Appendix A:
Notice of Preparation and Comment Letters/Initial Study

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A.1 - Notice of Preparation and Comment Letters

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Riverside Unified School District

Operations Division – Planning and Development

3070 Washington Street, Riverside, CA 92504-4697 • (951) 788-7496 • (951) 778-5646

DATE: October 31, 2018

TO: Responsible Agencies, Organizations, and Interested Parties

FROM: Riverside Unified School District

PROJECT TITLE: Casa Blanca Elementary School

Riverside Unified School District (RUSD) has determined that a Focused Environmental Impact Report (EIR) is necessary for the environmental impact analysis of the Casa Blanca Elementary School Project ("Project"). RUSD is the Lead Agency for the Project and will prepare the Focused EIR under the terms and requirements of the California Environmental Quality Act (CEQA) and the implementing the CEQA Guidelines.

The purpose of this notice is to: (1) serve as the Notice of Preparation to the Office of Planning and Research (OPR), Responsible Agencies, public agencies involved in funding or approving the Project, and Trustee Agencies responsible for natural resources affected by the Project, pursuant to CEQA Guidelines Section 15082; and (2) advise and solicit comments and suggestions regarding the preparation of the Focused EIR, environmental issues to be addressed in the Focused EIR, and any other related issues, from interested parties other than those noted above, including interested or affected members of the public. RUSD requests that any potential Responsible or Trustee Agency responding to this notice respond in a manner consistent with CEQA Guidelines Section 15082(b).

In order for the concerns of your agency to be addressed in the Draft Focused EIR, RUSD is requesting that you provide us with pertinent environmental information related to the scope and content relevant to your entity's statutory responsibilities in connection with the Project. Your response at a minimum should include: 1) significant environmental issues and reasonable alternatives and mitigation measures that the Responsible or Trustee Agency will need to have explored in the Draft Focused EIR; and b) whether or not your agency will be a Responsible or Trustee Agency for the Project.

The Project's description, location, and a discussion indicating the probable environmental effects of the proposed action are contained in the Project's Initial Study. Additional Project information, included within the Initial Study prepared for the Project to identify potential environmental effects of Project implementation, may be obtained at the RUSD Operations Division – Planning and Development address shown above. Further, the NOP and Initial Study can also be reviewed online at the following location:

http://www.riversideunified.org/departments/operations_division/facilities_planning_development/PublicNotices/

Furthermore, the NOP is available for viewing at the Riverside Unified School District located at 3380 14th Street, Riverside, CA 92501.

In an effort to provide agencies and the public adequate time to provide comments, RUSD is providing a 30-day public comment period for this Notice of Preparation and Initial Study. **All comments must be received within 30 days of the start of the public comment period, which starts October 31, 2018 and ends November 30, 2018.** All parties that have submitted their names and mailing addresses will be notified as part of the current Project's CEQA review process. If you wish to be placed on the mailing list or have any questions or need additional information, please contact the person identified above. RUSD will accept **written comments** from

agencies and interested parties regarding this notice through the close of business on **Friday, November 30, 2018 (submit written comments to RUSD address shown above) by 4:30 PM**.

PROJECT LOCATION

The proposed Casa Blanca Elementary School Project (Project) is located at 7351 Lincoln Avenue, south of State Route 91, in the City of Riverside in Riverside County. Specifically, in Township 3 south, Range 5 west, Section 10, as mapped on the United States Geological Survey (USGS) 7.5-minute Series Riverside West, California quadrangle. The Project site has regional access via State Route 91 (see Exhibit 1, Regional Location Map and Exhibit 2, Local Vicinity Map).

The site is located within the Casa Blanca Neighborhood in the City of Riverside. The City of Jurupa Valley and unincorporated Rubidoux are located to the north, the City of Moreno Valley is located to the east, unincorporated Woodcrest is located to the south, and the City of Norco is located to the west. Access to the site is off Lincoln Avenue. The Assessor Parcel Number for the Project site is 230-360-001.

The City of Riverside General Plan designates the project site as High Density Residential (HDR) with the current zoning designated as R-3-1500—for Multi-Family Residential zone.

PROJECT DESCRIPTION

RUSD proposes to construct the Casa Blanca Elementary School on a 9.8-acre site at 7351 Lincoln Avenue in the City of Riverside. The site was formerly occupied by the KPRO 1570 AM transmitter building and antenna system with four, approximately 125-foot-tall towers however all structures have been demolished. The site remains vacant land with no structures present.

The project would consist of a 1-story 11,000 square foot (SF) multi-purpose/food service building, a 1-story 6,500 SF administration building, a 2-story 83,000 SF classroom, and a library and kindergarten building with a capacity to serve up to 800 students (Exhibit 3, Site Plan). In addition to the main buildings, the site proposes to include outdoor recreation space that consists of a 13,500 SF kindergarten playground, 29,500 SF quad and courtyard, 36,800 SF hardcourts, 143,500 SF playfields (baseball, basketball, and soccer fields), a 4,000 SF outdoor Science Grow Lab, and associated landscaping totaling 240,870 SF. There are three proposed parking lots including a staff parking lot, kindergarten parking lot, and visitor lot.

Land use approval needed to implement the Project would include a General Plan Land Use and CUP from High Density Residential (HDR) to Public Facilities (PF), unless RUSD Board of Education votes to overrule per Government Code 53094. Additional approvals associated with the project are: Site Plan and Design Review from RUSD, California Division of the State Architect ("DSA"), and, or drainage and road improvement and related grading purposes from the City of Riverside; RUSD Board of Education, California Department of Education ("CDE") and California Department of Toxic Substances Control ("DTSC").

PROBABLE ENVIRONMENTAL EFFECTS OF THE PROJECT TO BE EVALUATED IN THE FOCUSED EIR

The environmental review of projects is normally a three-step process governed by the California Environmental Quality Act (CEQA). The first step is for the lead agency, RUSD, to determine whether a project is exempt from CEQA review. RUSD has determined that this project is not exempt from CEQA. The typical second step is the preparation of an Initial Study to determine potential impacts of the project on the environment. If the Initial Study determines that the project has the potential to cause one or more significant environmental impacts, the usual third step is to prepare an environmental impact report. In this case, the Initial Study has determined that a Focused EIR will need to be prepared based on the scale and potential complexity of the proposed project. Therefore, a Focused EIR will be prepared to fully evaluate the potential environmental impacts of the proposed

project. The Focused EIR will be comprehensive in nature, evaluating all subject issues from the CEQA Initial Study Checklist. In particular, the probable environmental effects of the project which are anticipated to be addressed in the Focused EIR are the project's impacts on:

- Air Quality
- Biological Resources
- Cultural and Tribal Resources
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Public Services
- Transportation and Traffic

The Focused EIR will address the short- and long-term effects of the project on the environment. It will also evaluate the potential for the project to cause direct and indirect growth-inducing impacts, as well as cumulative impacts. Alternatives to the proposed project will also be evaluated in the Focused EIR. Mitigation will be proposed for any potentially significant impacts and a mitigation monitoring program will be developed as required by §15150 of the CEQA Guidelines.

PUBLIC SCOPING MEETING

A public scoping meeting will be held on Wednesday, November 14th at 5:00 PM, located at Washington Elementary School, 2760 Jane St., Riverside, CA 92504 in the multipurpose room. At this meeting, public agencies, organizations, and members of the public will be able to review the proposed project application materials and provide comments on the scope of the environmental review process.

If you have any questions please contact Daniel Rodriguez, Assistant Director at 951-788-7496 Ext. 84705 or drrodriguez@rusd.k12.ca.us.

Sincerely,

Daniel Rodriguez
Assistant Director, Facilities Projects

Source: Census 2000 Data, The CaSIL

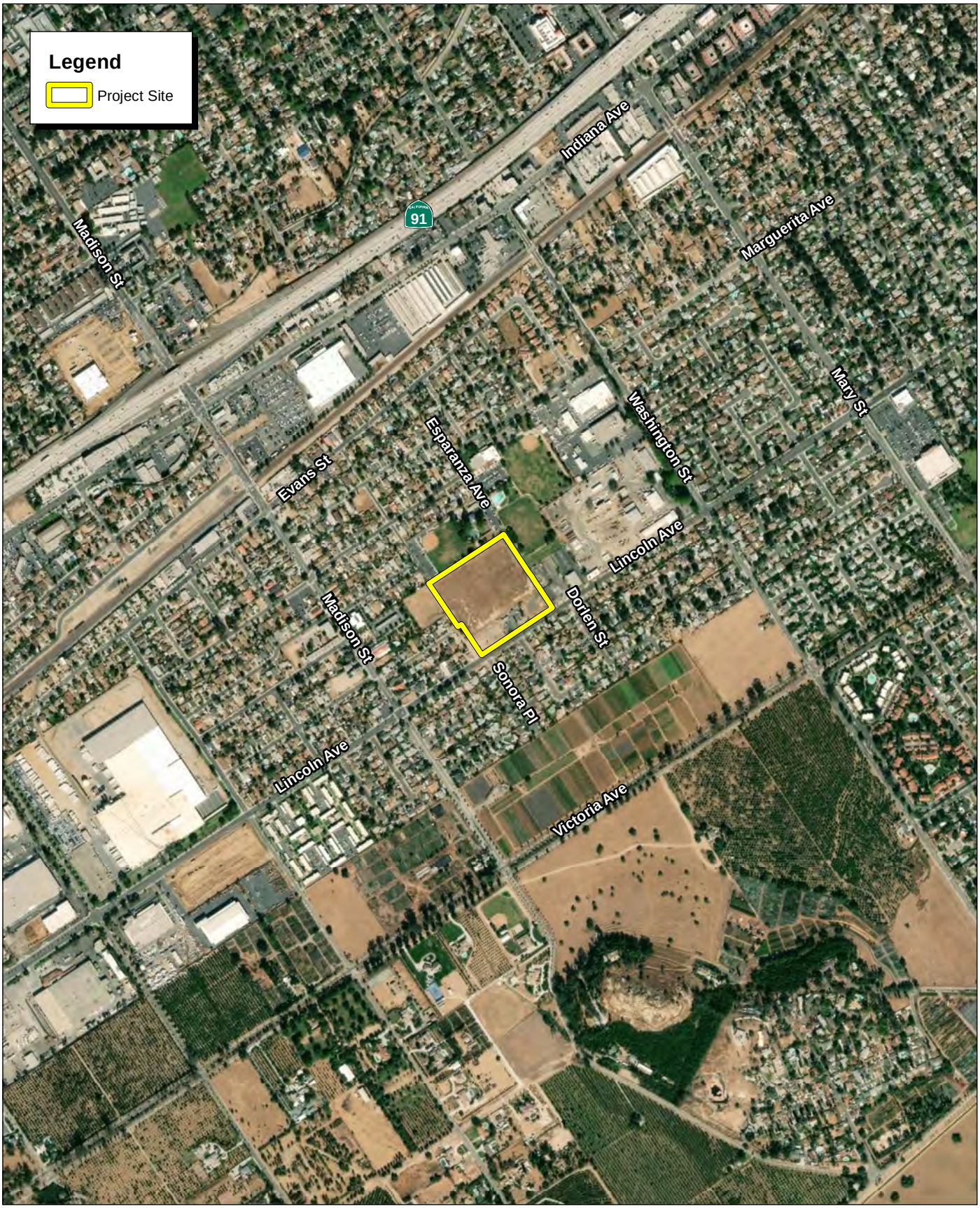
FIRSTCARBON SOLUTIONS™

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

34590005 • 10/2018 | 1_regional.mxd

RIVERSIDE UNIFIED SCHOOL DISTRICT
CASA BLANCA ELEMENTARY SCHOOL
NOTICE OF PREPARATION (NOP)

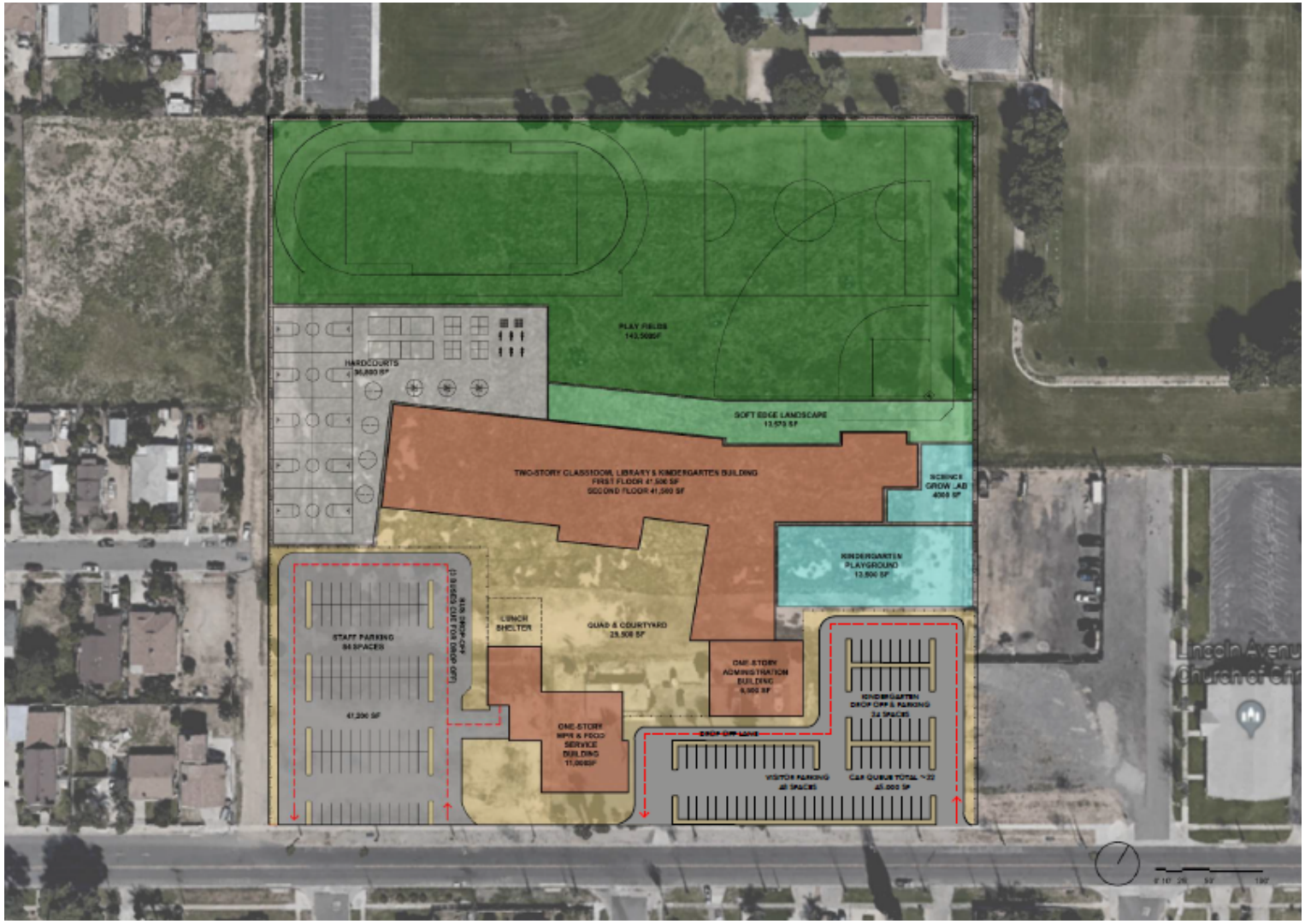


Source: ESRI Aerial Imagery. Riverside County Parcel Data.

FIRSTCARBON SOLUTIONS™

1,000 500 0 1,000
Feet

Exhibit 2
Local Vicinity Map
Aerial Base



FIRSTCARBON SOLUTIONS™

Exhibit 3
Site Plan

RIVERSIDE UNIFIED SCHOOL DISTRICT

COMMENT CARD

Name: BOB GARCIA (Please print) EMAIL djbmg@hotmail.com

Address: 7450 EMERALD STREET Phone Number (951) 204-1921

Parent ☐ Resident ☑

COMMENTS

WILL ADDITIONAL PROPERTY BEHIND AFRICAN AMERICAN CHURCH BE PURCHASED AND UTILIZED FOR RUSD PROJECT?

RIVERSIDE UNIFIED SCHOOL DISTRICT

COMMENT CARD

Name: Paul Chavez (Please print) EMAIL PJVFC03@AOL.COM

Address: 7306 Ysmeal Villegas Street Phone Number 951-682-3787

Parent ☐ Resident ☑

COMMENTS

will you need the EIR from present owner, will you enlarge Lincoln for new traffic and Bus.

RIVERSIDE UNIFIED SCHOOL DISTRICT

COMMENT CARD

Name: AL NAVARRO EMAIL _____
(Please print)

Address: 3141 JACARANDA ST Phone Number 951-212-9439

Parent ☐ Resident ☒

COMMENTS

TIME FRAME, THE USE OF THE PROPERTY FOR A SCHOOL
WOULD BENEFIT THE COMMUNITY IN MANY WAYS. A HOUSING PROJECT
WILL CAUSE CONSTANT TRAFFIC IN AREA. STOP BUSING

RIVERSIDE UNIFIED SCHOOL DISTRICT

COMMENT CARD

Name: BOB GARCIA EMAIL djbmg@hotmail.com
(Please print)

Address: 7450 EMERALD ST Phone Number (951) 204-4941

Parent ☐ Resident ☑

COMMENTS

WILL BUNKER BE CONNECTED FROM LINCOLN AVE. TO EMERALD STREET?

From: Joshua Palazzo <jpalazzo@riversidetransit.com>
Sent: Tuesday, November 6, 2018 11:05 AM
To: Rodriguez, Daniel R. <DRRodriguez@rusd.k12.ca.us>
Cc: Joe Forgiarini <jforgiarini@riversidetransit.com>; Sam Wattanachinda <swattana@riversidetransit.com>; Connie Mitchell <cmitchell@riversidetransit.com>
Subject: Casa Blanca Elementary School

Hi Daniel

Thanks for your letter dated October 21, 2018 regarding the proposed Casa Blanca Elementary School.

RTA currently has bus stops located on Lincoln Ave at both ends of the proposed project site. RTA would welcome the opportunity to consolidate these two bus stops at a location in between the two proposed parking lots, in front of the proposed school service building. RTA would also consolidate the two bus stops located on Lincoln Ave Eastbound across from the proposed school.

RTA would be happy to work with RUSD staff to identify the most appropriate location for such a new bus stops. We would especially welcome the opportunity to place these bus stops in reasonable proximity to any proposed new crossing facilities on Lincoln Ave associated with the new school.

Thanks again for the opportunity to comment on this new project and can you please confirm receipt of this email.

