

**FINAL MITIGATED NEGATIVE DECLARATION  
FOR THE CREEKSIDE TERRACE  
SLOPE PROTECTION PROJECT**

**UNIVERSITY OF CALIFORNIA, RIVERSIDE  
PROJECT No. 950503/950551  
SCH No. 2014081086**

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## Acronyms and Abbreviations

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AB	Assembly Bill
APE	area of potential effects
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
Basin	South Coast Air Basin
BAU	business as usual
BMPs	best management practices
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNPS	California Native Plant Society
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CUP	Conditional Use Permit
cy	cubic yards
dBA	A-weighted decibels
DBESP	Determination of Biologically Equivalent or Superior Preservation
EIR	environmental impact report
GHG	greenhouse gas
HMMP	Habitat Mitigation and Monitoring Program
IS/MND	initial study/mitigated negative declaration
L <sub>eq</sub>	equivalent sound level
LRDP	Long Range Development Plan
LRDP EIR	Long Range Development Plan Environmental Impact Report
LSA	Lake and Streambed Alteration
MLD	Most Likely Descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons

MSHCP	Multiple Species Habitat Conservation Plan
MSL	mean sea level
MT	metric tons
NAHC	Native American Heritage Commission
NO <sub>x</sub>	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
PM	particulate matter
PM10	particulate matter less than 10 microns in diameter
PM2.5	particulate matter less than 2.5 microns in diameter
PP	Programs and Practices
Project	Creekside Terrace Slope Protection Project
PS	Planning Strategy
RCRPOSD	Riverside County Regional Parks and Open Space District
ROC	reactive organic compounds
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SSC	Species of Special Concern
SKR	Stephens' Kangaroo Rat
SWPPP	Stormwater Pollution Prevention Plan
The Regents	Board of Regents of the University of California
University	University of California Riverside
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WoS	waters of the State
WoUS	waters of the U.S
WRC	Western Riverside County

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# Introduction

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The Creekside Terrace Slope Protection Project (herein referred to as “Project”) is located partially on property owned by the University of California, approximately 770 feet from the southern boundary of the west campus area of the Riverside campus, and partially located on property owned by others within the City of Riverside, Riverside County, California (Figure 1). The site is generally east of Chicago Avenue and south of Le Conte Drive. Specifically, the project site consists of a drainage feature approximately 0.20 mile north of the intersection of Chicago and Central Avenues (Figure 2), and includes a small, soft-bottom channel that enters the project boundary through a concrete culvert in the southeast and exits through a 6-foot concrete culvert in the northwest. The channel is bounded on either side by existing residential developments and vacant parcels zoned for residential development. A housing development terraced keystone retaining wall stands approximately 75 feet above the bed of the north side of the channel (Figure 3). The Project is within Section 31, Township 2 South, Range 4 West of the Riverside East U.S. Geological Survey (USGS) quadrangle dated 1967, photo revised 1980 (USGS 1967). The primary Assessor’s Parcel Number (APN) associated with the project site is 254-370-003.

## Project History

The Creekside Terrace residential development project was approved by the City of Riverside in 2004. The site was graded, and utility and street improvements, common facilities (clubhouse, pool, and playground), and 24 of the 78 approved residences were completed prior to acquisition of the property by the University of California, Riverside (University) in 2008. In 2012, the University addressed the uncompleted compensatory mitigation obligations required by the prior landowner pursuant to the previously issued California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement. Through cooperation with the CDFW, the University revised the required onsite mitigation to be addressed off site at a mitigation bank. Once the mitigation obligation was satisfied, the University was able to move forward with seeking approvals for the proposed Project.

An initial study/mitigated negative declaration (IS/MND) for the proposed Project was circulated in 2014, and comments were received from various agencies. However, the University put the Project on hold and the Final IS/MND, inclusive of response to comments, was not presented for approval to the Board of Regents of the University of California (The Regents), or its delegate. Delegates of The Regents include, but are not limited to, the University Chancellor. The Project has since become active again. Due to the lapse in time since the circulation of the 2014 IS/MND, the biological and cultural resources surveys were updated in 2018 and 2019, respectively. The proposed Project has not changed; however, it was determined that a portion of the soil removed from the channel would need to be hauled off site. This Final IS/MND discusses the changes in analysis from the Draft IS/MND that was circulated in 2014, including responding to the agencies’ comments.

Engineering evaluations conducted during the course of the property acquisition process identified remedial measures necessary to ensure long-term stability of the stream bank close to substantial keystone retaining walls along the northern side of the drainage (generally the western tract boundary).

During a pre-application meeting on October 9, 2019, with the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), Santa Ana Regional Water Quality Control Board (RWQCB), and CDFW (collectively, "the agencies"), the agencies asked the University to provide information on other options that were considered for the proposed Project. Remedial measures considered included a vertical concrete wall, sloped ungrouted rip-rap, and a sloped concrete wall. The slope with ungrouted rip-rap was selected as it would allow for some planting of vegetation. Based on the velocity in the channel, the rock rip-rap would be approximately one-quarter ton. The proposed design would serve as a permanent solution to the ongoing erosion problem and would provide long-term stability and protection of the retaining wall.

During project development, widening the channel was also considered to increase the channel's flood capacity; however, due to the lack of physical space within the access road area, this was determined infeasible. A minimum 10-foot setback is needed between the drainage channel and retaining wall so that the structural integrity of the wall footers is not compromised. Where the channel bends there is a larger physical area on the northern bank; however, widening the channel would only allow for a 5- to 5.5-foot setback, therefore compromising the integrity of the adjacent wall and homes. Although the portion of the access road east of the channel is narrower, the existing width is the minimum width allowable along that bank (because those soils have already stabilized); therefore, the option of widening the channel was not selected.

The proposed Project consists of stabilization improvements within a previously improved stream channel that lies partially within the Creekside Terrace boundaries, but primarily within the site of an adjacent, privately owned apartment development (Canyon Crest Village Apartment) south of the proposed Project (Figure 4). The apartment site owner entered into a legal agreement with the University granting access for due diligence inspections and construction of the proposed stabilization improvements. Other than pipe and outlet easements, no other easements occur over the drainage channel.

## **Relationship to the University of California, Riverside 2005 Long Range Development Plan and Environmental Impact Report**

The Creekside Terrace development is on University-owned property, but outside the contiguous University campus boundaries that define the planning area in the University of California, Riverside 2005 Long Range Development Plan (LRDP), as amended, and that frame the analysis in the associated program environmental impact report (LRDP EIR). On this basis, the environmental analysis for the Creekside Terrace Slope Protection Project may not be tiered from the LRDP EIR, as is typical with campus development and improvement projects.

Even though this analysis is not tiered from the LRDP EIR, it is University policy to extend established campus avoidance, minimization, and mitigation measures as contained in the adopted Mitigation Monitoring and Reporting Program (MMRP) for the LRDP EIR to relevant off-campus activities. Applicable LRDP EIR MMRP provisions are recognized throughout the impact discussion section of this document.

## Environmental Review and Approval

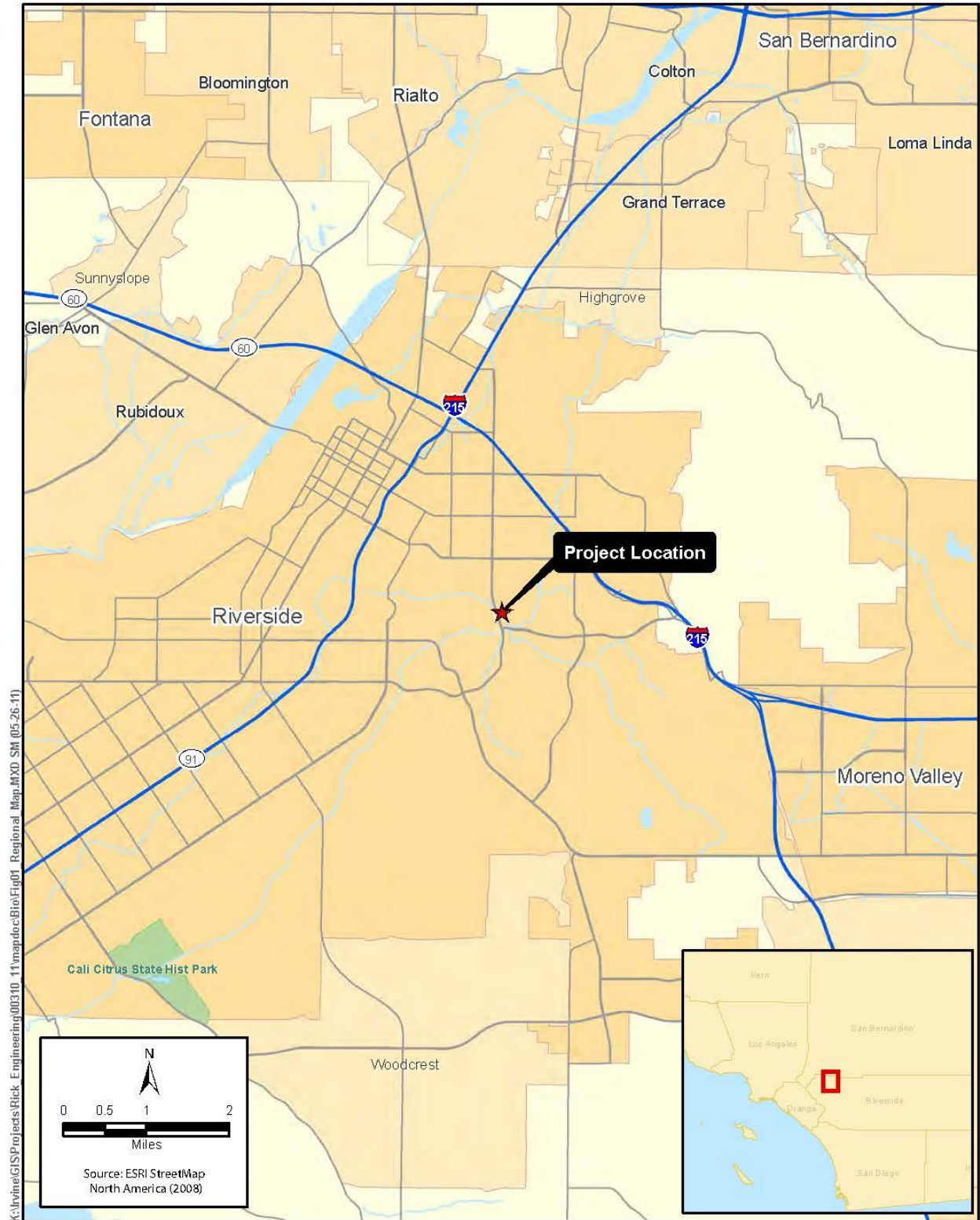
The University prepared a Draft IS/MND (State Clearinghouse number 2014081086) for the Project and circulated the document for a 30-day public review period commencing August 26, 2014, and ending September 25, 2014. The University used several methods to solicit comments on the Draft IS/MND from agencies, organizations, and members of the public. Notification included circulation through the Governor's Office of Planning and Research State Clearinghouse for distribution to state agencies and publication in the *Press-Enterprise* on September 2, 2014. In addition, the Draft IS/MND was posted with the Riverside County Clerk's office on August 25, 2014; on the University's Capital Programs-Architects & Engineers website (subsequently renamed the Planning, Design, & Construction website—<https://odc.ucr.edu/environmental-planning-ceqa>); and at the University Capital Planning (subsequently renamed the Planning, Design, & Construction) offices (1223 University Avenue, Suite 240 [formerly 200], Riverside, CA 92507). A notice of completion was mailed directly to various agencies and organizations and to individuals that had previously requested such notice, including 16 responsible and trustee agencies, a property owner, four individuals, and a Native American tribe. Three written comments were received during the public review period. Pursuant to Section 15074 of the California Environmental Quality Act (CEQA) Guidelines, the University has reviewed and considered all comments received on the Draft IS/MND, and has prepared responses to these comments, contained later on in this Final IS/MND.

In the course of completing this Final IS/MND, the following sections have been modified and new information has been added for further clarification: Air Quality, Biological Resources, Cultural Resources, Energy, Greenhouse Gas Emissions, Tribal Cultural Resources, and Wildfires. The project design and project objectives are consistent with the Project as previously proposed and would not result in greater impacts than previously documented as a result of the updated surveys/assessments. None of this information has revealed the existence of: (1) new, unavoidable or significant effects and mitigation measures or project revisions that must be added in order to reduce the effect to a less-than-significant level, or (2) a determination by the lead agency that the proposed mitigation measures or Project revisions will not reduce potential effects to a less-than-significant level and new measures or revisions must be required. Consequently, the University finds that the modifications and clarifications made to this Final IS/MND do not collectively or individually constitute a substantial revision in comparison to what was included in the Draft IS/MND within the meaning of State CEQA Guidelines §15073.5. Recirculation of this Final IS/MND, or any portion thereof, is therefore not required.

## Final Mitigated Negative Declaration

The University has prepared this Final IS/MND for the proposed Project in compliance with CEQA, the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and the University of California CEQA Handbook for consideration by The Regents or its delegate. The Final IS/MND incorporates the Draft IS/MND and presents all of the required contents as set forth in Section 15071 of the State CEQA Guidelines.

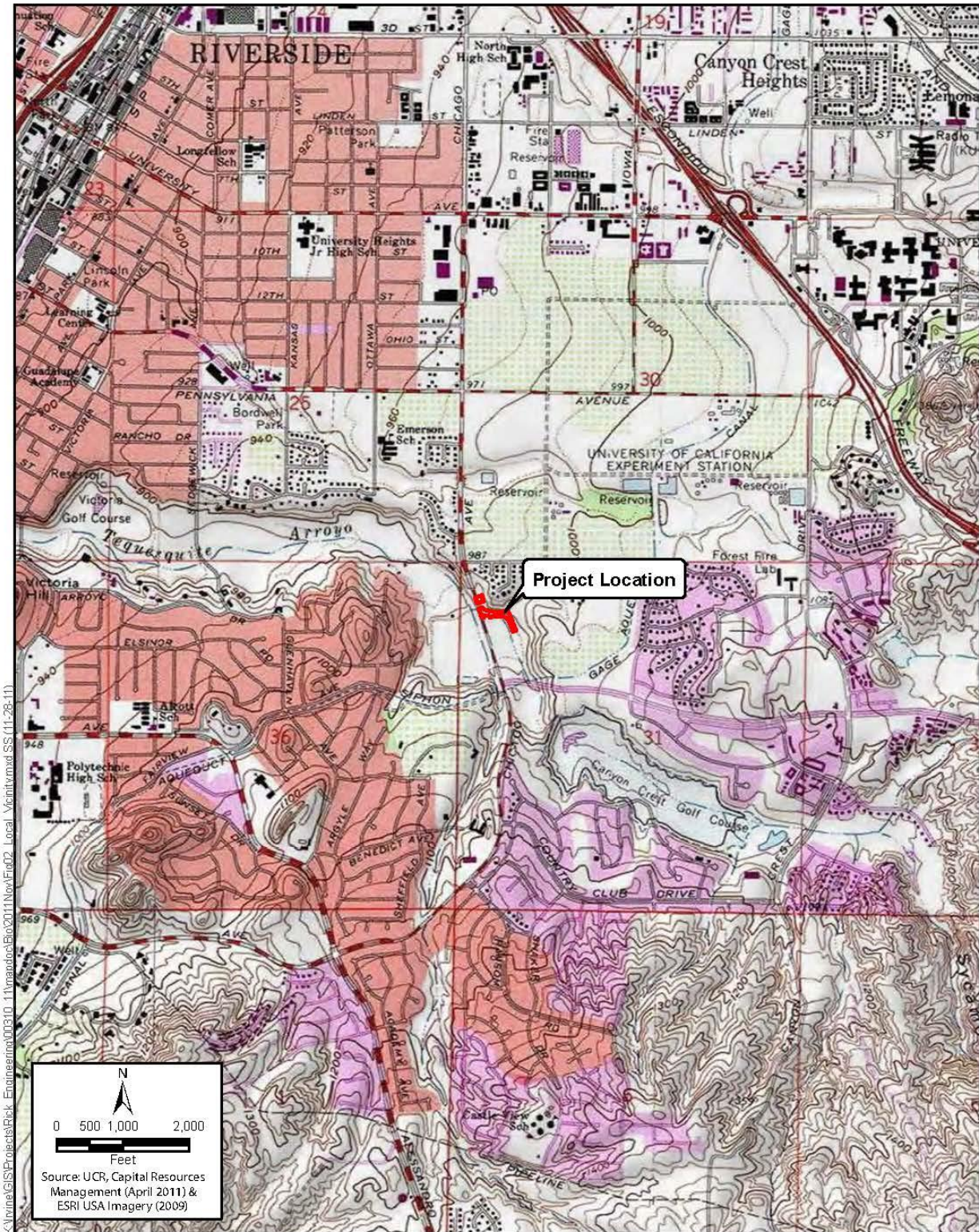
The intent of the Final IS/MND is to present comments pertaining to the analysis contained in the Draft IS/MND and to provide an opportunity for clarification, corrections, or minor revisions to the Draft IS/MND, as needed to address those comments. The Regents or its delegate will consider this Final IS/MND and the Draft IS/MND in the decision-making process regarding approval of project design and construction.



**Figure 1**  
**Regional Vicinity Map**  
**Creekside Terrace Slope Protection Project**







**Figure 2**  
**Vicinity/USGS Topographic Map**  
**Creekside Terrace Slope Protection Project**

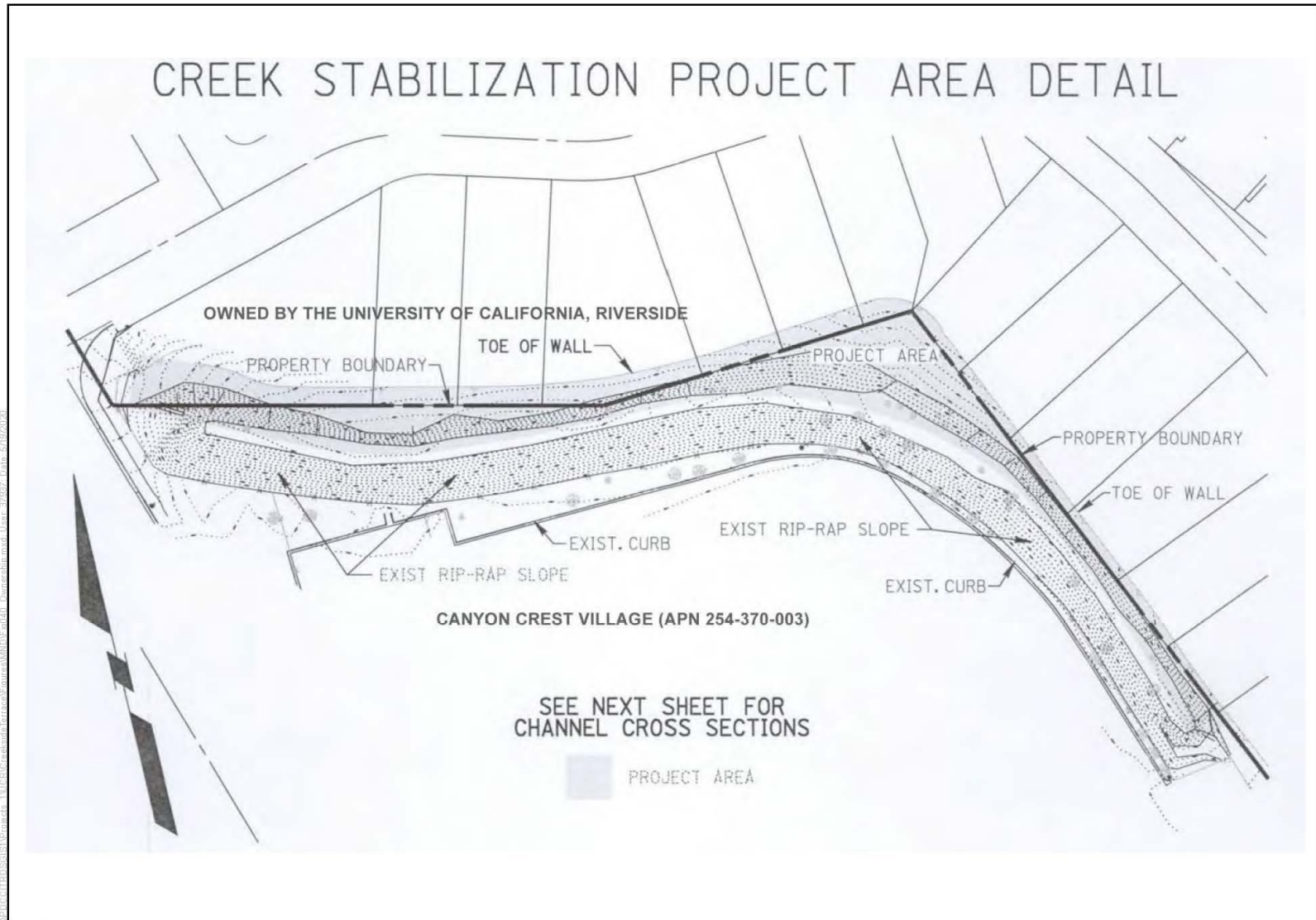






**Figure 3**  
**Project Site**  
**Creekside Terrace Slope Protection Project**





**Figure 4**  
**Property Ownership**  
**Creekside Terrace Slope Protection Project**



## Project Location

The proposed Project is located within the City of Riverside, Riverside County, California, approximately 0.20 mile north of Central Avenue and east of Chicago Avenue in the Canyon Crest area of the City of Riverside, California, within and adjacent to an off-campus residential development known as Creekside Terrace (Tract 31671). Figure 1 identifies the project location in the regional context.

