

DRAFT

**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

**CALIFORNIA SCHOOL FOR THE DEAF – RIVERSIDE: ATHLETIC COMPLEX
REPLACEMENT AND EXPANSION PROJECT**

RIVERSIDE, CALIFORNIA



June 2025

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REPLACEMENT AND EXPANSION PROJECT
RIVERSIDE, CALIFORNIA**

Prepared for:

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On Behalf of the Lead Agency:

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Project No. 20241779.05



June 2025

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LIST OF ABBREVIATIONS AND ACRONYMS

AAQS	ambient air quality standards
AB	Assembly Bill
ADT	average daily traffic
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan for the Santa Ana River Basin
BMPs	best management practices
BTU	British thermal units
CAAP	Climate Action and Adaptation Plan
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
CAL-OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
Caltrans Manual	<i>Caltrans' Construction Vibration Guidance Manual</i>
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife

CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CH ₄	methane
City	City of Riverside
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
CSDR	California School for the Deaf, Riverside
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DWR	California Department of Water Resources
EIA	United States Energy Information Administration
EO	Executive Order
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FTA Manual	<i>FTA's Transit Noise and Vibration Impact Assessment Manual</i>
GHG	greenhouse gas

GSP	Groundwater Sustainability Plan
GWh	gigawatt-hours
GWP	global warming potential
HBMS	Hazardous Building Materials Survey
HFCs	hydrofluorocarbons
HVAC	heating, ventilation, and air conditioning
I-215	Interstate 215
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
kWh	kilowatt-hours
L _{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L _{eq}	equivalent continuous sound level
LID	Low Impact Development
L _{max}	maximum instantaneous noise level
L _{min}	minimum measured sound level
LOS	level of service
LSTs	localized significance thresholds
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individual
MLD	Most Likely Descendant
MRZ	Mineral Resource Zone
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric tons

MT CO ₂ e/year	metric tons of carbon dioxide equivalents per year
N ₂ O	nitrous oxide
NAHC	Native American Heritage Commission
NO ₂	nitrogen dioxide
NO	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OPR	Office of Planning and Research
OPR TA	OPR's <i>Technical Advisory on Evaluating Transportation Impacts in CEQA</i>
Pb	lead
PF	Public Facilities (per City of Riverside Zoning Code)
PF	Public Facilities/Institutions (per City of Riverside General Plan)
PFCs	perfluorocarbons
PM ₁₀	particulate matter less than 10 microns in size
PM _{2.5}	particulate matter less than 2.5 microns in size
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
project	California School for the Deaf – Riverside: Athletic Complex Replacement and Expansion Project
RCM	Regulatory Compliance Measure
RFD	Riverside Fire Department
RMS	root-mean-square
RPD	Riverside Police Department

RPU	Riverside Public Utilities
RRWQCP	Riverside Regional Water Quality Control Plant
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCIC	South Coast Information Center
SCS	Sustainable Communities Strategy
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SMARTS	Stormwater Multiple Application and Report Tracking System
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SR-15	State Route 15
SR-91	State Route 91
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDL	Total Maximum Daily Loads
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency

USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VdB	velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compounds
WDID	Waste Discharge Identification Number
WQMP	Water Quality Management Plan
ZNE	zero net energy

1.0 PROJECT INFORMATION

1. Project Title:

California School for the Deaf – Riverside: Athletic Complex Replacement and Expansion Project

2. Lead Agency Name and Address:

California Department of Education
State Special Schools Division
1430 N Street
Sacramento, California 95814-5901

3. Contact Person and Phone Number:

Stephanie Coleman, Senior Environmental Planner
Department of General Services
(916) 376-1602

4. Project Location:

The proposed project is located within the California School for the Deaf, Riverside campus located at 3044 Horace Street in the City of Riverside (City), Riverside County, California (see Figure 2-1 in Chapter 2.0). The approximately 16-acre project site is comprised of one parcel (Assessor's Parcel Number [APN] 235-233-028).

5. Project Sponsor's Name and Address:

Same as lead agency

6. General Plan Designation:

Public Facilities/Institutions

7. Zoning:

Public Facilities

8. Description of Project:

Please refer to Chapter 2.0, Project Description.

9. Surrounding Land Uses and Setting:

Please refer to Chapter 2.0, Project Description.

10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):

Please refer to Chapter 2.0, Project Description.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.??

One California Native American tribe, the Agua Caliente Band of Cahuilla Indians, requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1. Consultation with Native American tribes was conducted by the CDE/Department of General Services (DGS), as described further in Section 4.18, Tribal Cultural Resources.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

The California School for the Deaf – Riverside: Athletic Complex Replacement and Expansion Project (proposed project) is located within the California School for the Deaf, Riverside (CSDR) campus at 3044 Horace Street in the City of Riverside (City), Riverside County, California. The approximately 16-acre project site is comprised of one parcel (Assessor's Parcel Number [APN] 235-233-028). The project site is bounded by Arlington Avenue to the north, Maude Street to the west and CSDR campus buildings and facilities to the south and east. The project site is approximately 0.25 mile east of California State Route 91 (SR-91) and approximately 3.5 miles southwest of Interstate 215 (I-215). Refer to Figure 2-1, Project Location and Vicinity.

2.2 EXISTING CONDITIONS

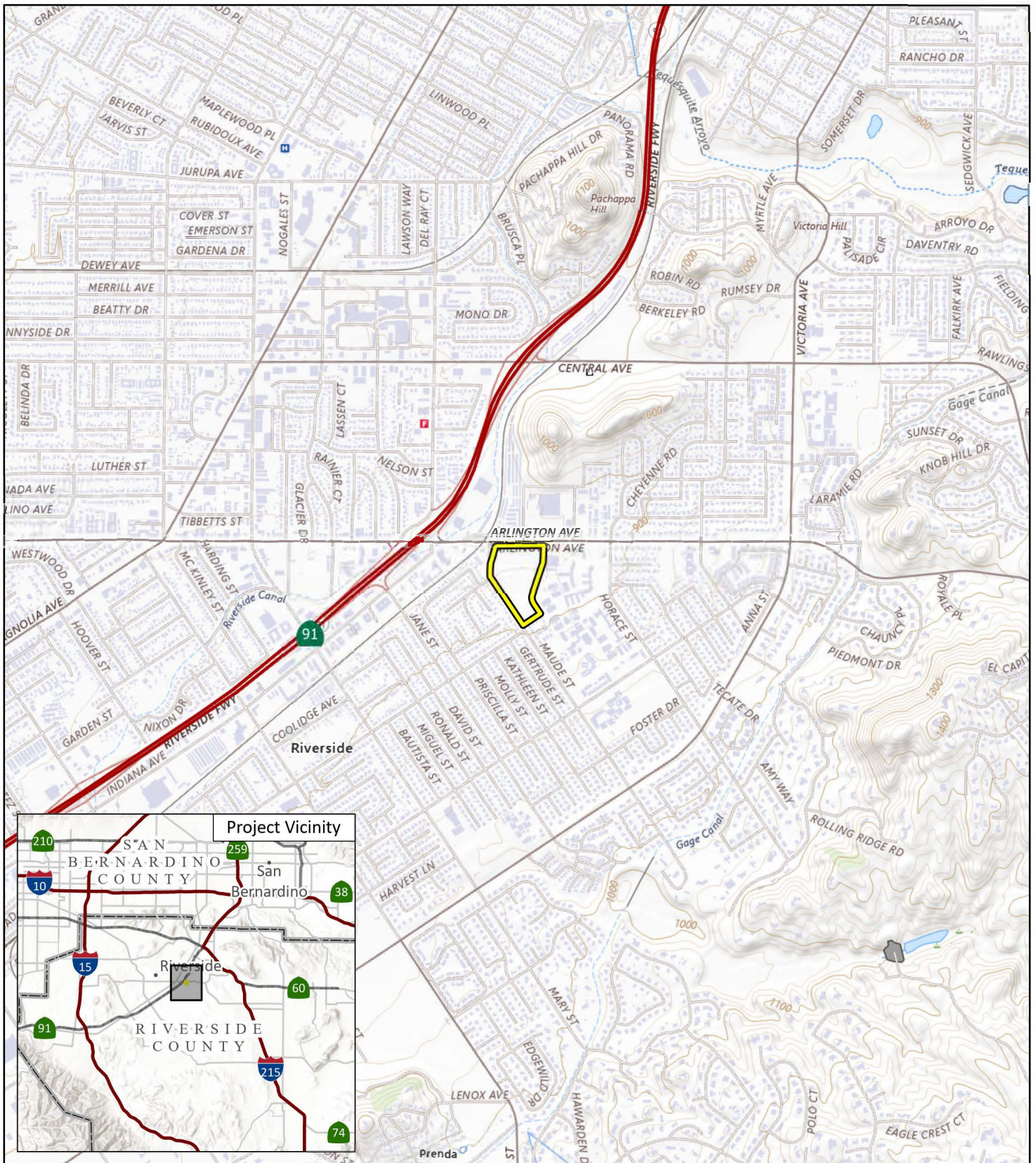
The project site is currently comprised of two grass sports fields (a baseball/softball field and a football/soccer field); a decomposed granite track; bleachers; dugouts; shot put/discus and long jump/high jump areas; athletic equipment; fencing; manual scoreboard; storage shed; pathways; and landscaped areas (refer to Figure 2-2, Aerial Photograph of the Project Site and Surrounding Land Uses). There is existing fencing and sidewalks along the north and west perimeters of the project site along Arlington Avenue and Maude Street, respectively. The east perimeter of the project site is adjacent to part of the campus' internal circulation system and designated parking areas. The project site is predominantly flat at approximately 880 feet above mean sea level. The existing athletic fields and associated infrastructure date back to the opening of the school in the mid-1950s.

The CSDR campus is enclosed by perimeter fencing and is gated. Primary access to the campus is provided along Horace Street, which borders the east side of the CSDR Campus.

Land uses surrounding the CSDR campus include residential to the east, west, and south, and commercial uses to the north. The project site is designated as Public Facilities/Institutions (PF) in the City's General Plan and is zoned Public Facilities (PF) per the City's Zoning Code.

The project site is owned by the State of California. State owned lands are under the jurisdiction of the State and are not controlled by local land use or zoning designations. However, as a matter of procedure, consistency with local designation is preferred. Therefore, where appropriate, this environmental document discusses the project's consistency with the City's general plan policies and Zoning Code regulations.

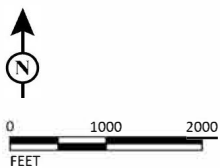
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LSA

 Project Site

FIGURE 2-1



SOURCE: Esri National Map (2025)

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California School for the Deaf - Riverside:
Athletic Complex Replacement and Expansion Project
Project Location and Vicinity

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LSA

 Project Site

FIGURE 2-2



0 125 250
FEET

SOURCE: Nearmap (1/20/2025)

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California School for the Deaf - Riverside:
Athletic Complex Replacement and Expansion Project
Aerial Photograph of the Project Site and Surrounding Land Uses

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2.3 PROPOSED PROJECT

The California Department of Education (CDE), State Special Schools Division, is proposing improvements to the existing original athletic fields and related infrastructure at the CSDR campus, to ensure the safety of participants and spectators, maximize use of the fields for the campus' needs, and meet Title IX requirements. The proposed project includes the following components:

- Replacing the existing grass sports fields with new football, soccer, baseball and softball fields;
- Replacing the existing decomposed granite track with a new all-weather 8-lane track;
- Constructing a new practice field;
- Replacing the existing infrastructure with new lighting, bleachers, dugouts, batting/pitching cages, shot put, long jump, high jump, discus, drinking fountains, electronic messaging, flagpoles, scoreboards, press booth, and a scorekeeper's booth;
- Constructing new support facilities including restrooms, security features, a concession and ticket booth building, and equipment storage;
- Constructing new pathways and walkways, additional vehicle parking, and fencing;
- Renovating existing landscaping and irrigation systems;
- Constructing a canopy of photovoltaic panels over the bleachers and support buildings; and
- Demolishing existing athletic equipment, fencing, bleachers, and a storage shed.

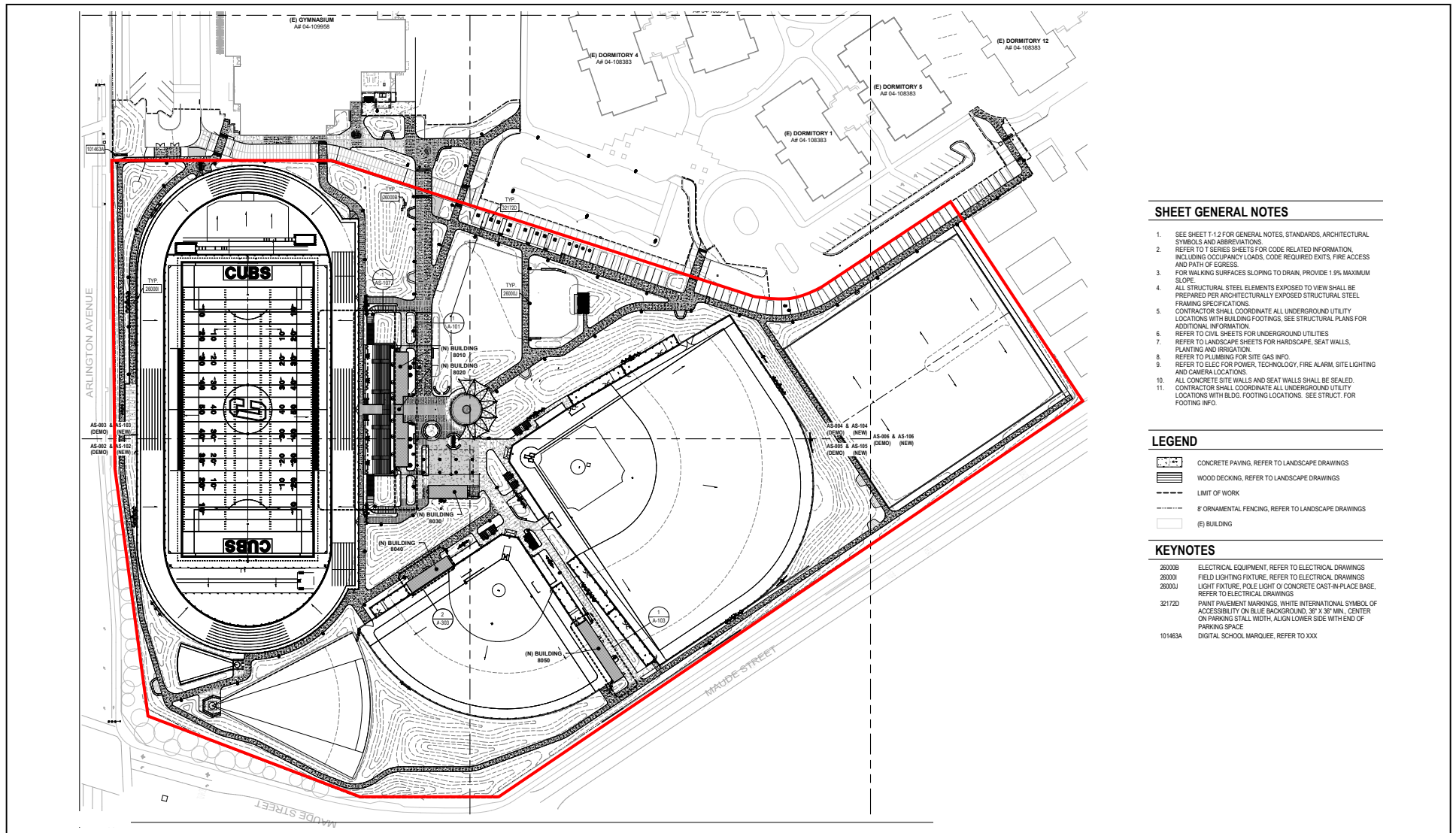
These project components are described in more detail below. Refer to Figure 2-3, Conceptual Site Plan.

2.3.1 Proposed Improvements

2.3.1.1 Athletic Fields

The proposed project would replace the existing grass athletic fields with new football, soccer, baseball, and softball fields. The new baseball and softball fields would remain grass/turf with magnetic bases, while the new football/soccer field would be synthetic turf. A new grass practice field would also be constructed to accommodate additional athletic activities. The existing decomposed granite track would be replaced with a new all-weather 8-lane track. The proposed project also includes dedicated areas for field events such as shot put, long jump, high jump, and discus.

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SHEET GENERAL NOTES

1. SEE SHEET T-1.2 FOR GENERAL NOTES, STANDARDS, ARCHITECTURAL SYMBOLS AND ABBREVIATIONS.
2. REFER TO T SERIES SHEETS FOR CODE RELATED INFORMATION INCLUDING OCCUPANCY LOADS, CODE REQUIRED EXITS, FIRE ACCESS AND PATH OF EGRESS.
3. FOR WALKING SURFACES SLOPING TO DRAIN, PROVIDE 1.9% MAXIMUM SLOPE.
4. ALL STRUCTURAL STEEL ELEMENTS EXPOSED TO VIEW SHALL BE PREPARED PER ARCHITECTURALLY EXPOSED STRUCTURAL STEEL FRAMING SPECIFICATIONS.
5. CONTRACTOR SHALL COORDINATE ALL UNDERGROUND UTILITY LOCATIONS WITH BUILDING FOOTINGS. SEE STRUCTURAL PLANS FOR ADDITIONAL INFORMATION.
6. REFER TO CIVIL SHEETS FOR UNDERGROUND UTILITIES.
7. REFER TO LANDSCAPE SHEETS FOR HARDSCAPE, SEAT WALLS, PLANTING AND IRRIGATION.
8. REFER TO PLUMBING FOR SITE GAS INFO.
9. REFER TO ELEC FOR POWER, TECHNOLOGY, FIRE ALARM, SITE LIGHTING AND CAMERA LOCATIONS.
10. ALL CONCRETE SITE WALLS AND SEAT WALLS SHALL BE SEALED.
11. CONTRACTOR SHALL COORDINATE ALL UNDERGROUND UTILITY LOCATIONS WITH BLDG. FOOTING LOCATIONS. SEE STRUCT. FOR FOOTING INFO.

LEGEND

- CONCRETE PAVING, REFER TO LANDSCAPE DRAWINGS
- WOOD DECKING, REFER TO LANDSCAPE DRAWINGS
- LIMIT OF WORK
- 8" ORNAMENTAL FENCING, REFER TO LANDSCAPE DRAWINGS
- (E) BUILDING

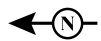
KEYNOTES

- 26000B ELECTRICAL EQUIPMENT, REFER TO ELECTRICAL DRAWINGS
- 26000C FIELD LIGHTING FIXTURE, REFER TO ELECTRICAL DRAWINGS
- 26000D LIGHT FIXTURE, POLE LIGHT OR CONCRETE CAST-IN-PLACE BASE, REFER TO ELECTRICAL DRAWINGS
- 32172D PAINT PAVEMENT MARKINGS, WHITE INTERNATIONAL SYMBOL OF ACCESSIBILITY ON BLUE BACKGROUND, 36" X 36" MIN., CENTER ON PARKING STALL WIDTH, ALIGN LOWER SIDE WITH END OF PARKING SPACE
- 101463A DIGITAL SCHOOL MARQUEE, REFER TO XXXX

LSA

LEGEND

- Project Boundary



0 90 180
FEET

SOURCE: Roesling Nakamura Terada Architects

I:\2024\20241779.05\G\Site_Plan.ai (6/9/2025)

FIGURE 2-3

California School for the Deaf - Riverside
Athletic Complex Replacement and Expansion Project
Conceptual Site Plan

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2.3.1.2 Infrastructure and Amenities

The proposed project includes replacing existing infrastructure with new lighting, bleachers, dugouts, batting/pitching cages, drinking fountains, electronic messaging, flagpoles, scoreboards, a press booth, and a scorekeeper's booth. New support facilities would be constructed including restrooms, security features, a concession and ticket booth building, and equipment storage. Additionally, new pathways, walkways, additional vehicle parking, fencing, and access roads would be installed. The renovated athletic complex would be fenced with gates and would include two security areas (one near the softball field and new practice field, and one near the new restrooms) for improved traffic and crowd control at sporting events. Pathways from the vehicle parking areas to all fields would be lit and wheelchair accessible. A new all-weather walking path would also be installed around the entire sports complex.

2.3.1.3 Landscaping and Sustainability

The proposed project involves renovating existing landscaping and irrigation systems. Approximately 11.13 acres (485,000 square feet) of the project site would be landscaping/pervious surface area including the athletic fields. A canopy of photovoltaic panels would be constructed over the football field, track, and bleachers. Additionally, the proposed project would include sustainability features such as battery storage, solar panels, storm drain retention vault and biofiltration unit. The proposed project has been designed to be zero net energy (ZNE) and will meet or exceed the requirements for Leadership in Energy and Environmental Design (LEED) "Gold" certification. ZNE indicates that the total amount of energy used by the project on an annual basis would be approximately equal to the amount of renewable energy generated on site.