Yours sincerely,
Joshua Palazzo

Joshua Palazzo
Planning and Scheduling Technician
Riverside Transit Agency
p: 951.565.5168 | e: jpalazzo@riversidetransit.com<mailto:jpalazzo@riversidetransit.com>
Website<http://www.riversidetransit.com/> | Facebook<http://www.facebook.com/pages/Riverside-Transit-Agency/115244955153960> | Twitter<http://twitter.com/rtabus> | Instagram<http://instagram.com/riversidetransit?ref=badge>
1825 Third Street, Riverside, CA 92507

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL: November 8, 2018
Drrodriguez@rusd.k12.ca.us
Attn: Daniel Rodriguez, Assistant Director
Riverside Unified School District
Operations Division – Planning and Development
3070 Washington Street
Riverside, CA 92504-4697

Notice of Preparation of a Draft Environmental Impact Report for the proposed Casa Blanca Elementary School project

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[1]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to

[1] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the proposed project and all air pollutant sources related to the proposed project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance[2] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

[2] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

available to assist the Lead Agency with identifying potential mitigation measures for the proposed project, including:

- Chapter 11 "Mitigating the Impact of a Project" of SCAQMD's *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Permits

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the proposed project. For more information on permits, please visit SCAQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

School Facilities

Based on a review of the Project Description and Project Location, SCAQMD staff found that the proposed project may be subject to the consultation requirements pursuant to California Public Resources Code 21151.8 and CEQA Guidelines Section 15186. Therefore, SCAQMD staff recommends that the Lead Agency review those sections and meet the appropriate CEQA requirements, if applicable. For a search of SCAQMD permitted facilities pursuant to California Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186, please fill out the "Grid Search Request Form" that is available at: http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/ab3205-request-form.pdf

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: http://www.aqmd.gov.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402.

Sincerely,

Daniel Garcia

Daniel Garcia
Program Supervisor
Planning, Rule Development & Area Sources

DG/AM
RVC181031-02
Control Number

From: McDowell, Jennifer
Sent: Friday, November 16, 2018 1:44 PM
To: 'drrodriguez@rusd.k12.ca.us.'
< drrodriguez@rusd.k12.ca.us.<mailto:drrodriguez@rusd.k12.ca.us.>>
Cc: McDowell, Jennifer
< JMcdowell@riversideca.gov<mailto:JMcdowell@riversideca.gov>>
Subject: Casa Blanca Elementary School EIR

Mr. Daniel Rodriguez,
I have reviewed the EIR that was sent to me and found that the link attached to the document would not allow me to respond. I am sending you my response to advise you that the closest Fire station to this location is Station 10, located at 2590 Jefferson St., Riverside, CA 92504.

For Fire Prevention;
We require sprinklers throughout this structure. We can discuss other possible safety methods a later date i.e. security measures for doors and gates, access and egress locations, and any additional requirements by the local jurisdiction.

The fire department calculates response times at the 90th percentile, meaning that 90% of the time the fire department will arrive onscene of a given incident in X timeframe.

For fires;
The first of six fire apparatus will arrive onscene within 8:22 seconds. The complete fire response (six apparatus) will arrive onscene within 18:42. The departments goal is to have a complete response arrive onscene within 18 minutes.

For EMS Calls;
The fire department will arrive onscene of a given incident within 7:40 seconds. The department's goal is to arrive onscene of a medical aid call within 7:30 seconds.

Please keep in mind that the fire department will never meet its benchmark (goal) because will evaluate our response times every year and lower our target goals for continuous improvement. Let me know if you have any additional questions.

Community Development
Department
Planning Division

City of Arts & Innovation

November 30, 2018

Daniel Rodriguez
Assistant Director, Facilities Projects
Riverside Unified School District
3070 Washington Street
Riverside, CA 92504

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Casa Blanca Elementary School – 7351 Lincoln Street

Dear Mr. Rodriguez:

Thank you for the opportunity to review the Notice of Preparation of an Environmental Impact Report (EIR) for Riverside Unified School District's (RUSD) proposed elementary school (grades K-6) located on a 9.8-acre site at the north side of Lincoln Avenue between Bunker Street, and Dorlen Street, within the Casa Blanca Neighborhood. The City is aware that the proposed elementary school will have the capacity to serve up to 800 hundred students and involves the development of three main buildings totaling 100,500 square feet, outdoor recreation space, and three parking lots.

City Staff has reviewed the Environmental Initial Study for the project, and offers the following comments:

Public Services Impacts

- The Initial Study concludes that sufficient water supplies are available to serve the project and therefore water supply impacts are less than significant. While water supplies may be adequate, off-site water main upgrades are needed at Lincoln Avenue and possibly Bunker Street. Please contact the Riverside Public Utilities Department, Water Division at (951) 826-5285 regarding water main upgrade requirements.

- The Initial Study concludes that wastewater impacts as a result of the project, are less than significant. While wastewater impacts may be less than significant, a sewer study should be prepared for the project to assess any immediate and downstream impacts/deficiencies.

Recreation Impacts

The Initial Study concludes that project will not have a significant impact on recreational facilities. While City Staff concurs, because the school is proposed south of the City of

Riverside's Villegas Park, the City's Parks, Recreation and Community Services Department requests that the School District consider the following:

- Access to and from the park and school for residential areas located north of the school.
- A possible shared joint use agreement with the City of Riverside for soccer at the proposed school.

Transportation/Traffic Impacts

- The Initial Study identifies impacts related to "transportation/traffic" as a "potentially significant impact" that will be further analyzed in the project EIR. The City's Public Works Department, Traffic Division requests the opportunity to review and provide input on draft traffic impact analysis for the project, as soon as it becomes available. Please contact the Public Works, Traffic Division at (951) 826-5311.

- Lincoln Avenue is identified as an 88-Foot, Four-Lane, Arterial roadway in Figure CCM-4, Master Plan of Roadways of the Circulation and Community Mobility Element of Riverside's General Plan 2025. Adequate street and traffic improvements need to be identified in the EIR to mitigate potential traffic impacts. Street improvements should include widening of Lincoln Avenue to the ultimate street width to match the property to west, and to be consistent with the General Plan 2025.

Should you have any questions regarding this letter, please contact Doug Darnell, AICP, Senior Planner, at (951) 826-5219, or by e-mail at ddarnell@riversideca.gov.

We thank you again for the opportunity to provide comments on the project, and we look forward to working with you in the future.

Sincerely,

Jay Eastman, AICP
Principal Planner

for

cc: Rusty Bailey, Mayor
Riverside City Council Members
Al Zelinka, City Manager
Rafael Guzman, Assistant City Manager
Moises Lopez, Deputy City Manager
Todd Corbin, Riverside Public Utilities General Manager
Chris Martinez, Public Works Director
Adolfo Cruz, Parks, Recreation and Community Services Director
David Welch, Community & Economic Development Interim Director
Mary Kopaskie-Brown, City Planner

JE:dd

A.2 - Initial Study

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FIRSTCARBONSOLUTIONS™

Casa Blanca Elementary School Project
Initial Study
City of Riverside, Riverside County, California

Prepared for:
Riverside Unified School District
Facilities Planning and Development Department
3070 Washington Street
Riverside, CA 92504
951.788.7496

Contact: Ana Gonzalez, Director

Prepared by:
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602
714.508.4100

Contact: Frank Coyle, Project Director
Angela Wolfe, Project Manager

Date: October 31, 2018

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Table of Contents

List of Tables

List of Exhibits

ACRONYMS AND ABBREVIATIONS

AFY	acre-feet per year
AQMP	Air Quality Management Plan
ASTM	American Society of Testing Materials
BMP	Best Management Plan
BRA	biological resources assessment
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CRA	Cultural Resources Assessment
DAMP	Drainage Area Management Plan
DEIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
GPA	General Plan Amendment
gpcd	gallons per capita per day
HDR	High Density Residential
LUST	leaking underground storage tank
MARB	March Air Reserve Base
mgd	million gallons per day
MS4s	municipal separate storm sewer systems
MWD	Metropolitan Water District
NPDES	National Pollution Discharge Elimination System
OCWD	Orange County Water District
RHNA	Regional Housing Needs Allocation
RPD	Riverside Police Department
RPU	Riverside Public Utilities Department
RTA	Riverside Transit Agency
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
RWQCP	Riverside Regional Water Quality Control Plant
SAMC	Sewer Authority Mid-Coastside
SCAQMD	South Coast Air Quality Management District
sq ft	square feet

USACE	United States Army Corps of Engineers
UWMP	Urban Water Management Plan
VOC	volatile organic compound
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan

SECTION 1: INTRODUCTION

The purpose of this Initial Study (IS) is to identify any potential environmental impacts from implementation of the Casa Blanca Elementary School Project in the City of Riverside, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, Riverside Unified School District (RUSD) is the Lead Agency in the preparation of this IS and any additional environmental documentation required for the project. RUSD has discretionary authority over the project. The intended use of this document is to disclose the project's potential environmental impacts, and to provide the basis for input from public agencies, organizations, and interested members of the public. Any impacts identified herein as potentially significant requiring additional impact analysis will be addressed in the project's forthcoming Draft Environmental Impact Report (DEIR) and associated technical studies.

The remainder of this section provides a brief description of the project location and the characteristics of the project. Section 2 includes an environmental checklist giving an overview of the potential impacts that may result from project implementation. Section 3 elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist.

1.1 - Project Location

The project site is located in the City of Riverside, Riverside County, California (Exhibit 1). More specifically, it is located within the Casa Blanca Neighborhood on the northern side of Lincoln Avenue and Sonora Place (Exhibit 2) at 7351 Lincoln Avenue (Assessor's Parcel Number: 230-360-001). The 9.8-acre project site was formerly occupied by a KPRO 1570 AM transmitter building and antenna system.

Regional access to the site is provided via State Route 91 Freeway (also known as the Riverside Freeway, SR-91) via the Madison Street exit, which is located approximately 0.7 miles northwest from the project site and approximately 4.6 miles southwest of SR-60, in the central portion of the City of Riverside.

1.2 - Environmental Setting

The project area is mostly undeveloped and consists of a square-shaped parcel totaling 9.8 acres. The project site is currently a vacant lot located in a relatively flat area that slopes gently to the northwest with no existing buildings or structures. It was formerly partially occupied by the KPRO 1570 AM transmitter building and antenna system which have now been demolished at the southern portion of the site(Exhibit 3). According to historical aerial photographic research, the site was first developed as an AM radio station in the late 1960s. Prior to its use as a radio station, the site was used for agriculture purposes.

Surrounding land uses include Church of Christ to the east, residential uses to the west and south, and a baseball field and community center to the north of the project site. Adjoining properties

include: a single-family residential development on the south; a grass field, the SSgt. Salvador J. Lara Casa Blanca Public Library, and single-family residential development on the west, Lincoln Avenue Church of Christ on the east, and Villegas Park on the north and northeast. See Exhibit 2 for existing site photos.

1.3 - Project Description

The Riverside Unified School District (RUSD) is proposing the construction of a K-6 campus known as the Casa Blanca Elementary School (project) on a 9.8-acre site at 7351 Lincoln Avenue in the City of Riverside.

Unless the City's zoning ordinances are overruled by a two-thirds vote of RUSD's Board of Education per Government Code 53094, the project would require a General Plan Amendment (GPA) and Rezone to a Public Facilities use (Exhibit 4) to ensure consistency with the City of Riverside General Plan, which designates the project site as High Density Residential (HDR) with the current zoning designated as R-3-1500—for Multi-Family Residential zone (Exhibit 5).

The project would consist of a 1-story 11,000-square-foot (sq ft) multi-purpose/food service building, a 1-story 6,500 sq ft administration building, a 2-story 83,000 sq ft classroom, and a library and kindergarten building with a capacity to serve up to 800 students (Exhibit 6). In addition to the main buildings, the site proposes to include outdoor recreation space that consists of a 13,500 sq ft kindergarten playground, 29,500 SF quad and courtyard, 36,800 sq ft hardcourts, 143,500 sq ft playfields (baseball, basketball, and soccer fields), a 4,000 sq ft outdoor Science Grow Lab, and associated landscaping totaling 240,870 sq ft.

A total of four driveways would provide ingress/egress to the project. All driveways front Lincoln Avenue and are restricted to right-in and right-out turning. There are three proposed parking lots: (1) a staff parking lot including a total of 84 stalls and a bus drop-off area for up to three buses to cue; (2) a kindergarten parking lot including a total of 24 spaces and a drop-off area; and (3) a visitor parking lot including a total of 48 spaces and a drop-off area. In total, the three proposed parking lots would provide a total of 156 spaces. The number of students' eligible to be bussed into Casa Blanca would be 309 based on a distance of greater than 1.25 miles. The remaining students would be walkers.

The new campus would serve students living in the Casa Blanca Neighborhood school boundary (Exhibit 7) and instruction at the school would begin starting in early August to the end of May, operating a total of 181 days out of the year for students with a few additional work days for teachers. The anticipated construction start date is June 2020 with a forecasted opening year would be 2022. The facilities would be unoccupied for certain holidays and for longer periods in the months of November, December, January, and March. Daily hours of operation for instruction would be consistent with the surrounding elementary schools; Monday, Tuesday, Thursday, and Friday from 8:05 a.m. to 2:30 p.m., and every Wednesday from 8:05 a.m. to 1:15 p.m. An afterschool program for the school is not established at this time; however, in the event an afterschool program is established, students will be on campus from close of school each day to 6:00 p.m.

Source: Census 2000 Data, The CaSIL

FIRSTCARBON SOLUTIONS™

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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RIVERSIDE UNIFIED SCHOOL DISTRICT
CASA BLANCA ELEMENTARY SCHOOL
INITIAL STUDY

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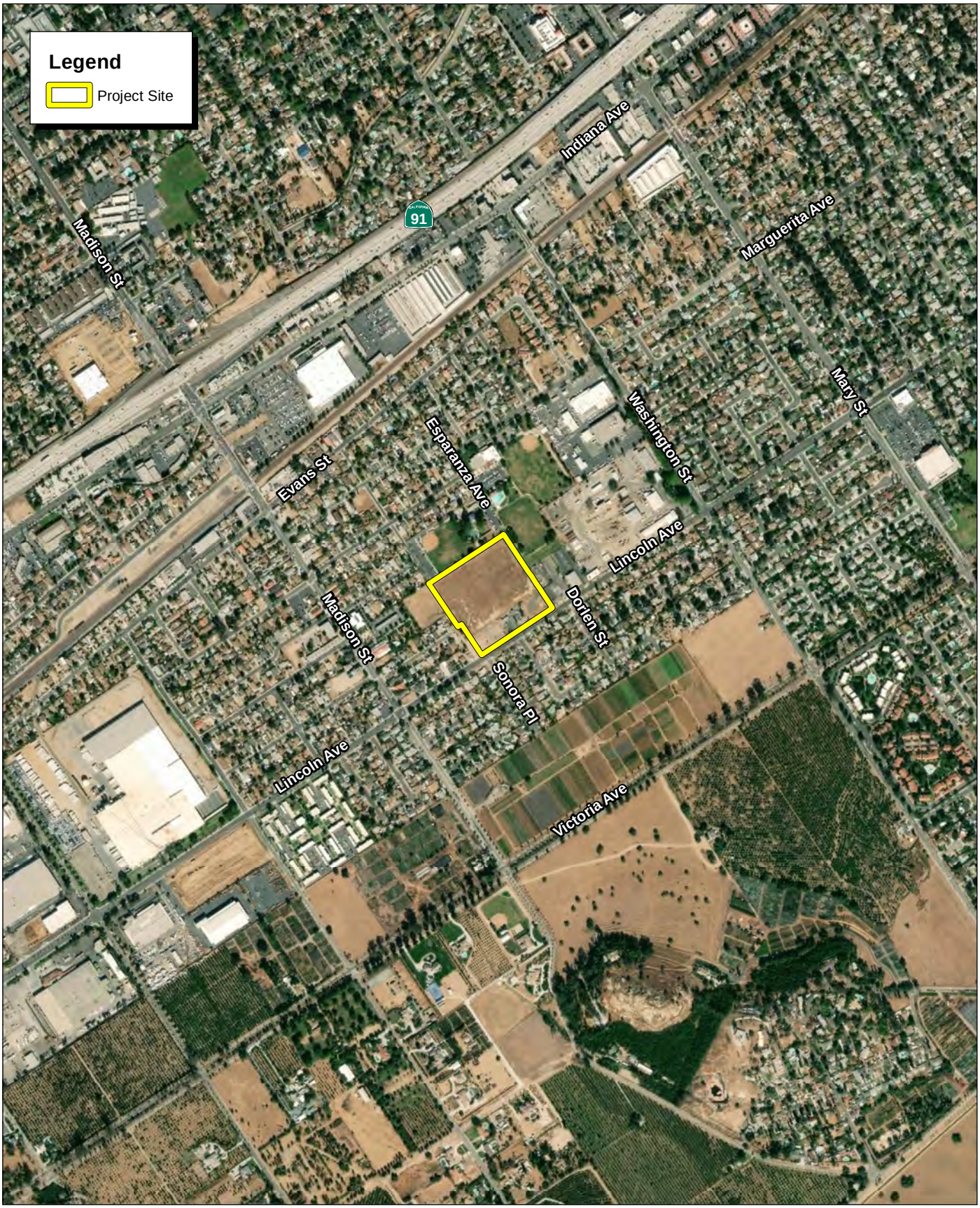

Source: ESRI Aerial Imagery. Riverside County Parcel Data.