## Project Site and Environmental Setting

The drainage channel is a previously improved remnant feature confined by two major roads, an established apartment development, and a residential subdivision. The surrounding area to the north, south, and east is characterized by residential development. Chicago Avenue, the City of Riverside's Andulka Park, and further residential development are situated to the west. This includes land owned by the University and property belonging to the adjacent apartment complex. The riparian area within the proposed project site lies primarily within the legal parcels associated with the apartments bordering the south and west banks.

## Project Objectives

The proposed Project intends to stabilize the stream bank in accordance with the recommendations of the University's consulting engineer, based upon accepted design standards.

The proposed finished conditions are intended to retain the existing hydrologic functions and values of the impacted drainage feature and to maximize post-construction biological functions for the north<sup>1</sup> channel bank.

## Project Description

The proposed Project involves stabilization of the north bank of an existing drainage channel adjacent to the University-owned Creekside Terrace residential development (Tract 31671). Specifically, the channel would be reshaped and rip-rap would be placed on the north bank to match existing conditions on the south bank. The proposed improvements would require the removal of all vegetation on the north bank as well as the channel bottom. Proposed ongoing activity would maintain a vegetation-free condition on the north bank to ensure channel flow capacity is maintained. Existing vegetation on the south bank would remain in place, and native vegetation

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<sup>1</sup> The drainage channel includes a bend within the project limits, with a portion of the channel oriented generally north/south and a portion oriented generally east/west. For this report, the bank adjacent to the University-owned property is referred to as the *north bank*, while the bank adjacent to the privately owned apartment site is referred to as the *south bank*.



would be allowed to naturally reestablish within the drainage channel bank on the south side. In addition to clearing vegetation from the work limits, the proposed improvements would include removal of non-native plants throughout the riparian area.

The proposed design would excavate the channel to expose the lower extent of the existing rip-rap cover on the south bank.<sup>2</sup> The site would be accessed via a gate at Chicago Avenue. The proposed staging area for the Project is located on an undeveloped residential lot at the corner of Donalisa Avenue and Oroblanco Avenue. Work would be conducted from the existing access path along the north side of the channel. A series of 34 small-diameter drains extending from the north bank would be protected in place (these are the outlets for the subdrain system for the Creekside Terrace retaining walls). Bottom sediments would be stockpiled for replacement in the reconstructed drainage channel. The excavated area would be graded to establish a v-channel with uniform slope face extending between the existing top of the bank on the Creekside Terrace side of the channel and the existing toe of rip-rap cover on the opposite bank. UngROUTED rip-rap with a filter fabric underlay would be placed over the newly graded slope and the subdrain system outlet pipes would be trimmed so that they do not extend beyond the rock surface. A portion of the stockpiled sediments would be replaced within the channel bottom. This differs from the Project analyzed in the Draft IS/MND circulated in 2014, where it was proposed that all the soil would be replaced in the channel bottom. It has since been determined that a portion of the soil removed from the channel would need to be hauled off site. However, this change would not result in new significant impacts. Finished surface elevations would be established to create a functional flow regime between the existing culverts at each end of the Project. Rip-rap pads (5 feet wide and 10 feet long) would be established at the existing inlet and outlet for energy dissipation.

The subject drainage channel flows year-round; therefore, diversion would be necessary during construction. Considering the nature of the tributary flows and the constrained conditions along the work limits, feasible diversion methods are limited. The entire work limits would need to be dewatered for the duration of construction. This would require a piped diversion from the existing culvert outlet at the upstream end of the work limits to the existing culvert inlet at the downstream end of the work limits. The diversion pipe is expected to be placed along the south bank or perhaps within landscaped areas within the adjacent apartment development. Considering the relative grade between the culvert outlet at the upstream end of the work limits and the likely bypass pipeline location, pumping is expected to be required. A portable generator may be required as a power source.

Construction is anticipated to last approximately 120 days. The proposed finished conditions are intended to retain the existing hydrologic functions and values of the impacted drainage feature and to maximize post-construction biological functions.

Project improvement plans are presented in Appendix A.

## Summary of Impacts

The review and analysis contained herein recognizes compliance with established local, state, and federal regulations and University standard procedures as the basis for a determination that impacts are less than significant for aesthetics, agricultural and forestry resources, air quality,

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<sup>2</sup> The southern slope was stabilized as part of the apartment development, approximately in 1983.

cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, transportation/traffic, tribal cultural resources, and wildfire. No project impacts are anticipated for mineral resources, population and housing, public services, recreation, and energy. The environmental review and analysis contained herein indicates that the proposed Project presents the potential for project-level environmental impacts related to biological resources, hydrology and water quality, land use and planning, noise, and utilities and service systems. Project impacts are summarized below.

## Project-Level Impacts Requiring Mitigation Measures

### Biological Resources

The proposed Project would impact a previously channelized stream feature that meets jurisdictional criteria under state and federal programs governing streams and riparian resources. The riparian habitat within the stream area is suitable habitat for the federally listed as endangered Least Bell's vireo, although focused surveys determined the species' habitat to be absent. The riparian habitat within the stream area is also suitable habitat for numerous species of birds protected under state and federal law. Collectively, the proposed improvements and post-construction treatments are judged to provide a finished condition of comparable, or better, biological function.

The proposed Project would result in permanent impacts, including all direct impacts associated with movement of soils within the channel and its banks, installation of rip-rap, filter fabric underlay, and any permanent features being installed for the Project to be built. Temporary impacts include staging areas or areas used for equipment access, vehicles, or personnel.

Even though the Project would not be within the contiguous University campus boundaries that define the planning area in the LRDP, the following project-specific mitigation measures provide a mechanism for implementation of the LRDP EIR MMRP measures below to reduce environmental impacts:

- Planning Strategy Conservation 1 (protect natural resources),
- Planning Strategy Conservation 2 (development to minimize site disturbance),
- Programs and Practices 4.4-1(a) (reduce impacts on Natural Open Spaces Reserve area, also listed as PP 4.1-2(c)),
- Programs and Practices 4.4-1(b) (reduce disturbance to Natural Open Spaces Reserve area),
- Programs and Practices 4.4-2(a) (avoid impacts on riparian and wetland habitats or evaluate),
- Mitigation Measure 4.4-3(a) (habitat regulated by Clean Water Act)
- Mitigation Measure 4.4-3(b) (habitat regulated by Clean Water Act),
- Mitigation Measure 4.4-3(c) (wetland creation or enhancement),
- Mitigation Measure 4.4-4(a) (nesting special status avian species surveys during construction), and
- Mitigation Measure 4.4-4(b) (delay construction if active nests for avian species are found).

The following measures also establish means to verify successful implementation of the riparian habitat restoration aspects of the proposed improvements as characterized in the project description, as they may be adjusted through the required state and federal permit processes. With implementation of these measures, potential impacts on biological resources would be less than significant.

**BIO 1 – Minimize Direct Impacts on Riparian Habitat.** Prior to initiation of ground disturbance activities, disturbance limits shall be clearly defined at the construction site and demarcated on site plans (refer to Appendix A). Access and staging shall be limited to the existing gated entrance from Chicago Avenue, the existing maintenance path along the north bank, or paved/landscaped areas within the adjoining apartment development. Protection measures for riparian habitat on the south bank will be established in consultation with the biological monitor.

**BIO 2 – Conduct Biological Monitoring During Construction.** A qualified biologist shall monitor construction for compliance with best management practices outlined in LRDP Programs and Practices (PP) 4.4-1(b) (reduce disturbance to Natural Open Space areas). Such measures may include minimizing vehicular access and parking in undisturbed areas or drainages; avoiding removal of native shrub or disturbance of drainages, except where necessary; avoiding overwatering; and not harassing wildlife species. Considering the nature of the work area and proximity of protected resources to the work limits, monitoring shall be continuous during the initial preparation and excavation phases. Once work transitions to placement of rip-rap, the frequency of monitoring may be reduced, as recommended by the monitoring biologist (taking into consideration the nature of the proposed work and time of year).

**BIO 3 – Provide a Worker Environmental Awareness Training.** To ensure compliance with best management practices identified in LRDP PP 4.4-1(b) (reduce disturbance to Natural Open Space areas), a biologist shall provide to all construction personnel a worker environmental awareness training prior to personnel initiating ground disturbance activities. The training will include a discussion of the importance of the stream and associated riparian habitat, areas to be avoided (including during parking and staging of equipment), a discussion of native wildlife with the potential to occur, and education on not harassing native wildlife.

**BIO 4 – Remove Exotic Plant Species.** During the construction phase, exotic plant species shall be removed from the riparian zone, including the protected south bank area. Exotic plant material shall be properly handled to prevent sprouting or regrowth. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants/seed and inspected to reduce the potential of spreading noxious weeds before mobilizing to the work area and before leaving the work area. Cleaning of equipment shall occur outside the work area where the wastewater stream is contained so as to prevent any invasive plant material from entering natural areas.

**BIO 5 – Monitor Revegetation.** As part of the project design, a one-time removal of exotic plants would occur on the southern bank, and native riparian species would be planted throughout the channel. No ongoing maintenance of vegetation within the channel is proposed. Because the channel enhancement is being done as part of the project design, it is not subject to performance criteria; however, it would provide a net benefit to the channel. Compensatory mitigation is addressed in BIO 6.

BIO 6 – Purchase into a Mitigation Bank or In-Lieu Fee Program as Compensatory Mitigation. BIO 6 in the Draft IS/MND circulated in 2014 included language pertaining to the outstanding mitigation the previous landowner left unaddressed. In 2012, the University addressed the uncompleted compensatory mitigation obligations required by the prior landowner pursuant to the previously issued CDFW Streambed Alteration Agreement. Through cooperation with the CDFW, the University revised the required onsite mitigation to be addressed off site at a mitigation bank.

BIO 6 now only pertains to the compensatory mitigation associated with the proposed Project. Compensation for impacts on non-wetland waters of the U.S. (WoUS) and CDFW streambeds would occur at a 1:1 ratio, and impacts on wetland WoUS and CDFW riparian habitat would be at a 2:1 ratio primarily through offsite mitigation at an agency-approved mitigation bank or in-lieu fee program. The final credit purchase requirement will be determined through the regulatory permit process with USACE, RWQCB, and CDFW.

BIO 7 – Pre-construction Nesting Bird Surveys. Prior to the onset of construction activities that would result in vegetation removal between February 15 and September 15 or as early as January for raptors, nesting bird surveys shall be conducted by a qualified biologist no more than 3 days prior to initiation of ground disturbance activities. The survey area shall include the direct disturbance limits and a 250-foot buffer zone or as determined through project-related permits. If nesting birds are encountered within the survey area, the qualified biologist will flag an avoidance buffer zone around the nest. No ground disturbance activities shall occur within the avoidance buffer zone until the qualified biologist has determined that the nest is no longer active and the young are not dependent on the nest.

BIO 8 – Preconstruction Roosting Bat Assessment and Survey. To ensure potential impacts on bat species are reduced, the following measure will be implemented:

- a) Prior to project initiation (e.g., staging, clearing/grubbing, grading), a daytime preliminary assessment will be conducted by a qualified bat biologist to reexamine areas suitable for bat use (i.e., palm trees). If bat sign is observed, then preconstruction roosting bat surveys will be conducted to confirm whether the areas with suitable habitat identified during the preliminary assessment are utilized by bats for day roosting and/or night roosting and to ascertain the level of bat foraging and roosting activity at each of these locations.
- b) If preconstruction roosting bat surveys are warranted, prior to tree removal or trimming, large trees and snags will be examined by a qualified bat biologist to ensure that no roosting bats are present. Palm frond trimming, if necessary, should be conducted outside the maternity season (i.e., April 15–August 31) to avoid potential mortality of flightless young.
- c) If a maternity site is identified during the preconstruction roosting bat surveys, then no construction activities at that location will be allowed during the maternity season (i.e., April 15–August 31) unless a qualified bat biologist has determined the young have been weaned. If a maternity site is present, and it is anticipated that construction activities cannot be completed outside of the maternity season, bat eviction and exclusion at maternity roost sites will be completed by a qualified bat biologist either as soon as possible after the young have been weaned, outside of the maternity season, or as otherwise approved by the qualified bat biologist in coordination with the CDFW.

The proposed Project would permanently affect 0.21 acre (652 linear feet) of federal non-wetland WoUS and waters of the State (WoS) and 0.01 acre of wetland waters jurisdictional under USACE and RWQCB. Refer to Table 3 in Section IV, *Biological Resources*, for a summary of impacts on USACE and RWQCB jurisdictional aquatic resources.

In addition, the proposed Project would permanently affect 0.06 acre (240 linear feet) of CDFW state streambed and 0.31 acre of CDFW riparian habitat. Temporary impacts would occur on 0.02 acre (296 linear feet) of CDFW state streambed and 0.04 acre of CDFW riparian habitat. Refer to Table 2 in Section IV, *Biological Resources*, for a summary of impacts on CDFW jurisdictional aquatic resources.

Compensation for the direct permanent impacts on USACE/RWQCB wetland and non-wetland WoUS and CDFW streambed and associated riparian habitat will be necessary. As part of the project design, a one-time removal of exotic plants would occur on the southern bank and native riparian species would be planted throughout the channel. No ongoing maintenance of vegetation within the channel is proposed. Because the channel enhancement is being done as part of the project design, it is not subject to performance criteria; however, it would provide a net benefit to the channel. The compensation for impacts on non-wetland WoUS and CDFW streambeds would occur at a 1:1 ratio, and impacts on wetland WoUS and CDFW riparian habitat would be at a 2:1 ratio primarily through offsite mitigation at an agency-approved in-lieu fee program. The University would coordinate with USACE, RWQCB, and CDFW to finalize the mitigation requirements. This compensation would ensure no-net-loss of wetlands and that impacts are less than significant under CEQA.

The project site is within the plan areas of two regional conservation efforts—the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the Long-term Habitat Conservation Plan for the Stephens' Kangaroo Rat (SKR). Implementation of the SKR plan is at a stage in which all conservation lands have been acquired. For projects outside the reserve areas, plan conformance is achieved through payment of mitigation fees that support ongoing management of the reserve lands. The campus is not within an SKR reserve and the University is exempt from payment of SKR mitigation fees.

Under the MSHCP, the stream feature and associated riparian habitat are subject to plan provisions for riverine and riparian resources (Volume I, Section 6.1.2). For riparian habitat, the plan requires consideration of suitability for three protected bird species: least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. The habitat at the project site is not suitable for southwestern willow flycatcher and western yellow-billed cuckoo, and least Bell's vireo are assumed to be absent on the basis of negative focused surveys.

The MSHCP stipulates that riparian habitat is to be avoided to the greatest extent practicable. If riparian habitat is affected, mitigation must demonstrate equal or superior functions and values. The proposed stabilization improvements would affect a highly constrained stream feature that is removed from MSHCP reserve areas. **Mitigation Measures BIO 1 through BIO 4 and BIO 7** provide for implementation of various measures during construction to ensure individual least Bell's vireos are not impacted and to ensure that impacts on the stream and riparian habitat are minimized. **Mitigation Measure BIO 6** provides for purchase into a mitigation bank or in-lieu fee program to ensure that riverine and riparian habitat functions and values are equivalent or superior to pre-project conditions. With implementation of **Mitigation Measures BIO 1 through BIO 6**, proposed activities and improvements would not conflict with MSHCP provisions for riparian and riverine resources, and a less-than-significant impact would result.

## Cultural Resources

A cultural resources survey, Native American consultation, and project-specific historical research did not reveal the presence of any known cultural resources within the project limits. There are no standing historic structures within or near the project limits. Considering the existing setting, prior survey results, and prior disturbances, there is no reasonable potential for the proposed improvements to cause a substantial adverse change in the significance of an historical resource. However, the following mitigation measure provides a means to ensure that the potential impacts on unanticipated and unknown archaeological resources that may exist and be encountered during construction would be avoided or minimized and impacts in this regard would be less than significant.

**MM CUL 1.** If an archaeological resource is discovered during construction, all soil-disturbing work within 100 feet of the find shall cease and the University Representative shall contact a qualified Archaeologist meeting the Secretary of the Interior standards within 24 hours of discovery to inspect the site. If a resource within the project area of potential effect is determined to qualify as a unique archaeological resource (as defined by the California Environmental Quality Act [CEQA]), the University shall devote adequate time and funding to determine if it is feasible, through project design measures, to preserve the find intact. If it cannot be preserved, the University shall retain a qualified non-University Archaeologist to design and implement a treatment plan, prepare a report, and salvage the material, as appropriate. Any important artifacts recovered during monitoring shall be cleaned, catalogued, and analyzed, with the results presented in a report of findings that meets professional standards.

- a) If significant Native American cultural resources are discovered, as determined by the consulting Archaeologist for which a Treatment Plan must be prepared, the contractor or his Archaeologist shall immediately contact the University Representative. The University Representative shall contact the appropriate tribal representatives.
- b) If requested by tribal representatives, the University, the contractor, or the project Archaeologist shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, return of artifacts to tribe).
- c) In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find shall halt immediately and the area of the find shall be protected. The University shall immediately notify the Riverside County Coroner of the find and comply with the provisions of California Health and Safety Code Section 7050.5.