2.4 PROJECT CONSTRUCTION

Construction of the proposed project would be completed in two phases. Phase 1 would include demolition of the existing facilities and construction of the new football/soccer field, track, softball field and batting cages, bleachers, and infrastructure improvements. Construction of Phase 1 is anticipated to begin in July 2027 and is expected to take approximately 10 months to complete. Phase 2 would include construction of the baseball field and batting cages, practice field, and support facilities. Construction of Phase 2 is anticipated to begin in May 2028 and is expected to take approximately 7 months to complete.

Based on the preliminary grading plans, the proposed project would require the net export of approximately 2,710 cubic yards of soil. Construction would involve the use of standard earthmoving equipment such as large excavators, a skid steer, a telehandler, and other related equipment.

Construction of the proposed project would require a maximum excavation depth of 10.5 feet. Direct access to the project site during construction would be provided via a gated driveway along Maude Street with entry authorization provided by the CSDR administrative staff.

2.5 REGULATORY REQUIREMENTS, PERMITS, AND APPROVALS

This Initial Study/Mitigated Negative Declaration (IS/MND) provides the environmental information and analysis and primary California Environmental Quality Act (CEQA) documentation necessary for the CDE to adequately consider the environmental effects of the proposed project. The CDE, as Lead

Agency for the CEQA process and document, has the approval authority and responsibility for considering the environmental effects of the proposed project.

3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Less than Significant Impact” as indicated by the checklist in Chapter 3.0.

- | | | |
|---|--|--|
| ☒ Aesthetics | ☐ Agriculture and Forestry Resources | ☒ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☒ Energy |
| ☒ Geology/Soils | ☒ Greenhouse Gas Emissions | ☒ Hazards & Hazardous Materials |
| ☒ Hydrology/Water Quality | ☒ Land Use/Planning | ☐ Mineral Resources |
| ☒ Noise | ☒ Population/Housing | ☒ Public Services |
| ☒ Recreation | ☒ Transportation | ☒ Tribal Cultural Resources |
| ☒ Utilities/Service Systems | ☒ Wildfire | ☒ Mandatory Findings of Significance |

3.1 DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find 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.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find 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.
- ☐ I find 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

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4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Impact Analysis

a. *Would the project have a substantial effect on a scenic vista?*

Less Than Significant Impact. Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains, foothills, ridgelines, coastlines, and open space areas. Scenic vistas within the City of Riverside include the hills and ridgelines surrounding the City, specifically the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. Additionally, the peaks of Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, Alessandro Heights, and the La Sierra/Norco Hills provide scenic views of the City and the region. Another prominent scenic resource in the City is the Santa Ana River, which extends along the City's northern edge, and provides significant natural habitat for various species and is a prominent visual landmark within the City. The City has also designated several scenic and special boulevards that meet local criteria for designation as scenic routes.¹

The project site is currently comprised of two grass sports fields (a baseball/softball field and a football/soccer field); a decomposed granite track; bleachers; dugouts; shot put/discus and long jump/high jump areas; athletic equipment; fencing; manual scoreboard; storage shed; pathways; and landscaped areas (refer to Figure 2-2). There is existing fencing and sidewalks along the north and west perimeters of the project site along Arlington Avenue and Maude Street, respectively. There are no landforms on the project site or in the nearby vicinity that would be considered scenic as defined by the City's General Plan.

¹ City of Riverside. 2007a. *Riverside General Plan 2025*. November.

Public views in the vicinity of the project site are generally diverse and characterized by the urban setting. Views of surrounding hillsides and mountains are visible from the project site and surrounding area; however, they are largely obstructed by intervening development including structures, landscaping, and overhead utilities. The Santa Ana River is located approximately 2.5 miles northwest of the project site but is not visible from the project site due to intervening development. The nearest designated scenic boulevard to the project site is Arlington Avenue, which borders the project site to the north. The project site is visible to motorists along Arlington Avenue; however, views are buffered and partially obstructed by vegetation and mature trees located along the northern border of the project site.

The proposed project includes the replacement of the existing original athletic fields and improvements to associated infrastructure on the project site. The majority of the proposed improvements do not involve the construction of new structures or above-ground improvements and consist of the replacement of existing sports fields, the replacement of an existing track, the construction of a new practice field, the construction of new pathways and walkways, additional vehicle parking, renovating existing landscaping and irrigation systems, and demolishing existing athletic facilities. The proposed project would also include the replacement of various existing above-ground improvements including lighting, bleachers, dugouts, batting/pitching cages, and fencing. Additionally, the following new structures that are not part of the existing visual landscape would be constructed: new scoreboards, press booth, a scorekeeper's booth, new restrooms, a concession and ticket booth building, and a canopy of photovoltaic panels. The proposed new structures and above-ground improvements would obscure current public views available from nearby public vantage points of surrounding mountains and hillsides. However, as stated above, these views are already largely obstructed by existing intervening development and the proposed development would not substantially obscure views more than existing conditions. Additionally, the proposed project's height, scale, and building materials would be in accordance with the City's Municipal Code for the site's Public Facilities (PF) zoning district and would be consistent with the surrounding urban development. Therefore, the proposed project would not result in a substantial adverse effect on a scenic vista. Impacts would be less than significant, and no mitigation is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The California Department of Transportation (Caltrans) Scenic Highway Program does not identify any State-designated scenic highways near the project site.² The nearest officially designated State Scenic Highway is a portion of State Route 91 (SR-91) in Anaheim, approximately 23 miles southwest of the project site, and the nearest eligible highways include a portion of SR-91 and State Route 15 (SR-15) in Corona, approximately 10.4 miles southwest of the project site. Given this distance, the proposed project would not result in impacts to scenic resources within a State Scenic Highway. No impacts would occur, and no mitigation is required.

² California Department of Transportation (Caltrans). n.d. California State Scenic Highway System Map. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed March 18, 2025).

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

Less Than Significant Impact. California Public Resources Code (PRC) Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” As further discussed in Section 4.14, Population and Housing, 315,015 people were recorded in the City of Riverside in the 2020 United States Census.³ Therefore, the project site is within an urbanized area as defined by PRC Section 21071.

The proposed project includes the replacement of the existing original athletic fields and improvements to associated infrastructure on the project site. The majority of the proposed improvements do not involve the construction of new structures or above-ground improvements and consist of the replacement of existing sports fields, the replacement of an existing track, the construction of a new practice field, the construction of new pathways and walkways, additional vehicle parking, renovating existing landscaping and irrigation systems, and demolishing existing athletic facilities. The proposed project would also include the replacement of various existing above-ground improvements including lighting, bleachers, dugouts, batting/pitching cages, and fencing. Additionally, the following new structures that are not part of the existing visual landscape would be constructed: new scoreboards, press booth, a scorekeeper’s booth, new restrooms, a concession and ticket booth building, and a canopy of photovoltaic panels.

As noted in Chapter 2.0, Project Description, the project site has a City General Plan designation of Public Facilities/Institutions (PF) and is located within the Public Facilities (PF) zoning district. Both the PF designation and PF zoning allow for public educational institutions and parks and recreational facilities. Additionally, the PF designation allows a maximum floor area ratio (FAR) of 1.0 and the PF zoning district allows a maximum building height of 60 feet or 4 stories. The proposed structures would all be a single story and the proposed project would not exceed a FAR of 1.0. The proposed project would be consistent with the PF zoning district setback requirements, which requires a minimum setback of 20 feet from all property lines with an additional setback of one foot for every two feet of building height in excess of 45 feet for any building adjacent to a zone permitting residential uses. The height and character of the proposed structures would be similar to the existing surrounding public facility uses and the proposed project would be consistent with the existing land use.

The proposed project would be consistent with the uses planned for the project site as outlined in the City’s General Plan and would be consistent with the development standards outlined in the City Municipal Code. Furthermore, the proposed project would be consistent with the objectives, goals,

³ United States Census Bureau. 2024. *QuickFacts, Riverside city, California; United States*. Website: <https://www.census.gov/quickfacts/fact/table/riversidecitycalifornia/PST045224> (accessed March 18, 2025).

and policies of the General Plan. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. The project site is located in an urbanized area, which is subject to existing exterior lighting from surrounding residential and commercial development and existing street lighting. Existing sources of light and glare on the project site consist of portable sports field lighting which consists of mobile generator powered lighting that is set up on-site for use during evening sports games. There are no existing habitable structures on the project site. Development of the proposed project would introduce new sources of light and glare from the new field lighting, scoreboards, and interior/exterior lighting associated with the proposed new structures. However, the new sources of light and glare associated with the proposed project would be consistent with the existing sources of light and glare associated with surrounding land uses.

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on the intensity and direction of sunlight. As previously discussed, the proposed project would include the construction of the following above-ground improvements: new lighting, bleachers, dugouts, batting/pitching cages, scoreboards, press booth, a scorekeeper's booth, new restrooms, a concession and ticket booth building, new fencing, and a canopy of photovoltaic panels. Although the proposed project would include some new reflective materials that could result in minor glare effects (i.e., windows and photovoltaic panels), such effects would not adversely affect daytime views of surrounding properties, including motorists along adjacent roadways, because the glass proposed for the proposed project would be low-reflective, set back from the roadway, and proposed landscaping would provide a buffer between potentially reflective materials and the public right-of-way.

Therefore, due to the proposed project's location, design, and compliance with applicable regulations, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant, and no mitigation is required.

4.2 AGRICULTURE AND FORESTRY 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 Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.2.1 Impact Analysis

- a. *Would the project 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?*

No Impact. The project site is located within an urbanized area of the City. There are no agricultural uses located within or adjacent to the project site. Additionally, the project site is classified as "Urban and Built-Up Land" by the California Department of Conservation.⁴ Therefore, development of the proposed project would not convert agricultural land to a non-agricultural use. The proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of

⁴ California Department of Conservation. 2022. California Important Farmland Finder (map). Website: maps.conservation.ca.gov/dlrp/ciff/ (accessed March 18, 2025).

Statewide Importance to a non-agricultural use. No impact would occur, and no mitigation is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is designated as Public Facilities/Institutions (PF) in the City's General Plan and is zoned Public Facilities (PF) per the City's Zoning Code. The PF zone is established to create and preserve areas for official and public uses of property and related activities, including civic centers, public schools, public buildings, parks and recreation facilities, waterworks and drainage facilities, and similar areas. Agricultural uses are prohibited within the PF zone. The project site is not subject to a Williamson Act contract. Therefore, development of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur, and no mitigation is required.

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

No Impact. The project site is located within an existing urban area zoned PF within the City. The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production. No impact would occur, and no mitigation is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Section 4.2.1.c, above. The proposed project would not result in the loss of forest land or the conversion of forest land to non-forest uses. No impact would occur, and no mitigation is required.

e. Would the project 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?

No Impact. Refer to Sections 4.2.1.a and 4.2.1.c, above. The project site is located within an existing urban area and would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. The proposed project would not involve other changes to the existing environment which, due to their location or nature, could adversely affect agricultural or forestry resources. No impact would occur, and no mitigation is required.

4.3 AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 Impact Analysis

The proposed project is within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the Basin. The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these acts, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for (AAQS) specific "criteria" pollutants, designed to protect public health and welfare. See Table 4.3.A, below. Primary criteria pollutants include carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), particulate matter less than 10 microns in size (PM₁₀), sulfur dioxide (SO₂), and lead (Pb). Secondary criteria pollutants include ozone (O₃), and particulate matter less than 2.5 microns in size (PM_{2.5}). The AAQS for each criteria pollutant represents the level that is considered safe to the public and avoids specific adverse health effects associated with each criteria pollutant.

The Basin is in nonattainment for the federal and State standards for O₃ and PM_{2.5}, and nonattainment for the State PM₁₀ standard. In addition, the Basin is in attainment/maintenance for the federal PM₁₀, CO, SO₂, and nitrogen dioxide (NO₂) standards. The SCAQMD has established project-level thresholds for VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}.

The SCAQMD considers any project in the Basin with construction- or operation-related emissions that exceed any of the emission thresholds above to have potentially significant impacts.

Table 4.3.A: SCAQMD Construction and Operation Thresholds of Significance

Emission Source	Pollutant Emissions Threshold (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Thresholds	75	100	550	150	150	55
Operation Thresholds	55	55	550	150	150	55

Source: CEQA Air Quality Handbook (South Coast Air Quality Management District 1993).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO₂ = sulfur dioxide

VOC = volatile organic compounds

In addition, the SCAQMD published its Final Localized Significance Threshold Methodology in June 2003 (updated July 2008), recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.⁵ This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance between the project and the nearest sensitive receptor. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather as sensitive receptors (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields). The nearest sensitive receptors to the area of project improvements are the existing school buildings located approximately 40 feet east of the project disturbance boundary line. Other sensitive receptors include the existing single-family residences that are located opposite Maude Street at approximately 86 feet west of the area of primary disturbance boundary line to the building façade.

LSTs are based on the ambient concentrations of that pollutant within the project source receptor area and the distance to the nearest sensitive receptor. For the proposed project, the appropriate source receptor area for the LST is Metropolitan Riverside County (Source Receptor Area 23). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As mentioned above, the closest sensitive receptors to the area of project improvements are the existing school buildings located approximately 40 feet east of the project disturbance boundary line. In cases where receptors may be closer than 82 feet (25 meters), any distances within the 82-foot (25-meter) buffer zone can be used. As such, the minimum distance of 25 meters was used for purposes of the LST assessment. The area of the proposed improvements associated with the proposed project is approximately 15.9 acres. However, based on the anticipated construction equipment and the anticipated grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 5.0 acres.⁶ As such, the LSTs for a 5.0-acre site at 25 meters were derived by interpolation. Table 4.3.B shows the localized emissions

⁵ South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology*. July. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf> (accessed March 2025).

⁶ SCAQMD. n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf> (accessed March 2025).

Table 4.3.B: SCAQMD Localized Significance Thresholds

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Construction	270.0	1,577.0	13.0	8.0
Operation	270.0	1,577.0	4.0	2.0

Source: *Final Localized Significance Threshold Methodology*. (SCAQMD 2008).

CO = carbon monoxide

PM₁₀ = particulate matter less than 10 microns in size

lbs/day = pounds per day

PM_{2.5} = particulate matter less than 2.5 microns in size

NO_x = nitrogen oxides

SCAQMD = South Coast Air Quality Management District

thresholds that would apply based on the project size and distance to nearby receptors during project construction and operation.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. An Air Quality Management Plan (AQMP) describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State AAQS. The Basin is in nonattainment for the federal and State standards for O₃ and PM_{2.5}. Therefore, the Basin is classified as a nonattainment area and an AQMP is required. The applicable air quality plan is the SCAQMD's adopted 2022 AQMP.⁷ The AQMP is based on regional growth projections developed by the Southern California Association of Governments (SCAG).

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review given that the air quality plan strategy is based on projections from local General Plans.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in the SCAQMD CEQA Air Quality Handbook, consistency with the Basin 2022 AQMP is affirmed when a project: (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The proposed project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated in Section 4.3.1.b, below. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

⁷ SCAQMD. 2022. *2022 Air Quality Management Plan*. Adopted December 2, 2022.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. The proposed project would replace, expand, and improve the two existing sports athletic fields with new football, soccer, baseball, and softball fields; therefore, the proposed project is not defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning and would be consistent with the City's General Plan and Zoning Ordinance.

Based on the consistency analysis presented above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

- b. Would the project 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?*

Less Than Significant Impact. As identified above, the Basin is currently designated as nonattainment for the federal and State standards for O₃ and PM_{2.5}. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified above in Table 4.3.A, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by site preparation and grading activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, VOC, directly emitted PM_{2.5} or PM₁₀, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include demolition, site preparation, grading, building construction, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation and grading phases due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction

site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM₁₀ emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the Department of State Hospitals to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_x), NO_x, VOCs, and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod), Version 2022.1. The proposed project is planned to be constructed in two phases. Construction is expected to take approximately 10 months for Phase 1 and 7 months for Phase 2. Phase 1 is anticipated to begin in July 2027 and Phase 2 is anticipated to begin May 2028. To be conservative, this analysis assumes that the phases would occur consecutively for a total period of 17 months, which was included in CalEEMod. The proposed project would include the demolition of existing support structures and replacement of the two existing sports athletic fields with new football, soccer, baseball, and softball fields on an approximately 16-acre area, which was included in CalEEMod. In addition, the proposed project would require the export of approximately 6,500 cubic yards (cy) of organic material (clear and grub), a total of 1,390 cy of inorganic material, and 8,766 cy of soil export. This analysis assumes that the 1,390 cy of inorganic material would occur during the demolition phase, the 6,500 cy of organic material would occur during the site preparation phase, and that the 8,766 cy of soil would occur during the grading phase, which was included in CalEEMod. Furthermore, approximately 8,456 cy of material would be imported to the site during project construction, which was also included in CalEEMod. This analysis assumes compliance with SCAQMD Rule 403 measures and the use of Tier 2 construction equipment. All other construction details are not yet known; therefore,

default assumptions (e.g., construction equipment, construction hauling and vendor truck trips and fleet activities) from CalEEMod were used. Construction emissions are summarized in Table 4.3.C, below. Appendix A provides CalEEMod output sheets.⁸

Table 4.3.C: Short-Term Regional Construction Emissions

Construction Year	Peak Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO _x	CO	SO _x	Fugitive PM ₁₀	Exhaust PM ₁₀	Fugitive PM _{2.5}	Exhaust PM _{2.5}
Demolition	0.8	25.8	19.4	<0.1	1.0	0.8	0.2	0.7
Site Preparation	1.2	40.9	29.4	0.1	8.1	1.1	4.1	1.0
Grading	1.4	50.2	36.6	0.1	4.1	1.4	1.6	1.3
Building Construction	0.6	19.5	14.5	<0.1	0.2	0.7	<0.1	0.6
Paving	0.8	13.4	11.5	<0.1	0.2	0.6	<0.1	0.5
Architectural Coating	0.1	1.1	1.0	<0.1	<0.1	0.1	<0.1	0.1
Peak Daily Emissions	1.4	50.2	36.6	0.1	9.2		5.1	
SCAQMD Threshold	75.0	100.0	550.0	150.0	150.0		55.0	
Significant?	No	No	No	No	No		No	

Source: Compiled by LSA (April 2025).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compounds

As shown in Table 4.3.C, construction emissions associated with the project would not exceed the SCAQMD's thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, and PM₁₀. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., landscape maintenance equipment use) related to the proposed project. The proposed project would replace, expand, and improve the two existing sports athletic fields with new football, soccer, baseball, and softball fields. The proposed project would not include the use of natural gas; therefore, the proposed project would not generate energy source emissions.

Mobile source emissions include VOCs and NO_x emissions that contribute to the formation of ozone. Additionally, PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Based on Section 4.17, Transportation, no additional trips are anticipated due to implementation of the proposed project. As such, the project would not result in a significant increase in the generation of vehicle trips or vehicle miles traveled (VMT) that would increase air pollutant emissions. Therefore, implementation of the proposed project would not generate new mobile source emissions.

⁸ LSA Associates, Inc. (LSA). 2025a. CalEEMod Output Sheets. January. Appendix A.

Emission estimates for operation of the project were calculated using CalEEMod. This analysis was conducted using land use codes *General Office Building*, *Parking Lot*, and *City Park*. The *City Park* land use was used to represent the proposed open space area, which includes the proposed landscape and athletic fields. The *General Office Building* land use was used to represent the proposed support structures, including restrooms, security features, a concession and ticket booth building, and equipment storage. As mentioned above, the proposed project would not include natural gas and would not generate new vehicle trips, which was included in CalEEMod. Furthermore, as described in Chapter 2.0, Project Description, the proposed project would include sustainability features such as battery storage, solar panels, storm drain retention vault and a biofiltration unit. The proposed project has been designed to be zero net energy (ZNE) and will meet or exceed the requirements for Leadership in Energy and Environmental Design (LEED) “Gold” certification. Where project-specific data were not available, default assumptions (e.g., water usage, and solid waste generation) from CalEEMod were used to estimate project emissions. CalEEMod output sheets are included in Appendix A.

The daily and annual emissions associated with project operational sources are identified in Table 4.3.D for VOCs, NO_x, PM₁₀, and PM_{2.5}.

Table 4.3.D: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile Sources	0.0	0.0	0.0	0.0	0.0	0.0
Area Sources	0.1	<0.1	0.2	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	0.1	<0.1	0.2	<0.1	<0.1	<0.1
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	No	No	No	No	No	No

Source: Compiled by LSA (April 2025).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compounds

As shown in Table 4.3.D, the proposed project would not exceed the significance criteria for daily VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} emissions. Based on the nature of the proposed improvements, the project would not result in a substantial source of energy, mobile, or area source emissions. Therefore, operation of the proposed project would not 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 AAQS. Impacts would be less than significant, and no mitigation is required.

