigation Incorporated</th>
<th>No Impact</th>
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<tbody>
<tr>
<td><strong>a.</strong> Physically divide an established community?</td>
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</table>

**10a. Response:** ([Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers]) The Project consists of the construction of a, co-locatable wireless telecommunications facility on a site served by improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the surrounding pattern of development or an established community. With the exception of a variance for height, the Project is consistent with the General Plan 2025, the Zoning Code, the Subdivision Code and the Citywide Design and Sign Guidelines. Therefore, **no impact** directly, indirectly or cumulatively to an established community will occur.
10b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, 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)

The Project has been designed to be generally, consistent with the Zoning Code and the Citywide Design Guidelines. The applicant has requested a variance to increase the height from 35-feet to 68-feet. The height is consistent with an existing telecommunications facility on-site, disguised as a palm tree (monopalm). With the approval of this project, the existing monopalm will be removed, and antennas and equipment relocated to the new facility (monoeucalyptus). This proposal is not a Project of Statewide, Regional or Areawide Significance. Further, this proposal is in compliance with the development standards set forth in the Zoning Code for Wireless Telecommunications Facilities. Application of these standards will ensure that the Project will not have a detrimental impact on adjacent land uses. Based on the above-referenced information, the proposed Conditional Use Permit to allow a wireless communication facility will not result in significant adverse environmental impacts. Thus, **less than significant impacts** will result from this Project.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

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

The proposed Project is not located within an MSHCP Cell and it would not conflict with any habitat conservation plan or natural community conservation plan, as it consists of the construction of a wireless telecommunication facility on a fully developed site. Therefore, **no impacts** directly, indirectly and cumulatively related to the proposed project are expected related to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

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?

11a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

The Project does not involve extraction of mineral resources or substantial 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?

11b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

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

<table>
<thead>
<tr>
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</table>

### 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? | ☐ | ☐ | ☒ | ☐ |

#### 12a. Response: *(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code)*

Per Implementation Tool N-1 of the General Plan 2025 Noise Element, this project has been reviewed to ensure that noise standards and compatibility issues have been addressed. The project meets the City’s noise standards as set forth in Title 7 of the Municipal Code, is compliant with the Noise/Land Use Noise Compatibility Criteria (Figure N-10) of the Noise Element; and therefore, it does not require an acoustical analysis. Therefore, impacts are **less than significant** 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? | ☐ | ☐ | ☒ | ☐ |

#### 12b. Response: *(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-7 – 2025 Railroad Noise, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions Report)*

Construction related activities although short term, are the most common source of ground borne noise and vibration that could affect occupants of neighboring uses. Title 7 limits construction related activities from 7:00 a.m. to 7:00 p.m. on weekdays, and 8:00 a.m. to 5:00 p.m. on Saturdays. No construction noise is permitted on Sundays or on Federal holidays. As construction activities are temporary and limited, the Project will cause a less than significant exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels. This Project will not generate or be exposed to long-term vibration impacts during operation of the proposed use or during construction activities as no blasting or pile driving is foreseeable in conjunction with development of this Project. Therefore, impacts are **less than significant** on the exposure of persons to or the generation of excessive ground borne vibration/noise levels in excess of established City standards directly, indirectly or cumulatively.

| c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project? | ☐ | ☐ | ☒ | ☐ |

#### 12c. Response: *(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-7 – 2025 Railroad Noise, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions Report)*

Refer to Response 12a above. As previously mentioned the ambient noise levels on the Project site and in the vicinity of the Project site will be negligible during construction and operational activities. Therefore, this Project will not cause a substantial increase in ambient noise levels in the Project vicinity above levels existing without the Project and a **less than significant** impact is expected.

| d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project? | ☐ | ☐ | ☒ | ☐ |

#### 12d. Response: *(Source: FPEIR Table 5.11-J – Construction Equipment Noise Levels, Appendix G – Noise Existing Conditions Report)*

The primary source of temporary or periodic noise associated with the proposed Project is from construction activity and maintenance work. Construction noise typically involves the loudest common urban noise events associated with minimal grading and construction activities anticipated with the construction of the wireless telecommunications facility. Both the General Plan 2025 and 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 the Title 7.
### ISSUES (AND SUPPORTING INFORMATION SOURCES):

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
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<th>No Impact</th>
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</table>

Considering the short-term nature of construction and through compliance with the provisions of the Noise Code, the temporary and periodic increase in noise levels due to the construction which may result from the Project are considered **less than significant** directly, indirectly and cumulatively.

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?

   - Response:

   (Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUP, 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))

   The Project site is located approximately 2.20 miles southeasterly of the closest airport (Riverside Municipal) and is not located within the Riverside County Airport Land Use Compatibility Plan (RCALUP). 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.

   
   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?

   - Response:

   (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUP, 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))

   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 consists of development anticipated under the General Plan 2025, 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.