## Hydrology and Water Quality

Temporary diversion of the existing stream would be required for the approximately 120-day construction period. Considering the proposed work limits, the constrained nature of the stream, and the proximity of developed private property and public improvements, the options for diversion are limited. It is expected that diversion would involve a contained method, such as pipes or hoses, extending from the existing inlet to the existing outlet and placed along the south bank or within adjacent landscaped areas.

With the assumed contained diversion, there is potential for flooding due to an upset condition involving a breach in the pipe or hose. An approximately 0.92-acre area that contains the existing stream channel has been zoned as Watercourse by the City of Riverside. This roughly corresponds to the fenced area between the apartment site parking lot and the Creekside Terrace development. As long as the potential overflow boundaries are confined to the existing Watercourse-zoned area, there would be no change in anticipated inundation boundaries and, therefore, no potential for significant impacts due to flooding from the temporary change in the stream course. **The following mitigation measure provides a means to ensure that the temporary diversion does not result in flooding on or off site, and impacts in this regard would be less than significant.**

HYD 1 – Temporary Diversion Design. The temporary diversion works shall be designed such that the inundation limits (including those resulting from an inadvertent breach of flows contained in a pipe or hose) are confined to the existing Watercourse overlay zone boundary. The University shall ensure that construction contracts provide sufficient detail for the design and method of temporary diversion.

## Land Use and Planning

Potential impacts in regard to land use and planning relate to project consistency with the adopted regional conservation plans. The discussion of Biological Resources above explains that, with implementation of recommended **Mitigation Measures BIO 1 through BIO 8**, the proposed Project would not conflict with applicable provisions of the two adopted habitat conservation plans that apply within the project area. Therefore, a less-than-significant impact would result with implementation of mitigation.

## Noise

The project-specific noise analysis evaluated potential construction-period noise from operation of heavy equipment and of a generator and pump for the temporary stream diversion. Predicted noise levels at the nearest residential receptors exceed applicable standards established under the City of Riverside Municipal Code. For all noise sources except the generator/pump for the stream diversion, construction activity may be limited to adhere to the provisions of Riverside Municipal Code Section 7.35.10(b)(5). Recommended **Mitigation Measure NOI 1** provides a means to enforce this restriction and, with implementation of this measure, impacts in this regard would be less than significant. This measure is more restrictive than the construction hour limits typically applied to campus projects under LRDP EIR MMRP PP 4.10-2 (hour limits for construction activities). Generator and/or pump operations for streamflow diversion would be continuous, and it would not be feasible to conform to the hour limitations under **Mitigation Measure NOI 1**. Recommended **Mitigation Measure NOI 2** requires implementation of attenuation features to achieve noise levels not exceeding applicable Riverside Municipal Code standards. Compliance with LRDP EIR MMRP PP 4.10-2, PP 4.10-7(b), PP 4.10-7(c), and PP 4.10-8 are also included as Campus standard practices for minimizing construction noise. With implementation of these measures, impacts in this regard would be less than significant.

NOI 1 – Restrict Construction Hours. The University will ensure that the construction contractor limits construction activities, where feasible, to occurring between 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. and 5:00 p.m. on Saturday. An exception is made as to operation of a generator and/or pump for temporary stream diversion, subject to Mitigation Measure NOI 2, below.

NOI 2 – Attenuation for diversion pump and generator. The University will ensure construction contracts specify that any generator or diversion pump will be equipped with mufflers, silencers, shrouds, shields, or other noise-reducing features so as to achieve a maximum exterior operational noise level not exceeding 45 A-weighted decibels (dBA) (one-hour equivalent sound level [L<sub>eq</sub>]) at exterior locations of nearby noise-sensitive land uses. Measures that can be implemented to achieve this include but are not limited to:

- enclosing equipment in solid wall structures,
- using low-noise equipment, and
- placing sound barriers (earth berms or constructed barriers) around equipment.

## Tribal Cultural Resources

Based on the results of the records search (Appendix E), Native American scoping, and field survey, specific cultural resources (prehistoric or historic) were not identified in the project APE. No specific resource information was provided by tribal contacts for the project APE, and no impact on historical resources under CEQA would occur. However, the discovery of unanticipated cultural resources and/or human remains is always a possibility during ground-disturbing activities.

**Mitigation Measure CUL 1** has been identified and included to reduce any potential impacts to unanticipated archaeological resources should they be encountered during construction. Impacts would be less than significant.

## Utilities and Service Systems

Potential impacts on utilities and service systems relate to the function of the subject stream feature as a component of the City of Riverside storm water drainage system. The proposed bank stabilization improvements would temporarily disturb the existing stream channel and associated riparian vegetation, which presents the potential for significant environmental effects related to biological resources, temporary flooding, and noise, as noted above. **Mitigation Measures BIO 1 through BIO 8, HYD 1, NOI 1, and NOI 2** have been identified to reduce these potential impacts to below a level of significance. **With implementation of the recommended LRDP EIR and campus standard practices noted above, the potential environmental effects of the proposed storm water facility improvements would be less than significant.**



# Environmental Checklist

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## I. Project Information

- |   |   |
|---|---|
| <b>1. Project Title:</b>  | Creekside Terrace Slope Protection Project<br>University Project Number 950503/950551   |
| <b>2. Lead Agency Name and Address:</b>   | University of California, Riverside<br>Planning, Design & Construction<br>1223 University Avenue, Suite 240<br>Riverside, CA 92507                            |
| <b>3. Contact Person and Phone Number:</b>  | Jaime Engbrecht<br>Planner<br>(951) 827-2421  |
| <b>4. Project Location:</b>   | Section 31, Township 2 South, Range 4 West of the<br>Riverside East USGS quadrangle; northeast of<br>Central and Chicago Avenues in the City of<br>Riverside. |
| <b>5. Project Sponsor's Name and Address:</b>   | See items 2 and 3, above  |
| <b>6. Custodian of the administrative record for this project (if different from response to item 3 above.):</b>  | See item 3, above   |
| <b>7. Identification of previous EIRs relied upon for tiering purposes (including all applicable LRDP and project EIRs and address where a copy is available for inspection.)</b> | 2005 LRDP EIR and 2005 LRDP MMRP, as amended<br>incorporated by reference   |

## II. Project Location and Description

- Description of Project:** (Describe the whole action involved, including but not limited to physical characteristics, site, later phases of the project, and any secondary, support, or off-site features necessary for its implementation and site selection process. Attach additional sheets if necessary.)

The proposed Project is located within Section 31, Township 2 South, Range 4 West of the Riverside East USGS quadrangle dated 1967, photorevised 1980 (USGS 1967). The project site is approximately 940 feet above mean sea level (MSL) as depicted on the Riverside

East USGS topographic map. The coordinates (decimal degrees) for the project site are latitude 33.958882° and longitude 117.346076°. The primary APN associated with the project site is 254-370-003.

The proposed Project involves stabilization of the north bank of an existing drainage channel adjacent to the University-owned Creekside Terrace residential development (Tract 31671). See *Project Description* in the preceding *Summary* section for a complete description.

## **2. Project Objectives:**

The proposed Project is intended to stabilize the existing stream bank in accordance with the recommendations of the University's consulting engineer based upon accepted design standards. Specifically, ungrouted rip-rap would be placed on the north bank to match existing conditions on the south bank.<sup>3</sup> The proposed design would excavate the channel to expose the lower extent of the existing rip-rap cover on the south bank. The excavated area would be graded to establish a v-channel with uniform slope face extending between the existing top of the bank on the northern bank and the existing toe of rip-rap cover on the southern bank. A portion of the stockpiled sediments would be replaced within the channel bottom over a filter fabric, and finished surface elevations would be established to create a functional flow regime between the existing culverts at each end of the Project.

The proposed finished conditions are intended to retain the existing hydrologic functions and values of the impacted drainage feature and to maximize post-construction biological functions for the north channel bank.

## **3. Surrounding land uses and environmental setting (Briefly describe the project's surroundings):**

The project site is within a developed area of the City of Riverside. Existing land uses include the Creekside Terrace residential community on the north side; vacant, undeveloped residential parcels immediately on the east side; Chicago Avenue, Andulka Park, and residential development to the west; and Canyon Crest Village Apartment followed by Central Avenue to the south. The project site lies between these two residential developments. Disturbances in the project boundary include small amounts of trash, human encroachment, high density of invasive plant species, and domestic animals. A large aquatic feature within the project boundary is a soft-bottom, perennial channel containing a mix of riparian and nonnative vegetation.

## **4. Discretionary approval authority and other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)**

Primary approval authority resides with The Regents of University of California or its delegate (the University).

Approvals may also be required from the City of Riverside Public Works and/or Planning departments (the campus has been in contact with City representatives, and determinations as to any required approvals by the City of Riverside are pending).

The proposed construction would also be subject to approvals from CDFW, the RWQCB, and USACE under various programs governing work within jurisdictional streams.

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<sup>3</sup> The drainage channel includes a bend within the project limits, with a portion of the channel oriented generally north/south and a portion oriented generally east/west. For this report, the bank adjacent to the University-owned property is referred to as the north bank, while the bank adjacent to the privately-owned apartment site is referred to as the south bank.

Applications were submitted to each agency in 2012 (USACE file number 2012-004340JEM, Regional Board File Number 332012-01, and CDFW reference number 1600-2005-0093-R6); however, they will be resubmitted for processing.

**5. Consistency with the LRDP: (Describe the project's consistency with: the scope of development projected in the LRDP; campus and community population levels projected in the LRDP; LRDP designation for this type of project; and applicable policy objectives and goals of the LRDP).**

The Creekside Terrace development is located off-campus, outside of the LRDP planning area. While the LRDP does not specifically address this location, the analysis in this document takes into account LRDP planning strategies, programs and practices, and mitigation measures that are applicable to resources potentially impacted by the proposed Project.

### III. Environmental Factors Potentially Affected

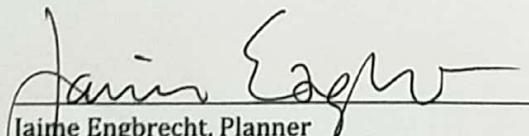
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

### IV. Determination

On the basis of this initial evaluation that follows:

- I find that the proposed project WOULD 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 that will avoid or reduce any potential significant effects to a less than significant level. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

  
 Jaime Engbrecht, Planner  
 University of California, Riverside  
 Planning, Design & Construction

2.12.2021  
 Date

## V. Evaluation of Environmental Impacts

During the completion of the environmental evaluation, the lead agency relied on the following categories of impact noted as column headings in the initial study checklist:

- A) “Potentially Significant Impact” is appropriate if there is substantial evidence that the project’s effect may be significant. If there are one or more “Potentially Significant Impacts” a Project EIR will be prepared.
- B) “Less Than Significant With Mitigation Incorporated” applies where the incorporation of project-specific mitigation measures will reduce an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” All mitigation measures must be described, including a brief explanation of how the measures reduce the effect to a less-than-significant level.
- C) “Less Than Significant Impact” applies where the Project will not result in any significant effects. The project impact is less than significant without the incorporation of mitigation.
- D) “No Impact” applies where the Project would not result in any impact in the category or the category does not apply. “No Impact” answers need to be adequately supported by the information sources cited, which show that the impact does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

# I. Aesthetics

<b>I. Aesthetics</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>Would the project:</b>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The project site is situated at the interface of an existing apartment development and an existing single-family residential subdivision, at the bottom of an approximately 40-foot bluff. The existing terrain and the apartment buildings limit public views of the project site to only a very limited window along Chicago Avenue. While the proposed improvements would remove mature riparian vegetation and remove soil from the channel within the work limits, the existing mature vegetation on the south bank would be retained, and riparian vegetation would be allowed to reestablish within the channel bottom. Physical conditions at the project site, together with the nature of the proposed improvements, preclude the potential for substantial adverse effects upon scenic vistas. Potential impacts would be less than significant.</p>				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>While the project site is not within the viewshed of a designated or eligible state scenic highway, Central Avenue between Chicago Avenue and Canyon Crest Drive is designated as a Scenic Boulevard in the City of Riverside General Plan, Circulation and Community Mobility Element (Figure CCM-4, Master Plan of Roadways). The proposed Project would remove mature trees, vegetation, and soil within the stream channel. Views of the project limits from Central Avenue would be blocked by existing topography and the apartment development. Since the improvement area is not visible from Central Avenue and would be removed from a designated or eligible state scenic highway, the proposed Project does not present the potential for significant impacts upon scenic roadways. Potential impacts would be less than significant.</p>				
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The project site is characterized by a remnant natural drainage feature isolated within a residential area within the City of Riverside. The riparian zone is visible from parking areas within the adjacent apartment development and from a very limited window along Chicago Avenue. The visual character of the project area and its surroundings could be affected in the short term by construction activity, including excavation, stockpiling, and presence of construction materials and equipment. Such conditions would cease once construction is complete and are not considered to represent a substantial degradation of the visual character of the site or its surroundings.</p> <p>The proposed improvements would require removal of all vegetation on the north bank of the channel, as well as the channel bottom. The existing mature vegetation on the south bank, adjacent to the apartments, would be retained, and riparian vegetation would be allowed to reestablish</p>				

<b>I. Aesthetics</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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within the channel bottom. While the proposed Project may diminish the extent of riparian cover, the essential look and function as perceived from the existing public perspectives would not change substantially. Therefore, potential impacts on the visual character and quality of the site and its surroundings 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed channel improvements do not include temporary or permanent lighting elements or reflective construction materials. The proposed Project, by its nature, would not produce any new sources of light or glare. No impacts are anticipated.

## II. Agriculture and Forestry Resources

<b>II. Agriculture and Forestry Resources</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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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 CA Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site itself is developed with a stream channel and is surrounded by developed lands and existing roads within the City of Riverside. The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program. The resource of concern is absent and there is no potential for adverse impacts.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not subject to a Williamson Act contract (City of Riverside General Plan Figure OS-3, Williamson Act Preserves). While agricultural uses are permitted within the Watercourse overlay zone that applies within the drainage channel, multiple physical constraints at this particular location would not accommodate agricultural uses (access, slopes, trees, perennial water flows). Implementation of the proposed Project would remain and function as a stream channel. No impact would occur.

<b>II. Agriculture and Forestry Resources</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is in a developed area of the City of Riverside. The site and surrounding area do not contain forest land or timberland. The resources of concern are absent and there is no potential for adverse impacts.

d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is in a developed area of the City of Riverside. The site and surrounding area do not contain forest land. The resource of concern is absent and there is no potential for adverse impacts.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is in a developed setting. The site and surrounding area do not contain forest land or farmland. The resources of concern are absent and there is no potential for adverse impacts.

### III. Air Quality

<b>III. Air Quality</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is within the South Coast Air Basin (Basin), which is a subregion of the South Coast Air Quality Management District (SCAQMD). Development within the Basin is subject to a comprehensive program of pollution control strategies detailed in SCAQMD's Air Quality Management Plan (AQMP) and implementing Rules. SCAQMD is required, pursuant to the federal



**III. Air Quality**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in nonattainment (i.e., ozone and fine particulate matter). The proposed Project would be subject to SCAQMD’s AQMP, which contains a comprehensive list of pollution control strategies directed at reducing emissions in order to achieve state and federal air quality standards.

The limited activities associated with ongoing operation and maintenance of the completed improvements would generate a negligible volume of air pollutant emissions. Therefore, assessment of air quality impacts for this Project is limited to the construction phase.

AQMP provisions and rules applicable to the proposed stabilization work include those pertaining to fugitive dust control (Rules 403, 404, and 405), visibility of emissions (Rule 401), and nuisance activities (Rule 402) (SCAQMD 2013). PP 4.3-2(a) (construction contract specifications measures to reduce emissions) and PP 4.3-2(b) (dust control measures) under the LRDP EIR MMRP require compliance with SCAQMD rules and regulations applicable to this Project, and LRDP EIR MMRP Mitigation Measures (MM) 4.3-1(a) (particulate matter [PM] control measures), MM 4.3-1(b) (construction emissions control plan), and MM 4.3-2 (use of low nitrogen oxide [NO<sub>x</sub>] diesel fuel) detail project-specific actions to ensure implementation of measures at construction sites and through construction contract specifications. Such measures include but are not limited to: incorporating into construction contract specifications measures to reduce emissions (compliance with SCAQMD Rules and regulations, maintenance programs, avoid idling, use of alternative fuels, provision of electrical on-site eliminating generators); implementing dust control measures to reduce fugitive dust (apply water or soil stabilizers, replace ground cover, suspend grading when wind speeds exceed 25 miles per hour, cover loose material within haul trucks, sweep streets, install wheel washers, post and enforce speed limits); providing contact information for notification of dust complaints; use of California Air Resources Board (ARB)-certified equipment during construction; prohibiting vehicle and engine idling in excess of 5 minutes; providing temporary traffic controls; scheduling construction activities to off-peak times to not affect traffic flows; maintaining construction equipment to specification; and use of low NO<sub>x</sub> diesel fuel and construction equipment. Campus procedures for project design development and contract administration provide an established mechanism for implementation of LRDP EIR MMRP provisions, including those related to implementation of applicable SCAQMD Rules for individual construction projects. Because project emissions would be restricted to the construction phase and established campus programs would ensure compliance with applicable SCAQMD Rules, the proposed Project would not conflict with or obstruct implementation of the SCAQMD AQMP. This would be considered a less-than-significant impact.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The proposed Project would contribute to regional air pollutant emissions during construction. Mass daily combustion emissions and fugitive dust (particulate matter less than 10 microns in diameter [PM<sub>10</sub>] and less than 2.5 microns in diameter [PM<sub>2.5</sub>]) emissions were compiled using CalEEMod (version CalEEMod.2016.3.2), which is a statewide land use emissions estimation/evaluation computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of projects.

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### III. Air Quality

	Potentially Significant Impact	Less-than- Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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The model was developed for the California Air Pollution Control Officers Association in collaboration with the California air districts.

Assumptions regarding construction phasing and equipment use were developed based on information provided by the University. Key assumptions included the following: approximately 1,000 cubic yards (cy) of soil would be excavated and hauled from the site; approximately 1,460 cy of rip-rap would be hauled in and placed within the channel; and construction would last approximately 120 days. A complete listing of the construction equipment by phase, construction phase duration assumptions, and changes to modeling default values used in this analysis are included within the CalEEMod printout sheets, attached in Appendix B, which contains the air quality and greenhouse gas emission impact analysis, including assumptions and model output.

Construction-period emissions are summarized in Table 1 below based on new project assumptions for an updated analysis conducted in 2019 (Appendix B). The amount of excavation would not cause the Project to exceed the SCAQMD local or regional significance thresholds.

Table 1 below and Appendix B summarize the emissions estimates for project construction and compare the estimated emissions to the regional and localized significance thresholds established by SCAQMD. Estimated emissions are all substantially below the applicable thresholds. Emissions estimates for PM10 and PM2.5 take into account compliance with SCAQMD Rule 403. As noted in the response to item III.a, above, PP 4.3-2(a) (construction contract specifications measures to reduce emissions) and PP 4.3-2(b) (dust control measures) under the LRDP EIR MMRP require compliance with SCAQMD Rules and regulations applicable to this Project, and LRDP EIR MMRP MM 4.3-1(a) (PM control measures), MM 4.3-1(b) (construction emissions control plan), and MM 4.3-2 (use of low NOX diesel fuel) detail project-specific actions to ensure implementation of measures at construction sites and through construction contract specifications (see item III.a, above, for additional detail). Campus procedures for project design development and contract administration provide an established mechanism for implementation of LRDP EIR MMRP provisions, including those related to implementation of applicable SCAQMD Rules for individual construction projects. Because estimated emissions are below applicable SCAQMD thresholds and established campus programs provide for incorporation of SCAQMD Rule 403 controls for particulate emissions assumed in the impact analysis, the proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Potential impacts in this regard would be less than significant. The applicable standard campus practices detailed in the LRDP EIR MMRP remain unchanged and are provided in this Final IS/MND.