Long Term Microscale (CO Hot Spot) Analysis. Vehicular trips typically contribute to congestion at intersections and along roadway segments near a project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of a project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological

conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the 5888 Mission Boulevard monitoring station in Riverside (i.e., the closest station to the project site) showed a highest recorded 1-hour concentration of 2.1 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.8 ppm (the State standard is 9 ppm) during the past 3 years. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

As described in Section 4.17, Transportation, no additional trips are anticipated due to implementation of the proposed project. As such, the project would not result in a significant increase in the generation of vehicle trips or VMT. Therefore, the proposed project is not expected to create any significant adverse impacts to nearby intersections and project-related vehicles are not expected to contribute significantly to CO concentrations exceeding the State or federal CO standards. Therefore, the intersections in the project area would not experience CO "hot spots. Impacts would be less than significant, and no mitigation is required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are people who have an increased sensitivity to air pollution or environmental contaminants. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors.

The following analysis assesses the potential health risk impacts associated with construction and operation of the proposed project through an LST analysis and a construction health risk assessment.

Localized Significance Analysis. As previously discussed, LSTs are based on the ambient concentrations of that pollutant within the project source receptor area and the distance to the nearest sensitive receptor. The closest sensitive receptors to the area of project improvements are the existing school buildings located approximately 40 feet east of the project disturbance boundary line. An LST analysis was completed to show the construction impacts at a distance of 25 meters (82 feet) to the nearest sensitive receptors.

The results of the LST analysis for construction and operation of the proposed project are summarized in Table 4.3.E, below. As shown in Table 4.3.E, the proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations during project construction or operation. Impacts would be less than significant, and mitigation is not required.

Table 4.3.E: Project Localized Emissions

Source	NO _x	CO	Total PM ₁₀	Total PM _{2.5}
Localized Construction Emissions (lbs/day)				
On-Site Project Emissions	48.8	35.3	8.8	5.0
Localized Significance Threshold	270.0	1,577.0	13.0	8.0
Exceeds Threshold?	No	No	No	No
Localized Operational Emissions (lbs/day)				
On-Site Project Emissions	<0.1	<0.1	<0.1	<0.1
Localized Significance Threshold	270.0	1,577.0	4.0	2.0
Exceeds Threshold?	No	No	No	No

Source: Compiled by LSA (April 2025).

Note: Source Receptor Area 23, based on a 5.0-acre construction and operation disturbance daily area, at a distance of 25 meters.

CO = carbon monoxide

PM_{2.5} = particulate matter less than 2.5 microns in size

lbs/day = pounds per day

PM₁₀ = particulate matter less than 10 microns in size

NO_x = nitrogen oxides

Construction Health Risk Assessment. The proposed project site is located in an urban area in close proximity to existing residential uses that could be exposed to diesel emission exhaust during the construction period. As such, to estimate the potential cancer risk from project construction equipment exhaust (including diesel particulate matter), a dispersion model was used to translate an emission rate from the source location to a concentration at the receptor location (i.e., a nearby residential land use). Dispersion modeling varies from a simpler, more conservative screening-level analysis to a more complex and refined detailed analysis. This refined assessment was conducted using CARB's exposure methodology, with the air dispersion modeling performed using the USEPA dispersion model American Meteorological Society/USEPA Regulatory Model (AERMOD). The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and site-specific meteorological data. The nearest residential receptors include the existing single-family residences that are located opposite Maude Street at approximately 86 feet west of the area of primary disturbance boundary line to the building façade. Worker receptors are also located opposite Maude Street, approximately 120 feet west of the area of primary disturbance boundary line to the building façade.

Table 4.3.F below identifies the results of the analysis utilizing the CalEEMod outputs, assuming the use of Tier 2 construction equipment. Model snapshots of the sources and modeling results are provided in Appendix B.

Table 4.3.F: Inhalation Health Risks from Project Construction to Off-Site Receptors

Maximally Exposed Individual (MEI)	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor	8.78	0.007	0.000
Worker Receptor	0.48	0.023	0.000
School Receptor	5.27	0.023	0.000
Threshold	10.0	1.0	1.0
Exceed?	No	No	No

Source: Compiled by LSA (April 2025).

µg/m³ = micrograms per cubic meter

PM_{2.5} = particulate matter less than 2.5 microns in size

As shown in Table 4.3.F, the cancer risk at the residential maximally exposed individual (MEI) would be 8.78 in one million, which would not exceed the SCAQMD cancer risk of 10 in one million. The cancer risk at the worker MEI would be 0.48 in one million and 5.27 at the school MEI, which would also be below the 10 in one million thresholds. The chronic hazard index for the residential MEI would be 0.007 in one million and 0.022 for the worker MEI and the school MEI, which would also be below the threshold of 1.0. The acute hazard index would be nominal (0.000). Therefore, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations.

Once the project is constructed, the project would not be a source of substantial emissions. As discussed in Section 4.3.1.b above, no additional trips are anticipated due to implementation of the proposed project. The proposed project would not result in additional operational activities when compared to existing conditions. As such, the project would not result in a substantial source of energy, mobile, or area source emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction or operation.

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less Than Significant Impact. The project's potential to result in emissions adversely affecting a substantial number of people is described below.

Construction. Project construction would generate limited odors over the short term, primarily from equipment exhaust. However, construction activity would be temporary and would cease after individual construction is completed. Additionally, construction activities that would generate odors are expected to be isolated to the immediate vicinity of the construction site. Therefore, odors from construction equipment exhaust would not adversely affect a substantial number of people.

Additionally, the proposed project would be required to implement standard control measures to limit fugitive dust and construction equipment emissions, which would reduce odor impacts, in accordance with SCAQMD Rules 402 and 1113. SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." SCAQMD Rule, 1113 limits the VOC content of architectural coatings (e.g., paint). Adherence to the standards identified in SCAQMD Rules 402 and 1113 is required for all construction projects to reduce emissions and objectionable odors impacts.

Furthermore, as previously discussed, construction activities would be temporary, and odors generated from construction activities would be isolated to the immediate vicinity of the construction site. Therefore, project construction activities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

Operation. According to SCAQMD, land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed project would replace, expand, and improve the two existing sports athletic fields with new football, soccer, baseball, and softball fields. As such, the proposed project does not include any land uses identified by SCAQMD as being associated with emitting objectionable odors. Therefore, operation of the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.4.1 Impact Analysis

- a. *Would the project 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 Wildlife or U.S. Fish and Wildlife Service?*

Less Than Significant Impact. Special-status species are defined as follows:

- Species that are listed, formally proposed, or designated as candidates for listing as threatened or endangered under the federal Endangered Species Act or California Endangered Species Act.
- Plant species assigned to California Rare Plant Ranks 1A, 1B, 2A, 2B, or 3.
- Animal species designated as Species of Special Concern or Fully Protected Species by the California Department of Fish and Wildlife (CDFW).

- Species that meet the definition of rare, threatened, or endangered under Section 15380 of the *State CEQA Guidelines*.
- Species considered as a taxon of special concern by local agencies.

The project site is generally flat and is currently comprised of grass sports fields, a track, fencing, landscaped areas and pathways, and related athletic facilities on the CSDR campus. Landscaping on the project site consists of ornamental trees and shrubs along the northern and western boundaries of the site and grass within the two existing sports fields, which is regularly maintained. The project site is located in a developed area and is completely surrounded by urban land uses consisting of a mix of residential and commercial uses. No natural habitats or plant communities are present on the project site, and the project site is not adjacent to any natural or undeveloped areas.

A records search, including the project site and 9 surrounding United States Geological Survey (USGS) 7.5-minute topographic quadrangles, was conducted using the California Natural Diversity Database (CNDDDB), which is included as Appendix C to this IS/MND. The CNDDDB records search indicated that there are 106 special-status and endangered, rare, or threatened plant and animal species that have been previously reported in the project vicinity, 44 of which were recorded within one mile of the project site. However, none of these species are expected to occur on the project site or on adjacent properties due to a lack of suitable habit, previous site disturbances and regular maintenance of the site, the relatively small size of the project site, and the fact that the project site is isolated from any open space with suitable habitat to support these species. The project site does, however, contain ornamental, non-native trees and shrubs that could provide nesting habitat for common birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or their eggs). Vegetation or tree removal/trimming and other construction activities could negatively affect individual birds or raptors that are nesting on or within the vicinity of the project site. To comply with the MBTA and the California Fish and Game Code and avoid impacts to nesting birds from implementation of the proposed project, if construction commences during the nesting bird season (February 1 through September 15), a pre-construction nesting bird survey would be required prior to construction, as detailed in **Regulatory Compliance Measure (RCM) BIO-1**.

RCM BIO-1

Nesting Bird Clearance Survey. If construction/ground-disturbing activities, including demolition, occurs between February 1 and September 15, a Qualified Biologist shall conduct a pre-construction clearance survey for nesting birds within 3 days of the start of any construction, demolition, or earthmoving activities to ensure that no nesting birds are disturbed during construction. The Qualified Biologist shall be retained by the Construction Contractor. The Qualified Biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests would occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a no-disturbance buffer.

In general, the no-disturbance buffer shall be a minimum of 50 feet for passerines and 250 feet for raptors. However, a species' sensitivity to disturbance can vary among species, the level of noise or construction disturbance, and the line of sight between the nest and the disturbance. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. A biological monitor with experience in monitoring active nests shall be present to delineate the boundaries of the buffer area, monitor daily all active nests to observe the efficacy of the no-disturbance buffers, and document any new nesting occurrences to ensure that nesting behavior is not adversely affected by the construction activity. Adversely affected nesting behavior, as determined by the biological monitor, includes, but is not limited to: disrupting reproductive behavior, nest abandonment, and/or prolonged absences of parents while incubating eggs. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur. Field memorandums shall be prepared by the biological monitor within 24 hours of each day of monitoring and shall be submitted to the California Department of Education (CDE) to document compliance with the applicable resource protection measures.

With implementation of **RCM BIO-1**, the proposed project would not 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 CDFW or United States Fish and Wildlife Service (USFWS). Impacts would be less than significant, and no mitigation is required.

b. Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The project site is located in a developed area and is comprised of grass sports fields, a track, fencing, landscaped areas and pathways, and related athletic facilities on the CSDR campus. There are no riparian or sensitive natural community areas on the project site. The CNDDDB records search (Appendix C) indicated that there are 7 sensitive natural communities that have been previously reported in the project vicinity, one of which was reported within one mile of the project site. However, none of these sensitive natural communities are present on the project site or on adjacent properties due to lack of suitable habitat and previous site disturbances. Therefore, the proposed project would not 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 CDFW or USFWS. There would be no impact, and no mitigation is required.

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. The project site is located in a developed area and is currently comprised of grass sports fields, a track, fencing, landscaped areas and pathways, and related athletic facilities on the CSDR campus. No drainage features, ponded areas, or riparian habitat subject to jurisdiction of the CDFW, the United States Army Corps of Engineers (USACE), and/or Regional Water Quality Control Board (RWQCB) are present within the project site. Additionally, no National Wetlands Inventory-mapped “blue line” wetlands are mapped on the project site.⁹ As such, implementation of the proposed project would not adversely affect any State or federally-protected wetlands through direct removal, filling, hydrological interruption, or other means. No impact would occur, and no mitigation is required.

- d. *Would the project 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?*

Less Than Significant Impact. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The project site is located in a developed area and is currently comprised of grass sports fields, a track, fencing, landscaped areas and pathways, and related athletic facilities on the CSDR campus. Surrounding land uses include a mix of residential and commercial uses and the CSDR campus. There are no migratory wildlife corridors or native wildlife nursery sites on or near the project site to support wildlife species. Additionally, there are no riparian corridors, creeks, or useful patches of habitat within or connecting the project site to any identified wildlife corridors or linkages. Therefore, the proposed project would not interfere with the movement of any wildlife species or with established wildlife corridors.

Ornamental, non-native trees and shrubs on the project site have the potential to provide minimal foraging and nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that are adapted to urban environments. However, **RCM BIO-1** includes measures to prevent potential impacts to nesting birds during construction activities. With implementation of **RCM BIO-1**, the proposed project would not interfere with the movement of any

⁹ United States Fish and Wildlife Service (USFWS). 2018. *National Wetlands Inventory, Surface Waters and Wetlands*. Website: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/> (accessed March 27, 2025).

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. Impacts would be less than significant, and no mitigation is required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. There are no local policies or ordinances protecting biological resources that are applicable to the proposed project. Therefore, no impact would occur and no mitigation is required.

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

No Impact. The project site is located in an urbanized area of the City of Riverside. The project site is located within the Plan Area of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). However, the project site is not located within an MSHCP criteria area, is not designated as a core or linkage area, is not located within the narrow endemic plant species survey area, is not located within a criteria area species survey area, and is not located within a burrowing owl survey area.¹⁰ Therefore, the proposed project would not conflict with the provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur, and no mitigation is required.

¹⁰ City of Riverside. 2007a. *Riverside General Plan 2025*. November.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

4.5.1 Impact Analysis

The discussion and analysis provided in this section is based on the Cultural Resources Analysis prepared for the proposed project (LSA Associates, Inc., April 2025).¹¹ Due to the confidential nature of the information included in cultural resources reports, the Cultural Resources Analysis is not provided as an appendix to this document.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. CEQA defines a “historical resource” as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) listed in a local register of historical resources as defined in the California Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project’s lead agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5(a)).

The project site is located in a developed area and is comprised grass sports fields, a track, fencing, landscaped areas and pathways, and related athletic facilities on the CSDR campus. On February 4, 2025, a record search at the South Coast Information Center (SCIC) was conducted to establish the status and extent of previously recorded sites, surveys and excavations within the project area. Data from the SCIC indicate there have been no resources or cultural resource studies previously conducted within the project site. Online research revealed agricultural cultivation within the project area in 1948, just prior to the development of the school.¹² As previously stated, the project site is currently comprised of athletic sports fields and aside from a storage shed constructed after 1975,¹³ does not include any permanent buildings.

¹¹ LSA. 2025b. *Cultural Resources Assessment, California School for the Deaf – Riverside: Athletic Complex Replacement and Expansion Project*. April.

¹² HistoricAerials.com. 1948. Aerial photograph of project area.

¹³ LSA Personal Communication with Stephanie Coleman, Department of General Services, February 4, 2025.

The project site does not qualify as an “historical resource” as defined by CEQA. There are also no known archaeological resources on the project site that would qualify as “historical resources” as defined by CEQA. Therefore, the proposed project would not result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines*. No impacts would occur, and no mitigation is required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. In its existing condition, the project site is completely disturbed and developed. The project site is located within the CSDR campus and surrounded by development. No cultural resources were identified during the archaeological field survey completed on February 13, 2025. The lack of resources identified by the record search, Sacred Lands File (SLF) search, and field survey, in addition to previous disturbance from the school’s development, result in a low probability for surface and subsurface resources to occur within the project site. Although the project site is not anticipated to be sensitive for cultural resources, ground-disturbing activities have the potential to reveal unknown buried deposits.

In the unlikely event that unanticipated archaeological resources are discovered at any time during project construction, impacts to these resources could be potentially significant. With implementation of **RCM CUL-1** requiring that a qualified archaeologist is retained to be on-call to respond to inadvertent discoveries during project construction and that all construction work occurring within 50 feet of any find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Qualification Standards for Archaeology, can evaluate the significance of the find, potentially significant impacts to previously undiscovered archaeological resources would be less than significant, and no mitigation is required.

RCM CUL-1

Inadvertent Discovery. The project applicant shall retain a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology. If potential cultural/archaeological resources (i.e., sites, features, or artifacts) are discovered during construction activities for the project, the California Department of Education (CDE) shall be notified and all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist can evaluate the significance of the find and determine whether the find constitutes a “Tribal Cultural Resource” pursuant to Section 21074 of the California Public Resources Code (PRC), or a “unique archaeological resource” pursuant to Section 21083.2(g) of the PRC or a “historical resource” pursuant to Section 15064.5(a) of the *State CEQA Guidelines*. Personnel of the proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

Prior to issuance of a grading permit, the CDE shall ensure that this mitigation measure is documented on the grading plans.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

No Impact. There are no known human remains at the project site. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall take place until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD will have the opportunity to offer recommendations for the disposition of the remains. With these regulations in place, no impact on human remains would occur.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

4.6.1 Impact Analysis

The proposed project is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central, Coastal, and Southern California.¹⁴ According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870.0 gigawatt-hours (GWh), or 85,869,985,679 kilowatt-hours (kWh). Total electricity consumption in Riverside County in 2022 was 17,781 GWh, or 17,780,573,271 kWh.¹⁵

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. According to the most recent data available, total gasoline consumption in California was 289,918 thousand barrels or 1,464.7 trillion British thermal units (BTU) in 2020.¹⁶ Of the total gasoline consumption, 273,289 thousand barrels or 1,380.7 trillion BTU were consumed for transportation.¹⁷ Based on fuel consumption obtained from CARB's California Emissions Factor Model, Version 2021, 730.6 million gallons of gasoline and 302.4 million gallons of diesel will be consumed from vehicle trips in Riverside County in 2025.¹⁸

¹⁴ Southern California Edison (SCE). 2020. About Us. Website: <https://www.sce.com/about-us> (accessed March 2025).

¹⁵ California Energy Commission (CEC). 2022a. Electricity Consumption by County and Entity. Website: <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (accessed March 2025).

¹⁶ A British Thermal Unit is defined as the amount of heat required to raise the temperature of one pound of water by one degree Fahrenheit.

¹⁷ United States Energy Information Administration (EIA). 2021. California State Profile and Energy Estimates. Table F3: Motor gasoline consumption, price, and expenditure estimates, 2020. Website: eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed March 2025).

¹⁸ California Emission Factor Model, Version 2021 (EMFAC2021). n.d. *Gasoline and Diesel*. Website: <https://arb.ca.gov/emfac/emissions-inventory/fb6b95c42cafba4b82ad406061efe5337d0f368a> (accessed March 2025).

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

Less Than Significant Impact. The proposed project would not increase the demand for electricity and gasoline when compared to existing site conditions. The discussion and analysis provided below is based on the data included in the California Emissions Estimator Model (CalEEMod) output, which is included in Appendix A.¹⁹

Construction-Period Energy Use. The anticipated construction schedule is expected to occur over a total of approximately 17 months. The proposed project includes the replacement of the existing original athletic fields and improvements to associated infrastructure on the project site.. Project construction activities would include demolition, site preparation, grading, building construction, and architectural coating activities.

Construction of the proposed project would require energy for the manufacture and transportation of building materials and for preparation of the site for grading activities and construction. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage within the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be less than significant, and no mitigation is required.

Operational Energy Use. Operational energy use is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with a project.

As discussed above, the proposed project includes the replacement of the existing original athletic fields and improvements to associated infrastructure on the project site. The proposed project would not include natural gas; therefore, no impact related to the consumption of natural gas would occur. Energy use consumed by the proposed project would include electricity consumption associated with lighting. New lighting is being proposed to replace the existing lighting associated with the original infrastructure at the athletic fields. Using CalEEMod, the estimated increase in electricity demand associated with the operation of the proposed project would be 75,948 kWh per year. Total electricity consumption in Riverside County in 2022 was 17,780,573,271 kWh;²⁰ therefore, operation of the proposed project would negligibly increase the annual electricity consumption in Riverside County by approximately less than 0.1 percent.

Furthermore, in 2018, Senate Bill (SB) 100 was passed, which has committed California to generate all electricity from carbon free sources by 2045. The proposed project considers the context of the changing electricity grid and is designed to displace natural gas emissions over the

¹⁹ LSA. 2025a. CalEEMod Output Sheets. March. Appendix A.

²⁰ CEC. 2022b. Electricity Consumption by County. Website: www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed March 2025).

lifetime of the building. The proposed project would include sustainability features such as battery storage, solar panels, storm drain retention vault and a biofiltration unit. In addition, the proposed project has been designed to be zero net energy (ZNE) and will meet or exceed the requirements for Leadership in Energy and Environmental Design (LEED) “Gold” certification. ZNE indicates that the total amount of energy used by the project on an annual basis would be approximately equal to the amount of renewable energy generated on site. As California’s grid becomes cleaner, and once the grid consists of 100 percent renewable generation sources, the proposed project would have zero operational emissions associated with electricity usage. In addition, the proposed project would be required to comply with the latest California Energy Code and California Green Building Standards Code (CALGreen Code) standards which include energy efficiency measures that would help lower energy consumption.

As described in Section 4.17, Transportation, no additional operational trips are anticipated for the proposed project. Therefore, vehicle trips associated with the proposed project would not increase the annual fuel use in Riverside County. As such, fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, given the proposed improvements, implementation of the proposed project would not result in a substantial increase in electricity, natural gas, or transportation-related energy, such that it would result in a wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant, and no mitigation is required.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

The CEC recently adopted the 2023 Integrated Energy Policy Report.²¹ The 2023 Integrated Energy Policy Report provides the results of the CEC’s assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2023 Integrated Energy Policy Report covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy

²¹ CEC. 2023. *2023 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 23-IEPR-01.

sector, natural gas assessment, transportation energy demand forecasts, and the California Energy Demand Forecast.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the region's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report. Therefore, the proposed project would not lead to new or substantially more severe energy impacts. Impacts would be less than significant, and no mitigation is required.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

4.7.1 Impact Analysis

The following discussion and analyses are based on the findings provided in the Geotechnical Investigation²² completed for the proposed project, which is included as Appendix D to this IS/MND.