FIRSTCARBON SOLUTIONS™

1,000 500 0 1,000
Feet

Exhibit 2
Local Vicinity Map
Aerial Base

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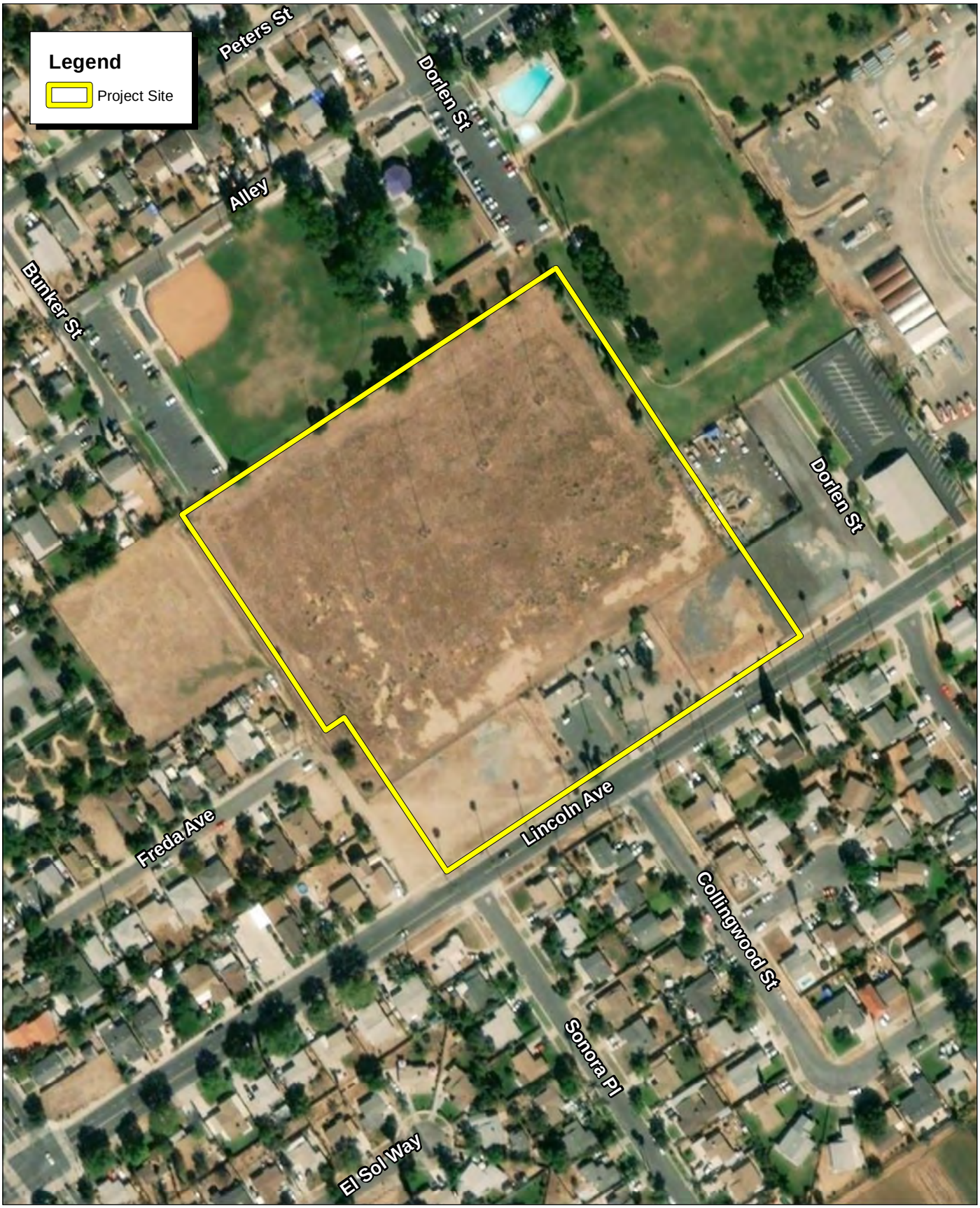

Source: ESRI Aerial Imagery. Riverside County Parcel Data.

FIRSTCARBON SOLUTIONS™

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Feet

Exhibit 3
Existing Site Layout

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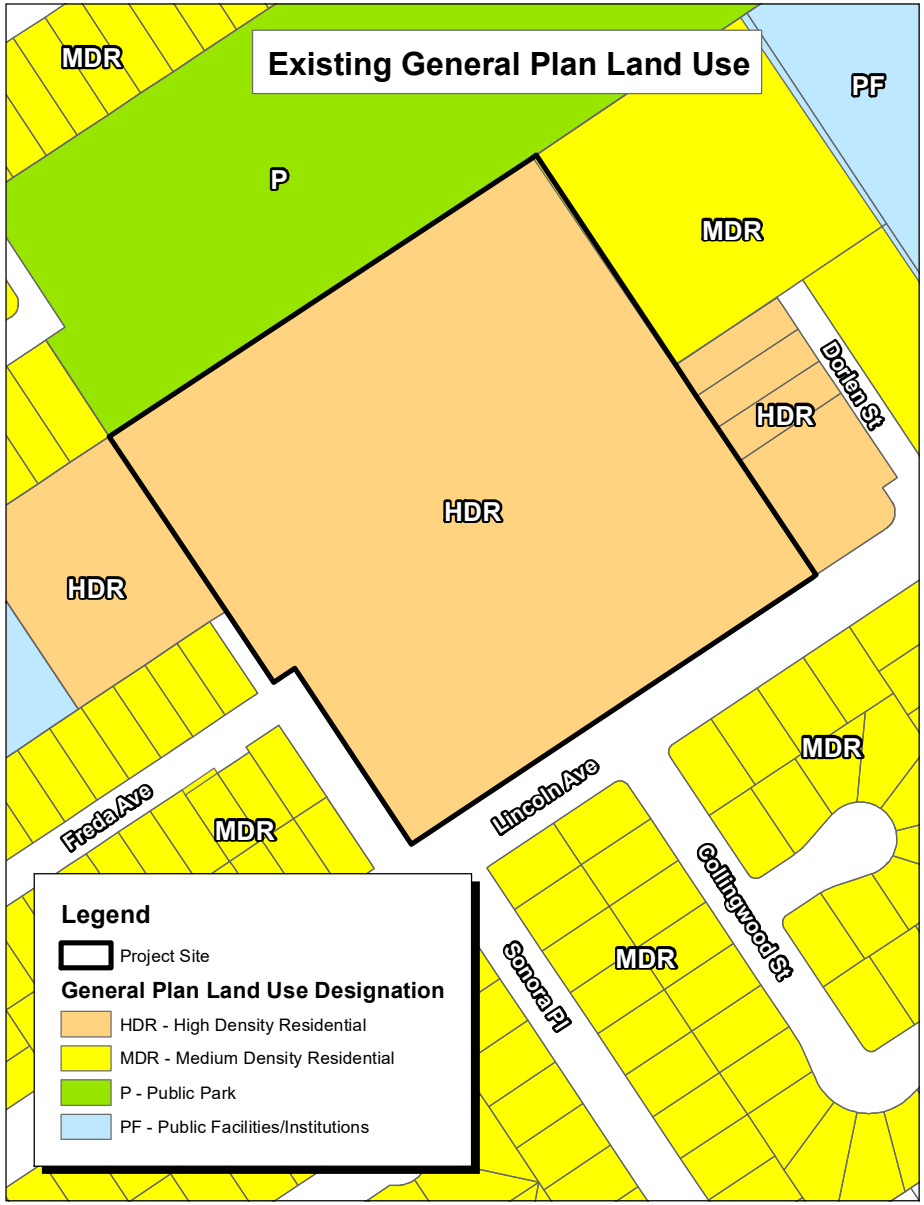

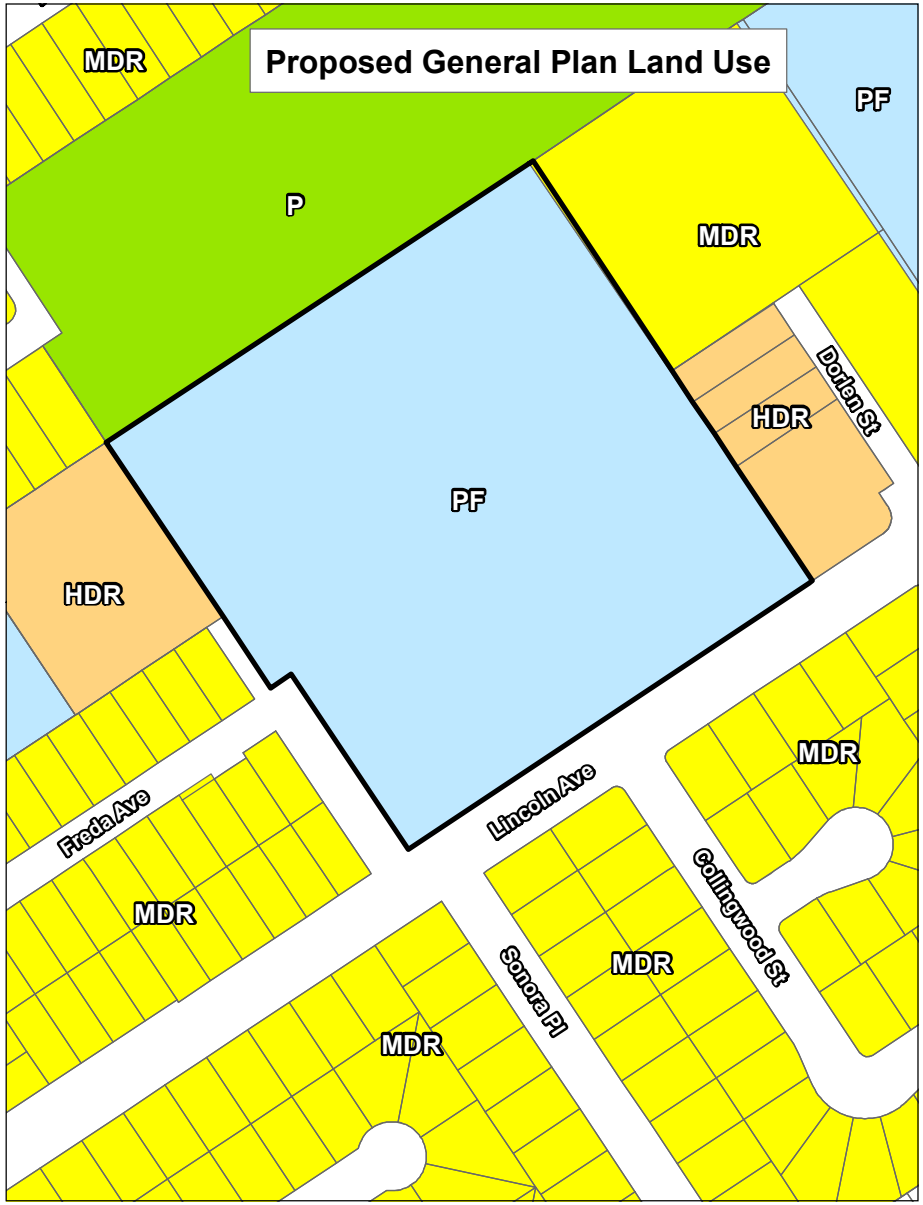

Source: City of Riverside General Plan Land Use GIS Data.

FIRSTCARBON SOLUTIONS™

250 125 0 250
Feet

Exhibit 4
Existing and Proposed General Plan Amendment Map

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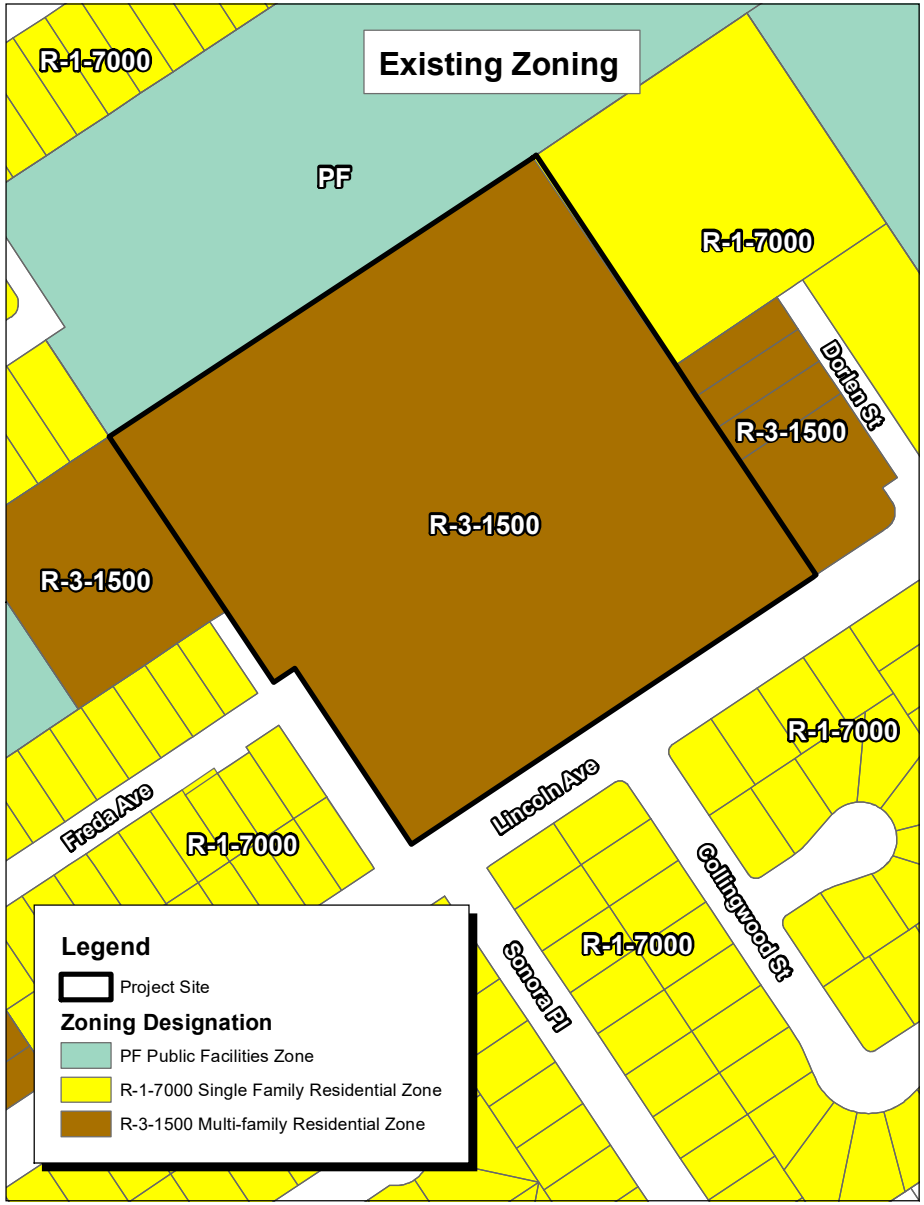

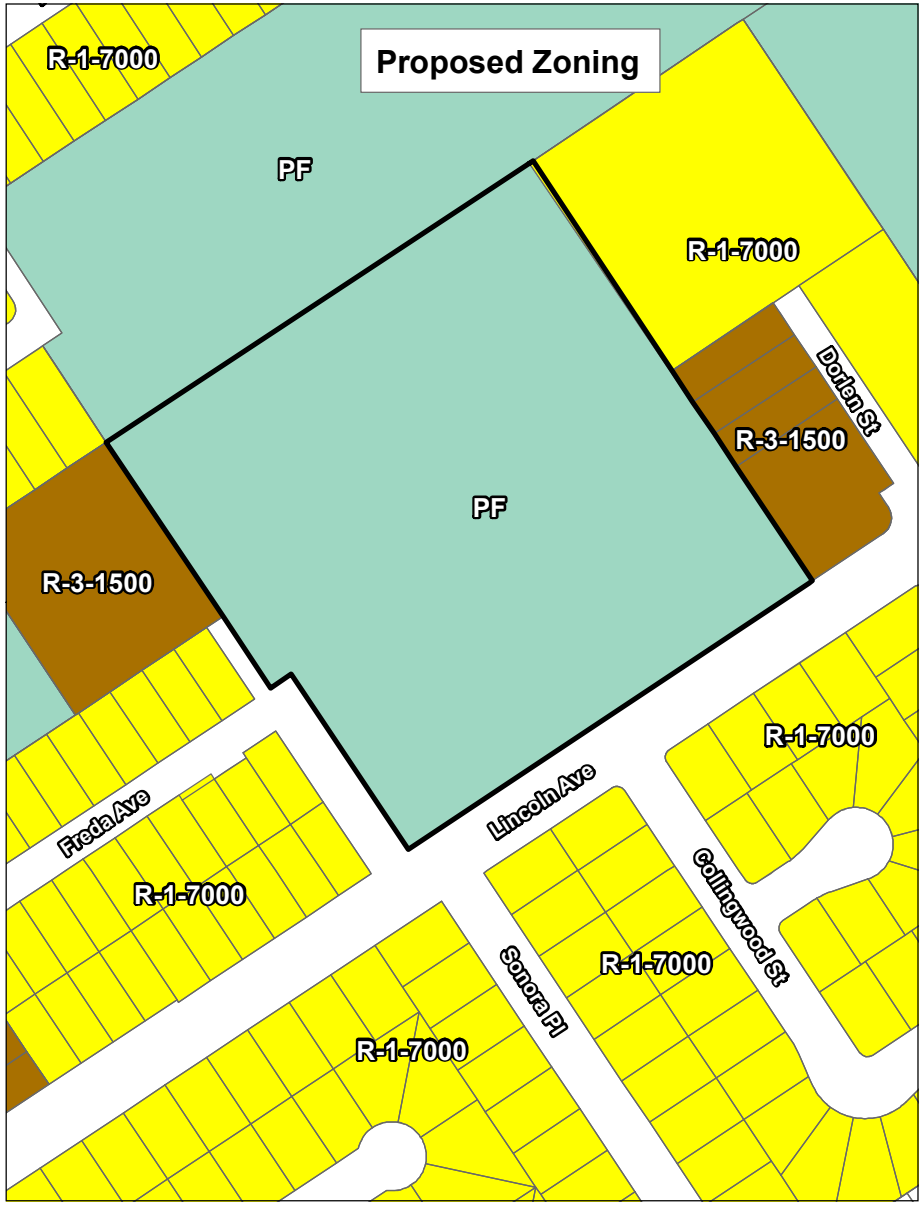

Source: City of Riverside General Plan Land Use GIS Data.