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**Table 1. Conservative Estimate of Maximum Daily Construction Emissions for the Project**

	<b>Criteria Pollutant Emissions (pounds per day)</b>					
	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM10<sup>a</sup></b>	<b>PM2.5</b>
<b><i>Regional Emissions</i></b>						
Project Emissions	3	29	21	<1	5	3
Regional Significance Threshold	75	100	550	150	150	55
<b>Exceed Regional Significance Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b><i>Localized Emissions</i></b>						
Project Emissions	3	19	20	<1	3	2
Localized Significance Threshold <sup>b</sup>	n/a	118	602	n/a	4	3
<b>Exceed Localized Significance Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod (Appendix B).

<sup>a</sup> PM10 emissions estimates take into account compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the site boundaries.

<sup>b</sup> Localized thresholds derived from SCAQMD Localized Significance Threshold Tables and are based on the project location (Source Receptor Area [SRA] 23, Metropolitan Riverside County), project area disturbed in any given day (1 acre), and the distance to the nearest sensitive receptor (25 meters).

**Notes:**

Construction emission calculation worksheets are included in Appendix B. These estimates of maximum daily emissions are for all construction phases (i.e., highest emissions from all phases for each pollutant presented).

Key assumptions included the following: excavation volume would be 1,000 cy, which is an increase of 700 cy from the 2019 analysis; rip-rap materials in the amount of 1,460 cy (same as in the 2015 estimate) would be hauled in and placed within the channel, and construction would last approximately 120 days.

<b>III. Air Quality</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Basin is in nonattainment status for ozone, PM10, and PM2.5. Ozone is regulated by way of its precursors—reactive organic compounds (ROC) and NO<sub>x</sub>. SCAQMD guidelines suggest that construction-related or operational emissions that exceed thresholds for individual projects would also be considered cumulatively considerable net increases in pollutants. As discussed under item III.b above, proposed construction is subject to standard construction-period control measures governed by SCAQMD Rules and regulations and LRDP EIR MMRP PP 4.3-2(a) (construction contract specifications measures to reduce emissions) and PP 4.3-2(b) (dust control measures) and MM 4.3-1(a) (PM control measures), MM 4.3-1(b) (construction emissions control plan), and MM 4.3-2 (use of low NO<sub>x</sub> diesel fuel). The SCAQMD’s approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. As discussed earlier, the proposed Project

**III. Air Quality**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.<sup>4</sup> In addition, the mass regional emissions calculated for the proposed Project presented above in Table 1 are less than the applicable SCAQMD daily significance thresholds.

In the long term, the Project would involve only limited operation and maintenance activities that would not generate appreciable emissions. As such, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. Cumulative impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Diesel particulate matter, which is classified as a carcinogenic toxic air contaminant by ARB, is the primary pollutant of concern with respect to health risks to sensitive receptors. Cancer health risks associated with exposures to diesel exhaust are typically associated with chronic exposure, in which a 70-year exposure period is assumed. Because construction would be of short duration (approximately 120 days), project construction is not anticipated to result in an elevated cancer risk to exposed sensitive receptors. In addition, localized construction emissions estimates would be well below SCAQMD localized emissions thresholds for applicable criteria pollutants (see Table 1, Appendix B). Considering the limited scale and duration of the proposed stabilization improvements, the proposed Project would not present the potential for significant sources of carbon monoxide, diesel particulate matter, or other toxic air pollutants that are of potential concern with respect to sensitive receptors. Potential impacts would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| e. Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Considering the nature and scale of the proposed stabilization improvements, potential sources of objectionable odors would be exhaust from vehicles and construction equipment during the approximately 120-day construction period. Construction at the project site would be of limited scale and duration, and the project site would be located at a major street intersection where such sources of odors are an element of the baseline condition. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors, nor would the proposed Project materially change the exposure to sources of odors in the project vicinity. Potential impacts would be less than significant.

<sup>4</sup> CEQA Guidelines Section 15064(h)(3) states “A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.”

## IV. Biological Resources

IV. Biological Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Would the project:

- |  |                          |                                     |                          |                          |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

In preparation for this Final IS/MND, biological resource surveys were updated since the last surveys were conducted in 2013. The updated survey results are presented in the Biological Resources Assessment included in Appendix C. (The Biological Resources Assessments included in the Draft IS/MND circulated in 2014 are included in Appendix D for reference.) The results have not resulted in a change where impacts would be considered significant. The findings reflected in this section represent the surveys conducted in 2018. Four species were evaluated for their potential to occur within the vicinity of the project boundary based on the results of the literature review and professional experience of the region: burrowing owl, least Bell’s vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.

- **Burrowing Owl.** This species is a CDFW Species of Special Concern (SSC) and could potentially occur in the regional vicinity. Based on the habitat assessment conducted, the project site does not contain the potential for burrowing owl to occur due to a lack of suitable burrowing owl habitat (i.e., open, sparsely vegetated areas) and the lack of potential burrow features (i.e., small mammal burrows). Therefore, this species is not anticipated to be present.
- **Least Bell’s Vireo.** The disturbed southern willow scrub (0.64 acre) on the project site has the potential to support least Bell’s vireo due to suitable canopy structure. This species was not documented within the project boundary during the focused surveys in 2018 and 2011 and was assumed absent in 2013. Because it was not detected in 2018, the species is still considered absent.
- **Southwestern Willow Flycatcher and Western Yellow-billed Cuckoo.** The project site does not contain suitable habitat for either species due to the relatively small size of the riparian habitat, the lack of extensive riparian vegetation with dense canopy within wide floodplain areas, and the fairly isolated nature of the riparian community. Therefore, these species are not anticipated to be present.

Based on review of the California Natural Diversity Database (CDFW 2019) and California Native Plant Society (CNPS) database (2019), there were seven special-status species that were identified as having potential to occur on the project site. These species are California satintail (*Imperata brevifolia*), western pond turtle (*Actinemys marmorata*), two-striped garter snake (*Thamnophis hammondi*), San Diego desert woodrat (*Neotoma lepida intermedia*), yellow warbler (*Dendroica petechia*), long-eared owl (*Asio otus*), and western yellow bat (*Lasiurus xanthinus*).

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#### IV. Biological Resources

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Only one special-status species was observed within the project boundary during the reconnaissance surveys: yellow warbler. Yellow warbler is designated as a CDFW SSC and is a species considered to be adequately conserved and covered under the Western Riverside County (WRC) MSHCP. Regional conservation efforts focused on areas outside of the project site have, and will, conserve sufficient habitat for this species. As such, in a regional context, impacts on this species would be considered less than significant.

Five special-status species were determined to have a low potential to occur in the project boundary: California satintail, western pond turtle, two-striped garter snake, San Diego desert woodrat, and long-eared owl.

California satintail is designated as a California Rare Plant Rank 2.1 species by CNPS. No individuals of California satintail were observed during the site visits. It was determined that this species has a low potential to occur on the site; however, if it does occur on site, it is in low numbers and project-related impacts would be considered less than significant.

Regional conservation efforts focused on areas outside of the project site have conserved sufficient habitat for western pond turtle, two-striped garter snake, San Diego desert woodrat, and long-eared owl to be considered adequately conserved in the region. As such, in a regional context, impacts on these species would be considered less than significant.

Western pond turtle was determined to have a low potential to occur on the site due to the presence of stream habitat; however, it is not expected to occur on site due to a lack of sufficient suitable basking sites. No individuals or any sign of presence of this species were detected during the site visits.

Two-striped garter snake was determined to have a low potential to occur on the site due to limited access to stream habitat; however, it is not expected to occur on site due to the highly urbanized nature of the site and a small prey-base in the stream. No individuals or any sign of presence of this species were detected during the site visits. Based on the limited availability of habitat and prey and overall low potential, if this species is present, it would not occur in numbers where potential impacts on this species would be considered significant under CEQA.

The San Diego desert woodrat was determined to have a low potential to occur on site due to the presence of riparian habitat; however, it is not expected due to a lack of substantial shrub cover and the narrow nature of the riparian corridor on the site. No individuals or any sign of presence of this species were detected during the site visits.

The long-eared owl was determined to have a low potential to occur on site due to the presence of riparian habitat; however, it is not expected to occur due to a lack of substantial riparian coverage on the project site and the high density of invasive plant species. No individuals or any sign of presence of this species were detected during the site visits.

One species, western yellow bat, was determined to have a moderate potential to occur on the project site. This species is known to roost in the dead fronds of palm trees within palm oases or residential areas and forages over water and among trees. Due to the lack of extensive palm coverage within the project boundary, it was determined that the project site lacks suitable communal roosting habitat for this species. However, due to the presence of a several individual palm trees, it was determined that the site has a moderate potential to support individual roosting and foraging western yellow bats. The proposed Project may directly remove suitable roosting

**IV. Biological Resources**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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trees, and there is also a potential for temporary indirect impacts due to construction noise and ground-moving disturbance during construction, as the majority of the palms within the project boundary occur on the south bank. Direct and/or indirect impacts on western yellow bat may be considered significant under CEQA. To ensure that the Project would have a less-than-significant effect on western yellow bat potentially roosting or foraging within the project boundary, biological construction monitoring **(BIO 2)** and a pre-construction roosting bat survey **(BIO 8)** would be performed to ensure there are no impacts on the species.

In addition to the species-specific analysis provided above, vegetation within the project site provides habitat for a variety of nesting birds that are protected under state and federal laws. Migratory, nongame, native bird species are protected under the federal Migratory Bird Treaty Act. Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests. If vegetation removal and other ground disturbance activities occur within the nesting bird breeding season (February 15 through September 15), there is a potential for impacts on nesting birds. **BIO 7** provides the avoidance and minimization measures that would be implemented during the bird breeding season. These measures may be superseded by conditional requirements in the Project’s CDFW Streambed Alteration Agreement. Potential impacts would be less than significant with the incorporation of the measures noted above.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The project site is characterized by a remnant reach of stream completely encompassed by existing residential development and major streets. The stream supports approximately 0.64 acre of riparian habitat in a highly constrained, channelized feature. The onsite riparian community is classified as disturbed southern willow scrub because of the numerous exotic plant species including edible fig, Mexican fan palm, salt-cedar, tree tobacco, and castor bean. The disturbed southern willow scrub also meets the WRC MSHCP definition of a riparian/riverine area pursuant to Section 6.1.2 of the WRC MSHCP. Riparian/riverine areas are also considered CDFW jurisdictional streambeds and riparian habitat. There are 0.057 acre of CDFW streambeds (MSHCP riverine) and 0.64 acre CDFW riparian habitat present in the study area. The project site does not support vernal pools or seasonal pools, or associated species.

Several LRDP EIR MMRP provisions have been taken into account in the campus design and development process for the proposed improvements, namely:

**PS Conservation 1** – Protect natural resources, including native habitat, remnant arroyos, and mature trees, identified as in good health as determined by a qualified arborist, to the extent feasible.

**PS Conservation 2** – Site buildings and plan site development to minimize site disturbance, reduce erosion and sedimentation, reduce storm water runoff, and maintain existing landscapes, including healthy mature trees whenever possible.

IV. Biological Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<p><b>PP 4.4-1(b)</b> – To reduce disturbance of Natural and Naturalistic Open Space areas:</p>				
<p>(i) Unnecessary driving in sensitive or otherwise undisturbed areas shall be avoided. New roads or construction access roads would not be created where adequate access already exists.</p>				
<p>(ii) Removal of native shrub or brush shall be avoided, except where necessary.</p>				
<p>(iii) Drainages shall be avoided, except where required for construction. Limit activity to crossing drainages rather than using the lengths of drainage courses for access.</p>				
<p>(iv) Excess fill or construction waste shall not be dumped in washes.</p>				
<p>(v) Vehicles or other equipment shall not be parked in washes or other drainages.</p>				
<p>(vi) Overwatering shall be avoided in washes and other drainages.</p>				
<p>(vii) Wildlife including species such as fox, coyote, snakes, etc. shall not be harassed. Harassment includes shooting, throwing rocks, etc.</p>				
<p><b>PP 4.4-2(a)</b> – Impacts to riparian and wetland habitats shall be avoided, wherever feasible. If avoidance is not feasible, then the impacts will be evaluated as part of the Clean Water Act section 404 and California Fish and Game Code section 1602 permit application process. If mitigation is required, the University of California will develop and implement a resource mitigation program to be reviewed and approved by the ACOE [USACE] and CDFG [CDFW] through the State and federal permit process. The permit shall mitigate the habitats such that they are consistent with the Clean Water Act and CDFG policy of “no net loss” of wetland. Furthermore, impacted wetlands and/or riparian vegetation that cannot be avoided would be replaced at a ratio approved by the ACOE and CDFG. If replacement within the area is not feasible, then an approved mitigation bank or other off-site area will be used. The revegetation of impacted areas or mitigation parcels will be performed by a qualified restoration specialist and shall be conducted only on sites where soils, hydrology, and microclimate conditions are suitable for riparian habitat. First priority will be given to areas that are adjacent to existing patches of native habitat.</p>				
<p><b>MM 4.4-3(b)</b> – If wetland or riparian habitat would be removed as a result of project development, the University shall restore or enhance wetland or riparian habitat as required by the applicable State and/or federal resource agencies.</p>				
<p><b>MM 4.4-3(c)</b> – Any proposal for wetland creation or enhancement (pursuant to MM 4.4-3(b) above) will be based upon the completion of soils, hydrologic and other studies confirming the feasibility of the creation or enhancement proposal and shall include United States Army Corps of Engineers (USACE)–approved measures intended to promote occupancy by special status and other wetland-dependent species (e.g., plantings, collection of topsoil and inoculation of target areas).</p>				
<p>Aside from temporary diversions required during construction, the proposed improvements would not alter the existing hydrologic regime—flows would continue to enter through the upstream culvert and exit through the downstream culvert. Tributary area limits and characteristics would</p>				



**IV. Biological Resources**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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not be altered.

The potential for adverse effects on riparian habitat relates to the direct removal that would be required to construct the stabilization improvements. A one-time removal of non-native vegetation on the south bank will also be conducted. Based upon the 2018 biological resources surveys (Appendix D) performed for the project site, the proposed Project will permanently affect 0.04 acre (240 linear feet) of CDFW state streambed and 0.31 acre of CDFW riparian habitat. Temporary impacts would occur on 0.02 acre (296 linear feet) of CDFW state streambed and 0.04 acre of CDFW riparian habitat. Riparian habitat is considered a sensitive biological resource; therefore, the temporary and permanent impacts on riparian vegetation represent a potentially significant impact. **Mitigation Measures BIO 1 through BIO 6**, below, would provide a means to document compliance with project commitments to minimize impacts on riparian habitat within the work area. Because the Project would also affect WRC MSHCP riparian/riverine habitat, a Determination of Biologically Equivalent or Superior Preservation (DBESP) report will be prepared and reviewed by the USFWS and CDFW. Approval of the DBESP by the CDFW and USFWS will provide an official record of Project consistency with the WRC MSHCP Riparian/Riverine policy (Section 6.1.2 of the WRC MSHCP Volume I).

With implementation of **Mitigation Measures BIO 1 through BIO 6**, project impacts on riparian habitat would be less than significant.

**BIO 1 – Minimize Direct Impacts on Riparian Habitat.** Prior to initiation of ground disturbance activities, disturbance limits shall be clearly defined at the construction site and demarcated on site plans (refer to Appendix A). Access and staging shall be limited to the existing gated entrance from Chicago Avenue, the existing maintenance path along the north bank, or paved/landscaped areas within the adjoining apartment development. Protection measures for riparian habitat on the south bank will be established in consultation with the biological monitor.

**BIO 2 – Conduct Biological Monitoring During Construction.** A qualified biologist shall monitor construction for compliance with best management practices outlined in LRDP EIR MMRP Programs and Practices (PP) 4.4-1(b) (reduce disturbance to Natural Open Space areas). Such measures may include minimizing vehicular access and parking in undisturbed areas or drainages; avoiding removal of native shrub or disturbance of drainages, except where necessary; avoiding overwatering; and not harassing wildlife species. Considering the nature of the work area and proximity of protected resources to the work limits, monitoring shall be continuous during the initial preparation and excavation phases. Once work transitions to placement of rip-rap, the frequency of monitoring may be reduced, as recommended by the monitoring biologist (taking into consideration the nature of the proposed work and time of year).

**BIO 3 – Provide a Worker Environmental Awareness Training.** To ensure compliance with best management practices identified in LRDP EIR MMRP PP 4.4-1(b) (reduce disturbance to Natural Open Space areas), a biologist shall provide to all construction personnel a worker environmental awareness training prior to personnel initiating ground disturbance activities. The training will include a discussion of the importance of the stream and associated riparian habitat, areas to be avoided (including during parking and staging of equipment), a discussion of native wildlife with the potential to occur, and education on not harassing native wildlife.

**IV. Biological Resources**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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BIO 4 – Remove Exotic Plant Species. During the construction phase, exotic plant species shall be removed from the riparian zone, including the protected south bank area. Exotic plant material shall be properly handled to prevent sprouting or regrowth. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants/seed and inspected to reduce the potential of spreading noxious weeds before mobilizing to the work area and before leaving the work area. Cleaning of equipment shall occur outside the work area where the wastewater stream is contained so as to prevent any invasive plant material from entering natural areas.

BIO 5 – Monitor Revegetation. As part of the project design, a one-time removal of exotic plants would occur on the southern bank, and native riparian species would be planted throughout the channel. No ongoing maintenance of vegetation within the channel is proposed. Because the channel enhancement is being done as part of the project design, it is not subject to performance criteria; however, it would provide a net benefit to the channel. Compensatory mitigation is addressed in BIO 6.

BIO 6 – Purchase into a Mitigation Bank or In-Lieu Fee Program as Compensatory Mitigation. BIO 6 in the Draft IS/MND circulated in 2014 included language pertaining to the outstanding mitigation the previous landowner left unaddressed. In 2012, the University addressed the uncompleted compensatory mitigation obligations required by the prior landowner pursuant to the previously issued CDFW Streambed Alteration Agreement. Through cooperation with the CDFW, the University revised the required onsite mitigation to be addressed off site at a mitigation bank.

BIO 6 now only pertains to the compensatory mitigation associated with the proposed Project. Compensation for impacts on non-wetland WoUS and CDFW streambeds would occur at a 1:1 ratio, and impacts on wetland WoUS and CDFW riparian habitat would be at a 2:1 ratio, primarily through offsite mitigation at an agency-approved mitigation bank or in-lieu fee program. The final credit purchase requirement will be determined through the regulatory permit process with the USACE, RWQCB, and CDFW.

Potential impacts would be less than significant with the incorporation of measures noted above.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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A delineation of jurisdictional waters and wetlands was conducted for the subject stream feature, in accordance with LRDP EIR MMRP MM 4.4-3(a). The jurisdictional delineation report is included as Appendix B of the attached Appendix C.) There are two potentially jurisdictional drainage features under the Clean Water Act Section 401/404 and Section 1600 of the California Fish and Game Code present within the study area. Feature 1 is a perennial channel and narrow riparian corridor. Feature 2 is a concrete-lined v-ditch along the northern edge of the project boundary. Refer to Table 2 below and Figure 6.

#### IV. Biological Resources

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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The proposed Project would permanently affect 0.21 acre (652 linear feet) of federal non-wetland WoUS/WoS and 0.01 acre of wetland waters jurisdictional under USACE and RWQCB. Refer to Table 3 below and Figure 5.