- a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

No Impact. Fault rupture is generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., within the last 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that

²² NOVA Services, Inc. 2025. *Geotechnical Investigation, Athletic Complex Replacement and Expansion California School for the Deaf, Riverside (CSDR), 3044 Horace Street, Riverside, California*. January 17.

would require specific geological investigations prior to approval of certain kinds of development within the delineated area. There are no mapped faults within or adjacent to the project site, and the project site is not located within an Alquist-Priolo Zone.²³ The nearest mapped fault to the project site is the Claremont Fault, which is located approximately 9 miles northeast of the project site. Therefore, the proposed project would not result in potential adverse effects, including the risk of loss, injury or death involving the rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map. No impact would occur, and no mitigation is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is in a seismically active area, where earthquakes have the potential to subject the proposed project to strong seismic ground shaking. The intensity of ground shaking would depend on the characteristics of the fault, distance from the fault, the earthquake magnitude and duration, and site-specific geologic conditions.

The proposed project would comply with the 2022 California Building Code (CBC) (Title 24, California Code of Regulations [CCR]),²⁴ which provides for stringent construction requirements for projects in areas of high seismic risk based on numerous inter-related factors. It is acknowledged that seismic hazards cannot be completely eliminated, even with implementation of advanced building practices. However, the seismic design standards of the CBC are intended to prevent catastrophic structural failure in the most severe earthquakes currently anticipated. Additionally, the proposed project would implement the project-specific design recommendations identified in the Geotechnical Investigation completed for the proposed project. With compliance with the CBC and implementation of the project-specific design recommendations identified in the Geotechnical Investigation, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic ground shaking. Impacts would be less than significant, and no mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon primarily associated with saturated soil layers located close to the ground surface. During ground shaking, these soils lose strength and acquire “mobility” sufficient to permit both horizontal and vertical movements. The significant factors on which liquefaction potential of a soil deposit depends include soil type, relative soil density, intensity of earthquake, duration of ground shaking, and depth of ground water. Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie relatively close to the ground surface. However, loose sands that contain a significant amount of fines (i.e., silt and clay) may also liquefy. According to the City of Riverside General Plan 2025 Program Environmental Impact Report (EIR), the project site is located in an area with low

²³ California Department of Conservation. 2021. *Earthquake Zones of Required Investigation*. California Geologic Survey. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/> (accessed September 6, 2024).

²⁴ City of Riverside. Municipal Code, Title 16 – Buildings and Construction, Chapter 16.08– Building Code.

liquefaction hazard.²⁵ Additionally, according to the Geotechnical Investigation completed for the proposed project, soils on site are relatively dense, and shallow groundwater was not present at the project site indicating a very low potential for liquefaction to occur. Therefore, the proposed project would not result in potential adverse effects, including the risk of loss, injury or death involving seismic-related ground failure including liquefaction. Impacts would be less than significant, and no mitigation is required.

iv. Landslides?

No Impact. A landslide generally occurs on relatively steep slopes and/or on slopes underlain by weak materials. The project site is relatively level and is not located next to any slopes. Additionally, there are no existing or historic landslides present on the property or in the nearby vicinity.²⁶ Furthermore, the project site is not located within a designated Earthquake Induced Landslide Zone.²⁷ Therefore, the proposed project would not result in potential adverse effects, including the risk of loss, injury or death involving landslides. No impact would occur, and no mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Topsoil is defined as the upper part of the soil profile that is relatively rich in humus and is technically known as the A-horizon of the soil profile.²⁸ Grading and earthmoving during project construction has the potential to result in erosion and the loss of topsoil. Exposed soils could be entrained in stormwater runoff and transported off the project site. To address the potential for erosion, the proposed project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) including best management practices (BMPs) during construction, which would reduce erosion in accordance with the requirements of the Construction General Permit as detailed in **RCM HYD-1** (refer to Section 4.10, Hydrology and Water Quality).

Operation of the proposed project would increase impervious surface area on the project site by 3.3 acres compared to existing conditions, which are not subject to erosion. Furthermore, the proposed project would be required to implement a project-specific Water Quality Management Plan (WQMP), which would contain post-construction measures to reduce potential impacts to soil erosion to less than significant levels as detailed in **RCM WQ-2** (refer to Section 4.10).

²⁵ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

²⁶ NOVA Services, Inc. 2025. *Geotechnical Investigation, Athletic Complex Replacement and Expansion California School for the Deaf, Riverside (CSDR), 3044 Horace Street, Riverside, California*. January 17.

²⁷ California Department of Conservation. 2021. *Earthquake Zones of Required Investigation*. California Geologic Survey. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/> (accessed September 6, 2024).

²⁸ California State Mining and Geology Board. 2014. *Surface Mining Reclamation Act Regulations*. California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1.

Compliance with existing regulatory requirements would ensure that the proposed project would not result in substantial soil erosion or the loss of topsoil during construction and/or operation. Impacts would be less than significant, and no mitigation is required.

- c. *Would the project 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?*

Less Than Significant Impact. As discussed in Section 4.7.1.a, site soils would not be subject to landslides or liquefaction.

Lateral Spreading. Lateral spreading is a form of horizontal displacement of soil toward an open channel or other “free” face, such as an excavation boundary. In a lateral spread failure, a layer of ground at the surface is carried on an underlying layer of liquefied material over a nearly flat surface toward a river channel or other bank. The lateral spreading hazard tends to mirror the liquefaction hazard for a site. Because the topography of the site is near level and the project site has a low risk of liquefaction, the potential for seismically induced lateral spreading is minimal. Therefore, the proposed project would not result in potential adverse effects, including the risk of loss, injury or death involving lateral spreading. Impacts would be less than significant, and no mitigation is required.

Subsidence. Subsidence can result from the removal of subsurface water resulting in either gradual depression or catastrophic collapse of the ground surface. According to the City of Riverside General Plan 2025 EIR, the project site is located in an area with low liquefaction hazard, which is generally characterized as having a groundwater depth greater than 30 feet.²⁹ Additionally, groundwater was not encountered in the borings drilled to a maximum depth of 16.5 feet below the ground surface during the field investigation completed for the Geotechnical Investigation.³⁰ The proposed project would require excavation to a maximum depth of 10.5 feet below ground surface. Therefore, it is not anticipated that dewatering or shoring of groundwater would be required during construction. Additionally, the project site is not located in an area of known subsidence associated with fluid withdrawal and the potential for subsidence due to the extraction of fluids is considered low at the project site.³¹ Therefore, the proposed project would not result in impacts related to subsidence, and no mitigation is required.

Unstable Soils and Collapse. As detailed in the Geotechnical Investigation completed for the proposed project, the site is underlain by undocumented fill and old alluvial fan deposits. The undocumented fill is potentially compressible and therefore unsuitable for support of structural or fill loads and the upper 3 feet of old alluvium is susceptible to collapse upon wetting. Dynamic settlement of the loose, near surface alluvium at the project site is anticipated and the fill and

²⁹ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

³⁰ NOVA Services, Inc. 2025. *Geotechnical Investigation, Athletic Complex Replacement and Expansion California School for the Deaf, Riverside (CSDR), 3044 Horace Street, Riverside, California*. January 17.

³¹ NOVA Services, Inc. 2025. *Geotechnical Investigation, Athletic Complex Replacement and Expansion California School for the Deaf, Riverside (CSDR), 3044 Horace Street, Riverside, California*. January 17.

upper old alluvial fan deposits at the project site are susceptible to hydro-consolidation. As such, the Geotechnical Investigation recommends the completion of remedial grading to mitigate potential impacts associated with hydro-consolidation and dynamic settlement. With implementation of the recommendations identified in the Geotechnical Investigation and requirements of the CBC, impacts related to unstable soils and collapse would be less than significant. No mitigation is required.

- d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact. Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. Shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percent change of the soil volume. According to the City of Riverside General Plan 2025 Program EIR, the project site is not located in an area that has soils with high shrink swell potential.³² Additionally, testing completed as part of the Geotechnical Investigation indicated that on-site soils have a low expansion potential.³³ Therefore, the proposed project would not result in substantial direct or indirect risks to life or property due to expansive soils. Impacts would be less than significant, and no mitigation is required.

- e. Would the project 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?*

No Impact. Development of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed project would have no impact related to the soils capability to adequately support the use of septic tanks or alternative wastewater disposal systems, and no mitigation is required.

- f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less Than Significant with Mitigation Incorporated. There are no known paleontological resources or unique geologic features within or near the project site. Known areas of paleontological sensitivity within the City include portions of the banks of the Santa Ana River and the area south of Mockingbird Canyon Reservoir.³⁴ The Santa Ana River is located approximately 2.5 miles northwest of the project site and the Mockingbird Canyon Reservoir is located approximately 3.8 miles southwest of the project site. Therefore, the project site is not located within an area identified as a place of paleontological importance. However, according to a search of the University of California

³² City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

³³ NOVA Services, Inc. 2025. *Geotechnical Investigation, Athletic Complex Replacement and Expansion California School for the Deaf, Riverside (CSDR), 3044 Horace Street, Riverside, California*. January 17.

³⁴ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

Museum of Paleontology at the University of California, Berkeley, there are 212 known localities that have produced 2,102 specimens within Riverside County.³⁵ Accordingly, although the project site is not known to contain unique paleontological resources or unique geologic features, the possibility of accidental discovery of paleontological resources during project construction cannot be discounted. Implementation of **RCM GEO-1**, described below, would reduce potential impacts to paleontological resources to a less than significant level. No mitigation is required.

RCM GEO-1

Inadvertent Discovery of Paleontological Resources. Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this measure, a “qualified paleontologist” shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least two years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the California Department of Education (CDE). If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.

³⁵ University of California Museum of Paleontology. n.d. *Databases*. Website: <https://ucmp.berkeley.edu/collections/databases/> (accessed March 21, 2025).

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

4.8.1 Impact Analysis

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF₆)

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO₂, methane, and N₂O, some gases, like HFCs, PFCs, and SF₆ are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO₂, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO₂ equivalents" (CO₂e).

State CEQA Guidelines Section 15064(b) provides that the “determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data,” and further states that an “ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting.”

Appendix G of the State CEQA Guidelines includes significance thresholds for GHG emissions. A project would normally have a significant effect on the environment if it would do either of the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Currently, there is no Statewide GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Threshold methodology and thresholds are currently developed and revised by air districts in California.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting held in September 2010 (Meeting No. 15), SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1. Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2. Consistency with a locally adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project’s geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3. Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are considered to be less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. For the analysis of stationary/industrial projects, the SCAQMD adopted a threshold of 10,000 metric tons (MT) of CO₂e per year (MT CO₂e/year). The proposed project is not a stationary source project and therefore, the 10,000 MT CO₂e/year threshold is not applicable. For all other land use types, the SCAQMD recommends utilizing one of two options to analyze the impact of a project’s GHG emissions. Under Option 1, the SCAQMD applies a “bright-line” screening-level threshold of 3,000 MT CO₂e/year for all land use types. Under Option 2, the SCAQMD applies a “bright-line” screening level threshold based on specific land use types as follows: 1,400 MT CO₂e for

commercial projects; 3,500 MT CO₂e for residential projects; or 3,000 MT CO₂e for mixed-use projects. This “bright-line” threshold is based on a review of the Office of Planning and Research (OPR) database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the “bright-line” thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

- **Tier 4. Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project’s GHG emissions is warranted. SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percent emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MT CO₂e/year per service population (for project-level analyses and 6.6 MT CO₂e/year per service population for plan-level projects (e.g., program-level projects such as general plans).

Furthermore, Section 15064.4 of the *State CEQA Guidelines* states that: “A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” In performing that analysis, the lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions or to rely on a qualitative analysis or performance-based standards. In making a determination as to the significance of potential impacts, the lead agency then considers the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting, whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The City adopted its first Climate Action Plan (CAP) in 2016, with the goal of reducing municipal and community-wide GHG emissions by 15 percent by 2020, from a 2012 baseline level. However, the City’s CAP was prepared based on the State’s 2020 GHG targets, which are now superseded by State policies (i.e., the 2022 California Green Standards Building Code [CalGreen Code]), the 2030 GHG targets established in Senate Bill (SB) 32, and Assembly Bill (AB) 1279. The City is currently developing a Climate Action and Adaptation Plan (CAAP) in conjunction with the 2050 General Plan Update. The CAAP will establish updated emissions reduction targets for the City. However, the City’s draft CAAP is currently under development and has not yet been formally adopted.

Therefore, this analysis evaluates the proposed project against the SCAQMD threshold of 3,000 MT CO₂e per year. The proposed project is also evaluated for compliance with the 2022 Scoping Plan and Connect SoCal 2024.

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant Impact. This section discusses the proposed project’s impacts related to the release of GHG emissions for the construction and operational phases of the project. Construction and operational GHG emissions were estimated using California Emissions Estimator Model

(CalEEMod) using the same methodology for the criteria pollutants described in Section 4.3, Air Quality.

Construction Activities. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

SCAQMD does not provide a separate GHG significance threshold for construction emissions; rather, applicable guidance specifies that construction emissions should be amortized over 30 years (a typical project lifetime), added to the project operational emissions, and that total compared to the GHG significance threshold. As shown in Table 4.8.A, the construction emissions associated with the proposed project would be approximately 750.7 MT CO₂e per year. Based on the 30-year lifespan of the proposed Project, the proposed project would result in GHG emissions of approximately 25.0 MT CO₂e per year (refer to the CalEEMod output in Appendix A for details³⁶).

Table 4.8.A: Construction Greenhouse Gas Emissions

Construction Year	Total Emissions per Year (MT)			Total Emissions per Year (MT CO ₂ e)
	CO ₂	CH ₄	N ₂ O	
2027	324.9	<0.1	<0.1	328.3
2028	418.1	<0.1	<0.1	422.4
Total Emissions for the Entire Construction Process				750.7
Total Construction Emissions Amortized over 30 Years				25.0

Source: Compiled by LSA (April 2025).

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

MT CO₂e = metric tons of carbon dioxide equivalent

MT = metric tons

N₂O = nitrous oxide

Since there is no separate GHG significance threshold for construction emissions, project level and cumulative GHG emissions during construction activities alone would be less than significant, and no mitigation is required.

Operational GHG Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., cars, trucks, and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the project site. Area-source emissions would be associated with activities such as landscaping and maintenance within the project site. Waste source

³⁶ LSA. 2025. CalEEMod Output Sheets. March. Appendix A.

emissions are typically generated by the energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste.

The proposed project includes the replacement of the existing original athletic fields and improvements to associated infrastructure on the project site. Additionally, the proposed project would include sustainability features such as battery storage, solar panels, storm drain retention vault, and biofiltration unit. The proposed project has been designed to be zero net energy (ZNE) and would meet or exceed the requirements for Leadership in Energy and Environmental Design (LEED) “Gold” certification. Additionally, as described in Section 4.17, Transportation, no additional operational trips are anticipated for the proposed project.

Following guidance from the SCAQMD, GHG emissions were estimated for the operational year of 2026 using CalEEMod. Operational GHG emissions associated with the proposed project are shown in Table 4.8.B, below.

Table 4.8.B: Greenhouse Gas Emissions

Emission Type	Operational Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources	0.0	0.0	0.0	0.0
Area Sources	0.1	<0.1	<0.1	0.1
Energy Sources	30.1	<0.1	<0.1	30.2
Water Sources	2.3	<0.1	<0.1	3.1
Waste Sources	0.4	<0.1	0.0	1.6
Total Project Emissions				35.0
Amortized Construction Emissions				25.0
Annual Project Emissions				60.0
SCAQMD Threshold				3,000
Emissions Exceed Threshold?				No

Source: Compiled by LSA (April 2025).

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

N₂O = nitrous oxide

As shown in Table 4.8.B, the proposed project would generate 60.0 MT CO₂e, which is below the 3,000 MT CO₂e threshold. As such, the proposed project would not be a substantial source of energy, area, waste, or water source emissions. Therefore, the proposed project would not generate GHG emissions that would have a significant impact on the environment. Therefore, impacts would be less than significant, and no mitigation is required.

- b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less Than Significant Impact. An evaluation of the proposed project’s consistency with the 2022 Scoping Plan and Connect SoCal 2024 is provided in this section.

2022 Scoping Plan. Executive Order (EO) B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the

Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016. AB 1279 codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The Scoping Plan contains GHG reduction measures that work towards reducing GHG emissions, consistent with the targets set EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and will not have a cumulative considerable impact on climate change.³⁷ The proposed project would not include natural gas. Therefore, the proposed project would be implementing its "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. In addition, the proposed project would be required to comply with the latest Title 24 standards of the California Code of Regulations (CCR), established by the California Energy Commission (CEC), regarding energy conservation and green building standards. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project

³⁷ Bay Area Air Quality Management District (Air District). 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*. April. Website: <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf?la=en> (accessed November 2024).

would be required to comply with the latest Title 24 standards of the CCR, which includes a variety of different measures, including reduction of wastewater and water use. In addition, the proposed project would also include low to moderate landscaping and would increase impervious surface area. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. As identified above, no additional operational trips are anticipated for the proposed project. Therefore, the proposed project would result in a less than significant VMT impact. In addition, the proposed project is located near commercial and residential areas that are presently served by existing public services (e.g., transit). Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

Connect SoCal 2024. Southern California Association of Governments' (SCAG) Connect SoCal 2024 identifies that land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in Connect SoCal 2024 is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. Connect SoCal 2024 contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in Connect SoCal 2024, would reach the GHG emissions target set by CARB, including the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). Connect SoCal 2024 does not require that local General Plans, Specific Plans, or zoning be consistent with Connect SoCal 2024 but provides incentives for consistency for governments and developers.

The objectives of Connect SoCal 2024 are to create a region with transit as a backbone of the transportation system; more complete streets where people and safety are prioritized; policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals; more housing, jobs, and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces; more housing to address the existing housing need; and safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies.

The proposed project would be consistent with the project site's existing General Plan designation and zoning. As such, it is assumed that the project's labor demand would not substantially increase population, households, or employment in the City. As such, the proposed project would be consistent with SCAG's goals for new job growth in the region. Therefore, because the proposed project would accommodate planned regional growth, the proposed project would not exceed the growth assumptions in the SCAG's Connect SoCal 2024.

Implementing SCAG's Connect SoCal 2024 will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. The proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206, and as such, it would not conflict with the SCAG Connect SoCal 2024 targets because those targets were established and are applicable on a regional level. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in Connect SoCal 2024.

As demonstrated above, the proposed project would generally be inconsistent with the 2022 Scoping Plan and SCAG's Connect SoCal 2024. As such, the proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in the 2022 Scoping Plan, EO B-30-15, and AB 197 and would be consistent with applicable State plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. Associated impacts would be less than significant, and no mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
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?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

4.9.1 Impact Analysis

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

Less Than Significant with Mitigation Incorporated.

Construction. Construction of the proposed project would involve the use and transport of hazardous materials. These materials could include fuels, oils, paints, and other chemicals used during construction activities. Handling and transportation of hazardous materials could result in accidental releases or spills and associated health risks to workers, the public, and environment. However, transport and use of hazardous materials would be subject to all applicable State and federal laws, such as Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, California Health and Safety Code, and California Code of Regulations (CCR) Title 8 and Title 22.

The proposed project would include the demolition of existing athletic facilities, fencing, bleachers, and a storage shed. Asbestos-containing materials are not expected to occur within

the existing infrastructure due to the materials used and the date the structures were constructed. However, it is possible that the infrastructure proposed for demolition could contain other hazardous materials such as lead based paint (LBP). Therefore, demolition of these structures could result in the release of hazardous materials into the environment. Implementation of **Mitigation Measure (MM) HAZ-1**, described below, would ensure that this impact would be reduced to a less than significant level.

MM HAZ-1

Hazardous Building Materials Survey. Prior to the demolition of existing infrastructure on the project site, a comprehensive Hazardous Building Materials Survey (HBMS) for the project site shall be prepared and signed by a qualified environmental professional, documenting the presence or lack thereof of hazardous building materials. The HBMS shall include abatement specifications for the stabilization and/or removal of identified hazardous building materials in accordance with all applicable laws and regulations. The demolition contractor(s) shall implement the abatement specifications and submit to the California Department of Education (CDE) evidence of completion of abatement activities prior to demolition of the existing structures.

Implementation of **MM HAZ-1** would require the preparation of a HBMS, which would require the development and implementation of specific procedures to ensure hazardous materials on the project site would be handled properly. Implementation of this mitigation measure would ensure that the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction of the proposed project.

Operation. The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. Because the proposed project is for recreational and educational uses, it would generally not involve transport, use, or disposal of significant quantities of hazardous materials. Only small quantities of chemicals would be used for routine maintenance that would not pose a significant threat to human or environmental health when used in compliance with existing regulations. As is the case during construction, the transport, use, and storage of hazardous materials during project operation would be regulated by applicable State and federal laws, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, the California Health and Safety Code, and CCR Title 8 and Title 22 as described above. These existing regulations inherently safeguard life and property from the hazards of fire/explosion arising from the storage, handling, and use of hazardous substances, materials, and devices, as well as hazardous conditions due to the use or occupancy of buildings.