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Feet

Exhibit 5
Existing and Proposed Rezone

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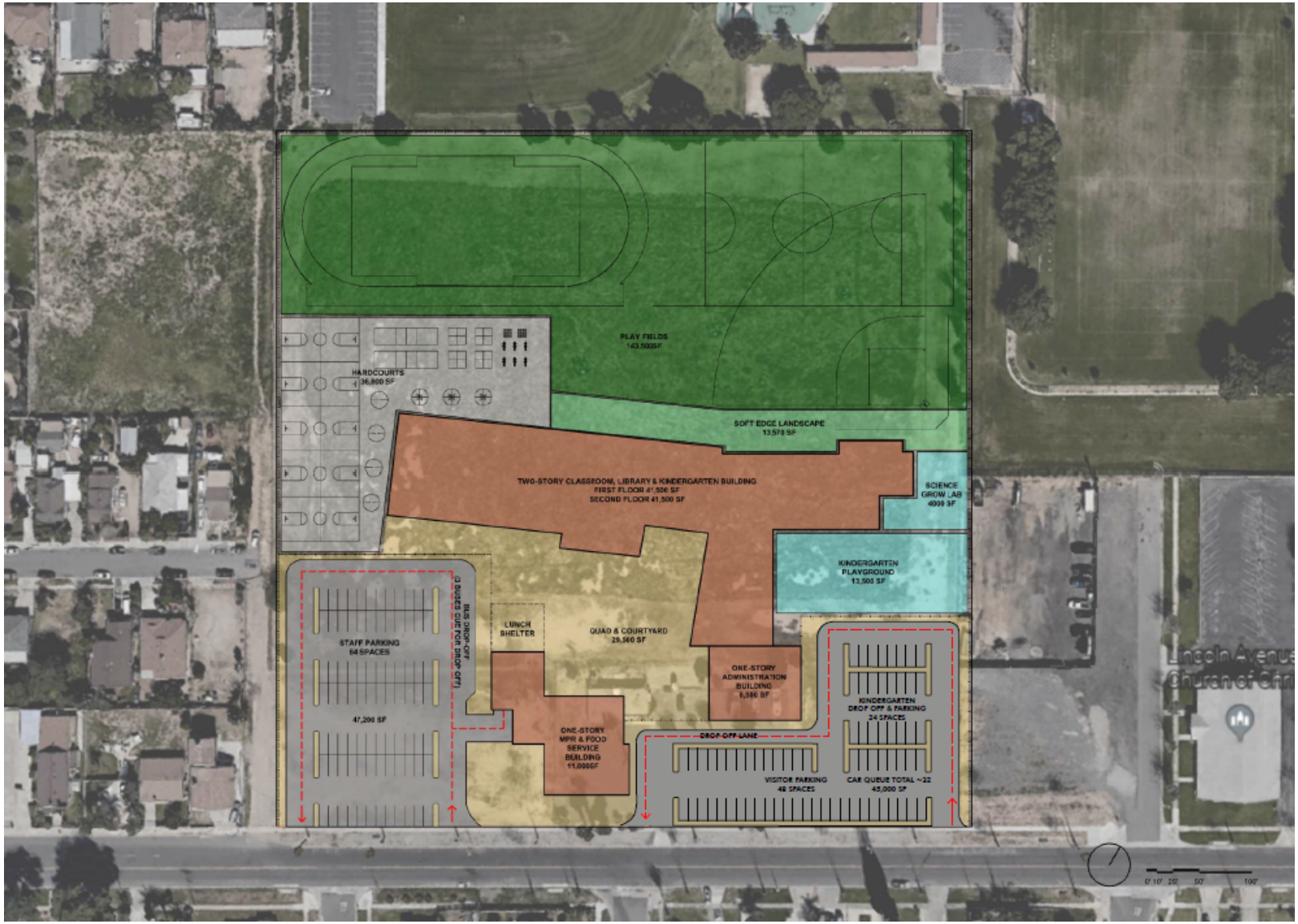

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Exhibit 6
Site Plan

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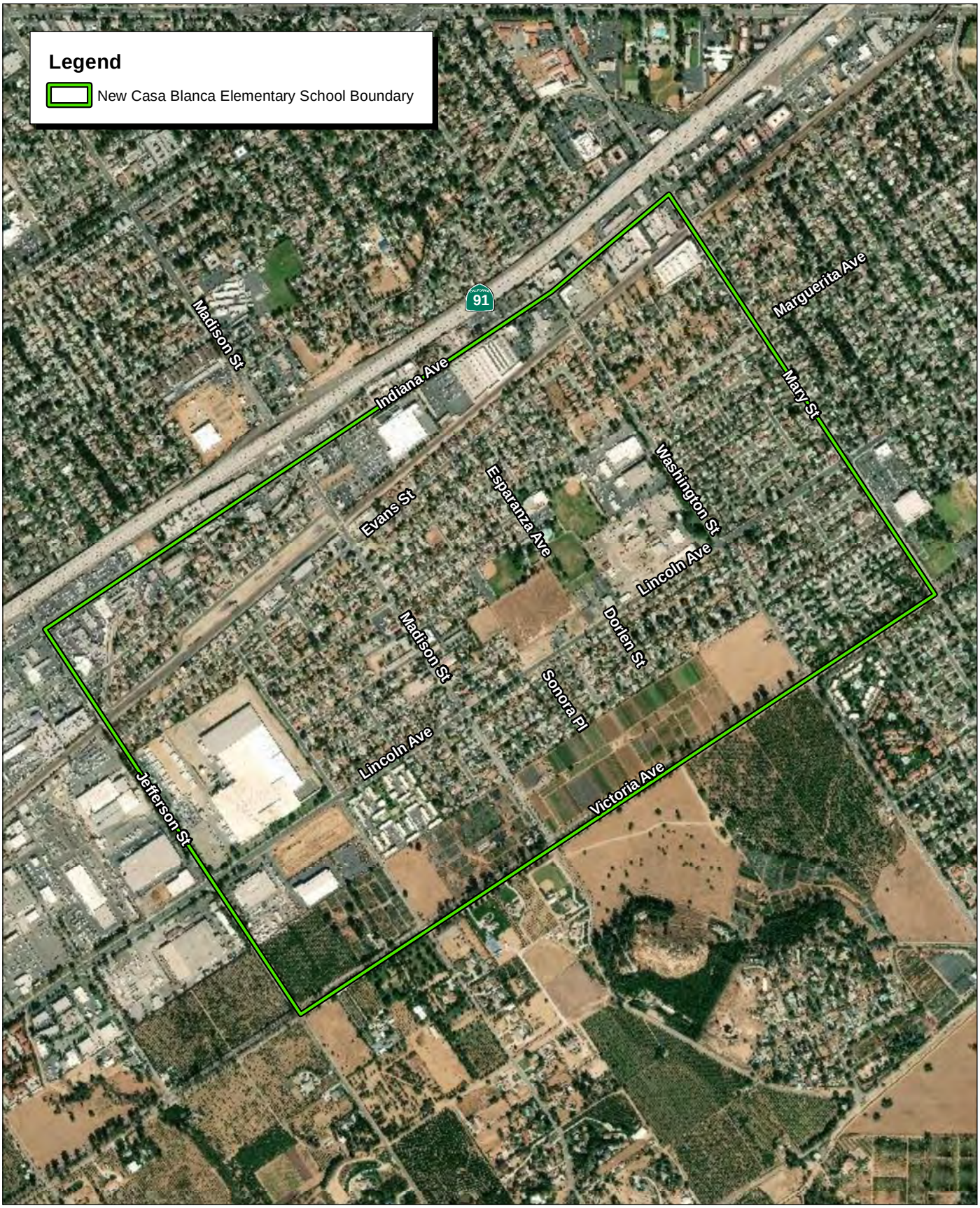

Source: ESRI Aerial Imagery.

FIRSTCARBON SOLUTIONS™

1,200 600 0 1,200 Feet

Exhibit 7
New Casa Blanca Elementary School Boundary

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1.3.1 - Construction

Prior to construction of the project and associated infrastructure, the vacant lot would need to be graded and paved to establish the various building foundations. The various proposed new buildings and associated infrastructure would be in keeping with surrounding architecture and consistent with development standards. The anticipated construction start date is June 2020.

1.3.2 - Operation

During the operational phase of the project, Casa Blanca Elementary School would provide academic services and accommodations to a maximum of 800 K-6 students within the immediate Casa Blanca neighborhood extending from Mary Street to Jefferson Street between Indiana Avenue and Victoria Avenue. Development of the new school would establish new facilities in a community where the demand for additional academic services and facilities is high, particularly at the elementary school grade levels.

1.4 - Discretionary Approvals

The project may require the following discretionary approvals:

- Site Plan and Design Review from RUSD, California Division of State Architect, and,/or drainage and road improvement and related grading purposes from the City of Riverside
- RUSD Board of Education (RUSD Board)
- California Department of Education
- California Department of Toxic Substances Control (DTSC)
- Land Acquisition Agreement
- General Plan and Zoning Code Map Amendment from the City of Riverside and Planning Commission, unless overruled by RUSD Board per Government Code 53094

1.5 - Intended Uses of this Document

This IS has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the project. The Draft IS will be circulated for a minimum of 30 days, during which period comments concerning the analysis contained in the IS should be sent to:

Ana Gonzalez, Director
Facilities Planning and Development Department
3070 Washington Street
Riverside, CA 92504
Phone: 951.788.7496
Email: AnaGonzalez@rusd.k12.ca.us

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Geology/Soils
☒	Greenhouse Gas Emissions	☐	Hazards/Hazardous Materials	☐	Hydrology/Water Quality
☒	Land Use/Planning	☐	Mineral Resources	☒	Noise
☐	Population/Housing	☒	Public Services	☐	Recreation
☒	Transportation/Traffic	☒	Tribal Cultural Resources	☐	Utilities/Services Systems
☒	Mandatory Findings of Significance				

Environmental 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 measure 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 10/16/18 Signed: _____

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Aesthetics *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 building within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Setting

The varied topographic setting encompassing the City of Riverside's natural features contribute to the overall distinguishing visual character. Scenic resources within the City of Riverside (City) include hillsides and ridgelines (distant views) of mountain forms. The City lies within the northern end of the Peninsular Ranges, approximately 12 miles south of the intersection with the Transverse Range. The Santa Ana Mountains are approximately 15 miles south and southwest of the City, while the San Jacinto Mountains are approximately 10 miles east and northeast of the City. The San Bernardino Mountains are about 20 miles north of the City. The Santa Ana River is located approximately 3.2 miles northwest of the project site. Additionally, Lake Matthews is located approximately 11.5 miles southwest of the project site.

Distant views of scenic vistas within the City have been identified at La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Park. These scenic vistas are not visible from the project site. The peaks of Box Springs Mountain, Mount Rubidoux, Arlington Mountain, Alessandro Heights, and the La Sierra/Norco Hills provide scenic view points of the City and the region.

The project site does not include any arroyos. However, there are three arroyos within a 2 mile-radius of the project site: the Alessandro, Prenda, and Woodcrest Arroyos as shown in Figure LU-3 in the General Plan Land Use and Urban Design Element. One of six arroyos in the City, the Tequesquite Arroyo, runs through two golf courses, the Andulka Park site, Riverside Country Club, Evans Sports Complex, and the Tequesquite Park site.[1] The arroyo is partially channelized at the golf courses and when it passes through Downtown Riverside. The banks have been planted with non-native grasses at the golf courses.

[1] City of Riverside Open Space and Conservation Element pg. OS-17.

According to California's Scenic Highway Mapping System, there are no designated Scenic Highways within the vicinity of the project site. The project site is located in a typical developed suburban area with moderate levels of existing light.

Environmental Evaluation

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than significant impact. As discussed above, there are designated scenic vistas with the City of Riverside located La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Park. In addition, the peaks of Box Springs Mountain (approximately 5.56 miles from the project site), Mount Rubidoux (approximately 3.27 miles), Arlington Mountain (approximately 5.43 miles), Alessandro Heights (approximately 1.92 miles), and the La Sierra/Norco Hills (approximately 6.14 miles) provide scenic view points of the City and the region.

The project site is located in a primarily residential area of Riverside that supports a mix of development, including commercial, residential, and institutional land uses. The project site itself does not include any scenic vistas or affect views of any scenic vistas. Due to its location in a relatively flat area of the City, surrounding intervening vegetation and existing development views of the Santa Ana River Wildlife area, the Box Springs Mountain Reserve, Sycamore Canyon Wilderness Park, or the California Citrus State Historic Park are not visible from the site. Additionally, no visual resources such as topographic or scenic features are located in the vicinity of the project site. The site is currently a vacant lot with no existing buildings or structures. The project proposes to construct a K-6 Elementary school campus that will have the capacity to serve up to 800 students. This includes the development of three main buildings totaling approximately 100,500 sq ft, outdoor recreation space, and three parking lots. Therefore, the project would not have a substantial adverse effect on scenic vista within the area; impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?

No impact. According to the Circulation and Community Mobility Element of the City's General Plan, there are no designated scenic highways near the project site. However, Figure CCM-4 shows Victoria Avenue as a designated historic and scenic boulevard requiring special landscaping and possibly additional right-of-way may be required. Furthermore, the heart of Riverside's greenbelt includes the mile-long scenic drive along Victoria Avenue which the City expects to designate as linear park in the future. Victoria Avenue, which is approximately 0.27 miles away from the project site, however, is not visible from the project site.

Review of the California's Scenic Highway Mapping System[2] does not identify any designated Scenic Highways near the project site. There are however three stretches of highway segments designated as Eligible State Scenic Highways Not Officially Designated in the project vicinity that include:

- Interstate 15 from the City of Corona south to the San Diego County line.
- State Route 91 from its intersection with Interstate 15 west to the Riverside County line.
- State Route 71 from State Route 91 north to the Riverside County line.

The three Eligible State Scenic Highway segments are all located in excess of 10 miles from the project site. Furthermore, there are no established scenic resources within the vicinity of the project site. Therefore, the project would have no impact regarding damage to scenic resources within a scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than significant impact. The existing visual character of the area surrounding the project site includes commercial, institutional, and residential developments. The site is currently a vacant lot with no existing buildings or structures. For the most part, the parcel is gated with areas of overgrown grasses.

The project would include the construction and operation of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. Construction and operation of Casa Blanca Elementary School would enhance the visual character and quality of the site by redeveloping an existing parcel with a use consistent with surrounding uses. In doing so, implementation of the project would entail removal of tall visually encroaching radio antenna structures and associated equipment with lower profile building elevations. Furthermore, the site would be well maintained with vegetative landscaping to soften the surrounding infrastructure within the Casa Blanca neighborhood. A landscaped sidewalk will extend in front of the school along Lincoln Avenue, connecting the neighborhood and creating a cohesive community walking feature with access to the school. Therefore, the project would not have a substantial adverse effect on existing visual character or quality of the site and its surroundings; impacts would be less than significant.

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

Less than significant impact. There are two primary sources of light: light emanating from building interiors that passes through windows, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). Existing lighting conditions in the project area include light from building interiors, security and warning lights, and the surrounding land uses, as well as street lighting. There are no existing sources of light on the vacant lot, however, the project proposes to install standard light pole structures in the parking lots and anticipates the amount of nighttime lighting emanating from the project site will be less than

[2] http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/

significant. The proposed school recreational fields would not have lighting. Adjoining recreational facilities include the baseball field and community center associated with Villegas Park located to the north, northwest, and northeast. These adjoining properties contain tall recreational lighting to accommodate nighttime baseball games.

Glare

Building design materials for the new school building have not yet been determined; however, the project would use various non-reflective materials designed to minimize transmission of glare from new structures including window surfaces. These methods would minimize the degree of glare to adjoining land uses, particularly residential, as well as to motorists and pedestrians traveling along Lincoln Avenue.

Light

The project would not introduce significant new sources of light; rather it would reduce the degree of existing sources on-site from the radio antennas. A specific lighting design has not been determined; however, adequate nighttime lighting would be provided for site safety and security purposes. These new sources of lighting would be in keeping with existing lighting patterns in the area. Aside from pole-mounted lighting that may potentially be required in the parking area, additional mounted lighting may also be installed on the three buildings. All new light fixtures would be designed and installed in accordance with lighting regulations contained in the City of Riverside Code of Ordinances, Chapter 19.556 Lighting, to prevent unnecessary light spillage or glare. Therefore, the project would have less than significant impact related to artificial lighting impacts.

The area is zoned for High Density residential, which has the potential for allowance of more nighttime lighting than a proposed school use. Construction and operation of the Casa Blanca Elementary School would reduce the amount of nighttime lighting, and using non-reflective materials in the building design would not create new sources of glare; therefore, impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Land Evaluation and Site Assessment Model prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland (State of California, 2017). 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, Forest Legacy

Assessment Project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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

No impact. RUSD proposes to redevelop the former KPRO 1570 AM radio station site to a K-6 Elementary school in the Casa Blanca Neighborhood in the City of Riverside. The site is not designated as Prime, Unique, or Farmland of Statewide Importance. The site appeared to be utilized for agricultural purposes from 1948 through 1952, with agricultural operations ceasing by 1962 when the radio station was constructed. From 1962 to present, the site has been occupied by the radio station with a building located on the southeastern portion of the site. There were also minor landscaping improvements and the additions of four antenna support structures as shown in the 1973-2009 aerials. According to the City of Riverside General Plan's Open Space and Conservation Element, the project site is currently designated as Urban and Built-up Land (City of Riverside, 2012, Figure OS-2). Approximately 0.63 miles east there is designated Farmland of Local Importance, and approximately 0.18 miles southeast there is Unique Farmland, which encompasses the Arlington Heights Greenbelt (City of Riverside, 2012, Figure OS-2). These agricultural sites are not within the Casa Blanca neighborhood and the project does not propose to convert any of these lands to non-agricultural use, therefore, no impacts related to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

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

No impact. The project site is currently zoned HDR. According to the General Plan Open Space and Conservation Element, there is currently no land in the Casa Blanca Neighborhood zoned for agricultural use, or under the Williamson Act contract (City of Riverside, 2012, Figure OS-3). The Williamson Act, codified in 1965 as the California Land Conservation Act, allows local governments to enter into contracts with private landowners, offering tax incentives in exchange for an agreement that the land will remain agricultural or related open space use only for a period of 10 years. Since the project site is not zoned for agricultural use, or under the Williamson Act contract, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. The project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impacts would occur.

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

No impact. CEQA requires the evaluation of forest and timber resources where those resources are present; however, the project site is located on Urban and Built-up land and is currently zoned HDR.

In addition, there are no forests or timberland within the Casa Blanca Neighborhood. Therefore, no impacts would occur.

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

No impact. The project site is located in an Urban Built-Up area in the City of Riverside, and there is no forest land within the vicinity of the project site. The project site and surrounding areas do not support a riparian forest or woodland/forest vegetation, as shown in General Plan Open Space and Conservation Element (City of Riverside, 2012, Figure OS-5). According to the United States Forest Service National Forest Locator Map, the nearest National Forest to the site is the Cleveland National Forest, located within the Santa Ana Mountains and approximately 13 miles southwest of the project site. As such, the project would not result in loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur.

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?

No impact. As mentioned above in Impacts 2(a) through 2(d), there is no Farmland or forest land within the Casa Blanca Neighborhood, which is located in an Urban and Built-Up area in the City of Riverside. The project would therefore not induce the conversion of Farmland to non-agricultural uses, or the conversion of forest land to non-forest use. Therefore, no impacts would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.* *Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

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

Would the project:

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

Potentially significant impact. The project is located within the South Coast Air Quality Management District (SCAQMD), and is therefore subject to the SCAQMD Air Quality Management Plan (AQMP). Consistency with the AQMP is determined by evaluating individual projects against the SCAQMD AQMP consistency criteria. The project recommends intensifying the land use within the project area and has the potential to result in emissions that could obstruct, either individually or on a cumulative basis, the attainment of the objectives of the SCAQMD AQMP. The project may exceed thresholds established in the SCAQMD handbook for air quality standards under the AQMP through added vehicle emissions directly through activities during both the construction phase and the operational phase, and indirectly through additional traffic volumes along surrounding roads. In addition, the project may contribute to a cumulatively considerable net increase of criteria

pollutants from additional traffic volumes along surrounding roads. The forthcoming DEIR will analyze whether the project will contribute substantially to, or violate, any air quality standards.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially significant impact. As mentioned in Impact 3(a) above, the project may exceed thresholds established in the SCAQMD handbook for air quality standards under the AQMP through added vehicle emissions directly through activities during both the construction phase and the operational phase, and indirectly through additional traffic volumes along surrounding roads. The forthcoming DEIR will analyze whether the project will contribute substantially to, or violate, any air quality standards.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Potentially significant impact. As mentioned in Impact 3(a) above, the project recommends intensifying the land use within the project area and has the potential to result in emissions that could obstruct, either individually or on a cumulative basis, the attainment of the objectives of the SCAQMD AQMP. The project may contribute to a cumulatively considerable net increase of criteria pollutants from additional traffic volumes along surrounding roads. The forthcoming DEIR will analyze whether the project will contribute substantially to, or violate, any air quality standards.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially significant impact. Known sensitive receptors located in the vicinity of the project area include existing residential uses, not to mention the project itself, would become a new sensitive receptor. Implementation of the project recommendations would generate short-term air pollutant emissions and potentially impact these sensitive receptors. The project would also introduce a new public elementary school to the Casa Blanca Neighborhood and ultimately increase the number of the vehicle trips on the roadway network. As such, the project would result in long-term air quality emission impacts, primarily associated with vehicle exhaust. The required DEIR will analyze the project's potential to expose sensitive receptors to air pollutant emissions associated with the land use change proposed by the project.

e) Create objectionable odors affecting a substantial number of people?