Several LRDP EIR MMRP provisions have been taken into account in the campus design and development process for the proposed improvements. Compensation for the direct permanent impacts on USACE/RWQCB and CDFW jurisdictional waters will be necessary (**BIO 6**). As part of the project design, a one-time removal of exotic plants would occur on the southern bank, and native riparian species would be planted throughout the channel. No ongoing maintenance of vegetation within the channel is proposed. Because the channel enhancement is being done as part of the project design, it is not subject to performance criteria; however, it would provide a net benefit to the channel. The compensation for impacts on non-wetland WoUS and CDFW streambeds would occur at a 1:1 ratio, and impacts on wetlands WoUS and CDFW riparian habitat would be at a 2:1 ratio primarily through offsite mitigation at an agency-approved in-lieu fee program. The University will coordinate with the USACE, RWQCB, and CDFW to finalize the mitigation requirements. This compensatory mitigation would ensure no net loss of wetlands and that impacts are less than significant under CEQA.

See IV.b above regarding potential impacts on the onsite stream feature, which is protected under the broader category of “waters of the United States” under Section 404 of the Clean Water Act.

**Table 2. Summary of Impacts on CDFW Streambed and Associated Riparian Habitat**

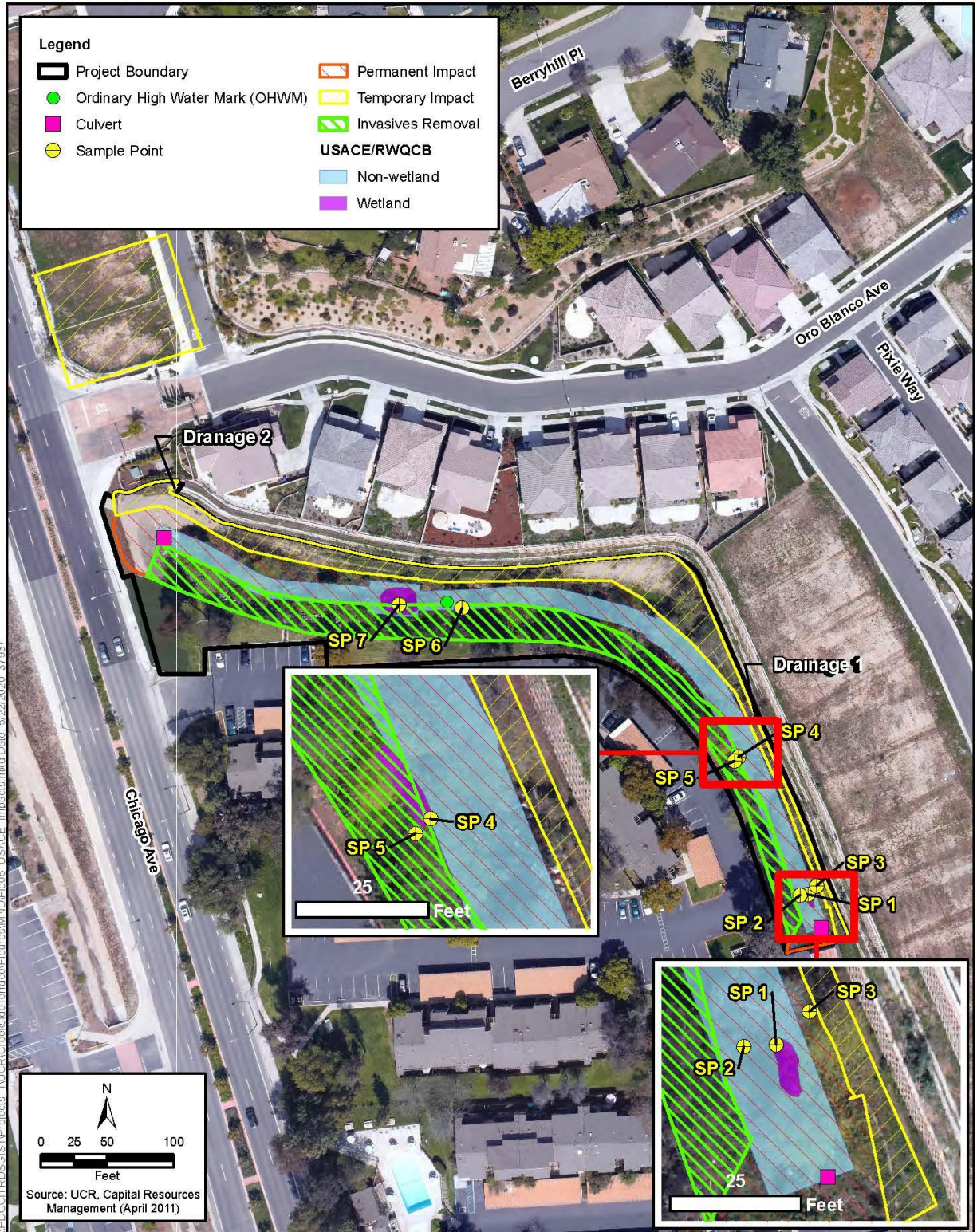
Feature Type	Feature Description	Unvegetated Streambed (acres/linear feet)		Riparian (acres)	
		Permanent	Temporary	Permanent	Temporary
Feature 1	Perennial; earthen; wetland portions exhibit hydrophytic vegetation, hydric soils (sandy redox and muck), and hydrology (debris wrack, drainage patterns).	0.04/240	0.02/295	0.31	0.04
Feature 2	Ephemeral; concrete-lined v-ditch.	0.00/0	0.00/1	0.00/0	0.00
	<b>Total</b>	<b>0.04/240</b>	<b>0.02/296</b>	<b>0.31/0</b>	<b>0.04</b>

**Table 3. Summary of Impacts on USACE and RWQCB Wetland and Non-Wetland Waters of the U.S./State**

Feature Type	Feature Description	Non-Wetland WoUS/WoS (acres/linear feet)		Wetland WoUS/WoS (acres)	
		Permanent	Temporary	Permanent	Temporary

Feature 1	Perennial; earthen; wetland portions exhibit hydrophytic vegetation, hydric soils (sandy redox and muck), and hydrology (debris wrack, drainage patterns). Sample Points SP-1 through 7.	0.21/652	0.00/0	0.01	0.01
Feature 2	Ephemeral; concrete-lined v-ditch.	--	--	--	--
<b>Total</b>		<b>0.21/652</b>	<b>0.00/0</b>	<b>0.01</b>	<b>0.01</b>





**Figure 5**  
**Impacts on USACE/RWQCB Jurisdiction**  
**Creekside Terrace Slope Protection Project**







**Figure 6**  
Impacts on CDFW Jurisdiction  
Creekside Terrace Slope Protection Project



IV. Biological Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<p>d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The riparian stream feature that is the subject of the proposed stabilization work is confined between buried storm drains at each end and is closely constrained by development. These conditions constrain the value of this stream for wildlife movement or nursery functions. While the extent of riparian habitat on site would be diminished as a result of the proposed improvements, the finished site conditions would retain a flowing channel. The site would be revegetated with riparian plants and the proposed Project would not substantially affect any limited movement or nursery functions that may exist. Potential impacts would be less than significant.</p>				
<p>e. Conflict with any applicable policies protecting biological resources?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>See items IV.a and IV.b, above, relative to policies protecting sensitive species and riparian habitat, and item IV.f, below, regarding regional conservation plans.</p>				
<p>The proposed Project would remove riparian vegetation and ruderal vegetation and would involve construction activity close to remaining riparian vegetation, ruderal vegetation, and residential landscaping that provides nesting habitat for bird species protected under the federal Migratory Bird Treaty Act and the California Fish and Game Code. Disturbance of active nests as a result of vegetation removal or construction activity would be in conflict with these state and federal biological resources protection policies. LRDP EIR MMRP provisions MM 4.4-4(a) (nesting special status avian species surveys during construction) and MM 4.4-4(b) (delay construction if active nests for avian species are found) establish standard campus practices to comply with these protection programs by avoiding impacts on active nests. The following mitigation measures (<b>Mitigation Measure BIO 7</b> and <b>BIO 8</b>) for the proposed Project reflects the requirements of these LRDP EIR MMRP provisions and would serve to reduce potential impacts in this regard on protected bird species to below a level of significance.</p>				
<p><u>BIO 7 – Pre-construction Nesting Bird Surveys.</u> Prior to the onset of construction activities that would result in vegetation removal between February 15 and September 15 or as early as January for raptors, nesting bird surveys shall be conducted by a qualified biologist no more than 3 days prior to initiation of ground disturbance activities. The survey area shall include the direct disturbance limits and a 250-foot buffer zone or as determined through project-related permits. If nesting birds are encountered within the survey area, the qualified biologist will flag an avoidance buffer zone around the nest. No ground disturbance activities shall occur within the avoidance buffer zone until the qualified biologist has determined that the nest is no longer active and the young are not dependent on the nest.</p>				
<p><u>BIO 8 – Preconstruction Roosting Bat Assessment and Survey.</u> To ensure potential impacts on bat species are reduced, the following measure will be implemented:</p>				
<p>a) Prior to project initiation (e.g., staging, clearing/grubbing, grading), a daytime preliminary assessment will be conducted by a qualified bat biologist to reexamine areas suitable for bat</p>				

IV. Biological Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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use (i.e., palm trees). If bat sign is observed, then preconstruction roosting bat surveys will be conducted to confirm whether the areas with suitable habitat identified during the preliminary assessment are utilized by bats for day roosting and/or night roosting and to ascertain the level of bat foraging and roosting activity at each of these locations.

- b) If preconstruction roosting bat surveys are warranted, prior to tree removal or trimming, large trees and snags will be examined by a qualified bat biologist to ensure that no roosting bats are present. Palm frond trimming, if necessary, should be conducted outside the maternity season (i.e., April 15–August 31) to avoid potential mortality of flightless young.
- c) If a maternity site is identified during the preconstruction roosting bat surveys, then no construction activities at that location will be allowed during the maternity season (i.e., April 15–August 31) unless a qualified bat biologist has determined the young have been weaned. If a maternity site is present, and it is anticipated that construction activities cannot be completed outside of the maternity season, bat eviction and exclusion at maternity roost sites will be completed by a qualified bat biologist either as soon as possible after the young have been weaned, outside of the maternity season, or as otherwise approved by the qualified bat biologist in coordination with the CDFW.

In addition to the species-specific analysis provided above, vegetation within the project site provides habitat for a variety of nesting birds that are protected under state and federal laws. Migratory, nongame, native bird species are protected under the federal Migratory Bird Treaty Act. Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests. If vegetation removal and other ground disturbance activities occur within the nesting bird breeding season (February 15 through September 15), there is a potential for impacts on nesting birds. **Mitigation Measures BIO 2** and **BIO 7** provide the avoidance and minimization measures that would be implemented during the bird breeding season. These measures may be superseded by conditional requirements in the State Streambed Alteration Agreement.

The measures would serve to reduce potential impacts in this regard on protected bird species to a less-than-significant impact under CEQA.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The project site is within the plan areas of two regional conservation efforts—the Western Riverside County MSHCP and the Long-term Habitat Conservation Plan for the SKR. Implementation of the SKR plan is at a stage in which all conservation lands have been acquired. For projects outside the reserve areas, plan conformance is achieved through payment of mitigation fees that support ongoing management of the reserve lands. The project site is not within an SKR reserve and the University is exempt from payment of SKR mitigation fees.

The University is not a Permittee of the WRC MSHCP; however, because a discretionary approval from the City of Riverside (a WRC MSHCP Permittee) is required, the Project must be in compliance with the WRC MSHCP. The project site occurs within the “Cities of Riverside and Norco Area Plan”



	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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#### IV. Biological Resources

of the WRC MSHCP. The project site is not within a criteria cell, a linkage area, or public/quasi-public lands; therefore, the Project is not subject to the Habitat Acquisition Negotiation Process. In addition, the Project is not within plan-defined areas requiring surveys for narrow endemic plant species, criteria area plant species, amphibian species, or mammalian species. The project site is not within or adjacent to a WRC MSHCP Conservation Area; therefore, the project site is not required to address Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface) of the WRC MSHCP. The project site is not within the WRC MSHCP Criteria Area Plant Species Survey Area pursuant to Section 6.3.2 of the WRC MSHCP. The project site is not within or adjacent to the WRC MSHCP Conservation Area; therefore, the project site is not required to address Section 6.4 (Fuels Management) of the WRC MSHCP, and the Project is consistent with the WRC MSHCP Fuels Management policies.

The project site is outside of the MSHCP Criteria Area, which identifies areas potentially subject to acquisition for long-term conservation. Beyond the evaluation of potential involvement of Criteria Area lands, determination that a particular activity is consistent with the MSHCP also entails consideration of a variety of plan policies directed at protection of specific species and resources. Plan policies potentially applicable to consistency evaluation for the project site are those related to riparian/riverine/vernal pool resources. The project site contains areas meeting the definition of a WRC MSHCP riparian/riverine area pursuant to Section 6.1.2 of the WRC MSHCP. As stated above, approval of the DBESP will provide an official record of the Project's consistency with the WRC MSHCP Riparian/Riverine policies. Mitigation measures mentioned earlier would serve to reduce potential conflicts with applicable plans to a less-than-significant impact under CEQA.

However, the stream feature and associated riparian habitat are subject to the plan provisions for riverine and riparian resources (Section 6.1.2 of the WRC MSHCP). For riparian habitat, the plan requires consideration of suitability for three protected bird species—least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. The biological survey conducted in support of this IS/MND (Appendix C) documents the absence of suitable habitat for southwestern willow flycatcher and western yellow-billed cuckoo. A focused survey was conducted for least Bell's vireo (Appendix D). No individuals of these species were identified, and it is assumed to be absent.

The MSHCP stipulates that riparian habitat is to be avoided to the greatest extent practicable. If riparian habitat is affected, mitigation must demonstrate equal or superior functions and values. The proposed stabilization improvements would affect a highly constrained stream feature that is removed from MSHCP reserve areas. **Mitigation Measures BIO 1 through BIO 4** and **BIO 7** (see item IV.b, above) provide for implementation of various measures during construction to ensure impacts on the stream and riparian habitat are minimized. **Mitigation Measures BIO 5** and **BIO 6** (see item IV.b, above) provide for revegetation monitoring and for purchase into a mitigation bank or in-lieu fee program to ensure that riverine and riparian habitat functions and values are equal or superior to pre-project conditions. With implementation of **Mitigation Measures BIO 1 through BIO 8**, proposed activities and improvements would not conflict with MSHCP provisions for riparian and riverine resources. As the proposed Project, including **Mitigation Measures BIO 1 through BIO 8**, would not conflict with applicable provisions of the two adopted habitat conservation plans that apply within the project area, potential impacts in this regard would be less than significant with mitigation incorporated.

## V. Cultural Resources

V. Cultural Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The proposed work limits and adjacent areas have been previously disturbed with construction of the existing apartments (in the 1980s) and the Creekside Terrace residential tract (in the early 2000s). There are no standing historic structures within or near the project limits. A cultural resource assessment prepared for the Creekside Terrace project in June 2003 determined that no historic resources were evident in site surveys and that no further evaluation was warranted. Considering the existing setting, prior survey results, and prior disturbances, there is no reasonable potential for the proposed improvements to cause a substantial adverse change in the significance of an historical resource.

A cultural resources survey performed for the Project in 2018 examined all exposed ground surface for the following: artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as burrows and drainages were inspected visually. Based on the results of an updated records search in 2018 (Appendix E), Native American scoping, and field survey, specific cultural resources (prehistoric or historic) were not identified in the project area of potential effects (APE).

No specific resource information was provided by tribal contacts for the project APE. There are no standing historic structures within or near the project limits. Considering the existing setting, prior survey results, and prior disturbances, there is no reasonable potential for the proposed improvements to cause a substantial adverse change in the significance of an historical resource.

The University’s standard contract specifications address the protection and recovery of buried archaeological resources, including historical resources, and the standard requirements are incorporated into the project as **Mitigation Measure CUL 1**, presented below. This mitigation measure identifies steps to be taken in the event archaeological resources, including cultural resources, are discovered during construction activities.

### Additional Project-Level Mitigation Measures

**MM CUL 1.** If an archaeological resource is discovered during construction, all soil-disturbing work within 100 feet of the find shall cease and the University Representative shall contact a qualified Archaeologist meeting the Secretary of the Interior standards within 24 hours of discovery to inspect the site. If a resource within the project area of potential effect is determined to qualify as a unique archaeological resource (as defined by the California Environmental Quality Act [CEQA]), the University shall devote adequate time and funding to determine if it is feasible, through project design measures, to preserve the find intact. If it cannot be preserved, the University shall retain a qualified non-University Archaeologist to design and implement a treatment plan, prepare a report, and salvage the material, as appropriate. Any important

V. Cultural Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
artifacts recovered during monitoring shall be cleaned, catalogued, and analyzed, with the results presented in a report of findings that meets professional standards.				
a) If significant Native American cultural resources are discovered, as determined by the consulting Archaeologist for which a Treatment Plan must be prepared, the contractor or his Archaeologist shall immediately contact the University Representative. The University Representative shall contact the appropriate tribal representatives.				
b) If requested by tribal representatives, the University, the contractor, or the project Archaeologist shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, return of artifacts to tribe).				
c) In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find shall halt immediately and the area of the find shall be protected. The University shall immediately notify the Riverside County Coroner of the find and comply with the provisions of California Health and Safety Code Section 7050.5.				
It is noted that this campus procedure is consistent with City of Riverside practices under General Plan EIR Mitigation Measure Cultural 4 (discovery of archaeological resources and Native American human remains). Potential impacts would be less than significant.				

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed work limits and adjacent areas have been previously disturbed with construction of the existing apartments (in the 1980s) and the Creekside Terrace residential tract (in the early 2000s). A cultural resource assessment prepared for the Creekside Terrace project previously in June 2003 determined that no archaeological resources were evident in site surveys and that no further evaluation was warranted. Additionally, an updated Cultural Resources Study was prepared for the project in 2019, which included a pedestrian survey, an updated records search, and Native American consultation. The pedestrian survey did not identify any cultural resources in the project APE, nor did the updated records search, and Native American consultation did not reveal any specific information of cultural resources within the project area. Considering the existing setting, prior survey results, and prior disturbances, there is no reasonable potential for the proposed improvements to cause a substantial adverse change in the significance of an archaeological resource, as none are known to exist.

Nevertheless, there is always a possibility of encountering unknown or undocumented cultural resources during earth-moving activities. The University’s standard contract specifications address the protection and recovery of buried archaeological resources, including human remains, and the standard requirements are incorporated into the project as **Mitigation Measure CUL 1**. This mitigation measure identifies steps to be taken in the event archaeological resources, including human remains, are discovered during construction activities.

It is noted that this campus procedure is consistent with City of Riverside practices under General Plan EIR Mitigation Measure Cultural 4 (discovery of archaeological resources and Native American human remains) and recommendations from a cultural resources report completed in 2019. Potential impacts would be less than significant.

<b>V. Cultural Resources</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed work limits and adjacent areas have been previously disturbed with construction of the existing apartments (in the 1980s) and the Creekside Terrace residential tract (in the early 2000s). Considering the existing setting and prior disturbances, there is no reasonable potential for the proposed improvements to cause a substantial adverse change in the significance of a paleontological resource or unique geologic feature. Additionally, based on the results of an updated records search in 2018 (Appendix E), Native American scoping, and field survey, specific cultural resources (prehistoric or historic) were not identified in the project APE.