Therefore, with implementation of **MM HAZ-1** during demolition of the existing structures on site and compliance with all applicable federal, State, and local laws during construction and

operation of the proposed project, impacts to the public or environment from the routine transportation, use, and disposal of hazardous materials would be less than significant with mitigation incorporated.

- b. *Would the project 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?*

Less Than Significant with Mitigation Incorporated. Exposure to hazardous materials during the construction and operation of the proposed project could result from (1) the improper handling or use of hazardous substances; (2) a transportation accident; or (3) inadvertent release resulting from an unforeseen event (e.g., fire, flood, or earthquake).

Construction. The proposed project would include the demolition of existing athletic facilities, fencing, bleachers, and a storage shed. During construction activities, the proposed project would be required to comply with relevant applicable federal and State laws and regulations pertaining to hazardous materials which would ensure that hazardous materials are properly handled and transported. The potential for the release of hazardous materials during project construction is low, and even if a release were to occur due to an unforeseen event, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials that would be used during construction activities. Additionally, implementation of **MM HAZ-1** would require the preparation of an HBMS, which would require the development and implementation of specific procedures to ensure hazardous materials on the project site would be handled properly. Implementation of this mitigation measure would ensure that the proposed project would result in less-than-significant impacts to human health or the environment associated with accidental releases of hazardous materials during construction. Therefore, impacts would be less than significant with mitigation incorporated.

Operation. As described above, small quantities of common hazardous materials would be used at the project site during operation of the proposed project. Improper use, storage, or handling could result in the release of hazardous materials into the environment which could pose a risk to the public. However, the project applicant would be required to comply with existing government regulations during the use and disposal of these materials, which would ensure that hazardous materials are properly handled and transported, and such materials would not be used in sufficient strength or quantity to create a substantial risk to human or environmental health should a release occur due to an unforeseen event. The potential for releasing hazardous materials into the environment during project operation would be consistent with existing conditions and would not be exacerbated by implementation of the proposed project. Therefore, operation of the proposed project would not result in a significant impact associated with hazards from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no mitigation is required.

Overall, with implementation of **MM HAZ-1** during demolition of the existing structures on site and compliance with all applicable federal, State, and local laws during construction and operation of the proposed project, the proposed project would 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. Impacts would be less than significant with mitigation incorporated.

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less Than Significant with Mitigation Incorporated. The project site is located within the CSDR campus. Implementation of **MM HAZ-1** would require the preparation of a HBMS, which would require the development and implementation of specific procedures to ensure hazardous materials on the project site would be handled properly during demolition of the existing infrastructure. Additionally, as noted in Sections 4.9.1.a and 4.9.1.b, the proposed project would comply with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, California Health and Safety Code, and CCR Title 8 and Title 22. Construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or create a hazard to the public and environment through reasonably foreseeable upset and accident conditions. During operation of the proposed project, only small quantities of chemicals would be used for routine maintenance, which would not pose a significant threat to human or environmental health. Therefore, this impact would be less than significant with mitigation incorporated.

- d. Would the project 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?*

No Impact. The project site is not included on any list of hazardous materials site compiled pursuant to Government Code Section 65962.5.³⁸ No impact would occur, and no mitigation is required.

- e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The closest airport is the Riverside Municipal Airport, located approximately 3 miles west of the project site. The project site is not located within a compatibility zone or within the Riverside Municipal Airport influence area boundary.³⁹ Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the area. No impact would occur, and no mitigation is required.

³⁸ California Environmental Protection Agency (CalEPA). 2024. Cortese List Data Resources. Website: <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed March 19, 2025).

³⁹ Riverside County Airport Land Use Commission. 2005. *Riverside County Airport Land Use Compatibility Plan Policy Document*. March.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Riverside County Emergency Management Department has prepared an Emergency Operations Plan, which addresses the planned response to extraordinary situations associated with natural disasters and/or human caused incidents. The plan focuses on coordinating mutual aid and provides an overview of the operational concepts relating to various emergency situations, identifies components of the emergency response, and describes the overall responsibilities for supporting stakeholders in protecting life and property.⁴⁰ The City's General Plan and the Emergency Operations Plan do not designate evacuation routes within Riverside. Regardless, the proposed project is located within the CSDR campus and would not require traffic detours or road closures on public roadways during construction. The CSDR has campus-specific plans to respond to emergencies such as natural disasters, man-made disasters, and critical incidents which are updated annually.⁴¹ CSDR's emergency procedures and plans would be followed in the event of an emergency during construction.

The improvements that would occur as part of the proposed project are site-specific and do not include any public right-of-way improvements to off-site areas (e.g., roadway improvements, intersection improvements) or change the existing use of the site. Operation of the proposed project would not result in a change in traffic volumes or access to the project site and would not interfere with existing emergency response times or adopted emergency response or evacuation plans. Additionally, the proposed project would comply with CSDR's emergency procedures and plans. Therefore, the proposed project would not result in impacts related to impairment or interference with an adopted emergency response or evacuation plan, and no mitigation is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. As described in Section 4.20, Wildfire, the project site is located in an urban area and is not within or adjacent to a wildland fire hazard area.⁴² Implementation of the proposed project would not change the existing use of the project site or alter the existing risk of wildfire on the project site. Therefore, the proposed project would not expose people or structures to a significant loss, injury or death involving wildland fires. No impact would occur, and no mitigation is required.

⁴⁰ Riverside County Emergency Management Department. 2024. *County of Riverside Operational Area Emergency Operations Plan (EOP)*. August.

⁴¹ California School for the Deaf, Riverside. N.d. *Guide to Emergency Procedures*. Website: <https://www.csdrcde.ca.gov/safety/> (accessed May 5, 2025).

⁴² Office of the State Fire Marshal. n.d. *Fire Hazard Severity Zones*. Website: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones> (accessed March 19, 2025).

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Less Than Significant Impact. The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB) regulate the quality of surface water and groundwater bodies throughout California. In the City of Riverside, the Santa Ana RWQCB is responsible for implementation of the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan). The Basin Plan establishes beneficial water uses and water quality objectives for waterways and water bodies within the region. Section 303(d) of the federal Clean Water Act (CWA) requires that states identify water bodies, including bays, rivers, streams, creeks, and coastal areas, which do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL establishes limits for pollutant discharges into impaired water bodies.

The project site is located within the Central Riverside drainage area, which flows into the Santa Ana River, Reach 3.⁴³ Santa Ana River Reach 3 drains to the Prado Flood Control Basin, which flows to Santa Ana River Reach 2. The receiving waters for stormwater runoff from the project site are listed as impaired on the 303(d) list for several constituents.⁴⁴ Santa Ana River Reach 3 is listed as an impaired water body for the following pollutants: copper, lead, toxicity, pyrethroids, bifenthrin, and indicator bacteria. Prado Basin is listed as impaired for pH, and Santa Ana River Reach 2 is listed as impaired for cadmium.

Runoff water quality is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the federal CWA). The NPDES program objective is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the Santa Ana RWQCB. Construction activities are subject to the SWRCB NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit [CGP]). Any construction activity, including grading, which would result in the disturbance of 1 acre or more would require compliance with SWRCB's CGP, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction Best Management Practices (BMPs) during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Project operations are subject to the NPDES Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS618033 (Municipal Separate Storm Sewer System [MS4] Permit). Any "Significant Redevelopment" projects that add or replace 5,000 square feet or more of impervious surface on an already developed site or "New Development" projects that create 10,000 square feet or more of impervious surface must comply with the requirements of the MS4 Permit. The MS4 permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. The MS4 Permit requires co-permittees to develop and implement standard design and post-development BMP guidance to guide application of Low Impact Development (LID) BMPs to the maximum extent practicable. The MS4 Permit requires that a Final Water Quality Management Plan (WQMP) be prepared for new development and significant redevelopment projects within its jurisdiction. In addition, the NPDES permit includes hydromodification requirements that projects must include management techniques to reduce the potential for impacts, such as a change in runoff and sediment yield because of land use modifications.

⁴³ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

⁴⁴ State Water Resources Control Board (SWRCB). 2024. *2024 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)*. Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html (accessed March 25, 2025).

The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Design BMPs are storm water management strategies that emphasize conservation and use of existing site features to reduce the amount of runoff and pollutant loading generated from a site. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into storm water. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in storm water runoff prior to releasing it to receiving waters.

Construction. The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. Construction activities would result in the disturbance of approximately 16 acres of soil. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked, and they have the potential to be transported via storm water runoff into receiving waters.

Because construction of the proposed project would disturb greater than 1 acre of soil, the proposed project is subject to the requirements of the CGP, which requires preparation of an SWPPP and implementation of construction BMPs during construction activities as detailed in **RCM HYD-1**. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Implementation of **RCM HYD-1** and construction BMPs would ensure that construction-related impacts to water quality would be less than significant.

RCM HYD-1

Construction General Permit. The project applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents, including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS).

A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit. These include: best management practices (BMPs) for erosion and sediment control, site management/housekeeping/waste management, management of non-stormwater discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction.

The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.

Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTS.

According to the City of Riverside General Plan 2025 Program Environmental Impact Report (EIR), the project site is located in an area with low liquefaction hazard, which is generally characterized as having a groundwater depth greater than 30 feet.⁴⁵ Additionally, groundwater was not encountered in the borings drilled to a maximum depth of 16.5 feet below the ground surface during the field investigation completed for the Geotechnical Investigation for the proposed project.⁴⁶ The proposed project would require excavation to a maximum depth of 10.5 feet below ground surface. Therefore, it is not anticipated that dewatering or shoring of groundwater would be required during construction.

Adherence with the CGP, including implementation of the required SWPPP and Construction BMPs, would ensure construction impacts related to surface water quality standards, waste discharge requirements, and surface water quality would be less than significant and no mitigation is required.

Operation. Pollutants of concern from long-term operations include suspended solids/sediment, nutrients, oil and grease, metals, pesticides/herbicides, organic compounds, and trash and debris. The proposed project would also be required to prepare a Final WQMP prior to construction, consistent with the requirements of the City's MS4 permit, because the proposed

⁴⁵ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

⁴⁶ NOVA Services, Inc. 2025. *Geotechnical Investigation, Athletic Complex Replacement and Expansion California School for the Deaf, Riverside (CSDR), 3044 Horace Street, Riverside, California*. January 17.

project consists of significant redevelopment that would add or replace 5,000 square feet or more of impervious surface on an already developed site. As detailed in **RCM HYD-2**, the Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Therefore, compliance with the requirements of the MS4 Permit would ensure that operational impacts to water quality would be less than significant, and no mitigation is required.

RCM HYD-2

Final Water Quality Management Plan. Prior to construction, the project applicant shall prepare a final Water Quality Management Plan (WQMP), as required by RWQCB Order No. R8-2010-0033, NPDES No. CAS618033 (MS4 permit). The final WQMP shall identify necessary site design best management practices (BMPs), source control BMPs, Low Impact Development (LID) BMPs, and treatment control BMPs (if applicable).

With compliance with existing regulations including the CGP and the MS4 Permit, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. The project site lies within the Upper Santa Ana Valley Groundwater Basin, Riverside – Arlington Subbasin.⁴⁷ The subbasin has a surface area of approximately 58,600 acres (92 square miles) and is located in northwest Riverside County and southwest San Bernardino County. The subbasin is bound by impermeable rocks of Box Springs Mountains to the southeast, Arlington Mountain to the south, La Sierra Heights and Mount Rubidoux to the northwest, and the Jurupa Mountains to the North. The northeast boundary is formed by the Rialto-Colton fault, and a portion of the northern boundary is a groundwater divide beneath the City of Bloomington. The Santa Ana River flows over the northern portion of the subbasin. Groundwater in the subbasin is found chiefly in alluvial deposits. Quaternary age alluvial deposits in the subbasin consist of sand, gravel, silt, and clay deposited by the Santa Ana River and its tributaries. The Riverside-Arlington Subbasin is replenished by infiltration from Santa Ana River flow, underflow past the Rialto-Colton fault, intermittent underflow from the Chino Subbasin, return irrigation flow, and deep percolation of precipitation. The total storage capacity of the subbasin is estimated to be 243,000 acre-feet.⁴⁸

Construction. As discussed in Section 4.10.1.a above, groundwater at the project site is likely at a depth greater than 30 feet and the proposed project would require excavation to a maximum depth of 10.5 feet below ground surface. Therefore, it is not anticipated that dewatering or

⁴⁷ California Department of Water Resources (DWR). n.d. *Groundwater Basin Boundary Assessment Tool*. Website: <https://gis.water.ca.gov/app/bbat/> (accessed March 25, 2025).

⁴⁸ California Division of Water Rights. 2004. *Upper Santa Ana Valley Groundwater Basin, Riverside-Arlington Subbasin*. *California's Groundwater Bulletin 118*. February 27.

shoring of groundwater would be required during construction and construction activities associated with the proposed project would not contribute to a substantial depletion of groundwater supplies. Furthermore, stormwater could continue to infiltrate during construction activities and therefore, project construction would not interfere substantially with groundwater recharge.

Operation. Development of the proposed project would increase impervious surface area on the project site by 3.3 acres compared to existing conditions, which would decrease on-site infiltration. As described above, the proposed project would include Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to encourage infiltration and reduce the amount of runoff from the project site in accordance with the MS4 Permit as detailed in **RCM HYD-2**. Therefore, development of the proposed project would not substantially decrease the amount of stormwater that infiltrates as compared to the existing conditions.

The proposed project would require the consumption of water for irrigation of the athletic fields and landscaped area, and for use in the proposed restrooms. The proposed restroom facilities would be approximately 1,400 square feet and therefore would result in a nominal increase in water demand. Additionally, the proposed project would not result in a significant increase in water demand for irrigation because the proposed uses would be consistent with existing uses and although the project would result in new grass fields it would also replace existing grass fields with synthetic turf fields and the proposed landscaping would replace existing landscaping. Water service for the proposed project would be provided by Riverside Public Utilities (RPU). RPU's primary source of water supply is local groundwater. RPU has facilities to extract groundwater from five groundwater basins including the Bunker Hill, Rialto-Colton, Riverside North, Riverside South, and Arlington Basins. RPU also distributes recycled water for non-potable uses. RPU also has an agreement with Western Municipal Water District to access imported water when needed. RPU's Urban Water Management Plan⁴⁹ indicates the City has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Therefore, the proposed project's water needs would not contribute to a substantial depletion of groundwater supplies.

For the reasons listed above, impacts related to the decrease of groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation is required.

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

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

Less Than Significant Impact.

Construction. During construction activities, more than 1 acre of soil would be disturbed. Soil would be exposed, and drainage patterns temporarily altered during grading and other

⁴⁹ City of Riverside Public Utilities (RPU). 2021. *2020 Urban Water Management Plan*. July 1.

construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As required by **RCM HYD-1**, the CGP requires the preparation of an SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. With compliance with the requirements in the CGP and implementation of construction BMPs, construction impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

Operation. After the completion of project construction, the proposed project would not significantly alter the existing drainage pattern of the site. However, operation of the proposed project would increase the impervious surface area on the project site by 3.3 acres compared to existing conditions, which would result in a net increase in stormwater runoff that could lead to downstream erosion in receiving waters. However, as discussed above, the proposed project would include Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to encourage infiltration and reduce the amount of runoff from the project site in accordance with the MS4 Permit as detailed in **RCM HYD-2**.

With incorporation of LID techniques as required by the MS4 Permit, operational impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

Less Than Significant Impact. Development of the proposed project would increase impervious surface area on the project site by 3.3 acres compared to existing conditions, which could have the potential to increase the volume and rate of stormwater runoff discharged from the project site. However, as previously discussed, the proposed project would include Site Design, Source Control, LID, and Treatment Control BMPs in accordance with the MS4 Permit as detailed in **RCM HYD-2**. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized so that on-site flooding would not occur. Therefore, with implementation of LID techniques as required by the MS4 Permit, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Impacts would be less than significant, and no mitigation is required.

- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

Less Than Significant Impact.

Stormwater Drainage System Capacity. After the completion of project construction, the proposed project would not significantly alter the existing drainage pattern of the site. Operation of the proposed project would increase impervious surface area on the project site by 3.3 acres compared to existing conditions, which would result in a net increase in stormwater runoff that could contribute additional runoff water to existing stormwater drainage systems. However, as discussed above, the proposed project would include Site Design, Source Control, LID, and

Treatment Control BMPs in accordance with the MS4 Permit as detailed in **RCM HYD-2**. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized such that drainage facility capacity would not be exceeded during a design storm. Therefore, the proposed project would not result in an exceedance of planned or existing stormwater drainage systems. Impacts would be less than significant, and no mitigation is required.

Polluted Runoff. As discussed in Section 4.10.1.a above, pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals, and each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. However, as required by **RCM HYD-1** the proposed project would be required to comply with the requirements set forth by the CGP, including preparation of an SWPPP, which would specify BMPs to be implemented to control the discharge of pollutants in stormwater runoff as a result of construction activities. Therefore, construction-related impacts would be less than significant, and no mitigation is required.

Expected pollutants of concern from long-term operations include suspended solids/sediment, nutrients, oil and grease, metals, pesticides/herbicides, organic compounds, and trash and debris. As previously discussed, compliance with the MS4 Permit, the implementation of LID techniques, and the incorporation of operational BMPs to target pollutants of concern as required by **RCM HYD-2**, would ensure that the proposed project would not discharge substantial sources of polluted runoff from the project site. Operation-related impacts would be less than significant, and no mitigation is required.

iv. Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C0710H, the project site is located in Zone X, which is identified as an area of minimal flood hazard.⁵⁰ The proposed project would not significantly alter the topography of the project site, which is relatively flat, and would not substantially alter drainage patterns. Because the proposed project would not place improvements and structures directly within a 100-year floodplain, the proposed project would not impede or redirect flood flows. No impact would occur, and no mitigation is required.

⁵⁰ Federal Emergency Management Agency (FEMA). 2024. Flood Insurance Rate Map (FIRM) No. 06065C0710H. Map Revised September 12, 2024. Website: <https://msc.fema.gov/portal/search> (accessed March 25, 2025).

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact.

Flooding. According to the FEMA FIRM No. 06065C0710H, the project site is located in Zone X, which is identified as an area of minimal flood hazard.⁵¹ Therefore, the proposed project would not risk release of pollutants due to project inundation due to flood hazard. No impact would occur, and no mitigation is required.

Tsunami. The project site is approximately 36 miles northeast of the Pacific Ocean at an elevation over 800 feet above mean sea level. Based on the distance from the Pacific Ocean, the project site is not located in a tsunami hazard zone and, therefore, would not be susceptible to impacts associated with a tsunami. The proposed project would not risk release of pollutants due to project inundation from a tsunami. No impact would occur, and no mitigation is required.

Seiches. Seiches are waves created in an enclosed body of water (e.g., a bay, lake, or harbor) that go up and down or oscillate and do not progress forward like standard ocean waves. Limited isolated damage to adjacent and down-slope structures has been observed from seiches occurring in swimming pools and in small shallow lakes and ponds. There are no sizeable enclosed bodies of water in the nearby vicinity of the project site. Therefore, the proposed project would not risk release of pollutants due to project inundation due to seiche. No impact would occur, and no mitigation is required.

Dam Inundation. The project site is not located within a mapped dam failure inundation area.⁵² Therefore, the project site is not at risk of inundation due to dam failure. No impact would occur, and no mitigation is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The proposed project is within the jurisdiction of the Santa Ana RWQCB. The Santa Ana RWQCB adopted a Basin Plan (January 1995, with amendments effective on or before June 2019) that designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As previously discussed, and as detailed in **RCM HYD-1** and **RCM HYD-2**, the proposed project would comply with existing NPDES permit requirements, including the CGP and MS4 Permit, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff. Compliance with these regulatory requirements would ensure that the proposed project would not degrade or alter water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. Therefore, the

⁵¹ FEMA. 2024. FIRM No. 06065C0710H. Map Revised September 12, 2024. Website: <https://msc.fema.gov/portal/search> (accessed March 25, 2025).

⁵² DWR. 2015. Division of Safety of Dams. *Dam Breach Inundation Map Web Publisher*. Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed March 25, 2025).

proposed project would not result in water quality impacts that would conflict with the Basin Plan. Construction and operational impacts related to a conflict with the Basin Plan would be less than significant.

The Sustainable Groundwater Management Act (SGMA), which was enacted in September 2014, requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. The SGMA requires the formation of local Groundwater Sustainability Agencies, which are required to adopt Groundwater Sustainability Plans (GSPs) to manage the sustainability of the groundwater basins. The project site is in the Upper Santa Ana Valley Basin – Riverside – Arlington Subbasin, which the California Department of Water Resources (DWR) designates as a very low priority basin.⁵³ Therefore, development of a GSP is not required for the basin associated with the proposed project.