Less than significant impact. Land uses typically considered to be associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors.

Diesel exhaust would be emitted during future construction activities (from the heavy-duty equipment). Volatile organic compounds (VOCs) would also be emitted during construction of the project from painting and asphalt paving. These odors are objectionable to some; however, the

odors would disperse rapidly from the project area and therefore should not be at a level to induce a negative response. Impacts would be less than significant

Mitigation Measures

This will be addressed in the forthcoming DEIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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 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?	☒	☐	☐	☐

Environmental Evaluation

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?

Potentially significant impact. The project site is developed and located in an urban environment that is built out with residential, commercial, and institutional development. According to Figure OS-

5 of the City of Riverside General Plan Open Space and Conservation Element, the project site is designated as Residential/Urban/Exotic. Urban or developed land is comprised of areas of intensive use with much of the land covered by structures. Included in this category are cities, transportation facilities, power and communications facilities, residences, shopping centers, industrial and commercial complexes, and institutions that may, in some instances, be isolated from urban areas. The project area contains undeveloped land and may have the potential to adversely impact threatened, sensitive, or special species. A biological resources assessment (BRA) will be prepared to identify sensitive species occurring and species with potential to occur within the project area. The BRA will also determine the potential for endangered, threatened, candidate, sensitive or special-status habitats, plant, and/or wildlife to be present on the property. Therefore, project implementation has the potential to significantly impact either directly or through habitat modifications on species, and therefore will be further analyzed in the forthcoming DEIR.

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

No impact. As mentioned above in Impact 4(a), the project site is located in a primarily urban area surrounded by a mix of residential, commercial, and institutional development. The City's General Plan Open Space and Conservation Element does not designate the project site as a riparian habitat. Furthermore, the project area contains vacant land that shows evidence of disturbance through past fill efforts. No riparian or sensitive habitats occur on the project site; therefore, the project is not expected to have substantial adverse impacts to riparian habitat or other sensitive natural communities.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No impact. The project area is not located on federally protected wetlands, the project is designated as Residential/Urban/Exotic as discussed in Impact 4(a) to (b). According to the City's General Plan Open Space and Conservation Element, vernal pools in the City of Riverside exist in the Lake Matthews Ecological Preserve (approximately 6.35 miles away from the project site), and are adjacent to the Santa Ana River between Main Street and Bandini Avenue (approximately 4 miles away). Marsh communities in the City are located along the shores of Lake Matthews (approximately 5.82 miles away). A Cismontane alkali marsh is also known to occur east of Lake Mathews near Cajalco Road and between Cajalco Road and Rider Street (approximately 9.36 miles away). Coastal scrub is found on the steep slopes in the southern hillsides (approximately 5.62 miles away), as well as at Sycamore Canyon, Alessandro Hills, Box Springs Mountain, Arlington Heights, Woodcrest, Rancho El Sobrante, and rocky outcroppings in the La Sierra Lands and the La Sierra/Norco Hills (City of Riverside, 2012). Therefore, the project site does not contain jurisdictional drainages, wetlands, riparian vegetation, or evidence of an ordinary high water mark; therefore, no United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or California Department of Fish and Wildlife jurisdictional areas are located on-site. No wetlands

occur on the project site; therefore, the project is not anticipated to have direct or indirect impacts on federally protected wetlands as defined by section 404 of the Clean Water Act. Relative to the significance criterion, the project is anticipated to have no substantial adverse effect on federally protected wetlands 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 wildlife nursery sites?

Less than significant impact. The project site is mostly undeveloped and located in a primarily urban area surrounded by a mix of residential, commercial, and institutional development. The urban context of the project site coupled with the dense surrounding development precludes significant wildlife movement corridors. Based on this, impacts would be less than significant.

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

Less than significant impact. There are several ornamental trees throughout the project site, both along the periphery of the project site and within the radio station parcel. None of the trees on-site are protected under the County of Riverside tree ordinance. A few ornamental trees are scattered about the project site, and the implementation of the project would remove these ornamental trees; however, the City of Riverside does not have a native tree or native shrub protective ordinance. Therefore, relative to the significance criterion, the project would not 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?

Potentially significant impact. The project site falls within the boundaries of the Rough Step 1 for the 2004 Western Riverside Multiple Species Habitat Conservation Plan. The species protected under the Western Riverside Multiple Species Habitat Conservation Plan that have the potential to occur on-site based on suitable habitat. Further discussion would be provided as part of a BRA and discussed in the forthcoming DEIR.

Mitigation Measures

This will be addressed in the forthcoming DEIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐
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:				
e) 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	☒	☐	☐	☐
f) 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.	☒	☐	☐	☐

Environmental Evaluation

Cultural Resources

Would the project:

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

Less than significant impact. The project would add buildings to the project site. Existing structures associated with the former radio station have been demolished or removed from the site. Section

15064.5 defines historic resources as resources listed or determined to be eligible for listing by the Historic Resources Commission, a local register of historic resources, or the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important to our past;

iii) Embodies the distinctive characteristics of a type, period, region or method of construction, represents the work of an important creative individual, or possesses high artistic values;

iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The project site is located within a primarily residential area of Riverside on the northern side of Lincoln Avenue and Sonora Place. The surrounding land uses includes a mix of development, including commercial, residential, and institutional uses. According to the City of Riverside General Plan Land Use and Urban Design Element, the project site is not located within a historic district or a potential historic district. The historic districts in the City of Riverside are concentrated in downtown corridors located northeast of the project site (City of Riverside, 2018, see Figure LU-5).

Research of historical aerial photographs from 1948 and 1952 indicated that the project site was used for agricultural purposes. The 1963 aerial photograph depicts the radio station building located on the southeastern portion of the site. The 1973 aerial photograph shows recent grading of the northwestern corner along with two unpaved dirt access roads diagonally transecting the central portion of the project site. The 1975 aerial photograph depicts four antenna tower support structures spaced out diagonally across the central portion of the site, as they currently exist today. The 1980 aerial photograph shows palm trees lining the driveway and parking areas to the radio station building, as well as along the southeastern border adjoining Lincoln Avenue. The historical aerial photographs and topographic maps show no evidence of any historic buildings or structures within the project area.

Given these factors, the likelihood of encountering undiscovered historic resources over the course of project construction is considered low. While unlikely, development activities always have the potential to encounter undiscovered archaeological resources. Therefore, the impacts to historical resources are less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially significant impact. As shown in Exhibit 3**,** the project was formerly the KPRO radio station site and is currently a vacant lot with no existing buildings or structures. Therefore, the project site has already been subject to construction and ground-disturbing activities in the past. The project would involve the redevelopment of the vacant lot with construction of a K-6 Elementary school campus that would result in significant ground-disturbing activities. However, the project is located in a primarily residential area of Riverside on the northern side of Lincoln Avenue

and Sonora Place. The surrounding land uses includes a mix of development, including commercial, residential, and institutional uses. It is highly unlikely the development of this project would result in the presence of archeological resources. However, while unlikely, the presence of subsurface archaeological resources on the project site remains possible, these could be presence of subsurface archaeological resources on the project site remains possible, and these could be affected by ground-disturbing activities associated with grading and construction at the site. It is possible that subsurface disturbance will occur at levels not previously disturbed (e.g., deeper excavation than previously performed) or may uncover undiscovered archeological resources at the site. Therefore, impacts to archaeological resources are potentially significant. Further analysis will be conducted as part of the CRA and discussed in the forthcoming DEIR.

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

Potentially significant impact. While unlikely and for the same reasons outlined above in Impact 5(b), the presence of subsurface paleontological resources on the project site remains possible and could be affected by ground-disturbing activities associated with grading and construction at the site. It is possible that subsurface disturbance will occur at levels not previously disturbed (e.g., deeper excavation than previously performed in certain locations) or may uncover undiscovered paleontological resources at the site. Therefore, impacts to paleontological resources are potentially significant. Further analysis will be conducted as part of the CRA and discussed in the forthcoming DEIR.

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

Potentially significant impact. As previously mentioned above in Impacts 5(a) through 5(c), the project site is currently a vacant lot. Historic review of aerial photographs identified that the former radio station has maintained this use dating back to 1962. There are no known cemeteries on or near the project site. The previous land use for the project site was for agricultural purposes. While highly unlikely that the presence of human remains exists within or near the project site, there is always the possibility that subsurface construction activities associated with the project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. As such, the impacts are potentially significant. Further analysis will be conducted as part of the CRA and discussed in the forthcoming DEIR.

Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

e) 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

Potentially significant impact. FCS will prepare a CRA that looks within and in the immediate vicinity of the project site's boundaries for potential tribal cultural resources. The CRA will include an analysis based on a pedestrian survey, records, and database search that will be discussed in the forthcoming DEIR.

f) 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.

Potentially significant impact. See Impact 5(e) above.

Mitigation Measures

This will be addressed in the forthcoming DEIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Geology and Soils *Would the project:*				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
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 risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Environmental Setting

Information and analysis for Geology and Soil impacts are based on the City of Riverside General Plan Public Safety Element, and a database and records search conducted on August 8, 2018.

Environmental Evaluation

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

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

Less than significant impact. Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely to occur along active faults, and typically occurs during earthquakes of magnitude 5.0 or higher. Ground rupture only affects the area immediately adjacent to a fault.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The main purpose of the Zoning Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet).

Southern California is known for having seismically active regions that may be susceptible to seismic activity at any point in time. This is due to active faults that traverse the seismically active areas. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone.

As stated in the General Plan Public Safety Element, there are no known active, potentially active, or inactive faults within the City of Riverside (City of Riverside, 2018, Figure PS-1). The nearest fault zone is the San Jacinto Fault Zone, which is approximately 11 miles northeast of the site. Thus, because of the site's distance to the Earthquake Fault Zone, the potential for surface fault rupture or secondary rupture along a pressure ridge within the site is considered unlikely. However, there is potential of an actual risk from ground rupture or strong ground movement during an earthquake. Development on the project site would be required to comply with all applicable California Building Standards Code seismic design standards. Compliance with these standards would help ensure that the proposed structures would not expose persons to seismic-related ground failure hazards.

The project site is not within an established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards, and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site (City of Riverside, 2018). Therefore, the impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than significant impact. As discussed in Impact 6(a)(ii) above, there are no known active, potentially active, or inactive faults within the City of Riverside. However, several faults in the region have the potential to produce seismic impact. The three faults that pass within 20 miles of the City of Riverside include: The San Andreas Fault (approximately 26 miles from the project site), the San Jacinto Fault (approximately 11 miles from the project site), and the Elsinore Fault (approximately 13 miles from the project site). These faults have the capability to produce up to an 8.3 magnitude earthquake, 7.0 magnitude, and 7.2 magnitude, respectively. Although no Alquist-Priolo fault zone or active or potentially active fault has been mapped at the surface within Riverside, one northwest southeast trending unnamed fault identified as County Fault (approximately 10.5 miles from the project site) is projected toward the southwest corner of the sphere of influence boundary south of Lake Mathews (City of Riverside, 2018, See Figure PS-1).

Due to of the proximity of these above-mentioned faults, the project site could be subjected to strong seismic ground shaking in the event of an earthquake. The project would involve all new structures, and would be required to conform to the seismic design parameters of the California Building Code with review and approval of plans by the City of Riverside Building and Safety Division of the City's Community Development Department for applicable regulations and engineering practices. Compliance with these regulations would ensure that impacts from a strong seismic ground-shaking event would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. Liquefaction describes the behavior of soils that, when loaded, suddenly suffer a transition from a solid state to a liquefied state, or having the consistency of a heavy liquid. Liquefaction can occur during vibratory conditions such as those induced by seismic event, under saturated conditions in soils, such as sand, in which the strength is purely frictional. A low relative density and loose consistency of the granular materials, shallow groundwater table, long duration and high acceleration of seismic shaking are some of the factors that can cause liquefaction. Presence of predominately cohesive or fine-grained materials and/or absence of saturated conditions can preclude liquefaction. Liquefaction hazards are usually manifested in the form of buoyancy forces expected on structures during liquefaction, increase in lateral earth pressures due to liquefaction, horizontal and vertical movements of structures resulting from lateral spreading, and post-earthquake settlement of the liquefied materials.

According to the General Plan Public Safety Element, the project site is not susceptible to liquefaction and the risks are identified as low. The project would involve all new structures and would be required to conform to the seismic design parameters of the California Building Code with review and approval of plans by the Riverside Building and Safety Division for applicable regulations and engineering practices. Compliance with these regulations would ensure that impacts related to seismic-related ground failure, liquefaction would be less than significant.

iv) Landslides?

Less than significant impact. According to the Department of Conservation Regulatory Mapping System, the project site is not located within a Landslide and Liquefaction Hazard Zone (CDC, 2018). However, the project site is located in a generally flat area of the City and is approximately 5 miles from reported known landslide areas. The project would comply with the City's Title 17—Grading Code and the California Building Code regulations (City of Riverside, 2018). Due to the relatively flat terrain and compliance with existing grading and building code regulations, the possibility of impacts associated with landslides would be less than significant.

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

Less than significant impact. Implementation of the project would require ground-disturbing activities, such as grading, that could potentially result in soil erosion or loss of topsoil. The project would include the construction and operation of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. The highest potential for erosion impacts would occur during the project's grading and excavation phases. During construction, there is potential for temporary erosion to occur. To reduce the erosion related impacts, the project would be required to comply with Best Management Practices (BMPs) and all federal, state, and local regulations for erosion control.

The project's grading plan would be designed by a registered civil engineer to ensure that the proposed earthwork and stormwater structures are designed to avoid soil erosion. Construction of the project would be required to comply with the Construction General Permit, through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). BMPs included in the SWPPP would minimize soil erosion during construction. The project would also be required to comply with the City's Municipal Code Titles 17 (Grading) and 18 (Subdivisions), which includes erosion control standards and measures to minimize soil erosion (City of Riverside, 2018). Compliance with the aforementioned regulations would ensure that project-related erosion impacts would be less than significant. As such, impacts would be less than significant.

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?

Less than significant impact. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are generally susceptible to subsidence include those with high silt or clay content. The project's engineering and construction would be in compliance with the California Building Code and the City's Municipal Code Titles 17 (Grading) such that lateral spreading, subsidence, liquefaction or collapse would not be a concern (City of Riverside, 2018). Thus, impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than significant impact. Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. This shrink/swell movement can adversely affect building foundations, often causing them to crack or shift, with resulting damage to the buildings they support. According to the United States Department of Agriculture Natural Resourced Conservation Service, two primary underlying soils occur on the site which include Arlington loam (ArB) with zero to 2 percent slope and Buren fine sandy loam (BuC2) with 2 to 8 percent slope (USDA, 2018). Both soils are considered moderately to well-drained soils and have low to moderate potential for soil expansion.

Therefore, compliance with applicable provisions of the City's Subdivision Code Title 18 and the California Building Code would ensure that project impacts related to expansive soils are less than significant.

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

No impact. The project would be connected to the City's existing sewer system. The project does not propose the use of septic tanks. As such, no impacts would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Environmental Evaluation

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially significant impact. The proposed construction of K-6 Elementary school includes the development of three main buildings totaling 100,500 sq ft, outdoor recreation space, three parking lots. The demolition, construction and long-term operational activities would result in the emissions of carbon dioxide CO_2), nitrogen dioxide (NO_2), and methane (CH_4), all of which have impacts on Global Climate Change. Although the SCAQMD has not fully adopted thresholds of significance for greenhouse gas (GHG) emissions, construction, and long-term operation of future development, construction activities and long-term operation of the future development would result in emissions of GHGs. Emission reductions could occur with the implementation of project features and/or mitigation measures to reduce the level of GHG emissions. Moreover, AB 32 requires certain statewide reduction targets for GHG emissions that equate to approximately a 28.3 percent reduction in GHG emissions compared with "business as usual" (BAU), which is defined as compliance with the state's 2006 Title 24 requirements. Therefore, due to the intensity of the project to the project site, there would be potentially significant impacts on the environment. The forthcoming DEIR will address and quantify the impacts regarding the project Air Quality and GHG emissions.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially significant impact. As previously mentioned in Impact 7(a), a project-specific Air Quality and GHG emissions Analysis will be prepared to address impacts of GHG emissions in addition to determining whether the project will achieve GHG reduction targets specified in AD 32. The forthcoming EIR will document the findings of the project's GHG emissions report, and impose mitigation measures as necessary.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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 two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. A school facility does not typically store large amounts of hazardous materials on-site, and only retail-size quantities needed for daily maintenance, including those for landscaping, would be stored on-site. The District outsources custodial services for the schools after hours utilizing general cleaning supplies that are not stored on-site.

During the construction phase of the project, limited amounts of hazardous materials would be used, including standard construction materials (e.g., paints and solvents) and petroleum based products (e.g., vehicle fuel and degreasers). The project would be required to comply with all federal, state, and local standards and regulations while handling, storing, and disposing of these hazardous materials. Compliance with all federal, State, and local standards and regulations would ensure that project impacts related to the routine transport, use, and disposal of hazardous materials would be less than significant. Thus, impacts would be less than significant.

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?

Less than significant impact. As mentioned above in impact 8a), the project would involve a limited amount of hazardous materials during the short-term construction phase as well as long-term operational phase. To prevent a significant hazard to the public or environment from the release of hazardous materials, the project would be required to comply with all federal, state, and local standards and regulations related to hazardous material transport, storage, and disposal. Compliance with all federal, state, and local standards and regulations would ensure that project impacts would be less than significant. Thus, impacts would be less than significant.

c) 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 impact. There are no existing operational schools identified within one-quarter of site. The nearest existing school is Riverside Montessori Academy located at 7141 Indiana Avenue approximately 0.45 miles north.

The project proposes the construction of a new elementary school. As part of the construction of the new school, the project would involve demolition of existing structures. The site has been partially developed as a radio station since the early 1960s. As a result, there is a potential that asbestos-containing materials and lead-based paints are present within the on-site building that would be demolished as part of the project. It is recommended that an asbestos and LBP survey be conducted prior to the disturbance or removal of asbestos-containing materials.