LRDP EIR MMRP PP 4.5-5 (discovery of buried human remains) and established campus construction contracting procedure provide for a standard provision in construction contracts requiring the contractor to report any unexpected discoveries of buried resources. In the event of unexpected discoveries, work must be halted until a paleontologist is retained to assess the significance of any find and to develop and implement appropriate measures to protect or collect the find. It is noted that this campus procedure is consistent with City of Riverside practices under General Plan EIR Mitigation Measure Cultural 4 (discovery of archaeological resources and Native American human remains). Potential impacts would be less than significant.

d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed improvement limits have been previously disturbed. There is no reasonable basis to anticipate that the proposed construction would disturb human remains. LRDP EIR MMRP PP 4.5-5 (discovery of buried human remains) and established campus procedure require a halt to excavation or grading in the event of the discovery of a burial, human bone, or suspected human bone. The procedure requires that the area of the find is protected and the University is to immediately notify authorities for evaluation as to whether the find is human remains and determination as to any ensuing course of action pursuant to California Health and Safety Code Section 7050.5 (for all human remains) and/or Public Resources Code (for Native American human remains). The code states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner.

It is noted that this campus procedure is consistent with City of Riverside practices under General Plan EIR Mitigation Measure Cultural 4 (discovery of archaeological resources and Native American human remains). Potential impacts would be less than significant.

## VI. Energy

In January 2019, updates to the State CEQA Guidelines were adopted, which included the addition of an Energy section, as addressed in this section.

<b>VI. Energy</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Would the project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? <b><i>(New CEQA Threshold)</i></b> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The proposed Project would result in a commitment of energy resources in the form of diesel fuel, gasoline, and electricity during construction and operation. The Project would not result in the wasteful, inefficient, or unnecessary consumption of energy. These types of resources are anticipated to be in adequate supply into the foreseeable future, and their use under the proposed Project would not differ from the use of these resources for any other type of project. A portable generator may be required as a power source during construction but would cease once construction has concluded.

The construction of the project improvements described above would require the commitment of energy resources in the form of diesel fuel and gasoline. However, the operation of the proposed Project would be considered passive use and would not require electricity. Therefore, no additional impacts on energy sources are anticipated with implementation of the proposed Project. Energy consumption during construction and operation would not substantially contribute to an increase in energy use and therefore would not substantially affect local and regional energy supplies or result in wasteful or inefficient use of energy. Impacts would be less than significant.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? <b><i>(New CEQA Threshold)</i></b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Riverside County has a program to coordinate and encourage eligible renewable energy resource development (County of Riverside 2014) in the County of Riverside at the General Plan level. The proposed Project would use a minimal amount of energy during construction, which would not lead to a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency. No impact would occur.

## VII. Geology and Soils

<b>VII. Geology and Soils</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The project site is not within a mapped earthquake fault zone (City of Riverside 2007c). The proposed improvements would stabilize an eroded stream bank by reconstructing the bank and establishing a non-erodible surface. Considering the absence of known faults and the nature of the proposed improvements, the proposed Project would not alter conditions that expose people or structures to adverse effects in this regard. No impact would occur.</p>				
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>There are several active earthquake faults within Southern California that could affect the project area in terms of ground shaking. The San Andreas, San Jacinto, and Elsinore faults are the more prominent due to their proximity and relatively high seismic potential (City of Riverside 2007c). The proposed improvements would stabilize an eroded stream bank by reconstructing the bank and providing a non-erodible surface treatment. The proposed improvements would not involve new structures and, therefore, would not alter exposure of people or structures to potential adverse effects in this regard. No impact would occur.</p>				
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The due diligence investigations conducted prior to the University's purchase of the Creekside Terrace residential development identified potentially liquefiable soils at the foot of the existing retaining walls along the north side of the stream (C.H.J. Incorporated 2007b and 2008a). Pressure grouting, as recommended by the geotechnical engineer (C.H.J. Incorporated 2008b), was completed in 2009 (John R. Byerly Incorporated 2009) to alleviate the risk of damage due to this condition. The proposed improvements would stabilize an eroded stream bank by reconstructing the bank and providing a non-erodible surface. The proposed improvements would not alter the exposure of people or structures to potential adverse effects in this regard. No impact would occur.</p>				

VII. Geology and Soils	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The proposed work is directed at protection of the Creekside Terrace retaining walls from potential stability hazards resulting from erosion of the north channel bank by water flowing within the stream. The proposed improvements would not alter the exposure of people or structures to potential adverse effects in this regard. No impact would occur.</p>				
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The proposed improvements may present the potential for soil erosion during construction. Soils within the work limits and temporary stockpiles may be prone to erosion due to exposure to both wind and rain. Established programs of the SCAQMD and the RWQCB require implementation of known best management practices (BMPs) during construction. The Stormwater Pollution Prevention Plan (SWPPP) required under the RWQCB regulations details applicable measures, location of application, timing of application, and responsibility for monitoring and maintenance of erosion control measures. LRDP EIR MMRP measures PP 4.4-2(b) (National Pollutant Discharge Elimination System [NPDES] compliance) and PP 4.8-1 (compliance with applicable water quality requirements) state the campus commitment to compliance with all applicable requirements of the RWQCB, including incorporation of BMPs in project design and construction. Established campus programs and procedures ensure that SWPPP requirements are incorporated into construction bid specifications, the SWPPP is prepared and notices are filed prior to start of construction, and that BMPs are implemented during construction.</p> <p>In the operation phase, the proposed Project would incorporate rip-rap cover on the north bank (to match existing conditions on the south bank) and at the existing storm drain inlet and outlet at each end of the stream. These design features would minimize potential for soil erosion in the operation phase and support the conclusion that impacts in this regard would be less than significant. Established campus procedures ensure that such design features are incorporated into project plans and that improvements are constructed in accordance with the plans. Potential impacts would be less than significant.</p>				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The proposed work is directed at correcting a stability hazard identified in the course of the University's acquisition of the Creekside Terrace development. The proposed improvements would protect the existing retaining walls from potential stability hazards due to erosion of the north channel bank by water flowing within the stream. A series of 34 small-diameter drains extending from the north bank would be protected in place (these are the outlets for the subdrain system for the Creekside Terrace retaining walls). The subdrain system outlet pipes would be trimmed so that they do not extend beyond the rock surface. The proposed improvements would not alter the exposure of people or property to stability hazards in a manner that presents the potential for new or more severe adverse impacts. Potential impacts would be less than significant.</p>				

<b>VII. Geology and Soils</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed work is directed at protection of the Creekside Terrace retaining walls from potential stability hazards resulting from erosion of the north channel bank by water flowing within the stream. Materials testing as part of the 2008 geotechnical investigation (C.H.J. Incorporated 2008a) characterized site soils as having “very low” potential for expansion. The proposed reconstruction of the north stream bank and covering of the bank with rip-rap would not alter the exposure of people or structures to potential adverse effects in this regard. No impact would occur.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed stabilization improvements would not generate waste water or affect any existing septic or alternative waste water disposal system. There is no potential for impacts of this nature. No impact would occur.

### VIII. Greenhouse Gas Emissions

<b>VIII. Greenhouse Gas Emissions</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Project greenhouse gas (GHG) emissions were estimated using the CalEEMod emissions estimation/evaluation model (Appendix B). The Project’s contribution to GHG emissions would be limited to the construction phase and is estimated to be 102 metric tons (MT) of carbon dioxide (CO<sub>2</sub>) equivalent (CO<sub>2</sub>e).

The SCAQMD has not adopted quantitative GHG emissions thresholds for non-industrial development projects. However, in its *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* documentation, SCAQMD suggests that a screening-level threshold of 1,400 MT per year of CO<sub>2</sub>e emissions for commercial projects is appropriate. While the proposed Project is not technically a commercial project, the suggested screening-level thresholds for all other land use types are higher than 1,400 MT CO<sub>2</sub>e per year. As such, the 1,400 MT CO<sub>2</sub>e per year significance criteria was used for this analysis.



**VIII. Greenhouse Gas Emissions**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Modeling assumptions regarding construction phasing and equipment use were developed based on information provided by the project applicant. Key assumptions included the following: excavation volume and export would be 1,000 cy, rip-rap materials in the amount of 1,460 cy would be hauled in and placed within the channel, and construction would last approximately 120 days. A complete listing of the construction equipment by phase, construction phase duration assumptions, and changes to modeling default values used in this analysis is included within the CalEEMod printout sheets that are included in Appendix B.

The proposed Project’s contribution to GHG emissions is estimated to be 118 MT of CO<sub>2</sub>e, total. Total CO<sub>2</sub>e emissions resulting from project construction would be far less than the 1,400 MT CO<sub>2</sub>e per year significance criteria identified above. Estimated CO<sub>2</sub>e emissions resulting from project construction would be temporary and substantially below this threshold. Impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The State of California identified a year 2020 target level for state-wide GHG emissions of 427 million metric tons (MMT) of CO<sub>2</sub>e, which is approximately 28.5% less than the year 2020 business as usual (BAU) emissions estimate of 596 MMT CO<sub>2</sub>e. ARB has adopted the Assembly Bill (AB) 32 Scoping Plan, which details specific GHG emission reduction measures for specific GHG emissions sources. The Scoping Plan considers a range of actions including regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms.

To achieve these GHG reductions, there will have to be widespread reductions of GHG emissions across California. Some of those reductions will need to come in the form of changes in vehicle emissions and mileage standards, changes in the sources of electricity, and increases in energy efficiency by existing facilities. The remainder will need to come from requiring new facility development to have lower carbon intensity than BAU conditions. Therefore, this analysis uses a threshold of significance that is in conformance with the state’s goals.

Both the University and the City of Riverside have adopted programs to reduce GHG emissions. Because emissions for the proposed Project would be limited to the construction phase, relevant aspects of both the University and City of Riverside GHG emission reduction programs are limited to those establishing objectives for substantial diversion of construction waste. The campus operates a very successful landscape waste recycling program that diverts 99% of green waste from landfills, with much of the green waste generated on the main campus composted at Agricultural Operations, a field station dedicated to plant sciences research on the West Campus. For the proposed Project, much of the construction waste would involve green waste and removal of existing vegetation to stabilize the slope. No operational waste, aside from the periodic removal of small amounts of exotic species of vegetation, would be required. Standard campus contracting provisions, to be included in contract specifications for implementation by the construction contractor, include green waste recycling and other requirements for implementation and monitoring of waste diversion practices in all campus construction projects. These campus provisions address both City and County of Riverside GHG reduction policies in this regard.

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### VIII. Greenhouse Gas Emissions

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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The proposed Project would not obstruct any AB 32 Scoping Plan measures or be inconsistent in any way with the AB 32 goal of reducing state-wide GHG emissions to 1990 levels by year 2020. Both the University and the City of Riverside have prepared plans/strategies/programs to reduce GHG emissions. Because emissions for the proposed Project are limited to the construction phase, relevant aspects of both the University and City of Riverside GHG emission reduction programs are limited to those establishing objectives for substantial diversion of construction waste. The campus operates a very successful landscape waste recycling program that diverts 99% of green waste from landfills, with much of the green waste generated on the main campus composted at Agricultural Operations, a field station dedicated to plant sciences research on the West Campus. For the proposed Project, much of the construction waste would involve green waste and removal of existing vegetation to stabilize the slope. No operational waste, aside from the periodic removal of small amounts of exotic species of vegetation, would be required. Standard campus contracting provisions include requirements for implementation and monitoring of waste diversion practices in all campus construction projects. These campus provisions address both City and County GHG reduction policies in this regard. As such, the proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Potential impacts would be less than significant.

## IX. Hazards and Hazardous Materials

IX. Hazards and Hazardous Materials	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The proposed construction may include short-term use of petroleum-based fuels, lubricants, pesticides, and other similar materials. LRDP EIR MMRP PP 4.7-1 (hazardous materials safety plans) acknowledges established campus programs to administer federal, state, and local laws regulating the management and use of hazardous materials. Considering the limited duration of construction activity and established programs governing transport, use, and disposal of hazardous materials, the proposed Project does not present the potential for a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials. Potential impacts would be less than significant.</p>				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Refer to item IX.a, above. Potential impacts would be less than significant.</p>				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>There are no existing or proposed schools within 0.25 mile of the site. No impact would occur.</p>				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A Preliminary Environmental Site Assessment was conducted for the Creekside Terrace project as part of the University’s acquisition process (C.H.J. Incorporated 2007a). This assessment included a site inspection, records search, interviews, and review of similar documentation prepared for the homebuilder that developed the Creekside Terrace tract. The assessment documents that the site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and that there is no evidence of recognized hazardous conditions affecting the property. No impact would occur.

<b>IX. Hazards and Hazardous Materials</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project site is within the land use planning area for the airport operations at March Air Reserve Base/Inland Port. The proposed stream bank stabilization work does not present the potential for any change with respect to airport safety hazards for people residing or working in the project area. No impact would occur.				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There are no private airstrips in the project vicinity. No impact would occur.				
g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Central Avenue is designated as an arterial evacuation route in the City of Riverside Emergency Operations Plan (City of Riverside 2007c, Figure PS-8.1, Evacuation Routes). While it is expected that Central Avenue may be used for construction deliveries and access, there is no reason to expect that project activities would block through-traffic or require a road closure. On this basis, the proposed Project does not present the potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Potential impacts 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project area is mostly within an urban area, and the stabilization and mitigation work would not increase the risk of loss, injury, or death involving wildland fires. The project site is in a developed area of the City of Riverside not affected by wildland fire hazard (City of Riverside 2007c, Figure PS-7, Fire Hazard Area). Considering the absence of contributing factors for such risk, the proposed Project would not present potential impacts in this regard. No impact would occur.				

## X. Hydrology and Water Quality

X. Hydrology and Water Quality	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The proposed Project would entail clearing, grading, and construction activity within and adjacent to a perennial stream channel. Temporary stockpiling of excavated soil material and construction materials may occur within the bench area along the north side of the stream area or at other nearby locations, most likely within previously graded lots within the Creekside Terrace development or within the parking lot and landscape areas of the adjacent apartments. Without proper safeguards, project construction could result in a discharge of pollutants into the stream or the local storm drain system.</p> <p>As required under the State General Permit for Discharge of Storm Water Associated with Construction Activity, the campus Stormwater Management Plan, and LRDP EIR MMRP PP 4.4-2(b) (NPDES compliance) and PP 4.8-1 (compliance with applicable water quality requirements), project contractors would prepare and implement a SWPPP detailing project-specific BMPs to limit the potential for the discharge of polluted water during construction. Typical BMPs anticipated to be included in the SWPPP include stream flow diversion, preservation of existing vegetation, temporary soil stabilization, track-out control, street sweeping, storm drain inlet protections, and general good housekeeping practices to separate sources of pollutants from runoff. Additional standard SWPPP provisions include requirements for implementation of control measures 48 hours prior to predicted rain events (i.e., 50% or greater chance of precipitation) and both visual monitoring and stormwater quality monitoring to ensure that BMPs are functioning properly throughout construction.</p> <p>Considering the limited scale and duration of construction activity and established state and campus programs governing construction-period storm water discharges, the proposed Project does not present the potential to violate any water quality standards or waste discharge requirements. Potential impacts would be less than significant.</p>				
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The proposed bank stabilization improvements, by their scale and nature, do not present the potential to affect groundwater recharge or deplete groundwater supplies. No impact would occur.</p>				

<b>X. Hydrology and Water Quality</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Project would involve a previously channelized, remnant drainage feature confined by two major roads (Chicago Avenue and Central Avenue), an established apartment development, and a residential subdivision within a developed area of the City of Riverside. Temporary diversion of the existing stream within the work limits would be required for the approximately 120-day construction period. See item X.a, above, regarding the standard requirement for a SWPPP to minimize potential for erosion and siltation due to this temporary alteration of the stream.</p> <p>The completed improvements would not alter the existing inlet, outlet, or basic channel configuration and capacity. Tributary area limits and characteristics would not be altered. Added rip-rap protection on the north bank, channel bottom, and at the inlet and outlet are expected to reduce any erosion and resultant siltation that may occur under existing conditions.</p> <p>Considering the limited scale and duration of construction activity, established state and campus programs governing construction-period storm water discharges, and the stabilized finished conditions, the proposed Project does not present the potential for substantial erosion or siltation. Potential impacts would be less than significant.</p>				
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The completed improvements would not alter the basic channel configuration and capacity. The existing inlet and outlet would remain as is and the tributary area limits and characteristics would not be altered. With essentially no change from relevant pre-project conditions, the proposed finished conditions do not present the potential to increase the rate or amount of surface runoff in a manner that would result in flooding, on or off site.</p> <p>Temporary diversion of the existing stream would be required for the approximately 120-day construction period. Considering the proposed work limits, the constrained nature of the stream, and the proximity of developed private property and public improvements, the options for diversion are limited. It is expected that diversion would involve a contained method, such as pipes or hoses, extending from the existing inlet to the existing outlet and placed along the south bank or within adjacent landscaped areas.</p> <p>With the assumed contained diversion, there is potential for flooding due to an upset condition involving a breach in the pipe or hose. An approximately 0.92-acre area that contains the existing stream channel has been zoned as Watercourse by the City of Riverside. This roughly corresponds to the fenced area between the apartment site parking lot and the Creekside Terrace development. As long as the potential overflow boundaries are confined to the existing Watercourse-zoned area,</p>				

<b>X. Hydrology and Water Quality</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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there would be no change in anticipated inundation boundaries and, therefore, no potential for significant impacts due to flooding from the temporary change in the stream course. **Mitigation Measure HYD 1** provides a means to ensure that the temporary diversion does not result in flooding on or off site:

HYD 1 – Temporary Diversion Design. The temporary diversion works shall be designed such that the inundation limits (including those resulting from an inadvertent breach of flows contained in a pipe or hose) are confined to the existing Watercourse overlay zone boundary. The University shall ensure that construction contracts provide sufficient detail for the design and method of temporary diversion.

Potential impacts would be less than significant with implementation of the mitigation measure noted above.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed improvements would stabilize an existing stream bank with ungrouted rip-rap. There are no aspects of the construction process or the finished improvements that would increase runoff volumes. On this basis, there is no potential impact in this regard with respect to stormwater drainage system capacity.

See item X.a, above, regarding potential construction-period impacts associated with polluted runoff. Potential impacts would be less than significant.

f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed improvements would stabilize an existing stream bank with ungrouted rip-rap. There are no apparent aspects of the construction process or the finished improvements that present the potential for substantial degradation of water quality.

See item X.a, above, for discussion of potential water quality concerns during the construction period. Potential 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed Project does not involve housing. No impact would occur.