As discussed above, the proposed project would comply with regulatory requirements to treat pollutants in stormwater runoff during construction and operation of the proposed project (**RCMs HYD-1** and **HYD-2**). Compliance with these regulatory requirements would ensure that stormwater that may infiltrate during construction or operation of the proposed project would be treated prior to reaching groundwater. Therefore, the proposed project would not affect groundwater quality within the Upper Santa Ana Valley Basin – Riverside – Arlington Subbasin. As previously stated, development of the proposed project would increase the impervious surface on the project site by 3.3 acres compared to existing conditions. Although development of the proposed project would increase the impervious surface area on the project site which could decrease on-site infiltration, the proposed project would include Site Design, Source Control, LID, and Treatment Control BMPs that would encourage infiltration and reduce the amount of runoff from the project site in accordance with the MS4 Permit as detailed in **RCM HYD-2**. Therefore, the proposed project would not substantially impact groundwater supplies within the Upper Santa Ana Valley Basin – Riverside – Arlington Subbasin. Furthermore, as previously stated, the project site is located within a very low priority basin and, therefore, the SGMA provisions do not apply. Impacts related to a conflict with or obstruction of a water quality control plan or sustainable groundwater management plan would be less than significant, and no mitigation is required.

⁵³ DWR. 2020. *Sustainable Groundwater Management Act 2019 Basin Prioritization Process and Results*. May.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

4.11.1 Impact Analysis

a. *Would the project physically divide an established community?*

No Impact. The physical division of an established community typically refers to the construction of a physical feature (e.g., an interstate highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside the community.

The proposed project includes improvements to the existing original athletic fields and related infrastructure at the CSDR campus. Land uses surrounding the CSDR campus include residential to the east, west, and south, and commercial uses to the north. Primary access into the CSDR campus is provided via Horace Street. However, access to the project site would be provided via a gated driveway along on Maude Street, which is a two-lane, undivided street to the west of the project site. The proposed improvements would be limited to the project site within the CSDR campus. The proposed project would not require the construction of any new infrastructure that would divide an established community, and would not remove any means of access. Therefore, the proposed project would have no impact related to physically dividing an established community, and no mitigation is required.

b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact. The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. The main documents guiding development and regulating land uses in Riverside are the City's General Plan and Zoning Code. As noted in Chapter 2.0, Project Description, the project site has a City General Plan designation of Public Facilities/Institutions (PF) and is located within the Public Facilities (PF) zoning district. Both the PF designation and PF zoning allow for public educational institutions and parks and recreational

facilities. Additionally, the PF designation allows a maximum FAR of 1.0 and the LI zoning district allows a maximum building height of 60 feet or 4 stories. The proposed structures would be single story and the proposed project would not exceed a FAR of 1.0. The proposed project would also be consistent with the PF zoning district setback requirements, which requires a minimum setback of 20 feet from all property lines with an additional setback of one foot for every two feet of building height in excess of 45 feet for any building adjacent to a zone permitting residential uses. Therefore, while the California Department of Education (CDE) is not required to comply with local requirements or standards, the proposed project would be consistent with the existing land use designation and development standards for the project site.

It should be noted that according to CEQA, policy conflicts do not, in and of themselves, constitute a significant environmental impact. Policy conflicts are considered to be environmental impacts only when they would result in direct physical impacts or where those conflicts relate to avoiding or mitigating environmental impacts. As such, associated physical environmental impacts are discussed in this IS/MND under specific topical sections. The proposed project would not result in any direct physical impacts that cannot be mitigated to a less than significant level. The proposed project would not conflict with any applicable land use plans, policies, or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, and this impact would be less than significant.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.12.1 Impact Analysis

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. The Surface Mining and Reclamation Act (SMARA) enacted by the California Legislature in 1975 provides guidelines to assist with the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land uses and ownership. SMARA categorizes areas into four Mineral Resource Zones (MRZs):

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits of which their significance cannot be properly evaluated.
- **MRZ-4:** An area where information is not adequate enough to be able to assign to any other MRZ zone.

There are scattered areas within the City that have deposits of feldspar, silica, limestone and other rock products; however, mining operations have not been active within the City for decades. The project site is designated as MRZ-4 and the nearest MRZ-2 area is located between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans, approximately 2.5 miles northwest of the project site.⁵⁴ No mineral resource extraction activities occur at the project site under existing conditions. The proposed project would include improvements to the existing original athletic fields and related infrastructure at the CSDR campus, and no mineral resource extraction activities are proposed as part of the proposed project. As such, the proposed project would not

⁵⁴ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. No impact would occur and no mitigation is required.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. There are no locally important mineral resource recovery sites within the City.⁵⁵ Given existing and proposed conditions on site, implementation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur, and no mitigation is required.

⁵⁵ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒

4.13.1 Introduction

Technical Background. The following provides an overview of the characteristics of sound, fundamentals of vibration, and noise and vibration regulatory settings that applies to the proposed project.

Characteristics of Sound. Sound is increasing in the environment and can affect quality of life. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations (or cycles per second) of a wave, resulting in the tone's range from high to low. Loudness is the strength of a sound and describes a noisy or quiet environment; it is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound. Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike units of measurement that use a linear scale (e.g., inches or pounds), decibels (dB) use a scale based on powers of 10.

For example, 10 dB is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty dB represents 1,000 times as much

acoustic energy as 0 dB. The dB scale increases as the square of the change, representing the sound-pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The dB system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 A-weighted decibels (dBA) (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source, and their dB level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source, such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases 4.5 dB for each doubling of distance.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in California are L_{eq} and the Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on dBA. CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during relaxation hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

Other noise rating scales of importance, when assessing the annoyance factor, include the maximum instantaneous noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis are specified in terms of L_{max} for short-term noise impacts. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise.

Another noise scale often used together with L_{max} in noise ordinances for enforcement purposes is noise standards in terms of percentile noise levels. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half of the time the noise level exceeds this level, and half of the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, L_{eq} and L_{50} are approximately the same.

Noise impacts can be described in three categories. The first category, audible impacts, refers to increases in noise levels noticeable to humans. Audible increases in noise levels generally involve a change of 3 dB or greater because that level has been found to be barely perceptible in

exterior environments. The second category, potentially audible impacts, refers to a change in the noise level between 1 and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category involves changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

Physiological Effects of Noise. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 160 to 165 dBA will potentially result in dizziness or loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less-developed areas. Table 4.13.A lists definitions of acoustical terms, and Table 4.13.B shows common sound levels and their noise sources.

Table 4.13.A: Definitions of Acoustical Terms

Term	Definition
Decibel, dB	A unit of noise level that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, Hz	Of a function periodic in time, the number of times that the quantity repeats itself in 1 second (i.e., number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. (All sound levels in this report are A-weighted unless reported otherwise.)
L ₂ , L ₈ , L ₅₀ , L ₉₀	The fast A-weighted noise levels that are equaled or exceeded by a fluctuating sound level 2 percent, 8 percent, 50 percent, and 90 percent of a stated time period.
Equivalent Continuous Noise Level, L _{eq}	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dB to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level, L _{dn}	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
L _{max} , L _{min}	The maximum and minimum A-weighted sound levels measured on a sound level meter during a designated time interval using fast-time averaging.
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time; usually a composite of sound from many sources from many directions, near and far; no particular sound is dominant.
Intrusive	The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, time of occurrence, and tonal or informational content, as well as the prevailing ambient noise level.

Source: *Handbook of Acoustical Measurements and Noise Control* (Harris 1991).

Table 4.13.B: Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	—
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	—
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	—
Near-Freeway Auto Traffic	70	Moderately Loud	Reference Level
Average Office	60	Quiet	½ as loud
Suburban Street	55	Quiet	—
Light Traffic; Soft Radio Music in Apartment	50	Quiet	¼ as loud
Large Transformer	45	Quiet	—
Average Residence without Stereo Playing	40	Faint	⅛ as loud
Soft Whisper	30	Faint	—
Rustling Leaves	20	Very Faint	—
Human Breathing	10	Very Faint	Threshold of Hearing
—	0	Very Faint	—

Source: Compiled by LSA (2025).

Fundamentals of Vibration. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors where the motion may be discernible. However, without the effects associated with the shaking of a building, there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Building damage is not a factor for normal operation and construction activities with the occasional exception of blasting and pile driving during construction.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Impacts with ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet (Federal Transit Administration [FTA] *Transit Noise and Vibration Impact Assessment Manual*

(FTA Manual).⁵⁶ When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects, it is assumed that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction activities have the potential to result in ground-borne vibration that could be perceptible and annoying. Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path usually will be greater than ground-borne noise.

Ground-borne vibration has the potential to disturb people as well as damage buildings. Although it is very rare for ground-borne vibration to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage nearby buildings. Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). RMS is best for characterizing human response to building vibration, and PPV is used to characterize the potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration. Vibration velocity level in dB is defined as:

$$L_v = 20 \log_{10} [V/V_{ref}]$$

where L_v is the velocity in decibels (VdB), “ V ” is the RMS velocity amplitude, and “ V_{ref} ” is the reference velocity amplitude, or 1×10^{-6} inches per second (in/sec) used in the United States.

Regulatory Setting.

Federal Transit Administration. Though the City does not have daytime construction noise level limits for activities that occur within the specified hours of Section 7.35.020(G), to determine potential construction noise impacts, construction noise was assessed using criteria from the FTA Manual. Table 4.13.C shows the FTA’s Detailed Assessment Daytime Construction Noise Criteria.

Table 4.13.C: Detailed Assessment Daytime Construction Noise Criteria

Land Use	Daytime 1-hour L_{eq} (dBA)
Residential	80
Commercial	85
Industrial	90

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

California Department of Transportation. Vibration standards included in the California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance

⁵⁶ Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed April 2025).

Manual (Caltrans Manual)⁵⁷ are used in this analysis for ground-borne vibration impacts on human annoyance and building damage. The criteria for environmental impact from ground-borne vibration are based on the maximum levels for a single event and the RMS vibration level. Table 4.13.D provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building. Table 4.13.E lists the potential vibration building damage criteria associated with construction activities, as suggested in the Caltrans Manual. Caltrans guidelines show that a vibration level of up to 0.3 in/sec in PPV is considered safe for newer residential structures and modern industrial or commercial buildings and would not result in any construction vibration damage.

Table 4.13.D: Interpretation of Vibration Criteria for Detailed Analysis

Human Response	Vibration Level (RMS in/sec)
Barely perceptible	0.01
Distinctly perceptible	0.04
Strongly perceptible	0.10
Severe	0.40

Source: *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

in/sec = inch/inches per second

RMS = root-mean-square

Table 4.13.E: Construction Vibration Damage Criteria

Structure / Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
New residential structures	0.50
Modern industrial / commercial buildings	0.50

Source: *Transportation and Construction Vibration Guidance Manual*, Table 19 (Caltrans 2020).

in/sec = inch/inches per second

PPV = peak particle velocity

Existing Setting.

Surrounding Land Uses. Land uses surrounding the project site include commercial uses to the north across Arlington Avenue, the CSDR campus to the east and southeast, and single-family residential uses to the west across Maude Street Avenue. The closest sensitive receptor to the project is the residences located approximately 90 feet west of the project boundary.

Overview of the Existing Ambient Noise Environment. The existing noise sources in the project area include traffic noise on Arlington Avenue, Maude Street, and State Route 91 (SR-91). Noise

⁵⁷ California Department of Transportation (Caltrans). 2020. *Transportation and Construction Vibration Guidance Manual*. April. Website: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf> (accessed April 2025).

from motor vehicles is generated by engines, the interaction between the tires and the road, and the vehicles' exhaust systems.

Ambient Noise Levels. Three long-term (24-hour) noise level measurements were conducted from February 18 to February 19, 2025, using Larson Davis Spark dosimeters. Table 4.13.H summarizes the results of the long-term noise level measurements along with a description of the measurement locations and noise sources that occurred during the measurements. As shown in Table 4.13.H, the daytime noise levels ranged from 63.9 to 74.1 dBA L_{eq} and nighttime noise levels ranged from 61.0 to 73.7 dBA L_{eq} . The daytime maximum instantaneous noise level ranged from 74.6 to 100.5 dBA and the nighttime instantaneous maximum noise level ranged from 72.1 to 95.9 dBA. Also, the calculated CNEL levels at LT-1, LT-2, and LT-3 were 77.5, 74.3, and 72.0 dBA, respectively. The long-term noise level measurement survey sheets along with the detailed hourly L_{eq} , L_{max} , and minimum measured sound level (L_{min}) results are provided in Appendix E of this IS/MND. Figure 4-13.1 shows the long-term monitoring locations.

Table 4.13.H: Long-Term Ambient Noise Monitoring Results

Monitor No.	Location	Noise Level (dBA)					Noise Sources
		Daytime		Nighttime		CNEL	
		L _{eq}	L _{max}	L _{eq}	L _{max}		
LT-1	3044 Horace Street. North of the existing football field/track, on a tree. Approximately 70 feet south of the Arlington Avenue centerline.	70.9-74.1	85.2-100.5	66.5-73.7	81.3-94.0	77.5	Traffic on Arlington Avenue.
LT-2	3044 Horace Street. West of the existing football field/track, on a tree. Approximately 240 feet south of the Arlington Avenue centerline and 32 feet east of the Maude Street centerline.	64.8-68.9	78.8-95.1	64.0-69.6	80.5-95.9	74.3	Traffic on Arlington Avenue and Maude Street.
LT-3	3044 Horace Street. West of the existing maintenance area, on a tree. Approximately 45 feet from the Maude Street centerline.	63.9-69.0	74.6-94.5	61.0-68.7	72.1-90.0	72.0	Traffic on Maude Street.

Source: Compiled by LSA (2025).

Note: Long-term (24-hour) noise level measurements were conducted from February 18, 2025, to February 19, 2025.

CNEL = Community Noise Equivalent Level

L_{eq} = equivalent continuous sound level

dBA = A-weighted decibels

L_{max} = maximum instantaneous noise level

ft = foot/feet

4.13.2 Impact Analysis

- Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less Than Significant Impact.

Short-Term Construction Noise Impacts. Two types of short-term noise impacts would occur during construction of the proposed project. The first type would be from construction crew commutes and the transport of construction equipment and materials to the project limits and would incrementally raise noise levels on roadways leading to the site. The pieces of

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FIGURE 4-13.1

LSA

LEGEND



Project Site Boundary



Long-term Noise Monitoring Location



0 200 400
FEET

SOURCE: Google Earth 2025

I:\2024\20241779.05\G\Noise_Locs.ai (4/1/2025)

*California School for the Deaf - Riverside: Athletic Complex
Replacement and Expansion Project
Noise Monitoring Locations*

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construction equipment for construction activities would move on site, would remain for the duration of each construction phase, and would not add to the daily traffic volume in the project vicinity. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 feet would generate up to a maximum of 84 dBA), the effect on longer-term (hourly or daily) ambient noise levels would be small because the hourly/daily construction-related vehicle trips are small compared to the existing average daily traffic (ADT) volumes on Maude Street. The grading phase would generate the most trips out of all of the construction phases based on the California Emissions Estimator Model (CalEEMod), Version 2022.1, results contained in Appendix A of this IS/MND. The acoustical equivalent traffic volume for the grading phase would be 668 passenger car equivalent vehicles. Maude Street would be the main roadway used to access the project site during construction and has an existing ADT volume on 2,933 based on the City's 24-hour Traffic Volume Counts.⁵⁸ Based on the information above, construction-related traffic would increase noise levels by up to 0.9 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related noise impacts associated with worker commute and equipment transport to the project site would be less than significant and no mitigation is required.

The second type of short-term noise impact is related to noise generated from construction activities. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. The proposed project anticipates demolition, site preparation, grading, building construction, paving, and architectural coating phases of construction. These various sequential phases change the character of the noise generated on a project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.13.I lists the $L_{\max}$ recommended for noise impact assessments for typical construction equipment included in the Federal Highway Administration (FHWA) Highway Construction Noise Handbook (2006), based on a distance of 50 feet between the equipment and a noise receptor.

Table 4.13.J lists the anticipated construction equipment for each construction phase based on the CalEEMod (Version 2022.1) results contained in Appendix A of this IS/MND. Table 4.13.J shows the combined noise level at 50 feet from all of the equipment in each phase and the L_{eq} noise level for each equipment at 50 feet based on the quantity, reference $L_{\max}$ noise level at 50 feet, and the acoustical usage factor. As shown in Table 4.13.J, construction noise levels would reach up to 89.2 dBA L_{eq} at a distance of 50 feet.

⁵⁸ City of Riverside. 2008. 24-Hour Volume Counts. Website: <https://riversideca.gov/pdf2/traffic-volume-count.pdf?ref=raincrossgazette.com> (accessed April 2025).

Table 4.13.I: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor ¹	Maximum Noise Level (L _{max}) at 50 ft ²
Backhoe	40	80
Compactor (ground)	20	80
Compressor (air)	40	80
Crane	16	85
Dozer	40	85
Drill Rig Truck	20	84
Dump Truck	40	84
Excavator	40	85
Flatbed Truck	40	84
Forklift	20	85
Front-End Loader	40	80
Generator	50	82
Grader	40	85
Impact Pile Driver	20	95
Jackhammer	20	85
Pavement Scarifier	20	85
Paver	50	85
Pickup Truck	40	55
Pneumatic Tools	50	85
Pump	50	77
Rock Drill	20	85
Roller	20	85
Scraper	40	85
Tractor	40	84
Welder/Torch	40	73

Source: FHWA Highway Construction Noise Handbook, Table 9.1 (FHWA 2006).

Note: The noise levels reported in this table are rounded to the nearest whole number.

¹ Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.

² Maximum noise levels were developed based on Spec 721.560 from the CA/T program to be consistent with the City of Boston, Massachusetts, Noise Code for the "Big Dig" project.

CA/T = Central Artery/Tunnel

FHWA = Federal Highway Administration

ft = foot/feet

L_{max} = maximum instantaneous noise level

Table 4.13.J: Summary of Construction Phase, Equipment, and Noise Levels

Construction Phase	Construction Equipment	Quantity	Reference Noise Level at 50 ft (dBA L _{max})	Acoustical Usage Factor ¹ (%)	Noise Level at 50 ft (dBA L _{eq})	Combined Noise Level at 50 ft (dBA L _{eq})
Demolition	Concrete Saw	1	90	20	83.0	89.2
	Excavator	3	85	40	85.8	
	Dozer	2	85	40	84.0	
Site Preparation	Dozer	3	85	40	85.8	87.3
	Front End Loader	4	80	40	82.0	
Grading	Excavator	2	85	40	84.0	89.2
	Grader	1	85	40	81.0	
	Dozer	1	85	40	81.0	
	Front End Loader	2	80	40	79.0	
	Scraper	2	85	40	84.0	
Building Construction	Crane	1	85	16	77.0	86.5
	Man Lift	3	85	20	82.8	
	Generator	1	82	50	79.0	
	Front End Loader	3	80	40	80.8	
	Welder / Torch	1	73	40	69.0	
Paving	Paver	2	85	50	85.0	87.6
	Pavement Scarafier	2	85	20	81.0	
	Roller	2	85	20	81.0	
Architectural Coating	Compressor (air)	1	80	40	76.0	76.0

Source: Compiled by LSA (2025).

¹ The acoustical usage factor is the percentage of time during a construction noise operation that a piece of construction equipment operates at full power.

dBA = A-weighted decibels

ft = foot/feet

L_{eq} = equivalent continuous sound level

L_{max} = maximum instantaneous noise level

Table 4.13.K shows the highest construction noise levels at the closest residential and commercial property lines surrounding the project site. As shown in Table 4.13.K, the closest residential and commercial property lines are located approximately 370 feet and 480 feet to the west, respectively, from the center of the project site and would be exposed to construction noise levels that reach up to 71.8 and 69.6 dBA L_{eq}, respectively. Although noise generated by project construction activities would be higher than the ambient noise levels and may result in a temporary increase in the ambient noise levels, construction noise would stop once project construction is completed. Therefore, noise generated from project construction activities would be less than significant, and no mitigation is required.

Table 4.13.K: Construction Noise Level Summary

Land Use	Direction	Composite Noise Level (dBA L_{eq}) at 50 ft ¹	Distance (ft)	Distance Attenuation (dBA)	Composite Noise Level (dBA L_{eq})
Residential	West	89.2	370	17.4	71.8
Commercial	West	89.2	480	19.6	69.6
Commercial	North	89.2	590	21.4	67.8

Source: Compiled by LSA (2025).

- 1 The composite construction noise level represents the site preparation and grading phases which are expected to result in the greatest noise level as compared to other phases.
- 2 The reference distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.

dBA L_{eq} = average A-weighted hourly noise level

ft = foot/feet

Long-Term Operational Noise Impacts. Long-term noise impacts in the project vicinity may occur at off-site land uses from traffic noise along roadways within the project area, heating, ventilation, and air conditioning (HVAC) noise associated with the new buildings, and noise generated from the athletic fields.