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)?

   - 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)

   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. Therefore, this Project will have **no impact** on population growth either directly or indirectly.

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

   - Response: (Source: CADME Land Use 2003 Layer)

   The Project will not displace existing housing, necessitating the construction of replacement housing elsewhere because the Project site is proposed on a previously improved 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.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?
ISSUES (AND SUPPORTING INFORMATION SOURCES):

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
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<th>No Impact</th>
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</table>

13c. **Response:** *(Source: CADME Land Use 2003 Layer)*

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.

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?

14a. **Response:** *(Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)*

The Project consists of the construction of a wireless telecommunications facility. Adequate fire facilities and services are located at 2590 Jefferson Street to serve this Project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be **no impacts** on the demand for additional fire facilities or services either directly, indirectly or cumulatively.

b. Police protection?

14b. **Response:** *(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)*

The Project consists of the construction of a wireless telecommunications facility. Adequate police facilities and services are provided by North Neighborhood Policing Center to serve this Project. There will be **no impacts** on the demand for additional police facilities or services either directly, indirectly or cumulatively.

c. Schools?

14c. **Response:** *(Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD,, Table 5.13-G – Student Generation for RUSD and AUSD By Education Level)*

The Project is non-residential 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.

d. Parks?

14d. **Response:** *(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)*

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.

e. Other public facilities?

14e. **Response:** *(Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)*

The Project consists of the construction of a wireless telecommunications facility. Adequate public facilities and services, including libraries and community centers, are provided to serve this Project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park and Recreation and Community Services...
and Library practices, there will be **no impacts** on the demand for additional public facilities or services either directly, indirectly or cumulatively.

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<thead>
<tr>
<th>ISSUES (AND SUPPORTING INFORMATION SOURCES):</th>
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</table>

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?

<table>
<thead>
<tr>
<th>15a. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Project will not result in an intensification of land use that would generate any additional demand for park facilities and therefore, there will be <strong>no impact</strong> on the demand for additional recreational facilities either directly, indirectly or cumulatively.</td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>15b. Response:</th>
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<tbody>
<tr>
<td>The Project will not include new recreational facilities or require the construction or expansion of recreational facilities; therefore, there will be <strong>no impact</strong> directly, indirectly or cumulatively.</td>
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</table>

16. TRANSPORTATION/TRAFFIC.

Would the Project result in:

Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance 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?

<table>
<thead>
<tr>
<th>16a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-I – 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)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Project site is located on a developed and improved site where no increase in intensity of use resulting in any measureable increase in traffic would occur and therefore <strong>no impact</strong> directly, indirectly or cumulatively to the capacity of the existing circulation system will occur.</td>
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</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>16b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-I – 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)</th>
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<td></td>
<td><strong>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</strong></td>
<td></td>
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<td></td>
<td>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.</td>
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<td>e.</td>
<td>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?</td>
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</table>

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)*

The Project will not change air traffic patterns, increase air traffic levels or change the location of air traffic patterns. As such, this Project will have no impact directly, indirectly or cumulatively on air traffic patterns.

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

16d. Response: *(Source: Project Site Plans)*

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 hazards due to design features such as driveways, intersection improvements, etc. In addition, the proposed use is compatible with other uses on the site. 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? | ☐ | ☐ | ☐ | ☒ |

16e. Response: *(Source: California Department of Transportation Highway Design Manual, GP Figure PS 8.1 – Evacuation Routes, Municipal Code, and Fire Code)*

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.

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? | ☐ | ☐ | ☐ | ☒ |


The Project is located on a site that is fully developed 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.

17. UTILITIES AND SYSTEM SERVICES.

Would the Project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ☐ | ☐ | ☐ | ☒ |

17a. Response: *(Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Figure 5.8-I – Watersheds, Wastewater Integrated Master Plan and Certified EIR)*

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 no site modifications are proposed that would affect wastewater treatment; therefore there will be no impact directly, indirectly or cumulatively to wastewater treatment.
ISSUES (AND SUPPORTING INFORMATION SOURCES):

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<td>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?</td>
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17b. Response: (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, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR.)

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. 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.

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?

17c. Response: (Source: FPEIR Figure 5.16-2 - Drainage Facilities)

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 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?

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)

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?

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)

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?

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.
ISSUES (AND SUPPORTING INFORMATION SOURCES):

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<td>g. Comply with federal, state, and local statutes and regulations related to solid waste?</td>
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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 statutes will occur directly, indirectly or cumulatively.

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?  

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)?

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

18a. Response: *(Source: MSHCP, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, Burrowing Owl Focused Survey Report, prepared by ACT Associates, Inc., dated September 2012, FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code, and Archaeological Survey Report, prepared by ATC Associates, Inc., dated November 2011)*

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**.

18b. Response: *(Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)*

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?


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**.
ISSUES (AND SUPPORTING INFORMATION SOURCES):

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