As mentioned above, the project would involve a limited amount of hazardous materials during the short-term construction phase and long-term operational phase. To prevent a significant hazard to the surrounding community from the release of acutely hazardous materials, the project would be required to comply with all federal, state, and local standards and regulations related to hazardous material transport, storage, and disposal. Compliance with all federal, state, and local standards and regulations would ensure that project impacts would be less than significant. As such, project impacts related to the emission or handling of hazardous materials would be less than significant.

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?

Less than significant impact. Available databases from federal and state regulatory agencies were reviewed to identify use, generation, storage, treatment, and/or disposal of hazardous materials and chemicals or release incidents of such materials, which may have impacted the project site. The electronic database search company Envirosite Corporation performed a records search of reasonably ascertainable environmental databases, including the standard state and federal sources, in accordance with American Society of Testing Materials (ASTM) standard of practice. A copy of the Government Records Report search by Envirosite is provided in Appendix A (Envirosite 2018). A standard records search was conducted for the project site using a standard 1-mile search radius, as measured from the project site parcel located northern side of Lincoln Avenue and Sonora Place at latitude/longitude 33.931588/-117.397197. The project site is located on a relatively flat surface that slopes gently to the northwest.

The project site was identified in the government records search report on one database with no occurrences of violations. The project site is listed on the Digital Obstacle, recorded with the latitude/longitude as having an approximately 125-foot-tall structure. The Federal Aviation Administration Digital Obstacle file describes all known obstacles of interest to aviation users in the United States. The former towers listed as obstacles on the database are no longer existing structures present on the site and have recently been demolished.

Further review of the regulatory databases for off-site properties having the potential to impact the project site did not identify any registered aboveground storage tanks or underground storage tanks within 0.25 mile of the project site. Review of the California and Riverside County Leaking Storage Tank Lists identified three sites listed on the leaking underground storage tank (LUST) database within the 0.5-mile search radius of the project site.

The nearest LUST site listed is the Riverside Unified School District located at 3070 Washington Street, which is located 0.35 mile northeast of the project site. The site was listed for the potential gasoline leak on soil, and the case was closed on April 4, 1989. The second nearest site listed is Topham and Sons located at 3245 Madison Street, which is 0.35 mile west-northwest of the project site. The site was listed for the potential gasoline leak on soil. The leaking tank of concern was removed and the case was closed on October 3, 2000. The third site listed is Geiger SelfServe located at 3387 Madison Street, which is 0.47 mile west-northwest of the project site. The site was

listed for the potential gasoline leak on soil. The leaking tank of concern was removed and the case was closed on September 11, 2000.

All the off-site listings have a low potential to impact the project site, based on the following criteria: (1) no reported impacts to groundwater, (2) closure approval received from the lead regulatory agency, (3) relative distance from the project site, and/or (4) identified as being cross-gradient or down gradient with respect to the local groundwater flow direction relative to the project site.

Therefore, project impacts related to creating a significant hazard to the public or environment would be less than significant.

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

No impact. The nearest airport is the Riverside Municipal Airport located approximately 2.71 miles northwest of the project site. According to the Riverside Airport Masterplan (2009), the project site is not located within its planning area (City of Riverside, 2009). March Air Reserve Base (MARB) is a 2,400-acre air base located approximately 6.5 miles southeast of the project. According to Figure PS-6B with the Public Safety Element of the General Plan and MARB/Inland Port Airport Land Use Compatibility Plan[3], the project appears to be on the edge but outside of airport influence boundary and within FAR Par 77 Notification Area. Therefore, there would be no associated impacts.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No impact. The project site is located in a primarily residential/commercial area of Riverside. In addition, the project site is not located within the vicinity of a private airstrip. Therefore, project implementation would not result in an airstrip-related safety hazard for people residing or working at the proposed residential development. Thus, no impacts would occur.

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

Less than significant impact. The City of Riverside adopted an Emergency Operations Plan in 2011[3] and a Local Hazard Mitigation Plan in 2012 which discusses the City's emergency response and evacuation plans in detail (City of Riverside, 2011). The project does not involve the development of structures or the redevelopment of any streets that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project also does not include any characteristics that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. The project would be required to follow current RUSD emergency evacuation procedures in the event of an emergency event. Thus,

[3] http://www.rcaluc.org/Portals/0/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700

impacts related to the implementation of an adopted emergency response plan or emergency evacuation plan would be less than significant.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less than significant impact. As discussed above, the project site is located in primarily residential/commercial area within the City of Riverside. The nearest fire station to the project site is City of Riverside Fire Station #10, located 0.86 miles southwest of the site at 2590 Jefferson Street. The project site would be adequately serviced in the event of a fire. Thus, impacts related to wildland fires (including wildland-urban interface fires) would be less than significant.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) **Violate any water quality standards or waste discharge requirements?**

Less than significant. The project site currently consists of one parcel totaling approximately 9.8 acres. The site is currently a vacant lot with no existing buildings or structures. The project would include the construction and operation of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling approximately 100,500 sq ft, outdoor recreation space, and three parking lots.

Project-related impacts related to water quality could occur over three different periods:

- During demolition of existing uses, when risk of pollution exposure is present;
- During the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest;
- Following construction, before the establishment of ground cover, when the erosion potential may remain relatively high; and
- After project completion, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would remain similar to existing conditions.

National Pollutant Discharge Elimination System

Under Section 402 of the Clean Water Act (CWA), the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges from construction activities disturbing one acre or more of land. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCBs to preserve, protect, enhance, and restore water quality. The City is within the jurisdiction of the Santa Ana Regional Water Quality Control Board. The City of Riverside, the Riverside County Flood Control and Water Conservation District, other cities in Riverside County (excluding Blythe), and the Coachella Valley Water District joined forces to apply for joint NPDES municipal permits, rather than separate ones. This has allowed the "co-permittees" to share resources, eliminate duplicate efforts, and minimize program costs to the public.

Short-term Construction

Dischargers whose projects disturb one or more acres of soil (or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres), are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the

ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. To obtain coverage for discharges under the General Construction Permit, dischargers are required to electronically file the Permit Registration Documents, which include a Notice of Intent (NOI), SWPPP, and other compliance-related documents required by the General Permit and mail the appropriate permit fee to the State Water Board.

A SWPPP typically includes both source-control and treatment-control BMPs to reduce water quality impacts. The BMPs that are most often used during construction include watering exposed soils; covering stockpiles of soil; installing sand bags to minimize off-site runoff; creating temporary desilting basins; and timing grading to avoid the rainy season (November through April). In addition, coverage under the Construction Permit would also include implementation of post-construction standards to achieve the pre-project volume and rate of stormwater runoff from the project area.

Overall, the project's demolition and construction activities would be subject to compliance with NPDES requirements, which include obtaining coverage under the General Construction Permit by filing the Permit Registration Documents (i.e., an NOI and SWPPP, among others), as well as the pertinent provisions of the City of Riverside Municipal Code. Compliance with the NPDES and Municipal Code requirements would ensure that the project's construction-related impacts to water quality are less than significant.

Long-Term Operations

The Municipal Storm Water Permitting Program regulates stormwater discharges from municipal separate storm sewer (drain) systems (MS4s). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The MS4 permits require the discharger to develop and implement a Storm Water Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP)—the performance standard specified in Section 402(p) of the Clean Water Act. The management programs specify what BMPs will be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations.

In accordance with the CWA, the Santa Ana Regional Water Quality Control Board developed the NPDES Permit and Waste Discharge Requirements Order No. R8-2010-0033 (MS4 Permit) for the Riverside County Flood Control District, the County of Riverside, and many incorporated cities of Riverside County within the Santa Ana Region.

This MS4 Permit requires the City to perform various activities including:

- Create and enforce ordinances
- Conduct inspections on businesses, construction sites, and other facilities
- Ensure new development is built using Low Impact Development (LID) techniques
- Educate the Public
- Maintain City facilities, etc.

The Permit requires the development and implementation of a program addressing stormwater pollution issues in development planning for private projects. The primary objectives of the municipal stormwater program requirements are to: 1) effectively prohibit non-stormwater discharges; and 2) reduce the discharge of pollutants from stormwater conveyance systems to the MEP statutory standard. The County Model Water Quality Management Plan (WQMP) was developed as part of the municipal stormwater program to address stormwater pollution from new development and redevelopment by the private sector. This WQMP contains a list of the minimum required BMPs that must be employed for a designated project. The Permittees are required to adopt the Program's requirements in their own water quality regulations. Developers must incorporate appropriate WQMP requirements into their project plans. Each Permittee must approve the project plan as part of their development plan approval process and prior to issuing Grading and Building Permits for projects covered by the model WQMP requirements.

The project would be undertaken in accordance with the Riverside County Drainage Area Management Plan (DAMP). Prior to issuance of a Grading or Building Permit for the project, applicable city agencies would review the project plans and impose terms, conditions, and requirements on the project, as needed. Additionally, the project would be subject to compliance Chapter 19, Article IV—Water Pollution of the Sewer Authority Mid-Coastside (SAMC), which addresses compliance with the 2006 DAMP.

To summarize, the project requires compliance with the Riverside County DAMP, which includes preparation of a WQMP that specifies the proposed BMPs. The project also requires compliance with NPDES, DAMP, and SAMC requirements. Given compliance with all applicable local, state, and federal laws regulating surface water quality, the project as designed is anticipated to result in a less than significant impact directly, indirectly or cumulatively to any water quality standards or waste discharge.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?

Less than significant impacts. The project would connect to the City's water facilities. The City's stormwater collection system includes catch basins, drainage basins, pumping stations, and force mains. As part of the project, construction activities including demolition, grading, paving and site improvements may result in loose sediment, which can be picked up by surface water or wind into nearby storm drains and into waterways.

The project site sits over the Riverside South Water Supply Basin. According to the Envirosite report for the project site, there are no federal, state, or local wells found within the 0.5-mile radius of the project site (Envirosite, 2018). Based on the topographic gradient surrounding the site, the groundwater is assumed to be flowing with a northwest gradient. Review of nearby investigation reports available on the State Water Resources Control Board's EnviroStor website indicate the depth of groundwater in the area ranges from 98 to 103 feet, but perched groundwater may occur at

various times throughout the year above the upper confining layer. In order to determine a precise depth to groundwater, further subsurface investigation would be warranted. However, the project would not deplete groundwater supplies nor substantially interfere with groundwater recharge such that there would be a new deficit in aquifer volume or a lowering of the local groundwater table level, as it would comply with the conditions set forth by the NPDES, DAMP, and Riverside Municipal Code. As such, project implementation would therefore result in a less than significant impact to groundwater supplies.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less than significant impact. The City's stormwater collection system includes catch basins, drainage basins, pumping stations, and force mains. The project site is located in a relatively flat area with a topographic gradient to the northwest. As part of the project, construction activities including demolition, grading, paving and site improvements may result in loose sediment, which can be picked up by surface water or wind into nearby storm drains and into waterways.

The preconstruction and post construction drainage patterns would be similar to existing conditions. Further, no stream or river traverses the project site or is located in its vicinity. As such, impacts related to the alteration of existing drainage patterns in the area that would result in substantial erosion or siltation on- or off-site would be less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than significant impact. The project includes the redevelopment of an existing radio station site with the construction of a K-6 Elementary school that will include three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. Project implementation would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As such, impacts related to the alteration of existing drainage patterns in the area that would result in increased surface runoff on or off-site would be less than significant. However, prior to project implementation, a WQMP is required to address the impacts of surface run-off in relation to flooding on- or off-site.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than significant impact. The project would continue to be served by the City's stormwater drainage system. Construction activities such as demolition, grading, and paving could introduce additional pollutants and sediment into water runoff and flow into nearby storm drains. The project is over one acre in size and is required to comply with the SWPPP. As stated in the permit, during and after construction, BMPs would be implemented to reduce/eliminate adverse water quality impacts resulting from development. All impacts related to runoff during site preparation,

demolition, and grading would be addressed by the SWPPP. Projects that comply with NPDES requirements would not result in a significant impact related to changes in the quantity, rate, or quality of stormwater runoff from the site. Finally, continuous use and operation of the site would not create or contribute runoff water that would exceed the capacity of existing stormwater drains on the project site. Therefore, impacts would be less than significant.

f) Otherwise substantially degrade water quality?

Less than significant impact. The project is over one acre in size and is required to have coverage under the SWPPP. As stated in the Permit, during and after construction, BMPs would be implemented to reduce/eliminate adverse water quality impacts resulting from development. Sources of stormwater pollution would be mitigated through adherence to NPDES permit requirements. The project would not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. For these reasons, there would be a less than significant impact directly, indirectly, or cumulatively from stormwater exceeding the capacity of existing or planned stormwater drainage systems, substantial additional sources of polluted runoff, or other sources of water quality degradation. Impacts would be less than significant.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No impact. A flood hazard area identified on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) is classified a Special Flood Hazard Area, defined as the area that will be inundated by the flood event having a 1.0 percent chance of being equaled or exceeded in any given year. The one percent annual chance flood is also referred to as the base flood or 100-year flood.

The project site is in Zone X (shaded) Other Flood Areas, pursuant to FIRM Insurance Rate Map No. 06059C0720G Zone X. Zone X (shaded) Other Flood Areas is an area of 0.2 percent annual chance flood; areas of 1.0 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1-square-mile; and areas protected by levees from 1.0 percent annual chance flood. It includes the areas located outside the Special Flood Hazard Area (FEMA, 2018). The project does not propose the construction of housing, and the project is not located within a Special Flood Hazard Area. Therefore, project development will not place housing within a 100-year flood hazard area.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No impact. As previously addressed in Impact 9(g), the project site is not located within the 100-year floodplain. Therefore, no impacts associated with placing structures within a 100-year flood hazard area would occur.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No impact. As depicted in City of Riverside General Plan Public Safety Element Figure PS-4: Flood Hazard Areas, the project site is not located within the inundation area of a levee or dam (City of Riverside, 2018). The nearest dam inundation area is approximately 1 mile east of the project site. Therefore, project implementation would not expose people or structures to a significant risk involving flooding associated with the failure of a levee or dam, or coastal storm surges. No impacts would occur.

j) Inundation by seiche, tsunami, or mudflow?

No impact. The project site is located in the City of Riverside surrounded by several mountain ranges. A seiche is an earthquake or slide-induced wave that can be generated in an enclosed body of water. There is no enclosed body of water in the project vicinity.

A tsunami is a sea wave generated by an earthquake, landslide, volcanic eruption, or even by a large meteor hitting the ocean. An event such as an earthquake creates a large displacement of water resulting in a rise or mounding at the ocean surface that moves away from this center as a sea wave. Tsunamis generally affect coastal communities and low-lying (low-elevation) river valleys in the vicinity of the coast. Buildings closest to the ocean and near sea level are most at jeopardy. According to the California Geological Survey Orange County Tsunami Inundation Maps (CDC, 2018), the project site is not located within a tsunami inundation area.

Potential risk from mudflow (i.e., mudslide, debris flow) does not exist within the project area, as steep slopes are not located on or in proximity of the project site.

Therefore, project implementation would not expose people or structures to potential hazards from inundation by seiche, tsunami, or mudflow. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	☒	☐	☐	☐

Environmental Evaluation

Would the project:

a) Physically divide an established community?

Less than significant impact. The project site is located within a primarily residential area in the Casa Blanca Neighborhood in the City of Riverside on the northern side of Lincoln Avenue and Sonora Place. RUSD proposes to construct a K-6 Elementary school campus that will have the capacity to serve up to 800 students in the community. The new buildings will include: a 1-story 11,000 sq ft multi-purpose/food service building, a 1-story 6,500 sq ft administration building, a 2-story 83,000 sq ft building for several maker-space and traditional classrooms with a capacity to serve up to 800 students, a library, and collaborative areas totaling 100,500 sq ft. In addition to the main buildings, the site proposes to include outdoor recreation space that consists of a 13,500 sq ft kindergarten playground, 29,500 sq ft quad and courtyard, 36,800 sq ft hardcourts, 143,500 sq ft playfields (baseball, basketball, and soccer fields), a 4,000 sq ft Science Grow Lab, and associated landscaping totaling 240,870 sq ft. There are also three proposed parking lots including: a staff parking lot, kindergarten drop-off lot, and a visitor parking lot. A total of four driveways would provide ingress/egress to the project. All driveways front Lincoln Avenue and are restricted to right-in and right-out turning. Pedestrians will continue to be able to access the sidewalk along Lincoln Avenue. Currently, elementary age students in the approximately 1.5 square mile Casa Blanca community are bused to attend school at one of six schools several miles away. This project would provide a single school for neighborhood children to attend. The project design would allow students and families to safely walk to school and would provide efficient busing services.

The proposed K-6 Elementary school will accommodate students living within the easterly boundary of Mary Street, Victoria Avenue to the southeast, Jefferson Street to the southwest, and Indiana Street at the northwest boundary.

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local bridge that would impact mobility within an existing community or between a community and outlying area. As discussed above, the project does not involve any such features, and would not remove any means of access or impact mobility. Therefore, the project will not physically divide an established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than significant impact. The analysis contained in this Initial Study Checklist addressed the potential conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

The project is located in a R-3-1500 zone and designated by the City of Riverside General Plan as a HDR land use area. The HDR designation allows for a maximum of 29 du/acre or 18.6 persons/acre; the primary intent of the HDR designation is for multi-family residential use. A tentative tract map for the construction of 210du on the project site was approved by the City of Riverside Planning Commission on August 23, 2018. In order to construct a public school in this zone, RUSD is required to apply for a GPA and Rezone to a Public Facilities use unless the RUSD Board votes to overrule this requirement as stated in Government Code Section 53094. The approval of a GPA and Rezone or through a decision made by the RUSD Board to approve the project by-right would reduce impacts to the General Plan and Zoning Code to less than significant.

The Casa Blanca Neighborhood includes a mix of uses surrounding the project site including a church, library, community center, and various government buildings. Additionally, according to the Land Use and Urban Design Element, the City of Riverside adopted The Casa Blanca Community Plan in 1974 and updated it in 1987 (City of Riverside, 2018). The community plan recommendations include preserving and protecting the neighborhood's single family character. To further encourage investment in the neighborhood, the City also adopted The Casa Blanca Redevelopment Area (amended in 2001), which encompasses almost the entire neighborhood as well as portions of Presidential Park and Riverside Auto Center to the southwest and a very small portion of the Victoria neighborhood on the northeast side of Mary Street. The overall purpose of the plan was to preserve the neighborhood's roots as a citrus colonia established by Mexican immigrants during the City's agricultural heyday, the Casa Blanca neighborhood is known contemporarily for being family-oriented, strong-knit, and largely residential in character. Casa Blanca's residents and the City have invested significant effort to improve the physical and economic conditions in the neighborhood. Residents have organized themselves through several active community organizations, whose

activities led to the creation of one of the City's first Community Plans in 1974. Both the Casa Blanca Community Plan and the Redevelopment plan envision the preservation of the Casa Blanca neighborhood; however, any future development standards would be driven and consistent to the City of Riverside Municipal Code.

Therefore, with implementation of the proposed GPA and RZ the project would not conflict with any adopted land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant.

c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?