- **Traffic Noise:** The proposed project would not generate any additional project trips. Therefore, traffic noise is expected to remain the same as existing conditions with the proposed project and noise impacts on off-site sensitive receptors would be less than significant. No mitigation is required.
- **HVAC Noise:** The proposed project would include approximately three ground floor or rooftop HVAC units for the concession and ticketing booth building. Each HVAC unit would generate a noise level of 75 dBA L_{eq} at a distance of 3 feet based on typical small HVAC units. Three HVAC units operating at the same time would generate a noise level of 79.6 dBA L_{eq} at a distance of 3 feet. The closest residential property line from the HVAC units is approximately 380 feet. At a distance of 380 feet, noise would be attenuated by 37.6 dBA to a noise level of 42.2 dBA. This noise level would not exceed the City's exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) 30-minute (L_{50}) noise standards of 55 dBA and 45 dBA, respectively, for residential uses. Therefore, noise generated from on-site HVAC equipment would be less than significant and no mitigation is required.
- **Sports Activities:** Noise generated from the improved athletic fields is not expected to change because the operations of the proposed project would remain the same. Therefore, noise generated from the improved athletic fields would be less than significant and no mitigation is required.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Short-Term Construction Vibration Impacts. This construction vibration impact analysis discusses the level of human annoyance using vibration levels in RMS amplitude and assesses the potential for building damage using vibration levels in PPV (in/sec). Vibration levels calculated in RMS velocity are best for characterizing human response to building vibration, whereas vibration levels in PPV are best for characterizing damage potential.

Table 4.13.L shows the reference vibration levels at a distance of 25 feet for each type of standard construction equipment from the Transportation and Construction Vibration Guidance Manual.⁵⁹ Outdoor site preparation and grading for the proposed project is expected to require the use of a large bulldozer, loaded trucks, and jackhammer, which would generate ground-borne vibration of up to 0.089 in/sec PPV (0.062 in/sec RMS), 0.076 in/sec PPV (0.053 in/sec RMS), and 0.035 in/sec PPV (0.025 in/sec RMS) when measured at 25 feet, respectively.

Table 4.13.L: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L _v at 25 ft	
	Maximum PPV (in/sec)	RMS PPV (in/sec) ¹
Pile Driver (Impact), Typical	0.644	0.451
Pile Driver (Sonic), Typical	0.170	0.119
Vibratory Roller	0.210	0.147
Hoe Ram	0.089	0.062
Large Bulldozer²	0.089	0.062
Caisson Drilling	0.089	0.062
Loaded Trucks²	0.076	0.053
Jackhammer²	0.035	0.025
Small Bulldozer	0.003	0.002

Source: *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

¹ RMS vibration velocity is 70 percent of the maximum PPV.

² Equipment shown in bold is expected to be used on site.

μin/sec = microinches per second

Caltrans = California Department of Transportation

ft = foot/feet

in/sec = inches per second

L_v = velocity in decibels

PPV = peak particle velocity

RMS = root-mean-square

VdB = vibration velocity decibels

The greatest vibration levels are anticipated to occur during the site preparation and grading phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts normally occur within the buildings.

⁵⁹ Caltrans. 2020. *Transportation and Construction Vibration Guidance Manual*. April. Website: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf> (accessed April 2025).

The formula for vibration transmission is provided below:

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.1}$$

Table 4.13.M lists the projected vibration levels from various construction equipment expected to be used from the center of the project site to the nearest buildings in the project vicinity. As shown in Table 4.13.M, the closest building structure is approximately 430 feet from the center of the project site and would experience a vibration level of up to 0.003 in/sec RMS. This vibration level would not have the potential to result in annoyance because vibration levels would not exceed the Caltrans annoyance threshold of 0.04 in/sec RMS. Other building structures that surround the project site would experience lower vibration levels because they are farther away.

Table 4.13.M: Potential Construction Vibration Annoyance

Land Use	Direction	Equipment/ Activity	Reference Vibration Level (VdB) at 25 ft	Distance to Structure (ft) ¹	Vibration Level (in/sec RMS)
Commercial	North	Large Bulldozers	0.0623	644	0.002
		Loaded Trucks	0.0532	644	0.001
		Jackhammer	0.0245	644	0.001
Residential	West	Large Bulldozers	0.0623	430	0.003
		Loaded Trucks	0.0532	430	0.002
		Jackhammer	0.0245	430	0.001
Commercial	West	Large Bulldozers	0.0623	560	0.002
		Loaded Trucks	0.0532	560	0.002
		Jackhammer	0.0245	560	0.001
School	On-site (East/South)	Large Bulldozers	0.0623	460	0.003
		Loaded Trucks	0.0532	460	0.002
		Jackhammer	0.0245	460	0.001

Source: Compiled by LSA (2025).

Note: The Caltrans annoyance threshold is 0.04 in/sec RMS.

¹ Distance from the center of the project site to the building structure.

Caltrans = California Department of Transportation

VdB = vibration velocity decibels

ft = foot/feet

Similarly, Table 4.13.N lists the projected vibration levels from various construction equipment expected to be used on the project site at the project construction boundary to the nearest buildings in the project vicinity. As shown in Table 4.13.N, the closest building structure is approximately 30 feet from the project construction boundary (within the CSDR campus) and would experience a vibration level of up to 0.073 PPV (in/sec). This vibration level would not result in building damage because the building is conservatively assumed to be an older structure or better, and the anticipated project-related vibration levels would not exceed the Caltrans vibration damage threshold of 0.30 PPV (in/sec). Other building structures that surround the project site would experience lower vibration levels because they are farther away and are also conservatively assumed to have been built using nonengineered timber and/or masonry construction. Therefore, vibration levels generated from project construction would be less than significant, and no mitigation is required.

Table 4.13.N: Potential Construction Vibration Damage

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft	Distance to Structure (ft) ¹	Vibration Level
			PPV (in/sec)		PPV (in/sec)
Commercial	North	Large Bulldozers	0.089	150	0.012
		Loaded Trucks	0.076	150	0.011
		Jackhammer	0.035	150	0.005
Residential	West	Large Bulldozers	0.089	90	0.022
		Loaded Trucks	0.076	90	0.019
		Jackhammer	0.035	90	0.009
Commercial	West	Large Bulldozers	0.089	120	0.016
		Loaded Trucks	0.076	120	0.014
		Jackhammer	0.035	120	0.006
School	East (On-site)	Large Bulldozers	0.089	30	0.073
		Loaded Trucks	0.076	30	0.062
		Jackhammer	0.035	30	0.029

Source: Compiled by LSA (2025).

Note: The Caltrans building damage threshold for older residential structures is 0.30 PPV (in/sec).

¹ Distance from the project construction boundary to the building structure.

Caltrans = California Department of Transportation in/sec = inches per second
ft = foot/feet PPV = peak particle velocity

Long-Term Operational Vibration Impacts. Once operational, the proposed project would not generate vibration. Furthermore, vibration levels generated from project-related traffic on the adjacent roadways (i.e., Arlington Avenue and Maude Street) would be unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration levels generated from project-related traffic on the adjacent roadways would be less than significant and no mitigation is required.

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?*

No Impact. The nearest airports to the project site are the Riverside Municipal Airport and Flabob Airport, which are located 3.0 miles west and 3.3 miles northwest of the project site, respectively. Based on the Riverside County Airport Land Use Compatibility Plan,⁶⁰ the project site is outside the 55 dBA CNEL noise contours of Riverside Municipal Airport and Flabob Airport. There are no private airstrips located within the vicinity of the project site. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels. No impact would occur, and no mitigation is required.

⁶⁰ Riverside County Airport Land Use Commission. 2005. *Riverside County Airport Land Use Compatibility Plan Policy Document*. March.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 Impact Analysis

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

Less Than Significant Impact. *State CEQA Guidelines* Section 15126.2[d] identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing either directly or indirectly in the surrounding environment. New employees generated by commercial or industrial development and new population from residential development represent direct forms of growth, which have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered substantial if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies.

The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. Construction of the proposed project would provide short-term construction jobs over an approximately 7-month period. The workforce would include a variety of construction trade workers, such as surveyors, cement finishers, ironworkers, welders, carpenters, electricians, painters, landscapers, and laborers. Generally, construction workers are only at a job site for the timeframe in which their specific skills are needed to complete that phase of construction. Although the proposed project would increase the number of employees at the project site during construction activities, it is expected that local and regional construction workers would be available to serve the construction needs of the site. Given the relatively short duration of construction, project-related construction workers would not be expected to relocate their places of residence as a consequence of working on the project site; therefore, the proposed project would

result in a less than significant impact associated with inducing substantial population growth or demand for housing through increased construction employment, and no mitigation is required.

Once operational, the proposed project would not result in direct population growth as the proposed use is not residential and would not contribute to permanent residency on site. Additionally, the proposed project would not result in new jobs or an increase in the number of employees or students on-site. Therefore, the proposed project would not directly or indirectly induce population growth. Impacts would be less than significant, and no mitigation is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. Under existing conditions, the project site does not contain any residential uses and construction of the proposed project would not displace existing residents within the nearby residential areas. Therefore, the proposed project would not result in the displacement of people or housing and would not require the construction of replacement housing elsewhere. No impact would occur, and no mitigation is required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. 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:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

4.15.1 Impact Analysis

a. *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:*

i. *Fire protection?*

Less Than Significant Impact. The Riverside Fire Department (RFD) provides fire suppression, fire prevention, hazardous materials and decontamination expertise, and emergency response services to the City of Riverside and the project site. The RFD deploys from 12 fire stations staffed 24 hours per day spanning a response area of over 81 square miles. The RFD employs 216 full-time firefighters and responds to over 39,000 emergency calls annually.⁶¹ Riverside City Fire Station 3, located at 6395 Riverside Avenue, approximately 0.4 mile to the northwest, is the closest station to the project site. Average travel time between Fire Station 3 and the project site is 4 minutes. RFD's response time goal is a 5-minute response time for the first arriving units for all emergency medical service and fire related incidents 90 percent of the time. Additionally, RFD's policy states that units will be located and staffed such that an effective response force of 4 units with a minimum of 12 personnel shall be available to all areas of the City within a maximum response time of 10 minutes.⁶² Additionally, the City maintains mutual aid and automatic aid agreements with surrounding cities and Riverside County, which allow for the services of nearby fire departments to assist the City during major emergencies.

⁶¹ Riverside Fire Department (RFD). 2016. *Operations*. Website: <https://riversideca.gov/fire/divisions/operations> (accessed March 26, 2025).

⁶² City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. Construction associated with the proposed project could increase the potential for accidental on-site fires from the operation of construction equipment, the use of flammable construction materials, and sparks during the removal of existing on-site vegetation. As required by the California Occupational Safety and Health Administration (CAL-OSHA) and California Fire Code requirements, the construction contractor would be required to carefully store flammable materials in appropriate containers during project construction, use construction equipment with spark arrestors, and immediately and completely clean up spills of flammable materials if they occur. In addition, the construction contractor and construction personnel would be trained in emergency response, and fire suppression equipment specific to the construction site would be available and maintained on site for the duration of the construction period. Adherence to existing laws would ensure that the proposed project would not have a significant construction-related impact on fire protection service from RFD. Therefore, construction-related impacts to fire protection would be minimized and the provision of and/or need for new or physically altered governmental facilities (the construction of which could cause significant environmental impacts) would not be required.

Once operational, project compliance with requirements set forth in the California Fire Code would provide fire protection for people and structures, as well as emergency medical services. In addition, as discussed in Section 4.17, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, create a significant design hazard due to a geometric design feature or incompatible use, or result in a significant impact to any local roadways or intersections. Therefore, the proposed project would not impair emergency response vehicles, and average response times in the area would remain within acceptable response time limits.

The proposed project would not result in changes to the existing land use on site and once operational, the proposed project would not result in new jobs or an increase to the number of visitors, employees, or students on site. Additionally, the proposed project would not result in additional vehicle trips. Nevertheless, through compliance with California Vehicle Code 21806(A)(1), which requires all vehicles to yield to emergency vehicles, the proposed project is not expected to affect the RFD's response times. The proposed project would comply with all applicable State and local codes related to fire safety and emergency access. The proposed project would not result in a significant increase in demand for fire protection and life safety services because the project would not result in any changes to the existing land use on site and would not result in new jobs or an increase to the number of visitors, employees, or students on site. The RFD would continue providing services to the project site and would not require additional firefighters or the construction of a new or expanded fire station to serve the proposed project. Therefore, the proposed project would have a less than significant impact on fire protection and safety services and facilities, and no mitigation is required.

ii. Police protection?

Less Than Significant Impact. The Riverside Police Department (RPD) provides police protection services to the project site. The RPD has three stations within the City and the Lincoln Station, located at 8181 Lincoln Avenue, approximately 2.2 miles to the southwest is the closest station to the project site. The RPD employs 394 sworn officers and 236 civilian personnel. RPD strives to respond within 7 minutes to Priority 1 calls, which are typically of a life-threatening nature, such as a robbery in process or an accident involving bodily injury. RPD strives to respond to less-urgent Priority 2 calls within 12 minutes, which are not life threatening and include incidents such as burglary, petty theft, and shoplifting.⁶³

Construction activities on the project site have the potential to attract criminals that may be attracted to construction equipment and/or vehicles with gasoline and diesel fuel at the project site, and/or unsecured construction materials. To minimize criminal trespassing, the project site (construction areas) would be fenced, and access points would be locked during non-construction hours. Additionally, construction equipment would be stored in well-lit areas, and smaller equipment would be secured to reduce pilfering by trespassers. Based on the above, construction of the proposed project would not result in a demand for additional police services or significantly impact existing service ratios or response times.

As previously discussed, the proposed project would not result in changes to the existing land use on site and the proposed project would not result in new jobs or an increase to the number of visitors, employees, or students on site. As such, the proposed project would not result in a demand for more police protection services beyond what was anticipated and planned for this location. RPD would continue to provide service to the project site and would not require additional officers or the construction of new or expanded police facilities to serve the proposed project. The proposed project would not increase response times by increasing traffic volumes on area roadways to the point where additional significant congestion would occur. Based on the above, operation of the proposed project would not result in a demand for additional police services or significantly impact existing service ratios or response times.

Therefore, the proposed project would have a less than significant impact on police protection services, and no mitigation is required.

iii. Schools?

No Impact. The project site is located within the CSDR campus, within the boundaries of Riverside Unified School District. The Riverside Unified School District enrolls approximately 40,000 students across 50 schools including 30 elementary schools, 7 middle schools, 5 high schools, 8 specialty schools, and 21 preschool programs.⁶⁴ The proposed project does not include any residential uses,

⁶³ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

⁶⁴ Riverside Unified School District. 2025. *At-A-Glance 2024-2025*. Website: https://cdns5-ss12.sharpschool.com/UserFiles/Servers/Server_580721/File/Our%20District/RUSD%20At-A-Glance.pdf (accessed March 26, 2025).

and therefore would not directly affect student population. As previously discussed, the proposed project would not result in any changes to the existing land use on site and would not result in new jobs or an increase to the number of visitors, employees, or students on site. Therefore, the proposed project would not increase student population within the City and would have no impacts related to schools. No mitigation is required.

iv. Parks?

No Impact. The City maintains a performance standard of 3 acres of parkland for every 1,000 residents. The City currently meets this performance standard and has more than one thousand additional acres of parkland than required.⁶⁵ As previously discussed, the proposed project would not result in any changes to the existing land use on site and would not result in new jobs or an increase to the number of visitors, employees, or students on site. Therefore, the proposed project would not result in an increased demand for parks and recreational facilities and there would be no impact. No mitigation is required.

v. Other public facilities?

No Impact. Other public facilities located in the surrounding area include the Marcy Library located 6927 Magnolia Avenue approximately 0.9 mile northwest of the project site and the Ysmael Villegas Community Center located at 3091 Esperanza Street approximately 1 mile southwest of the project site. Development of the proposed project would not increase the demand for other public service including libraries, community centers, and public health care facilities. As previously discussed, the proposed project does not include development of residential uses, would not result in any changes to the existing land use on site, and would not result in new jobs or an increase to the number of visitors, employees, or students on site. Therefore, the proposed project would not result in an increased demand for public facilities, and there would be no impact. No mitigation is required.

⁶⁵ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

4.16.1 Impact Analysis

- 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?*

No Impact. The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. The proposed project would not involve the addition of any housing units that would permanently increase the City's population. Additionally, the proposed project would not result in any changes to the existing land use on site and would not result in new jobs or an increase to the number of visitors, employees, or students on site. Therefore, development of the proposed project would not create a significant increase in the use of existing neighborhood, regional parks, or other recreational facilities. There would be no impact, and mitigation is not required.

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

Less Than Significant Impact. The proposed project includes improvements to and the expansion of existing recreational facilities within the CSDR campus. Potential adverse effects on the environment related to the development of the proposed project have been evaluated in this IS/MND. Implementation of regulatory compliance and mitigation measures contained in this IS/MND would reduce potential impacts to less than significant levels.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

4.17.1 Impact Analysis

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

Less Than Significant Impact. In order to assess the impact of the proposed project on the surrounding circulation system, LSA calculated the project trips that would be generated.

Project construction would temporarily generate traffic on the existing area roadway network. These temporary vehicle trips would include construction workers and vendors traveling to and from the project site as well as trucks associated with the delivery of construction equipment and hauling of materials. The anticipated construction schedule is expected to occur over a total of approximately 17 months. It is anticipated that project construction would occur in six (6) phases including demolition, site preparation, grading, building construction, paving, and architectural coating. The paving and architectural coating phases of construction would occur towards the end of project construction and are anticipated to occur simultaneously. The other four (4) construction phases are expected to occur sequentially and are not anticipated to overlap with other phases of construction. Once grading has been completed and building materials are delivered to the project site, all construction activities would occur within the project site and therefore, would not disrupt off-site traffic flow.

Table 4.17.A summarizes the project construction trip generation for each phase of construction and the timeline for each phase. As shown in Table 4.17.A, the highest number of construction trips that would occur in a single day during the entirety of project construction would be during the grading phase which would temporarily generate 37 daily trips, with 19 trips in the a.m. peak hour and 18 trips in the p.m. peak hour. As such, it is not anticipated that project construction would generate a significant number of trips to and from the project site during any phase of construction as proposed by the project. Furthermore, no temporary roadway or lane closures would occur, and no off-site roadway improvements are proposed as part of the project.

Table 4.17.A: Project Construction Trip Generation

Construction Phases	A.M. Peak Hour			P.M. Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Demolition (7/5/2027 to 9/24/2027)							
Trip Generation (Workers)	8	0	8	0	7	7	15
Trip Generation (Hauling Trucks)	6	0	6	0	6	6	12
Total Trip Generation	14	0	14	0	13	13	27
Site Preparation (9/27/2027 to 12/17/2027)							
Trip Generation (Workers)	9	0	9	0	9	9	18
Trip Generation (Hauling Trucks)	7	0	7	0	7	7	14
Total Trip Generation	16	0	16	0	16	16	32
Grading (12/20/2027 to 3/17/2028)							
Trip Generation (Workers)	10	0	10	0	10	10	20
Trip Generation (Hauling Trucks)	9	0	9	0	8	8	17
Total Trip Generation	19	0	19	0	18	18	37
Building Construction (3/20/2028 to 9/15/2028)							
Trip Generation (Workers)	1	0	1	0	1	1	2
Trip Generation (Vendors)	1	0	1	0	0	0	1
Trip Generation (Hauling Trucks)	5	0	5	0	4	4	9
Total Trip Generation	7	0	7	0	5	5	12
Paving and Architectural Coating (9/18/2028 to 12/8/2028)							
Trip Generation (Paving - Workers)	8	0	8	0	7	7	15
Trip Generation (Architectural Coating - Workers)	1	0	1	0	0	0	1
Total Trip Generation	9	0	9	0	7	7	16

Source: California Emissions Estimator Model (CalEEMod) (2025).

The proposed project involves improvements to the existing original athletic fields and related infrastructure at the CSDR campus, including the replacement of existing sports fields, the replacement of an existing track, construction of a new field, replacement of existing infrastructure, and construction of new support facilities, pathways and walkways, additional vehicle parking, fencing, and a canopy of photovoltaic panels. The proposed project would not result in any changes to the existing land use on site and would not result in new jobs or an increase to the number of visitors, employees, or students on site. Therefore, the proposed project would not generate any operational traffic.

Based on the anticipated low trip generation for temporary project construction and no operational trips, the proposed project is not anticipated to result in any level of service (LOS) or operational deficiencies to the surrounding circulation network.

The City's General Plan Circulation and Community Mobility Element provides policy direction for the transportation system and links circulation strategies with those of population growth, environmental quality, and economic well-being. The Circulation and Community Mobility Element establishes key goals, policies, programs, and requirements for achieving a transportation system that balances the needs of all road users. The proposed project would not generate a substantial number of temporary construction trips or any operational trips to warrant modifications to any transportation facilities. Therefore, the proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. State CEQA Guidelines Section §15064.3 codifies the change from LOS to vehicle miles traveled (VMT) as a metric for transportation impact analysis. Under Senate Bill (SB) 743, VMT analysis is the primary method for determining CEQA impacts. Jurisdictions were not required to adopt VMT as a significant impact determination until July 1, 2020.

Therefore, the proposed project was evaluated against the criteria and thresholds as outlined in the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR TA) to determine VMT impacts. The OPR TA provides details on appropriate screening thresholds that can be used to identify when a project is anticipated to result in a less than significant impact without conducting a more in-depth analysis.