<b>X. Hydrology and Water Quality</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<p>h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</p> <p>The existing stream channel is within the 100-year floodplain (FIRM Panel 06065C0728G, Zone AE, Base Flood Elevations determined). In the finished condition, the proposed channel configuration would be essentially unchanged. The proposed finished improvements would not present the potential to impede or redirect flood flows.</p> <p>The construction process would entail temporary placement of structures within the 100-year flood hazard zone to divert stream flows from the construction area. With implementation of <b>Mitigation Measure HYD 1</b> (see item X.d, above), the temporarily diverted stream flows would be confined to an area already recognized as susceptible to flood hazard. Potential impacts would be less than significant with implementation of the mitigation measure noted above.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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?</p> <p>The project site is within the dam inundation area for the Sycamore Canyon Dam (City of Riverside 2007c, Figure PS-4, Flood Hazard Areas) and is also within the 100-year floodplain (see item X.h, above). The proposed Project would alter the existing setting by grading the stream bank and placing rip-rap on the finished surface. This nominal change in the existing setting would not alter the existing exposure to risk of loss, injury, or death associated with the existing 100-year floodplain and dam inundation limits.</p> <p>The construction process would require temporary diversion of stream flows, which presents limited potential for exposure of people and structures in the immediate vicinity to risk of loss or injury due to flooding (see item X.d, above). With implementation of <b>Mitigation Measure HYD 1</b>, the temporarily diverted stream flows would be confined to an area already recognized as susceptible to flood hazard. Potential impacts would be less than significant with the implementation of the mitigation measure noted above.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>j. Inundation by seiche, tsunami, or mudflow?</p> <p>The project site is at an inland location and there are no confined water bodies in the project vicinity; therefore, there is no potential for impacts related to seiche or tsunami. The surrounding area consists of relatively level paved and landscaped surfaces and retaining walls. Conditions contributing to mudflow hazard are similarly absent, with no potential for impacts in this regard.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## XI. Land Use and Planning

XI. Land Use and Planning	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project would stabilize one bank of a stream situated within a fenced easement between two existing residential developments. There is no potential for impacts in this regard.				
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 LRDP, general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>While the University is exempt from local land use controls pursuant to its constitutional authority, the University has nonetheless analyzed the Project’s consistency with local zoning and permitting requirements. The City of Riverside provides a zoning designation for the Creekside Terrace residential development of R-1-8500 for single family residential, and the apartment complex is designated as R-3-3000 for multi-family residential. The drainage channel and adjacent lands totaling 0.92 acre are within the Watercourse overlay zone (roughly corresponds to the existing fenced area along the stream at the interface of the apartments and the Creekside Terrace development). This zoning designation is in recognition of the existing stream channel and periodic flooding hazards. Such areas are to be kept free of particular structures or improvements that may endanger life or property or significantly restrict the carrying capacity of the designated floodway or stream channel (Riverside Municipal Code, Chapter 19.230.010). Riverside Municipal Code Section 19.230.020.C provides that grading within the Watercourse overlay zone is subject to a Conditional Use Permit (CUP).</p> <p>The proposed improvements would stabilize the north stream bank and maintain the existing channel capacity; the Project would not compromise the water course protection objectives of the Municipal Code zoning provisions. On this basis, there is no potential for conflict with this land use policy adopted to avoid effects on water courses and associated flood zones.</p> <p>University coordination with the City to date has indicated that a CUP would not be required in this case—ostensibly due to the limited nature of the proposed grading and temporary nature of changes in channel flow conditions. Should the City’s position change regarding the need for such an approval, the University is amenable to processing the necessary application. Such a requirement is an administrative matter that does not alter the conclusion regarding potential impacts or the magnitude thereof. The City of Riverside provided a comment letter that describes requirements for processing within the City as the project site is within private land. The City states that (1) grading plans must be submitted to the Public Works Department for review and (2) a separate construction permit must be obtained prior to any operations within the Chicago Avenue street right-of-way and/or public storm drain easement. The University will comply with these</p>				

<b>XI. Land Use and Planning</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
requirements, and no other application is assumed required by the City. No impact would occur.				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Refer to item IV.f, above, for discussion of project conformance to the Western Riverside County MSHCP and the Long-term Habitat Conservation Plan for the SKR. With implementation of recommended <b>Mitigation Measures BIO 1 through BIO 8</b> , the proposed Project would not conflict with applicable provisions of the two adopted habitat conservation plans that apply within the project area. Potential impacts would be less than significant with the incorporation of the mitigation measures noted above.				
d. Create other land use impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed stabilization work would not involve a change in land use. There are no apparent aspects of the proposed construction or finished conditions that present the potential for creation of other land use impacts. No impact would occur.				

## XII. Mineral Resources

<b>XII. Mineral Resources</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project site and surrounding area are committed to development that precludes the potential for loss of availability of a known mineral resource of value to the region and the residents of the state. No impact 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There are no locally important mineral resource recovery sites in the City of Riverside (General Plan 2025 Draft EIR (City of Riverside 2007d, page 5.10-6). No impact would occur.				

### XIII. Noise

<b>XIII. Noise</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Would the project result in:

- |  |                          |                                     |                          |                          |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. Exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

Potential noise impacts of the proposed Project would be limited to the 120-day construction phase. The City of Riverside Municipal Code (Section 7.35.10(b)(5)) addresses construction noise and identifies timeframes in which operation of construction equipment would be considered to result in excessive noise levels. On the basis of this City Municipal Code provision, noise emanating from construction activity adhering to hours of 7:00 a.m. to 9:00 p.m. on weekdays, and 8:00 am to 6:00 p.m. on Saturdays is not considered excessive or in violation of the Municipal Code.

Chapter 7.25 of the Riverside Municipal Code establishes exterior and interior performance standards for residential properties. During the daytime (7 a.m. to 10 p.m.), the noise level standard is 55 decibels for exterior use areas and 45 decibels for interior locations. During nighttime hours (10 p.m. to 7 a.m.), these limits are lowered to 45 decibels for exterior use areas and 35 decibels for interior locations. Section 7.25.010 further defines a series of time periods for which the noise standard may be exceeded without violating the ordinance—ranging from 15 minutes per hour for noise exceeding the performance standard by 5 decibels to 1 minute for noise levels exceeding the performance standard by 15 decibels. An exceedance of 20 decibels or more for any duration is considered a violation. Since construction noise during certain hours of the day is not considered to be in violation of the Municipal Code, these noise limits apply to construction noise between the hours of 9 p.m. and 7 a.m. on weekdays and 6 p.m. and 8 a.m. on Saturdays.

Campus standard practices for minimizing construction noise are detailed in the following LRDP EIR MMRP provisions and will be included for the proposed Project:

PP 4.10-7(b) – The campus shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contract shall specify that engine-driven equipment be fitted with appropriate noise mufflers.

PP 4.10-7(c) – The campus shall continue to require that stationary construction equipment, material and vehicle staging to be placed to direct noise away from sensitive receptors.

PP 4.10-8 – The campus shall continue to conduct meetings, as needed, with off-campus constituents that are affected by campus construction to provide advance notice of construction activities and ensure that mutual needs of the particular construction project and of those impacted by construction noise are met, to extent feasible.

An analysis of projected noise levels resulting from project construction is presented as Appendix F, and staff reviewed the assumptions in 2019. The predicted maximum combined sound level of simultaneously operating equipment is 83 decibels at 50 feet. Sensitive receptors that may be

### XIII. Noise

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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affected by construction noise are nearby residences within the adjacent apartment project and the Creekside Terrace development, as well as recreation areas within Andulka Park. Accounting for attenuation provided by the distance to the nearest residential uses in the adjacent apartment complex, the maximum exterior noise level is predicted to be 79 decibels. Accounting for the distance and vertical separation to the nearest residential uses in the Creekside Terrace development, the maximum exterior noise level is predicted to be 70 decibels. Construction noise levels at Andulka Park would up to 66 decibels, but in most outdoor use locations in the park, construction noise would be overshadowed by noise from traffic on Chicago Avenue.

The noise analysis also considers noise from operation of a generator and pump for the temporary stream diversion. It is anticipated that the pump would need to be situated at the upstream end of the project limits near the existing inlet culvert. This location is approximately 50 feet from the nearest residences within the apartment site; the predicted exterior noise level at these sensitive receptors is approximately 82 decibels. The nearest receptors within the Creekside Terrace development are farther away and separated vertically from the noise source; the predicted maximum exterior noise level at the nearest receptor is 66 decibels. Accounting for attenuation provided by the buildings, interior noise levels could be as high as 57 decibels at adjacent apartment units and 41 decibels at residences in Creekside Terrace.

For all noise sources except the generator/pump for the stream diversion, construction activity may be limited to adhere to the provisions of Riverside Municipal Code Section 7.35.10(b)(5). Recommended **Mitigation Measure NOI 1** provides a means to enforce this restriction and, with implementation of this measure, impacts in this regard would be less than significant. This measure is more restrictive than the construction hour limits typically applied to campus projects under the LRDP EIR MMRP PP 4.10.2 (hour limits for construction activities).

Continuous operation of a generator and/or pump for streamflow diversion during the construction period would result in noise levels exceeding the standards within Riverside Municipal Code Chapter 7.25, which would constitute a significant impact. Recommended **Mitigation Measure NOI 2** requires implementation of attenuation features to achieve noise levels not exceeding the Municipal Code standards. With implementation of this measure, impacts in this regard would be less than significant.

**NOI 1 – Restrict Construction Hours.** The University will ensure that the construction contractor limits construction activities, where feasible, to occurring between 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. and 5:00 p.m. on Saturday. An exception is made as to operation of a generator and/or pump for temporary stream diversion, subject to Mitigation Measure NOI 2, below.

**NOI 2 – Attenuation for diversion pump and generator.** The University will ensure construction contracts specify that any generator or diversion pump will be equipped with mufflers, silencers, shrouds, shields, or other noise-reducing features so as to achieve a maximum exterior operational noise level not exceeding 45 A-weighted decibels (dBA) (one-hour equivalent sound level [ $L_{eq}$ ]) at exterior locations of nearby noise-sensitive land uses. Measures that can be implemented to achieve this include but are not limited to:

- enclosing equipment in solid wall structures,
- using low-noise equipment, and

<b>XIII. Noise</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<ul style="list-style-type: none"> <li>placing sound barriers (earth berms or constructed barriers) around equipment.</li> </ul> <p>Potential impacts would be less than significant with the incorporation of the mitigation measures noted above.</p>				
<p>b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</p> <p>The proposed Project would entail stabilization of the slopes of a drainage feature that has previously been channelized along its natural alignment. Project construction activities may result in some minor amount of ground vibration. However, the proposed stabilization work would not include use of equipment or processes that are significant sources of groundborne noise and vibration. Additionally, vibration from these activities would be short term and would end when construction is completed. Because construction activity would not involve high-impact activities, such as blasting and pile driving, this potential impact is considered less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</p> <p>The finished bank stabilization improvements would not entail any new permanent sources of noise. No impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project (including construction)?</p> <p>See item XIII.a, above. Potential impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</p> <p>The project site is within the land use planning area for airport operations at March Air Reserve Base/Inland Port. The proposed stream bank stabilization does not present the potential for any change with respect to exposure to aircraft noise for people residing or working in the project area. Potential impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</p> <p>There are no private airstrips in the project vicinity. No impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## XIV. Population and Housing

<b>XIV. Population and Housing</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would not involve new homes or businesses and would not extend new infrastructure to an undeveloped area. No impact would occur.				
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would not displace any existing housing. No impact would occur.				
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would not displace any existing housing. No impact would occur.				

## XV. Public Services

<b>XV. Public Services</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would entail stabilization of the slopes of a drainage feature situated within an area of existing residential development. There are no aspects of the construction process or the finished improvements that would alter demand for fire protection services or affect existing physical facilities associated with provision of fire protection services. No impact would occur.				

<b>XV. Public Services</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would entail stabilization of the slopes of a drainage feature situated within an area of existing residential development. There are no aspects of the construction process or the finished improvements that would alter demand for police protection services or affect existing physical facilities associated with provision of police protection services. No impact would occur.				
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would entail stabilization of the slopes of a drainage feature situated within an area of existing residential development. There are no aspects of the construction process or the finished improvements that would alter demand for school services or affect existing physical facilities associated with provision of school services. No impact would occur.				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed Project would entail stabilization of the slopes of a drainage feature situated within an area of existing residential development. The project site is separated from nearby Andulka Park by an existing major thoroughfare, Chicago Avenue, and, in the finished condition, the Project would not alter the volume or nature of flows that are received in existing downstream storm drain improvements along the park boundary. There are no aspects of the construction process or the finished improvements that would alter demand for park services or affect existing physical facilities associated with provision of park services. No impact would occur.				
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Considering the location and the general nature and limited scale of the proposed improvements, the proposed Project does not present the potential for substantial adverse impacts associated with increased demand for public services or the need for additional public facilities. No impact would occur.				
f. Create other public service impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Considering the location and the general nature and limited scale of the proposed improvements, the proposed Project does not present the potential for substantial adverse impacts associated with increased demand for public services or the need for additional public facilities. No impact would occur.				

## XVI. Recreation

<b>XVI. Recreation</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The proposed Project would entail stabilization of the slopes of a drainage feature situated within an area of existing residential development. There are no aspects of the construction process or the finished improvements that would alter demand for parks or recreational facilities services or affect existing physical facilities due to increased use of existing parks or recreational facilities.</p> <p>The subject drainage feature outlets through an existing 72-inch concrete storm drain pipe that passes under Chicago Avenue and discharges to an open channel along the perimeter of Andulka Park. The proposed bank stabilization improvements would not alter stream flow or tributary area conditions and, therefore, do not present the potential for changes in discharge characteristics that could contribute to physical deterioration of the existing downstream improvements. No impact would occur.</p>				
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The proposed Project would not include recreational facilities and would not require the construction or expansion of recreational facilities. No impact would occur.</p>				



## XVII. Transportation/Traffic

<b>XVII. Transportation/Traffic</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Both Chicago Avenue and Central Avenue are fully improved as four-lane, divided arterials. The City of Riverside service standard for arterials is Level of Service D (City of Riverside 2007a, page CCM-11). Level of Service D corresponds to a volume to capacity ratio not exceeding 1.0; therefore, roadways in the City of Riverside are considered to operate over capacity when the daily traffic volume exceeds the daily capacity value (City of Riverside 2007e, page 12). The traffic counts (City of Riverside 2013) available from the City’s website indicate daily traffic volumes of approximately 17,000 to 25,000 vehicles per day on the segments of Chicago Avenue and Central Avenue near the project site. The General Plan EIR traffic study indicates a daily capacity of 33,000 per day for 110-foot arterials such as Central Avenue and Chicago Avenue. Under existing conditions, there is capacity to add an additional 8,000 to 16,000 daily trips before reaching the City’s service standard for arterials and exceeding the allowed volume to capacity ratio.</p> <p>Temporary construction-related trips would result in an increase in trips on the surrounding roadway network. Specifically, construction-related trips would include daily trips for construction workers, delivery of equipment, delivery of materials, and removal of debris and excavated soil. No more than 18 construction worker trips are anticipated on any given day during the 120-day construction period. A total of 15 pieces of off-road equipment would be used throughout the four phases of construction, and no more than six pieces would be delivered during any given phase. As such, the number of construction trips related to the delivery of equipment would be minimal. A range of 2,500 to 4,360 cy of materials would be delivered or removed from the project site, including up to 1,460 cy of rip-rap delivered to the site and 300 cy of excavated soil and 2,600 cy of vegetation debris taken from the site. At a capacity of about 16 to 20 cy of materials per truck trip, a total of about 250 to 545 round trips would account for material delivery and removal of debris and excavated soil over the 120-day construction period. The adjacent roadway network would be able to accommodate the additional short-term construction trips, including trips of up to 50 miles away to and from a quarry in Corona or southern Riverside County for rock import.</p> <p>While the proposed Project would temporarily increase the number of vehicle trips in the immediate vicinity, the proposed Project does not present the potential to conflict with City of Riverside policy regarding performance of the circulation system. Potential impacts would be less than significant.</p>				

<b>XVII. Transportation/Traffic</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
See item XVII.a, above. Potential impacts would be less than significant				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project site is within the land use planning area for the airport operations at March Air Reserve Base/Inland Port. The proposed stream bank stabilization work would not present the potential for any change with respect to air traffic patterns. No impact would occur.				
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Access to the work area is by way of a gated entry off Chicago Avenue immediately south of the entrance drive to the Creekside Terrace development. There is a continuous raised median separating the northbound and southbound travel lanes along this section of Chicago Avenue, which has a posted speed limit of 45 miles per hour and a striped bike lane adjacent to the outside curb. The signalized intersection at Central Avenue is approximately 1,100 feet to the south. Two driveways serving the apartment complex are located between Central Avenue and the work area access point.				
It is not expected that temporary closures of the traffic lanes on Chicago Avenue between the northern apartment driveway and the Creekside Terrace entrance would be required during the anticipated 120-day construction period. However, in the event that traffic lane closures may be required during construction, at least one through lane of traffic would be maintained at all times, consistent with LRDP PP 4.14-5 (maintaining access during construction), which requires the campus to maintain at least one unobstructed lane in both directions on campus roadways; in this case, the measure would apply to off-campus streets to be affected by the proposed campus Project. Standard provisions of the required City encroachment permit would also ensure that appropriate signage and traffic control measures are implemented to provide for safety of vehicles, bikes, and pedestrians.				
Once construction is complete, the road and access conditions would be unchanged. With no change from existing conditions, there is no potential for increased hazards due to design features or incompatible uses. Potential impacts would be less than significant.				

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XVII. Transportation/Traffic</b>				
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
See item XVII.d, above. As stated previously, at least one through lane would be maintained at all times, consistent with LRDP PP 4.14-5 (maintaining access during construction), and no lane closures on Chicago Avenue are anticipated. In the finished condition, there would be no change potentially affecting emergency access. Potential impacts would be less than significant.				
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
See items XVII.d and XVII.e, above. The bus stop on the east side of Chicago Avenue just north of Central Avenue is several hundred feet south of the proposed Project and would not be adversely affected by proposed construction activity with compliance with LRDP PP 4.14-5 (maintaining access during construction). In the finished condition, there would be no change potentially affecting public transit, bicycle, or pedestrian facilities. Potential impacts would be less than significant.				

### XVIII. Tribal Cultural Resources

In January 2019, updates to the State CEQA Guidelines were adopted, which included the addition of a Tribal Cultural resources section, as addressed in this section.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XVIII. Tribal Cultural Resources</b>				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or <b>(New CEQA Threshold)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In September 2014, Governor Brown signed AB 52 (Chapter 532, Statutes of 2014), which creates a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." The legislation imposes new requirements for offering to consult with California				

**XVIII. Tribal Cultural Resources**

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Native American tribes regarding projects that may affect a tribal cultural resource, emphasizes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.

Recognizing that tribes may have expertise regarding their tribal history and practices, AB 52, which became effective on July 1, 2015, requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project, if they have requested such notice in writing. The project notification is required prior to the lead agency’s release of a Notice of Preparation of an EIR or NOI to adopt an MND or ND. Once Native American tribes receive a project notification, they have 30 days to respond as to whether they wish to initiate consultation regarding the project, including subjects such as mitigation for any potential project impacts. If a tribe request consultation and the lead agency and the tribe ultimately agree on mitigation to address any potentially significant impacts on tribal cultural resources, the mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. It should be noted that the original environmental document for the proposed project went out for public review in 2014, before AB 52 tribal consultation was enacted. To date, the University has received two requests for project notification pursuant to AB 52 (from the Agua Caliente Band of Cahuilla Indians and the Torres Martinez Desert Cahuilla Indians).

In January 2019, updates to the State CEQA Guidelines were adopted, which included the addition of a Tribal Cultural Resources section, as addressed in this section.

Refer to item V. a, above. Based on the results of the records search (Appendix E), Native American scoping, and field survey, specific cultural resources (prehistoric or historic) were not identified in the project APE. No specific resource information was provided by tribal contacts for the project APE, and no impact on historical resources under CEQA would occur. However, the discovery of unanticipated cultural resources and/or human remains is always a possibility during ground-disturbing activities. The University’s standard contractor specifications address protection and recovery of buried artifacts, including archaeological resources, and the standard requirements are incorporated into the project as **Mitigation Measure CUL 1**. It is noted that this campus procedure is consistent with City of Riverside practices under General Plan EIR Mitigation Measure Cultural 4 (discovery of archaeological resources and Native American human remains) and recommendations from a cultural resources report completed in 2019.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. <b>(New CEQA Threshold)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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A cultural resources report was completed in 2019 (Appendix E). Based on the results of the

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### **XVIII. Tribal Cultural Resources**

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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records search in 2018, the Sacred Lands File search through the NAHC, and the field survey, no specific tribal cultural resources were identified in the project APE. No impact is anticipated.