Potentially significant impact. As discussed in Impact 4(f) above, the project site falls within the boundaries of the Rough Step 1 for the 2004 Western Riverside Multiple Species Habitat Conservation Plan. The species protected under the Western Riverside Multiple Species Habitat Conservation Plan have the potential to occur on-site based on suitable habitat. Further discussion would be provided as part of a BRA and discussed in the forthcoming DEIR.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Evaluation

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?

No impact. The project does not involve extraction of mineral resources. The project site is located within a predominately single family residential area of Riverside on the northern side of Lincoln Avenue and Sonora Place. According to the California Department of Conservation Regulatory Mapping Database, the project site is not classified as a mineral resource site.

The City of Riverside Open Space and Conservation Element describes the historical importance of quarrying of granitic rock as a significant industry in Riverside (City of Riverside, 2012). However, these operations have not been active for decades and most extraction sites are now beyond the urban periphery. Figure OS-1 Mineral Resources of the Open Space and Conservation Element shows the project site is not within a known mineral resource site that contains mineral resources of value to the region or residents of the area. Thus, no impacts would occur.

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

No impact. The project site is located within a predominately single family residential area of Riverside on the northern side of Lincoln Avenue and Sonora Place. The City of Riverside Open Space and Conservation Element describes the historical importance of quarrying of granitic rock as a significant industry in Riverside (City of Riverside, 2012)**.** However, these operations have not been active for decades and most extraction sites are now beyond the urban periphery. Figure OS-1 Mineral Resources of the Open Space and Conservation Element, shows the project site is not within a known mineral resource site and project implementation would not result in a loss of availability of a locally important mineral resource recovery site. Thus, no impacts would occur.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Noise *Would the project result in:*				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Evaluation

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially significant impact. A significant impact would occur if project-related, noise producing construction activities would occur during hours other than those permitted by the City. The City's Title 7—General Noise Regulations limits noise producing construction activities to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays. Such activities shall not take place at any time on a Sunday or a federal holiday (City of Riverside, 2018).

Short Term Construction Noise Impacts

Two types of short-term noise impacts would occur during site preparation and project construction. The first type would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site. The second type of short-term noise impact is related to noise generated during site-preparation, grading, and construction activities. The site preparation phase, which includes excavation and grading activities, generate the highest noise levels because the noisiest construction equipment is earthmoving equipment.

Traffic Noise Impacts

A significant impact would occur if persons working, visiting, or residing at the project site would be exposed to transportation noise levels that would exceed the City's normally acceptable land use compatibility threshold of up to 60 A-weighted decibel (dBA) community noise equivalent level (CNEL) for the proposed School land use developments.

Stationary Operational Noise Impacts

The project would include new stationary noise sources such as parking lot activities, outdoor recreational activities, loud speaker systems, school bells, and mechanical ventilation system equipment. These would be potential point sources of noise that could affect receptors in the project vicinity.

School buildings typically require mechanical equipment, such as air conditioners, exhaust fans, and air handling equipment for ventilation of the buildings. Schools require parking areas for staff, visitors, and persons residing at the project site. Typical parking lot activities include people conversing, doors closing, and vehicles idling. Such activities are expected to occur sporadically throughout the day, as persons arrive and leave the parking lot areas.

As such, the noise levels within the project vicinity could potentially result in a significant impact due to the generation of noise levels in excess of standards established by the City of Riverside General Plan and noise ordinance. These impacts will be further addressed in the Noise Technical Report and forthcoming DEIR.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. The City of Riverside has not adopted criteria for groundborne vibration impacts. The project could potentially result in excessive groundborne vibration and noise during the constructional phase. However, the potential increase in groundborne vibration or groundborne noise levels will be further addressed in the Noise Technical Report and forthcoming DEIR.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially significant impact. A significant impact would occur if implementation of the project would result in a substantial increase in ambient noise levels compared with noise levels existing without the project. New permanent noise sources associated with implementation of the project would be project-related traffic and new stationary noise sources.

Traffic Noise Impacts

It is likely the project would result in an increase in existing traffic noise levels as the project is expected to generate minimal high volumes of trips to the project site. For an increase of 3 dBA in traffic noise levels to occur, project trips would have to be double those of the existing average daily traffic volumes. The project could result in a doubling of traffic volumes over existing traffic volumes on any of the access roadways in the project vicinity. Therefore, the project could result in a substantial permanent increase in traffic noise levels and project-related traffic noise impacts on off-site receptors would be potentially significant. Further analysis will be conducted as part of the Noise Technical Report and forthcoming DEIR.

Stationary Noise Source Impacts to Off-site Receptors

As mentioned above in Impact 12(a), new stationary noise sources resulting from implementation of the project is expected to result in noise levels above existing ambient noise levels. Therefore, it is likely the operational noise levels generated by project-related stationary noise sources would exceed existing ambient noise levels at the nearest off-site receptor by 5 dBA or greater. Because project-related operational noise levels could result in a substantial (5 dBA or greater) increase in ambient noise levels at any off-site sensitive receptor, project-related mechanical equipment operational noise impacts to off-site receptors would be potentially significant. Further analysis will be further addressed as part of the Noise Assessment and discussed in the forthcoming DEIR.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially significant impact. Construction noise impacts were previously mentioned in Impact 12(a), the façade of the nearest proposed residence to the project site would be located approximately 90 feet from the acoustic center of construction activity where multiple pieces of heavy machinery would operate. Compliance with the permissible construction hours established by the City's Municipal Code-Title 7 would reduce the effects of noise produced by construction activities on longer-term (hourly or daily) ambient noise levels, and it would reduce potential impacts that could result in annoyance or sleep disturbances at nearby sensitive receptors. The City limits noise producing construction activities to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays (City of Riverside, 2018). Such activities shall not take place at any time on a Sunday or a legal holiday. Therefore, potential short-term construction noise resulting from the project could result in a substantial temporary increase in ambient noise levels and would be considered potentially

significant impact. Further analysis will be conducted as part of the Noise Assessment and discussed in the forthcoming DEIR.

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

Less than significant. The nearest airport to the project site is the Riverside Municipal Airport and is located 2.7 miles northwest of the project site. Due to its distance from the airports runways, the project site is located outside of the airport's 55 dBA CNEL noise contours. Therefore, implementation of the project would not expose persons residing, working, or visiting the project site to excessive noise levels associated with public airport noise. Impacts associated with public airport noise would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No impact. No private airstrips are located within 2 miles of the project site. Therefore, due to the distance of the project location from any private airstrips, the project would not expose persons residing, working, or visiting the project site to excessive noise levels associated with private airstrip noise. No impacts associated with private airstrip noise would occur.

Mitigation Measures

This will be addressed in the forthcoming DEIR.

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

Environmental Setting

According to the City of Riverside's General Plan Housing Element, updated in 2018, the City's estimated population totaled 311,955 residents as of 2013. The population is projected to increase to 383,077 at the ultimate buildout of the City in 2025 (City of Riverside, 2018). According to the US Census, the City of Riverside has 91,940 households as of 2012-2016, an increase of 1,694 households since the 2007-2011 American Community Survey. In 2011, the number of employed residents in Riverside was 129,047 (City of Riverside, 2018). The General Plan includes a range of policies in order to ensure the provision of housing options that respond to the needs of all economic and demographic segments of the community including seniors, families, the homeless, and individuals with special needs. The City's Municipal Code also contains numerous standards and procedures to encourage the development of housing that is affordable to a range of households with varying income levels.

Environmental Evaluation

Would the project:

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

Less than significant impact. The project involves the development of a K-6 Elementary school campus, which includes the construction of three main buildings, approximately 240,870 sq ft of outdoor recreation space, and three parking lots. According to the RUSD Neighborhood Schools Study, 807 students within the proposed school boundary currently attend six different elementary

schools in the neighborhood south of Highway 91 between Mary and Jefferson Street and mostly north of Victoria Avenue (RUSD 2017). The six elementary schools include: Harrison, Jefferson, Madison, Monroe, Victoria, and Washington. Out of the 807 students, there are 453 students that are bussed to four feeder elementary schools (Harrison, Jefferson, Monroe, and Victoria) outside of the Casa Blanca Neighborhood (RUSD 2017). The project would provide a single neighborhood school for the students currently located in the Casa Blanca area. The proposed school campus would not induce substantial growth in the area directly or indirectly. The number of employees anticipated are approximately 30-40 people and would be a mix of new hires and transfers from within the District. There would not be any new construction of homes, businesses or provide an extension of roads and other infrastructure. Therefore, due to the neighborhood's need to establish an elementary school campus to accommodate existing students, the impacts to population growth are less than significant.

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

Less than significant impact. As mentioned in Impact 13 (a) above, the project would construct a K-6 Elementary school that would accommodate students from the surrounding Casa Blanca neighborhood that are currently attending six different elementary schools. The six elementary schools include: Harrison, Jefferson, Madison, Monroe, Victoria, and Washington. The project site does not contain housing; however, it is currently a vacant radio station site and designated for HDR. The City of Riverside recently adopted a mid-cycle update on the Housing Element of the General Plan. The plan was adopted in October 10, 2017, in anticipation of population growth of a projected population growth to 383,077 people at ultimate buildout (City of Riverside, 2018). In conjunction with the update, a Candidate Rezone Site Booklet was released that identified vacant and underutilized parcels for rezoning to multi-family or higher densities to increase housing opportunities within the City. The Housing Element Update involves rezoning and general plan amendments for as many as 395 acres (303 parcels), which exceeds the 191 acres required to be rezoned to meet Regional Housing Needs Allocation (RHNA) set by law and the Southern California Association of Governments. As such, due to the buffer set by the Housing Element Update on housing needs, the project would not result in any substantial displacement of housing or necessitate the construction of additional housing elsewhere. Therefore, the impacts to existing housing are less than significant.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No impact. As discussed above, the project does not contain any housing. The project would not displace people, necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*				
a) Fire protection?	☒	☐	☐	☐
b) Police protection?	☒	☐	☐	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Environmental Evaluation

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

a) Fire protection?

Potentially significant impact. Fire protection and emergency response services in the City of Riverside are provided by the Riverside Fire Department. The closest station to the project site is Fire Station #10 located at 2590 Jefferson Street, which is approximately 0.85 miles southwest from the project site (City of Riverside, 2018). The project does not propose new or physically altered fire protection facilities. The project involves the construction of a K-6 Elementary school in the Casa Blanca Neighborhood. Because the project involves construction and operation of a new school with a maximum of 800 students, project implementation has the potential to increase RFD response times to the project site or the surrounding vicinity, or require construction of new or physically altered fire protection facilities.

The project's design would be subject to compliance with the requirements set forth in the 2016 California Fire Code (and all amendments), including the provision of fire sprinkler systems throughout the building, as noted in the Riverside Municipal Code, in addition to National Fire Protection Association standards; Title 19, of the California Public Safety Code; and, the California Health and Safety Code. The project would also be subject to compliance with the fire provisions specified in the 2016 California Building Code and all incorporated amendments, and the 2015 International Fire Code (City of Riverside, 2018). The project plans would be reviewed and approved

by the Riverside Building and Fire Departments, which would ensure adequate emergency access, fire hydrant availability, and compliance with all applicable codes and standards. Compliance with the City's permit process and Riverside Municipal Code requirements would ensure that project implementation would result in a potentially significant impact to fire protection services.

b) Police protection?

Potentially significant impact. Police protection is provided by the Riverside Police Department (RPD). As shown in the General Plan Public Safety Element, the closest police station to the project site is the Lincoln Station, located at 8181 Lincoln Avenue, which is approximately 1.1 miles southwest of the project site (City of Riverside, 2018, see Figure PS-8). In addition, the project plans would be reviewed and approved as part of the City's discretionary review process by the Riverside Building and Safety Division and by the Police Department, which would ensure that adequate safety and crime prevention measures are provided. The project would not require the construction of new RPD facilities or the expansion of existing facilities to accommodate new staff or equipment. The project involves the construction of a K-6 Elementary school in the Casa Blanca Neighborhood.

As described by the City's General Plan EIR, the RPD does not use a formula for calculating the number of officers per capita. Instead, staffing is based on growth and evaluated on a project-by-project basis. Because the project involves construction and operation of a new school to serve up to 800 students, project implementation has the potential to increase RPD response times to the project site or surrounding vicinity. As such, project implementation would result in a potentially significant impact and will be further analyzed in the forthcoming DEIR.

c) Schools?

No impact. The project involves the development of a K-6 Elementary school campus, which includes the construction of three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. According to the RUSD Neighborhood Schools Study, there are currently 807 students that reside within the Casa Blanca neighborhood and attend six different elementary schools (Harrison, Jefferson, Washington, Monroe, Victoria, and Madison). Out of the 807 students, there are 453 students that are bussed to four feeder elementary schools (Harrison, Jefferson, Monroe, and Victoria) outside of the Casa Blanca Neighborhood (RUSD 2017). The number of students eligible to be bussed into Casa Blanca would be 309 based on a distance of greater than 1.25 miles. The remaining students would walk or find another means of transportation. The proposed school campus will accommodate the existing students in the Casa Blanca Neighborhood. Due to the reduction in impacts to the existing schools, there would not be an increase in the student population and therefore no impacts would occur.

d) Parks?

No impact. The City currently has a 1 to 2 ratio in favor of community parks, based on the General Plan Park and Recreation Element. The project includes the redevelopment of an existing radio station site with the construction of a K-6 Elementary school that will include the construction of three main buildings totaling approximately 100,500 SF, outdoor recreation space, and three parking

lots. The project is surrounded by an existing park (Villegas Park), Washington Park (approximately 0.63 miles away), and other recreational uses.

As discussed in Section 2.15 below, the project would not negatively impact park facilities. Rather, the project includes the construction of a school campus including 240,870 sq ft of outdoor recreational space including sports fields and hardcourts for soccer, baseball, and basketball. Additionally, students attending Casa Blanca Elementary School would utilize the recreational facilities that would be available within the footprint of the existing campus. The project would not increase population in the area and thus would not increase the use of existing neighborhood and regional parks or other recreational facilities. No impact would occur.

e) Other public facilities?

No impact. According to the General Plan Public Facilities and Infrastructure Element, the City of Riverside provides public facilities including libraries, hospitals, and community centers. The closest library is the SSgt. Salvador J. Lara Casa Blanca Library located at 2985 Madison Street, which is 0.81 miles west of the project site; the nearest community center is the Ysmael Villegas Community Center located at 3091 Esperanza Street, which is 0.23 miles north of the project site. The project proposes to construct a K-6 Elementary school within the Casa Blanca Neighborhood that would include a new library on the campus. Therefore, the project would have no impact on the public facilities in the Casa Blanca Neighborhood.

Mitigation Measures

This will be addressed in the forthcoming DEIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
15. Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Environmental Evaluation

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. According to the General Plan's Park and Recreation Element, the City maintains 52 public parks and additional open space areas encompassing more than 2,806 acres. There are currently 30 neighborhood parks, 15 community parks, 11 city-wide/special use parks, and six reserve/open space parks owned by the City. Larger parks contain features such as sports facilities, picnic areas, restrooms, and playgrounds. Smaller parks typically include basic landscaping, playgrounds, and picnic facilities. These parks feature sports facilities, picnic areas, restrooms, and playgrounds (City of Riverside, 2012, see Figure PR-1). Villegas Park is the nearest park to the project site, and is located at 3091 Esperanza Street which adjoins the project site to the north.

The City currently reflects a 1 to 2 ratio in favor of community parks, which is a rate consistent with prevailing standards. As stated in the General Plan 2023 FPEIR, the current Riverside standards for parkland distribution recommend three developed acres per 1000 population. The project involves the development of a K-6 Elementary school campus which includes the construction of three main buildings totaling approximately 100,500 sq ft, outdoor recreation space, and three parking lots. This will result in a campus capacity of 800 students total. The project does not propose to physically alter any existing park facilities; however, it does propose to construct new recreational facilities that would be available for use by the students attending the school during school hours. For these reasons, the project would have no impact on existing neighborhood and regional parks in the area.

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 project includes the redevelopment of an existing radio station site and construct approximately 240,870 sq ft of outdoor recreation space. The outdoor recreation space will consist of a 13,500 sq ft kindergarten playground, 29,500 sq ft quad and courtyard, 36,800 sq ft hardcourts, 143,500 sq ft playfields (baseball, basketball, and soccer fields), a 4,000 sq ft outdoor Science Grow Lab, and associated landscaping. Although the project involves construction of recreational facilities as part of the new campus, environmental impacts of the project are evaluated in this document and all impacts are determined to be less than significant with the implementation of mitigation measures. As such, the project would have a less than significant impact on the environment. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Transportation/Traffic *Would the project:*				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

Environmental Evaluation

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially significant impact. The project would include the construction and operation of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. Therefore, the project would result in changes to land uses, circulation, and infrastructure; all applicable plans, ordinances, policies, and measures for all modes of transportation will be taken into consideration. As such, there is a potentially significant impact. Further analysis will be conducted as part of a Traffic Impact Analysis Report and discussed in the forthcoming DEIR.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially significant impact. The project would include the construction and operation of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. Therefore, the project would result in changes to land uses, circulation, and infrastructure. As such, there is a potentially significant impact to applicable congestion management programs. Further analysis will be conducted as part of a Traffic Impact Analysis Report and discussed in the forthcoming DEIR.

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

No impact. The nearest airport is the Riverside Municipal Airport located approximately 2.71 miles northwest of the project site. According to the Riverside Airport Masterplan (2009), the project site is not located within its planning area (City of Riverside, 2009). MARB is a 2,400-acre air base located approximately 6.5 miles southeast of the project. According to Figure PS-6B with the Public Safety Element of the General Plan and MARB/Inland Port Airport Land Use Compatibility Plan, the project appears to be on the edge but outside of airport influence boundary and within FAR Par 77 Notification Area. Because of the nature and scope of the project, project implementation would not result in a change in air traffic patterns. Therefore, there would be no associated impacts.

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

No impact. The project would not substantially increase hazards due to the design features or incompatible uses. District plans are required to be reviewed and approved by the Division of the State Architect. Impacts would be less than significant.

e) Result in inadequate emergency access?

Less than significant impact. The project would provide access via Lincoln Avenue. The project proposes to construct a total of four driveways; all driveways front Lincoln Avenue and are restricted to right-in and right-out turning, which can provide more efficient emergency access. There are also three proposed parking lots including a staff parking lot, kindergarten drop-off lot, and a visitor parking lot with drop-off areas in each lot. The Division of the State Architect will review the site plan for safety, including fire vehicle access, and adequate fire lanes. The California Department of Education will review the plans in terms of the site layout, including layout of the student drop off area. As such, impacts would be less than significant. Further analysis will be conducted as part of a Traffic Impact Analysis Report and discussed in the forthcoming DEIR.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially significant impact. The project site is served by the Riverside Transit Agency (RTA) a multi-modal transportation agency serving western Riverside County. RTA is responsible for coordinating local and regional transit services throughout the region with 37 fixed routes, eight CommuterLink routes, and Dial-A-Ride services. Transit service is provided to the project by RTA Route 10 along Lincoln Avenue. Metrolink, a commuter rail system serving Southern California, also serves the project site. The nearest Metrolink station is the Riverside Station located at 4066 Vine Street. Further analysis will be conducted as part of a Traffic Impact Analysis Report and discussed in the forthcoming DEIR.