The OPR TA recommends VMT screening thresholds for smaller projects. The 'Screening Thresholds for Land Use Projects' section of the OPR TA states the following:

Screening Thresholds for Small Projects

Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.

The OPR TA recommends that a project generating fewer than 110 daily trips may be screened out of a detailed VMT analysis due to the presumption of a less than significant impact. As shown in Table 4.17.A, the proposed project is estimated to generate fewer than 110 daily trips temporarily during construction (up to a maximum of 37 daily trips per day during the most intensive phase of construction) and 0 daily trips once construction is complete. As such, a detailed VMT analysis is not required, and the proposed project is presumed to have a less than significant transportation impact related to VMT. No mitigation is required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The proposed project does not include or require any improvements to the existing roadway network. As such, the proposed project would not result in any hazards due to geometric design features. Additionally, operations of the proposed project would not generate any additional trips and therefore, would not result in any hazards related to incompatible uses. Therefore, no impacts would occur, and no mitigation is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. Primary access into the CSDR campus is provided via Horace Street. However, access to the project site would be provided via a gated driveway along Maude Street, which is a two-lane, undivided street to the west of the project site. All emergency access routes to

the CSDR campus, project site, and adjacent areas would be kept clear and unobstructed at all times during construction. No roadway or lane closures are anticipated, and construction vehicles would not impede traffic flow on the surrounding public or internal circulation system. Furthermore, the proposed project does not include or require any improvements to the existing roadway network. Therefore, the proposed project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation is required.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

4.18.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
 - ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Less Than Significant Impact. The term “California Native American tribe” is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the Native American Heritage Commission (NAHC).”

Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52) requires lead agencies to evaluate a project’s potential to affect “tribal cultural resources.” Such resources include “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American

Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources.” AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a “tribal cultural resource.”

CEQA defines a “historical resource” as a resource that meets one or more of the following criteria: (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) is listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) is determined to be a historical resource by a project’s lead agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5[a]).

“Local register of historical resources” means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

A resource may be listed as a historical resource in the California Register if it meets any of the following National Register of Historic Places criteria, as defined in PRC Section 5024.1(C):

- a) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- b) Is associated with the lives of persons important in our past.
- c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- d) Has yielded, or may be likely to yield, information important in prehistory or history.

A “substantial adverse change” to a historical resource, according to PRC Section 5020.1(q), “means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

The *CEQA Guidelines* do not preclude identification of historical resources during the analysis of a project as defined in PRC Sections 5020.1(j) or 5024.1. Pursuant to *State CEQA Guidelines* Section 15064.5[c][4], if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the IS, but they need not be considered further in the CEQA process.⁶⁶

Per AB 52 (specifically PRC 21080.3.1), Native American consultation is required upon request by interested California Native American tribes that have previously requested that the lead agency provide them with notice of such projects. On March 20, 2025, certified letters were sent to

⁶⁶ Pursuant to Section 21082.3(c) of the PRC, details on the nature, extent, and location of tribal cultural resources identified by Native American tribes shall remain confidential for the purposes of this analysis.

interested Native American tribes for consultation under AB 52. On April 3, 2025, follow-up emails were sent to the tribal contacts who had not responded to the mailed letters. The following tribes responded to the project's notification including the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Indians, Pala Band of Mission Indians, Quechan Indian Tribe of the Fort Yuma Reservation, and Rincon Band of Luiseno Indians. The Agua Caliente Band of Cahuilla Indians requested formal consultation pursuant to AB 52 which was concluded on June 16, 2025.

As discussed in Section 4.5, Cultural Resources, the project site does not qualify as an "historical resource" as defined by CEQA. There are also no known archaeological resources on the project site that would qualify as "historical resources" as defined by CEQA. In its existing condition, the project site is completely disturbed and developed. The project site is located within the CSDR campus and surrounded by development. No cultural resources were identified during the archaeological field survey completed on February 13, 2025. The lack of resources identified by the record search, Sacred Lands File (SLF) search, and field survey in addition to disturbance from the school's development, indicate low probability for surface and subsurface resources. Although the project site is not anticipated to be sensitive for cultural resources, ground-disturbing activities have the potential to reveal unknown buried deposits.

In the unlikely event that unanticipated archaeological resources are discovered during project construction, impacts to these resources could be potentially significant. With implementation of **RCM CUL-1** requiring that a qualified archaeologist is retained to be on-call to respond to inadvertent discoveries during project construction and that all construction work occurring within 50 feet of any find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Qualification Standards for Archaeology, can evaluate the significance of the find, potentially significant impacts to tribal cultural resources or Native American human remains would be less than significant, and no mitigation is required.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

4.19.1 Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less Than Significant Impact. The project site is located within an urbanized area with existing and surrounding land uses supported by existing utility infrastructure. Implementation of the proposed project would require connections to the existing infrastructure within the project site, which would involve ground disturbing activities and the use of heavy machinery, among other construction activities.

Water. The project site is within the water service area of Riverside Public Utilities (RPU). The proposed project would not require the construction of new water treatment facilities, or the expansion of existing facilities, other than those already planned. The proposed project includes installation of new water lines that would connect to existing waterlines within the CSDR campus, which have sufficient capacity to accommodate the proposed project.

The proposed restroom facilities would be approximately 1,400 square feet and therefore would result in a nominal increase in water demand. Additionally, the proposed project would not result in a significant increase in water demand for irrigation because the proposed uses would be consistent with existing uses and although the project would result in new grass fields it would also replace existing grass fields with synthetic turf fields, which require less water than grass fields, and the proposed landscaping would replace existing landscaping. The proposed

project would be required to comply with the latest Title 24 standards of the California Code of Regulations (CCR), which includes a variety of measures to reduce water use, such as compliance with applicable flow rates for plumbing and compliance with the local water efficient landscape ordinance. In addition to the use of low water usage fixtures and the installation of drought friendly native landscaping, the proposed project would include installation of a bioretention basin. As such, the proposed project would not substantially increase demand for water and would therefore not exceed the capacity of existing water treatment facilities. Therefore, the proposed project would not require or result in the relocation or construction of new or expanded water facilities, and impacts would be less than significant.

Wastewater. The project site is within the sewer service area of the Riverside Public Works Department. The proposed project includes installation of new sewer lines which would connect to existing sewer lines within the CSDR campus, which have sufficient capacity to accommodate the proposed project. The new connection would be constructed in conformance with City standards, and is within the project disturbance footprint evaluated within this IS/MND. The proposed uses would be consistent with existing uses on the project site and would not result in a substantial increase in the generation of wastewater on the project site. The proposed restroom facilities would be approximately 1,400 square feet and therefore would result in a nominal increase in wastewater generation. Additionally, the proposed project would be required to comply with the latest Title 24 standards of the CCR, which includes a variety of different measures, including reduction of wastewater use. Therefore, environmental effects associated with construction of a new sewer connection has been evaluated as part of the proposed project within this IS/MND and as described in Chapter 4.0, would not be significant.

Stormwater Drainage. The proposed project includes the installation of new storm drains and storm water infrastructure. On-site stormwater drainage infrastructure would be designed consistent with the requirements of the City's Municipal Separate Storm Sewer System (MS4) Permit and would be constructed in conformance with City standards. Compliance with the City's MS4 Permit would ensure that the proposed project would not result in a substantial increase in the generation of stormwater on the project site. Environmental effects associated with construction of new stormwater facilities have been evaluated as part of the proposed project within this IS/MND and as described in Chapter 4.0, and would not be significant.

Electric Power/Natural Gas. The proposed project would be served by existing overhead electric facilities. The proposed project would not require relocation of any existing overhead electric facilities. Additionally, the proposed uses would be consistent with existing uses on the project site and would not result in a substantial increase in the demand for electric power on the project site. The proposed project would not use natural gas for construction or operation. Therefore, construction activities would not impact natural gas services, and the proposed project would not require new or physically altered electric or natural gas transmission facilities.

Telecommunication Facilities. The proposed project would connect to existing telecommunications lines. The proposed project would not require relocation of any existing telecommunication facilities.

Because the proposed project would connect to existing utility services within or adjacent to the project site, and there is sufficient excess capacity within those systems to accommodate project demands, the relocation or reconstruction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities would not be required. No modifications to utility infrastructure would be necessary outside of the immediate project site footprint. As such, impacts associated with the construction or expansion of utility facilities would be less than significant, and no mitigation is required.

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

Less Than Significant Impact.

Construction. Short-term demand for water may occur during demolition, excavation, grading, and construction activities on site. Water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be temporary and would cease once construction is complete. Overall, short-term demolition and construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. Therefore, construction impacts associated with new or expanded water facilities would be less than significant, and no mitigation is required.

Operation. Water service to the project site is currently provided by RPU and would continue to be provided by RPU for the proposed project. RPU's primary source of water supply is local groundwater. RPU has facilities to extract groundwater from five groundwater basins including the Bunker Hill, Rialto-Colton, Riverside North, Riverside South, and Arlington Basins. RPU also has an agreement with Western Municipal Water District to access imported water when needed. The proposed project would not significantly increase water consumption on the project site compared to existing conditions as the proposed land use would be consistent with the existing land use and the project would not result in an increase to the number of visitors, employees, or students on site. The proposed restroom facilities would be approximately 1,400 square feet and therefore would result in a nominal increase in water demand. Additionally, the proposed project would not result in a significant increase in water demand for irrigation because the proposed uses would be consistent with existing uses and although the project would result in new grass fields it would also replace existing grass fields with synthetic turf fields and the proposed landscaping would replace existing landscaping. The proposed project would be required to comply with the latest Title 24 standards of the CCR, which include a variety of different measures including reduction of water use.

Furthermore, the proposed project would be developed consistent with the existing land use and zoning designations for the project site. Therefore, the proposed project would be consistent with the City's growth projections anticipated in local and regional planning documents, including the Urban Water Management Plan (UWMP).⁶⁷ RPU's UWMP indicates the City has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Therefore, sufficient water supplies would be available to serve the proposed

⁶⁷ City of Riverside Public Utilities (RPU). 2021. *2020 Urban Water Management Plan*. July 1.

project and reasonably foreseeable future development during normal, dry and multiple dry years. Operational impacts associated with new or expanded water facilities would be less than significant and no mitigation is required.

- c. *Would the project 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?*

Less Than Significant Impact.

Construction. No significant increase in wastewater flows is anticipated as a result of construction activities on the project site. Sanitary services during construction would be provided by portable toilet facilities, which use vehicles to transport waste off-site for treatment and disposal. Therefore, during construction, potential impacts to wastewater treatment and wastewater conveyance infrastructure would be less than significant, and no mitigation is required.

Operation. The project site is within the sewer service area of the Riverside Public Works Department. The Riverside Regional Water Quality Control Plant (RRWQCP) treats wastewater generated within the majority of the City of Riverside, including the project site.⁶⁸ The RRWQCP comprises two treatment plants and a common tertiary filtration plant, managing up to 46 million gallons per day.⁶⁹ The proposed project would not significantly increase wastewater generation on the project site compared to existing conditions as the proposed land use would be consistent with the existing land use and the project would not result in an increase to the number of visitors, employees, or students on site. The proposed restroom facilities would be approximately 1,400 square feet and, therefore, would result in a nominal increase in wastewater generation. Additionally, the proposed project would be required to comply with the latest Title 24 standards of the CCR, which include a variety of different wastewater use reduction measures, such as compliance with applicable flow rates for plumbing. Furthermore, the proposed project would be developed consistent with the existing land use and zoning designations for the project site. Therefore, the proposed project would be consistent with the City's growth projections anticipated in local and regional planning documents. As such, wastewater generated from the proposed project would not cause the RRWQCP to violate any wastewater treatment requirements. Operational impacts associated with wastewater treatment and wastewater conveyance infrastructure would be less than significant, and no mitigation is required.

⁶⁸ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program*, State Clearing House Number 2004021108. November.

⁶⁹ City of Riverside. 2016. *Regional Water Quality Control Plant*. Website: <https://riversideca.gov/publicworks/sewer/regional-water-quality-control-plant> (accessed March 27, 2025).

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less Than Significant Impact. Solid waste collection is a “demand-responsive” service, and current service levels can be expanded and funded through user fees. The City of Riverside Public Works Department collects trash from approximately 38,500 households (70 percent of all households) largely using automated trash collection trucks. Additionally, private collectors service various residential neighborhoods within the City and commercial areas are serviced by three different private collectors. All non-hazardous solid waste collected is taken to the Robert A. Nelson Transfer Station, which is owned by the County of Riverside. Waste is then transferred to the Badlands Landfill for disposal.⁷⁰ The Badlands Sanitary Landfill has a maximum permitted daily disposal rate of 5,000 tons of solid waste, a remaining capacity of 4,900,000 cubic yards, and an anticipated closure date of 2059.⁷¹

Construction. Construction activities occurring on the project site would generate solid waste from demolition of the existing storage shed, bleachers, and fencing. However, the majority of the demolition waste would be comprised of the turf from the existing sports fields. The proposed project would be required to comply with the California Green Building Standards Code (CALGreen Code), which requires that at least 65 percent of non-hazardous construction and demolition waste from non-residential construction operations be recycled and/or salvaged for reuse (Section 4.408 of the 2022 CALGreen Code), thus reducing the input of solid waste to the receiving landfills. With compliance with the CALGreen Code, solid waste generated by construction activities associated with the proposed project would not cause the capacity at the Badlands Sanitary Landfill to be exceeded. Therefore, impact associated with the disposal of solid waste during construction would be less than significant, and no mitigation is required.

Operation. The proposed project would not significantly increase solid waste generation on the project site compared to existing conditions as the proposed land use would be consistent with the existing land use and the project would not result in an increase to the number of visitors, employees, or students on site. As such, the proposed project would be served by a landfill with sufficient capacity to accommodate the project’s waste disposal needs. Furthermore, the proposed project would comply local and State waste reduction strategies. Therefore, impacts associated with the disposition of solid waste during operation would be less than significant, and no mitigation is required.

⁷⁰ City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

⁷¹ CalRecycle. 2019. *SWIS Facility/Site Activity Details, Badlands Sanitary Landfill (33-AA-0006)*. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367> (accessed Marcy 27, 2025).

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The proposed project would comply with all federal, State, and local solid waste statutes and/or regulations related to solid waste. Additionally, as detailed in Section 4.19.1.d above, the Badlands Sanitary Landfill has sufficient capacity to accommodate the proposed project's waste disposal needs. Therefore, the proposed project would result in a less than significant impact related to solid waste regulations, and no mitigation is required.

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

4.20.1 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The project site is not located within or near a State Responsibility Area (SRA) for fire service and is not located in a Very High Fire Hazard Severity Zone (VHFHSZ). Additionally, the project site is not located within a locally designated fire hazard area.⁷² An SRA VHFHSZ is located approximately 1 mile southeast of the project site. The Riverside County Emergency Management Department has prepared an Emergency Operations Plan, which addresses the planned response to extraordinary situations associated with natural disasters and/or human caused incidents. The plan focuses on coordinating mutual aid and provides an overview of the operational concepts relating to various emergency situations, identifies components of the emergency response, and describes the overall responsibilities for supporting stakeholders in protecting life and property.⁷³ The City's General Plan and the Emergency Operations Plan do not designate evacuation routes within Riverside. Regardless, the proposed project is located within the CSDR campus and would not require traffic detours or road closures on public roadways during construction. The CSDR has campus-specific plans to respond to emergencies such as natural disasters, man-made disasters, and critical incidents which are updated annually. CSDR's emergency procedures and plans would be followed in the event of an emergency during construction.

⁷² City of Riverside. 2007b. *Program Environmental Impact Report, City of Riverside General Plan 2025 Program, State Clearing House Number 2004021108*. November.

⁷³ Riverside County Emergency Management Department. 2024. *County of Riverside Operational Area Emergency Operations Plan (EOP)*. August.

The improvements that would occur as part of the proposed project are site-specific and do not include any public right-of-way improvements to off-site areas (e.g., roadway improvements, intersection improvements) or change the existing use of the site. Operation of the proposed project would not result in a change in traffic volumes or access to the project site and would not interfere with existing emergency response times or adopted emergency response or evacuation plans. The project site would be accessible to emergency vehicles in the event an emergency occurs on the site. Additionally, the proposed project would comply with CSDR's emergency procedures and plans. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impact would be less than significant and no mitigation is required.

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

Less Than Significant Impact. As previously discussed, the project site is not located within a SRA for fire service and is not within a locally designated very high fire hazard severity zone. Additionally, the project site is generally flat and is surrounded by existing development. Furthermore, the proposed project would not include any design features that would increase the potential for a wildfire beyond existing conditions. Therefore, the proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire as a result of slope, prevailing winds, and other factors. Impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact. As previously discussed, the project site is not located within any SRAs for fire service and is not within a locally designated very high fire hazard severity zone. The proposed project would connect to existing utilities, and their construction would not cause significant environmental effects, as detailed in Section 4.19, Utilities and Service Systems. The proposed project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, emergency water sources, or power lines that may exacerbate fire risk. Therefore, impacts would be less than significant and no mitigation is required.

- d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Less Than Significant Impact. As previously discussed, the project site is not located within any SRAs for fire service and is not within a locally designated very high fire hazard severity zone. Additionally, the project site is not located in a landslide hazard or flood zone as detailed in Sections 4.7, Geology and Soils, and 4.10, Hydrology and Water Quality, respectively. The project site is generally flat and is not surrounded by any adjacent slopes which would have the potential to result in risks related to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage

changes. Therefore, the proposed project would not expose people or structures to significant risks as a result of post-fire slope instability or drainage and runoff changes. Impacts would be less than significant, and no mitigation is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or 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?	☐	☒	☐	☐

4.21.1 Impact Analysis

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Less Than Significant Impact. As discussed in Section 4.4, Biological Resources, the project site does not contain suitable habitat for special-status species or federally protected wetlands, and it would not conflict with an adopted Habitat Conservation Plan or Natural Communities Conservation Plan. However, ornamental trees and shrubs located along the project site's perimeter could provide suitable habitat for nesting birds. To comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code and avoid impacts to nesting birds from implementation of the proposed project, if construction commences during the nesting bird season (February 1 to September 15) a pre-construction nesting bird survey would be required prior to construction, as detailed in **RCM BIO-1**.

As discussed in Section 4.5, Cultural Resources, the proposed project is not expected to result in any significant impacts to any examples of the major periods of California history or prehistory. No historic cultural or archaeological resources as defined by CEQA were identified in the Cultural Resources Assessment prepared for the proposed project. And no cultural resources were identified during the archaeological field survey completed on February 13, 2025. The lack of resources identified by the record search, Sacred Lands File (SLF) search, and field survey, in addition to previous disturbance from development of the CSDR campus, indicate a low probability for surface

and subsurface resources within the project site. Although the project site is not anticipated to be sensitive for cultural resources, ground-disturbing activities have the potential to reveal unknown buried deposits. In the unlikely event that unanticipated archaeological resources are discovered during project construction, impacts to these resources could be potentially significant. Therefore, **RCM CUL-1** would be required, which requires that a qualified archaeologist is retained to be on-call to respond to inadvertent discoveries during project construction and that all construction work occurring within 50 feet of any find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Qualification Standards for Archaeology, can evaluate the significance of the find. Additionally, in the unlikely event that fossils of any sort are discovered during grading/earthmoving activities, **RCM GEO-1** would be implemented to reduce potential impacts to paleontological resources. With implementation of **RCMs CUL-1 and GEO-1**, potential impacts associated with important examples of the major periods of California history or prehistory would be less than significant.

With implementation of regulatory compliance measures, the potential for the proposed project 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 rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory would be less than significant, and no mitigation is required.

- 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)?*

Less Than Significant Impact. Section 15065(a)(3) of the *State CEQA Guidelines* states that a project's cumulative impacts are the possible environmental effects that may be cumulatively considerable when considered with other reasonably foreseeable projects. Cumulatively considerable impacts occur when the incremental effects of a particular project or program are significant when viewed in connection with the effects of other past, current, or reasonably foreseeable future projects. Section 15355 of the *State CEQA Guidelines* defines a cumulative impact as an impact that is created as a result of the combination of the project evaluated in the CEQA document together with other projects causing related impacts. The proposed project is located in a developed urban area, within a portion of the CSDR campus. At this time, no other reasonably foreseeable projects have been identified for the CSDR campus or within the immediate surroundings. While various projects within Riverside have the potential to be under construction concurrent with the proposed project, concurrent projects within the city would be subject to regulations similar to those outlined in this document and would incorporate mitigation measures, as necessary, that would reduce impacts of the project. As shown in the discussion above, environmental impacts associated with the proposed project can be reduced to less than significant levels with the implementation of RCMs and/or project-specific MMs. All project-related impacts are localized and confined to the immediate project area. Given that the potential project-related impacts are less than significant and limited to the project site, implementation of the proposed project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects

of probable future projects. Therefore, cumulative impacts would be less than significant, and no mitigation is required.

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

Less Than Significant with Mitigation Incorporated. Based on the analysis provided throughout this IS/MND, with incorporation of RCMs and MMs, the proposed project would not result in any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts on human beings would be less than significant with mitigation incorporated.

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