Mitigation Measures

This will be addressed in the forthcoming DEIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Utilities and Service Systems *Would the project:*				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Setting

The City of Riverside Public Utilities Department (RPU) prepared its 2015 Urban Water Management Plan (UWMP) in accordance with the Urban Water Management Planning Act, sections 10610 through 10656 of the California Water Code. This UWMP summarizes RPU's projected retail and wholesale water demands, and characterizes the source waters available to meet those demands for years 2020 through 2040. The plan also describes the reliability of RPU's water supplies and discusses RPU's water shortage contingency plan during a catastrophic event or drought conditions.

Water Service and Supply

In addition, the Riverside General Plan Public Facilities and Infrastructure Element outlines the domestic water services in the City of Riverside. The RPU which encompasses 68 square miles within City limits is the main provider of water services. The project site is located within the RPU service

area. The City of Riverside is also serviced by the Western Municipal Water District (WMWD), which is approximately 9.85 square miles within southeast Riverside, the Eastern Municipal Water District (EMWD) serves a small one-square-mile area of the City, and the Riverside Highland Water Company serves the northern sphere portion of the City, approximately 0.25 square miles (City of Riverside, 2012, See Figure PF-1). Riverside obtains its water supply from groundwater stored in the Bunker Hill, Riverside North, and Riverside South groundwater basins. RPU's wells produce more than 26 billion gallons of water providing an average 71 million gallons per day (mgd), including peak demands of more than 110 mgd. RPU encompasses 57 wells and is distributed through more than 975 miles of pipelines (City of Riverside, 2016).

Wastewater and Solid Waste

The Riverside Public Works Department operates a comprehensive wastewater collection, treatment, and disposal system that serves most of the City. WMWD is responsible for collection and treatment of wastewater flows only in a small portion of the City. The City's wastewater collection system includes over 102.7 miles of gravity sewers and 18 wastewater pump stations.

According to the Public Facilities and Infrastructure Element, the Riverside Public Works Department collects trash from 70 percent of all households. The remaining portion of the City is collected by a private contractor. The private collector services approximately 20,000 customers in the La Sierra, University and Orangecrest neighborhoods. All solid waste collected is tipped at the Robert A. Nelson Transfer Station, which is owned by the County of Riverside. The waste is then transferred to either the Badlands Landfill in Moreno Valley, the El Sobrante Landfill located east of Interstate 15 south of the City of Corona, or the Lamb Canyon Landfill located between the City of Beaumont and the City of San Jacinto for disposal (City of Riverside, 2015).

Environmental Evaluation

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than significant impact. The project would result in the construction of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling 100,500 sq ft, outdoor recreation space, and three parking lots. As mentioned in the General Plan Public Facilities and Infrastructure Element, the 2005 capacity for the Riverside Regional Water Quality Treatment Plant was 40 mgd, with capacity anticipated to be reached not before 2025. A planned expansion will allow the facility ultimately to treat 52.2 million gallons of wastewater per day. The plant provides full tertiary treatment for all flows (City of Riverside, 2018). Therefore, the redistribution of students to be enrolled at the Casa Blanca Elementary School given the existing infrastructure in place and the planned capacity for service will have less than potentially significant impact.

The Riverside Public Works Department

According to the City of Riverside 2015 UWMP, the City of Riverside Public Works Department operates and maintains the Riverside Regional Water Quality Control Plant (RWQCP). The plant capacity has recently been expanded to 46 mgd. The service area of the RWQCP extends beyond the RPU service area to include the areas served by Jurupa, Rubidoux, and Edgemont Community Services Districts. Tertiary-treated effluent from the RWQCP is discharged into the Santa Ana River. The RWQCP is required to discharge 15,250 acre-feet per year (AFY), adjusted for quality, to meet downstream obligations to Orange County Water District (OCWD) established in the Orange County Judgment. A separate requirement, to discharge a total of 25,000 AFY, is included in the RWQCP ORDER WR 2008—0024 Conditionally Approving Wastewater Change Petition WW-0045. RPU maintains a recycled water distribution system that provides recycled water for landscape irrigation and commercial purposes (City of Riverside, 2016).

The City of Riverside lies within the Santa Ana region of the California Regional Water Quality Control Board. Therefore, the City's NPDES permit is a joint permit that includes the City of Riverside, the Riverside County Flood Control and Water Conservation District, other cities in Riverside County (excluding Blythe) and the Coachella Valley Water District. A NPDES permit implements federal and state laws governing point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States.

In addition, the project is subject to comply with on-site sewer cleaning requirements. Regular cleaning is a requirement under the State of California, State Water Resources Control Board Order No. 2006-0003, and Statewide General Waste Discharge Requirements for Wastewater Collection Agencies, adopted on May 2, 2006. Therefore, impacts will be less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than significant impact. The project would be served by RPU, which obtains its water supply from groundwater stored in the Bunker Hill, Riverside North, and Riverside South groundwater basins. RPU's wells produces more than 26 billion gallons of water providing an average 71 mgd, including peak demands of more than 110 mgd. RPU encompasses 57 wells and is distributed through more than 975 miles of pipelines (City of Riverside, 2018). The wastewater treatment for the project site is provided by the Riverside Public Works Department, which has adequate capacity to serve the projects effluent.

Based on the City of Riverside 2015 URMP, RPU calculated a baseline water use in the 2010 UWMP at 264 gallons per capita per day (gpcd) for the period from 1999 through 2008. Based on those figures, RPU calculated a compliance water use target of 211 gpcd for 2020, and an interim water use target of 238 gpcd for 2015. In 2010, the actual consumption was calculated as 206 gpcd. RUSD estimates a capacity of 800 students on the project site as result of the project. Using the projected student number, water demand for the project would be approximately 168,800 gpcd, using the

2020 target gpcd, or approximately 189 AFY. Under normal conditions, the 2015 UWMP predicts a total citywide water demand of 95,221 AFY in 2020 and 96,534 AFY in 2025 (City of Riverside, 2016).

Water Facilities

RPU has facilities to extract groundwater from five groundwater basins: Bunker Hill, Rialto-Colton, Riverside North, Riverside South, and Arlington Basins. The Riverside Basin is divided into Riverside North and Riverside South by the San Bernardino County/Riverside County boundary. These basins are hydrogeologically connected but separated for administrative purposes. The groundwater extracted from the Bunker Hill Basin, Rialto-Colton Basin, Riverside North, and Riverside South sub-basins is conveyed to RPU's potable or non-potable distribution system depending on the well location and local water quality. Raw groundwater from many of RPU's wells receives treatment prior to entering the potable distribution system. RPU has a total of 201 wells, of which 50 are potable wells; 14 are non-potable wells; 85 are monitoring wells; and 50 are not active (i.e., standby, out of service, abandoned, destroyed, or unknown) (City of Riverside, 2016). Additional sources of water available to RPU include groundwater from the Rialto-Colton Basin, recycled water from RWQCP, and imported water from WMWD through a connection at the Metropolitan Water District of Southern California's (MWD) Henry J. Mills Treatment Plant (Mills WTP).

Wastewater Facilities

As previously mentioned, the City of Riverside Public Works Department operates and maintains the Riverside Regional Water Quality Control Plant (a tertiary treatment center). The plant capacity has recently been expanded to 46 mgd. Tertiary-treated effluent from the RWQCP is discharged into the Santa Ana River. The RWQCP is required to discharge 15,250 AFY, adjusted for quality, to meet downstream obligations to OCWD established in the Orange County Judgment. A separate requirement, to discharge a total of 25,000 AFY, is included in the RWQCP ORDER WR 2008—0024 Conditionally Approving Wastewater Change Petition WW-0045. All wastewater from the RPU water service area is treated at the RWQCP. The volume of wastewater collected, treated, and discharged in 2015 was 20,024 AF, 29,130 AF and 28,930 AF, respectively (City of Riverside, 2016).

The project would result in the construction of a new K-6 Elementary school campus that would have the capacity to serve up to 800 students. This includes the development of three main buildings totaling 100,500 sq ft, approximately 240,870 sq ft of outdoor recreation space, and three parking lots. The new school campus will accommodate the existing students in the Casa Blanca Neighborhood where approximately 807 students within the proposed school boundary currently attend six different elementary schools. Due to the existing infrastructure in place and the planned capacity for service, the project will have less than significant impact.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than significant impact. The City of Riverside currently has sewage facilities available to serve the project and the site. Furthermore, projects that comply with NPDES requirements would not result in a significant impact related to changes in the quantity, rate, or quality of stormwater runoff

from the site. The project would not require or result in the construction of new stormwater drainage facilities or the expansion of existing facilities, and impacts would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than significant impact. RPU is the municipally-owned utility that provides potable, non-potable, and recycled water to retail customers primarily within the City of Riverside. As mentioned previously, a majority of the RPU's water are extracted groundwater from five groundwater basins. RPU has a total of 201 wells, of which 50 are potable wells; 14 are non-potable wells; 85 are monitoring wells; and 50 are not active. Additionally, RPU has the ability to purchase State Water Project water from WMWD through a connection at the Metropolitan Water District of Southern California (MWD) Henry J. Mills Water Treatment Plant (WTP). Up to 30 cubic feet per second (cfs) or 19.4 mgd of imported water can be purchased from WMD through an existing agreement and conveyed through existing infrastructure. Historically, imported water has only been purchased during the peak demand months, when needed (City of Riverside, 2016).

Table 1: City of Riverside Projected Water Supplies (AF)

Year	2020	2025	2030	2035	2040
Groundwater	88,773	93,773	96,573	96,573	96,573
Imported	21,700	21,700	21,700	21,700	21,700
Recycled Water	6,430	6,430	6,430	6,430	6,430
Total Citywide Water Supply	116,903	121,903	124,703	124,703	124,703
Notes: Numbers are in Acre Feet. Table adapted from Table 1-3: Actual and Planned Supplies from the 2015 Urban Water Management Plan, available: https://riversideca.gov/utilities/pdf/2016/RPU_2015_UWMP_June_Draft.pdf					

A forecast of the City of Riverside water supplies and water demands in normal, wet, and dry year conditions from 2020 through 2040 are listed in the City's most current UWMP 2015. The Tables 1-1, Actual and Projected Demands; 1-2, Expected Future Water Supply Projects or Programs; and 1-3, Actual and Planned Supplies shows the forecast for the City of Riverside water supplies and water demands in normal water year conditions from 2020 through 2040.

Based on the City's 2015 UWMP (which reported a baseline water use of 211 GPCD). Using the estimated 800 student capacity projected for the site, as mentioned above in Section (b) water demand for the project is approximately 168,800 gpcd, or approximately 189 AFY (City of Riverside, 2016).

The City's current and future water needs and projections are based on GIS data from the California Department of Water Resources and the Southern California Association of Governments, which develops regional forecasts of future population. The RPU service area is approximately 80 percent built out and contains about 15 percent vacant land available for development. RPU has identified

three categories of growth for ultimate build out: (1) development within the remaining vacant land, (2) increased density within areas already developed as defined in the City's General Plan 2025, and (3) water demand associated with growth and expansion at the University of California Riverside and California Baptist University. Therefore, the City's current and future water demands outlined in the 2015 UWMP took into consideration future development of the project site with residential uses and its associated population increase (City of Riverside, 2016).

Thus, despite the ongoing drought conditions in Southern California, RPU's conservation efforts and long-range planning have created a situation where RPU's identified supplies exceed the expected demands through 2040. As such, impacts on water supplies as a result of project development would be less than significant.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than significant impact. As discussed in Impact 17(b) above, the project would be served by the City of Riverside Public Works Department, which has adequate treatment capacity to serve the project's effluent. Impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than significant impact. As mentioned above, the Riverside Public Works Department collects trash from 70 percent of all households. The remaining portion of the City is collected by a private contractor. The project site is located within the Riverside Public Works Department service area. The private collector services approximately 20,000 customers in the La Sierra, University, and Orangecrest neighborhoods. All solid waste collected is tipped at the Robert A. Nelson Transfer Station, which is owned by the County of Riverside. The waste is then transferred to either the Badlands Landfill in Moreno Valley, the El Sobrante Landfill located east of Interstate 15 south of the City of Corona, or the Lamb Canyon Landfill located between the City of Beaumont and the City of San Jacinto for disposal (City of Riverside, 2012). Due to the construction of a new K-6 Elementary school campus with a capacity of up to 800 students this may increase solid waste on-site. However, the El Sobrante Landfill has a remaining capacity of 145,530,000 tons in-county (184,930,000 tons total), with estimated capacity to be reached in 2045 (CalRecycle, 2018). The Badlands Landfill has an overall remaining disposal capacity of approximately 15,748,799 cubic yards, with the expected capacity to be reached in 2022 (CalRecycle, 2018). The Lamb Canyon Landfill has a remaining disposal capacity of 19,242,950 cubic yards, which is estimated to be reached in 2029 (CalRecycle, 2018).

Furthermore, implementation of the General Plan is anticipated to increase solid waste collection and disposal capacity between 884 tons per day and 2,573 tons per day at buildout. The City currently contributes approximately 287 tons per day (2 percent) of solid waste the landfills are allowed to accept daily. By 2025, the City will contribute 14 percent of the amount of solid waste. With the remaining capacity of approximately 56.57 million tons as well as a 9 to 15-year lifespan (with potential for expansion to both Badlands Landfill and Lamb Canyon Landfill), the increase in

solid waste generated by the development under the proposed General Plan is not anticipated to exceed capacity of the landfills. In addition, Public Resource Code Section 41780 requires every city and county to divert from landfills at least 50 percent of waste generated within their jurisdiction, and the City has exceeded its required reduction in recent years (City of Riverside, 2012).

Therefore, the project is consistent with the growth assumptions in the City's General Plan and the impacts to the landfill capacity to accommodate the project's projected waste disposal needs is therefore less than significant.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than significant impact. All collection, transportation, and disposal of any solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. Therefore, there would be no associated impacts.

The project would utilize the existing solid waste services for the surrounding area of the project. Furthermore, consistent with provisions stated in the 2013 CalGreen Building Code, any hazardous materials collected on the project site during either construction or operation of the project would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. Therefore, impacts associated with solid waste statutes and regulations would be less than significant.

Mitigation Measures

No mitigation measures are required.

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

Environmental Evaluation

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

Potentially significant impact. Implementation of the project is not expected to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Impact 4a) above, the project area contains undeveloped land and may have the potential to adversely impact threatened, sensitive, or special species. A BRA will be prepared to identify sensitive species occurring and species with potential to occur within the project area. However, while unlikely, development activities have the potential to adversely impact threatened, sensitive, or special species. As such, the forthcoming DEIR will address this issue along with mitigation measures for development impacts.

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)?

Potentially significant impact. The project would result in potentially significant project-level impacts related to air quality, biological resources, greenhouse gas emissions, land use and planning, population and housing, transportation/traffic, cultural resources/tribal cultural resources, and noise.

All other impacts of the project were determined either to have no impact, or to be less than significant. Cumulatively, the project could potentially result in significant impacts combined with impacts of other current or probable future impacts; therefore, these issues will be discussed in the forthcoming DEIR.

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

Potentially significant impact. Previous section of this Initial Study reviewed the project's potential impacts related to air quality, biological resources, greenhouse gas emissions, land use and planning, population and housing, transportation/traffic, cultural resources/tribal cultural resources, noise, and other environmental issue areas. As concluded in these previous discussions, the project would result in significant environmental impacts. Therefore, the forthcoming DEIR will evaluate the potential for the project to directly or indirectly affect human beings.

Mitigation Measures

This will be addressed in the forthcoming DEIR.

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SECTION 3: REFERENCES

California Department of Conservation (CDC). 2018. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed August 9, 2018.

California Department of Conservation (CDC). 2018. Orange County Tsunami Inundation Map. Website: http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/Orange. Accessed August 9, 2018.

CalRecycle. 2018. Solid Waste Permit Information. Website: https://www.calrecycle.ca.gov/. Accessed August 29, 2018.

City of Riverside Fire Department. 2017. Standard of Cover. Website: https://riversideca.gov/fire/SOCDocs/SOC-Final.pdf. Accessed August 8, 2018.

City of Riverside. 2007. General Plan 2025 Education Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2009. Airport Master Plan. Website: https://www.riversideca.gov/sites/default/files/airport/2018/2011-RiversideAirportMasterPlan.pdf. Accessed August 14, 2018.

City of Riverside. 2011. Emergency Operations Plan-Base Plan. Website: https://www.riversideca.gov/fire/oem/publications-references.asp. Accessed August 1, 2018.

City of Riverside. 2012. General Plan 2025 Open Space and Conservation Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2012. General Plan 2025 Park & Recreation Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2015. Riverside Police Department. Website: https://www.riversideca.gov/rpd/default.asp. Accessed August 2, 2018.

City of Riverside. 2015. Riverside Public Library. Website: https://www.riversideca.gov/library/loc_marcy.asp. Accessed August 3, 2018.

City of Riverside. 2016. Urban Water Management Plan (UWMP). Website: https://riversideca.gov/utilities/pdf/2016/RPU_2015_UWMP_June_Draft.pdf. Accessed August 1, 2018.

City of Riverside. 2017. Final Environmental Impact Report. 2014–2012 Housing Element Update Housing Implementation Plan. Website: https://www.riversideca.gov/planning/housing-element.asp. Accessed August 13, 2018.

City of Riverside. 2018. General Plan 2025 Housing Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2018. General Plan 2025 Land Use and Urban Design Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2018. General Plan 2025 Public Facilities and Infrastructure Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2018. General Plan 2025 Public Safety Element. Website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp. Accessed August 1, 2018.

City of Riverside. 2018. Riverside Municipal Code. Website: https://www.riversideca.gov/municode/. Accessed August 6, 2018.

Department of Toxic Substances Control (DTSC). 2018. EnviroStor. Website: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=200+city+blvd%2C+orange+ca. Accessed August 20, 2018.

Envirosite Corporation. 2018. Envirosite Search. Website: http://www.envirositecorp.com/products/screen-research-data/envirosite-search/. Accessed August 9, 2018.

Federal Emergency Management Agency (FEMA). 2018. FEMA Flood Map Service Center. Website: https://msc.fema.gov/portal/home. Accessed August 20, 2018.

Riverside Unified School District (RUSD). 2017. Neighborhood Schools Study. Accessed September 11, 2018.

United States Department of Agriculture (USDA). 2017. Web Soil Survey. Website: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. Accessed August 13, 2018.

United States Forest Service. 2018. National Forest Locator Map. Website: https://www.fs.fed.us/ivm/. Accessed August 11, 2018.

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