In 2018, an updated cultural survey and outreach to affected tribes were conducted for the Project. The proposed Project was found to be within the territory of the Rincon Band of Luiseño Indians, and is within Rincon's specific area of historic interest, but there is no knowledge of cultural resources within or near the proposed Project. The Gabrieleño/Tongva San Gabriel Band of Mission Indians stated that the area could be sensitive due to its proximity to the creek and that there should be archaeological or Native American monitoring or spot-checking during ground disturbance. The San Manuel Band of Mission Indians stated that the Project is located just outside of Serrano ancestral territory, and they will not be requesting consulting party status with the lead agency. The Soboba Band of Luiseño Indians stated that the Project is within the bounds of the Luiseño Tribal Traditional Use Areas, is near known sites, and is a shared use area that was used in ongoing trade between the tribes and is considered to be culturally sensitive by the people of Soboba. They requested consultation with the project proponents and lead agency and that Native American monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department be present during ground disturbing proceedings. It should be noted that to date, the above noted tribes have not requested to be part of the University's AB 52 tribal consultation process. The campus subsequently contacted Soboba Band of Luiseño Indians via email on May 22, 2020 noting that based on the results of a records search in 2018, Native American scoping, the Sacred Lands File search through the NAHC, and the field survey, specific tribal cultural resources (prehistoric or historic) were not identified in the project APE, and as such, tribal monitoring will not be included during construction activities. To date, there has been no response from the tribe. Nevertheless, there is always a possibility of encountering unknown or undocumented burials containing human remains or cultural resources during earth moving activities. UCR's standard contract specifications address the protection and recovery of buried cultural or archaeological resources, including human remains, and the standard requirements are incorporated in the project as a mitigation measure as noted in **Mitigation Measure CUL 1**. Additionally, **Mitigation Measure CUL 1** provides specifications for consultation with tribes should any resources be encountered during construction. It should be noted that the original environmental document for the proposed project went out for public review in 2014, before AB 52 tribal consultation was enacted. To date, the University has received two requests for project notification pursuant to AB 52 (from the Agua Caliente Band of Cahuilla Indians and the Torres Martinez Desert Cahuilla Indians). On July 18, 2018, the University provided these tribes with notification of the proposed project. No response was received by the Torres-Martinez Desert Cahuilla Indians. On July 26, 2018, the Agua Caliente Band of Cahuilla Indians (ACBCI) responded to this request stating that the project area is not within the boundaries of the ACBCI Reservation; however, the project area is within the tribes' Traditional Use Area. The tribe requested copies of any cultural resources documentation (records search, inventory, report, and site records) generated in connection with the project. On April 10, 2019, the Cultural Resources Report was e-mailed to ACBCI. On April 30, 2019, ACBCI requested updates to the Cultural Resources Report regarding the following items: incorporate their comments in Section 4.2, Native American Heritage Commission, and

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**XVIII. Tribal Cultural Resources**

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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incorporate their response letter dated November 7, 2018 in Appendix B. They also deferred to Soboba and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. As noted above, to date, these tribes have not requested to be part of the University’s AB 52 tribal consultation process. The updates to the Cultural Resources Report were incorporated, and the updated report was provided to ACBCI on May 23, 2019.

The University’s standard contractor specifications address protection and recovery of buried artifacts, including archaeological resources, and the standard requirements are incorporated into the project as **Mitigation Measure CUL 1**. This mitigation measure identifies steps to be taken in the event archaeological resources, including Native American cultural resources, are discovered during construction activities. Potential impacts would be less than significant with mitigation incorporated.

**XIX. Utilities and Service Systems**

**XIX. Utilities and Service Systems**

Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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Would the project:

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

The proposed bank stabilization improvements would not generate wastewater or require wastewater treatment services. No impact would occur.

- 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?

The proposed bank stabilization improvements would not generate new demand for water or wastewater services or otherwise require or result in the construction of expansion of water or wastewater treatment facilities. No impact would occur.

<b>XIX. Utilities and Service Systems</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<p>c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p> <p>The proposed Project would modify a segment of open channel that functions as a component of the City’s storm water drainage system. The proposed bank stabilization improvements would entail temporary disturbance of the existing stream channel and associated riparian vegetation, which presents the potential for significant environmental effects related to biological resources, temporary flooding, and noise, as discussed in preceding sections of this checklist (see Sections IV, X, and XIII). <b>Mitigation Measures BIO 1 through BIO 8, HYD 1, NOI 1, and NOI 2</b> have been identified to reduce these potential impacts to below a level of significance. In addition, the environmental analysis presented throughout this initial study acknowledges established campus and City programs and practices that contribute to avoidance and minimization of potential environmental effects, including those related to construction-period air emissions, discovery of unknown cultural resources, erosion, construction-period noise, construction-period hazardous materials use and transport, and construction-period traffic safety (see Sections II, V, VII, VIII, IX, X, XIII, and XVII, above). With implementation of the recommended mitigation measures <b>BIO 1 through BIO 8, HYD 1, NOI 1, and NOI 2</b> and implementation of City and campus standard practices, the potential environmental effects of the proposed storm water facility improvements would be less than significant.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</p> <p>Refer to item XIX.a, above. The proposed Project would require comparatively limited volumes of water only during the construction phase. There are no known circumstances with existing water supplies that suggest such temporary demand would require new or expanded entitlements or resources. Potential impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>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?</p> <p>The proposed bank stabilization improvements would not require wastewater service. No impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>XIX. Utilities and Service Systems</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Project construction activities would generate a one-time volume of demolition waste, consisting of approximately 133 to 2,600 cubic yards of vegetation and 236 to 300 cubic yards of soil. As stated previously in item VIII.b, both the University and the City of Riverside have adopted programs requiring substantial diversion of construction waste. Standard campus contracting provisions include requirements for implementation and monitoring of waste diversion practices in all campus construction projects. These campus provisions address both City and County reduction policies in this regard. For the proposed Project, much of the construction waste would involve green waste and removal of existing vegetation to stabilize the slope. No operational waste, aside from the periodic removal of small amounts of exotic species of vegetation, would be required. Standard campus contracting provisions, to be included in contract specifications for implementation by the construction contractor, include green waste recycling and other requirements for implementation and monitoring of waste diversion practices in all campus construction projects. Ongoing operation would generate limited volumes of waste consisting of vegetation cleared from the north bank and adjacent access area.</p> <p>The Robert A. Nelson Transfer Station, located at 1830 Agua Mansa Road, receives refuse from western Riverside County, including the UCR campus. The transfer station is owned by the Riverside County Department of Waste Resources (RCDWR) and is operated by Burrtec Waste Industries. The transfer station is permitted to accept up to 4,000 tons of solid waste per day and is currently processing approximately 2,500 to 3,000 tons of solid waste per day (Burrtec 2019). It should be noted that this number reflects all waste, including recycling, green waste, and C&amp;D. Considering the limited nature of project waste generation and established practices for substantial diversion from landfill disposal, the Project does not present the potential to generate solid waste in excess of local landfill capacity. Potential impacts would be less than significant.</p>				
g. Comply with applicable federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Applicable statutes related to solid waste are those addressing reduction of the volume of waste sent to landfills. As stated previously in items IX.b and XIX.f, above, both the University and the City of Riverside have adopted programs and established standard implementation programs for substantial diversion of waste. Considering the limited nature of project waste generation and established programs for diversion from landfill disposal, the proposed Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste, and there would be no impact in this regard. No impact would occur.</p>				



<b>XIX. Utilities and Service Systems</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
h. Create other utility and service system impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Considering the location and the general nature and limited scale of the proposed improvements, the proposed Project does not present the potential for adverse impacts on utility and service systems. No impact would occur.

## XX. Wildfire

In January 2019, updates to the State CEQA Guidelines were adopted, which included the addition of a Wildfire section, as addressed in this section.

<b>XX. Wildfire</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan? <i>(New CEQA Threshold)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project area is mostly within an urban area, and the stabilization and mitigation work would not alter any roadways that could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project would not involve modifications to facilities that are critical to emergency response—such as police, fire, and hospital facilities—and project improvements would not impede access to these facilities in an emergency. All access points, storage, and staging areas would be located in a manner that has the least impact on vehicular and pedestrian traffic. Therefore, the proposed Project would not affect an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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According to the Fire and Resource Assessment Program *Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE* map for the City of Riverside, the project area is not located within or near areas that are susceptible to wildfires; therefore, further analysis of the hazards related to wildfire is not warranted (CAL FIRE 2019). Also, the project area is surrounded on all

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**XX. Wildfire**

sides by development and vacant development parcels. There would be a less-than-significant impact related to wildland fires.

The proposed project activities would not increase exposure to significant risk of loss, injury, or death involving wildland fires, and the Project would not exacerbate wildfire risk or expose occupants to pollutant concentrations from a wildfire. Additionally, there would be no significant increase in naturally caused fires as the project would maintain similar natural, open spaces as currently exist at the project locations, and because the project includes the provision of additional water to sites to ensure success of newly installed vegetation. Potential impacts would be less than significant.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Implementation of the proposed Project would involve restoration, stabilization, mitigation, and enhancement of the hydrology of the channel and native habitat. The proposed Project would not construct buildings, power lines or other utilities, or permanent roads. All access points, storage, and staging areas during construction would be located in a manner that has the least impact on native vegetation as well as vehicular and pedestrian traffic. Potential impacts would be less than significant.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed Project aims to stabilize the north bank of an existing drainage channel adjacent to the University-owned Creekside Terrace residential development. The subject drainage channel flows year-round; therefore, diversion would be necessary during construction. The entire work limits would need to be dewatered for the duration of construction. Considering the relative grade between the culvert outlet at the upstream end of the work limits and the likely bypass pipeline location, pumping is expected and a portable generator may be required as a power source. Construction is anticipated to last approximately 120 days. No buildings or habitable structures are proposed as part of the Project. No permanent residences or structures would be displaced with the proposed improvements. Therefore, the Project would not expose people or structures to significant risks of flooding or landslides, and a less-than-significant impact would occur.

## XXI. Mandatory Findings of Significance

XXI. Mandatory Findings of Significance	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<p>The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):</p>				
<p>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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed Project would stabilize the slopes of highly constrained, previously channelized drainage feature in an area of residential development. The recommended mitigation measures (<b>Mitigation Measures BIO 1, BIO 2, and BIO 3</b>) establish requirements to minimize impacts on the stream and associated riparian habitat and provide a framework for implementation of onsite riparian habitat restoration as well as offsite riparian habitat restoration via the purchase into a mitigation bank or in-lieu fee program (<b>Mitigation Measures BIO 4, BIO 5 and BIO 6</b>). In the finished condition, the overall quality of the environment and the value of the channel as habitat would not be substantially altered from pre-project conditions.</p>				
<p>Project-specific surveys have documented the limited presence of wildlife within the work limits and the absence of rare, threatened, or endangered species. Mitigation measures (<b>Mitigation Measures BIO 2 and BIO 8</b>) have been recommended to avoid significant impacts should any sensitive or otherwise protected bird species be identified within the work limits as construction proceeds.</p>				
<p>The project site is previously disturbed and supports a perennial stream. No cultural resources were discovered in conjunction with prior development and there is no reasonable expectation that cultural resources would be discovered in the course of the proposed work. Nevertheless, there is always a possibility of encountering unknown or undocumented burials containing human remains or cultural resources during earth moving activities. UCR's standard contract specifications address the protection and recovery of buried cultural or archaeological resources, including human remains, and the standard requirements are incorporated in the project as a mitigation measure as noted in <b>Mitigation Measure CUL 1</b>.</p>				
<p>Potential impacts would be less than significant with mitigation incorporated.</p>				

<b>XXI. Mandatory Findings of Significance</b>	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<p>b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Impacts resulting from the proposed bank stabilization improvements as identified in the discussion of checklist sections I through XX of this IS/MND would be isolated to the work limits or immediately surrounding environs within an established residential neighborhood in the City of Riverside. Potential impacts would be substantially limited to the approximately 120-day construction period. The review and analysis contained herein recognizes compliance with established local, state, and federal regulations and University-standard procedures as the basis for a determination that impacts are less than significant for aesthetics, agricultural and forestry resources, air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, transportation/traffic, tribal cultural resources, and wildfire. The environmental review and analysis contained herein also indicates that the proposed Project presents the potential for project-level environmental impacts related to biological resources, hydrology and water quality, land use and planning, noise, and utilities and service systems, and mitigation is proposed to reduce those impacts. All identified direct impacts of the proposed improvements would be mitigated to below a level of significance with implementation of the recommended mitigation measures and standard City and University programs and practices. Therefore, no significant cumulatively considerable impacts would result under the proposed Project.</p>				
<p>c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Aspects of the Project presenting the potential for adverse impacts on human beings are associated with construction-related air emissions, flooding, noise, traffic, and hazardous materials use and transport. The discussion presented in the respective sections of this checklist (see discussion under Sections III, IX, X, XIII, and XVII) supports the conclusion that the proposed Project would not cause substantial adverse effects on human beings.

## VI. Supporting Information Sources

### Printed References

*Unless noted, all documents are available for review at the University of California, Riverside, Planning, Design & Construction (formerly Capital Resource Management), University Village, 1223 University Avenue, Suite 240 (formerly 200), Riverside California, 92507*

C.H.J. Incorporated. 2007a. Preliminary Environmental Site Assessment Tract No. 31671 Creekside Terrace Riverside California, Prepared for University of California, Riverside (Job No. 07616-9). August 10. Colton, CA.

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California Department of Fish and Wildlife (CDFW). 2019. *California Natural Diversity Database*. Sacramento, CA: Riverside East, San Bernardino South, Redlands, Sunnymead, Perris, Steele peak, Lake Mathews, Riverside West and Fontana. California Department of Fish and Game, Wildlife and Habitat Data Analysis Branch. Element reports for the, *Riverside East, California*, and immediately surrounding USGS 7.5-minute quadrangle maps. November.

California Native Plant Society (CNPS). 2019. *Inventory of Rare and Endangered Plants* (online edition, v8-03). Sacramento, CA. Accessed: November 2019.

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Riverside, City of. 2007. *City of Riverside General Plan 2025*, Riverside, CA. November. Available: <http://riversideca.gov/planning/gp2025program/general-plan.asp>.

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- . 2007e. City of Riverside General Plan 2025 Program Documents, Final Programmatic Environmental Impact Report, Volume 3, Appendix H – Transportation Study. Riverside, CA. November. Available: [http://www.riversideca.gov/planning/2008-0909/FPEIR/Volume\\_3/Appendix\\_H.pdf](http://www.riversideca.gov/planning/2008-0909/FPEIR/Volume_3/Appendix_H.pdf)
- . 2013. City of Riverside Traffic Counts. Available: <http://www.riversideca.gov/traffic/pdf/2011-05-24hrVolumeCounts.pdf>
- South Coast Air Quality Management District (SCAQMD). 2013. SCAQMD Rules and Regulations. Available: <http://www.aqmd.gov/rules/rulesreg.html>.
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- U.S. Geological Survey (USGS). 1967. 7.5-minute, Riverside East quadrangle map. Photorevised 1980.

## Personal Communication

- Long, Rhonda, Riverside County Regional Parks and Open Space District (RCRPOSD). Personal communication—August 14, 2014.

## Documents Incorporated by Reference

- California Department of Conservation, Division of Land Resources Protection. 2012. Farmland Mapping and Monitoring Program. Riverside County Important Farmland 2010, Sheet 1 of 3. January. Available: [ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/riv10\\_west.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/riv10_west.pdf)
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- Riverside, County of. 2014. Riverside County eRED Program. July. Available: <https://planning.rctlma.org/Home/Riverside-County-eRED-Program>.

University of California, Riverside. 2005. Long Range Development Plan Final Environmental Impact Report Mitigation Monitoring and Reporting Program. Available: <http://lrdp.ucr.edu/UCR%20LRDP%20Volume%20III%20FEIR%20November.pdf> (MMRP is Chapter D of Volume III, Final EIR)

University of California, Riverside. 2005. Long Range Development Plan Amendment 2 Final Environmental Impact Report Mitigation Monitoring and Reporting Program. Available: <http://lrdp.ucr.edu/Final%20EIR%20Volume%20III.pdf> (MMRP is Chapter 4 of Volume III, Final EIR)

## VII. Initial Study Preparers

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### **University of California, Riverside**

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Stephanie Tang, Campus Environmental Planner

Jaime Engbrecht, Planner

# Comments and Responses

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The University has reviewed and evaluated the comments received on the Draft IS/MND for the Creekside Terrace Slope Protection Project and has prepared written responses to these comments. Since circulation of the Draft IS/MND in 2014, it has been determined that additional soil will need to be transported off site. The remainder of the proposed Project has not changed. This section contains copies of the comments received during the public review process and provides an evaluation and written response for comments made regarding environmental issues.

## Comments Received

During the public review period for the Draft IS/MND, which occurred between August 26, 2014 and September 24, 2014, the University received three comment letters from agencies; no letters were received from organizations and individuals.

The commenting parties are listed below, along with a corresponding letter for organizational purposes of identifying comments and responses, which are provided in this section.

Comment Letter	Agency	Correspondence Date	Date Received
A	City of Riverside Community Development Department	September 22, 2014	September 25, 2014
B	State of California Department of Fish and Wildlife	September 24, 2014	September 25, 2014
C	State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	September 25, 2014	September 29, 2014

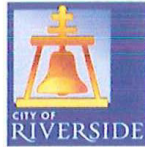
## Comments and Responses to Comments

This section presents all written comments on the Draft IS/MND received by the University during the 30-day public review period from August 26, 2014 to September 25, 2014 and the responses to those comments.

The comments received do not trigger any recirculation as required by CEQA Guidelines Section 15073.5, nor do they question the University's determination that an MND is the appropriate CEQA compliance document for the proposed Project.



# Comment Letter A: City of Riverside Community Development Department



Community Development  
Department  
Planning Division

City of Arts and Innovation

## Comment Letter A

September 22, 2014

Tricia D. Thrasher, ASLA LEED AP  
Principal Environmental Project Manager  
UCR Capital Planning  
University Village  
1223 University Avenue, Suite 200  
Riverside, CA 92507

**SUBJECT: NOTICE OF COMPLETION - NEGATIVE DECLARATION - CREEKSIDE TERRACE SLOPE STABILIZATION PROJECT**

Dear Ms. Thrasher:

Thank you for the opportunity to comment on the Negative Declaration for the proposed Creekside Terrace Slope Stabilization Project a proposal to stabilize the north bank of an existing drainage channel generally located north of Central Avenue, East of Chicago Avenue and south of LeConte Drive. Given the location of the project within the City of Riverside and the potential impacts on City streets and stormwater facilities, the City's Public Works Department is providing the following comments for your consideration.

A-1

As indicated within the Draft initial Study, project construction would take place on property owned by the University of California, Riverside as well as on private land not owned by the University of California Regents. Typically, operations on University-owned property are not subject to City approval or permitting. However, given that the project also includes construction on private property, grading plans must be submitted to Public Works for review and approval and a Grading Permit shall be obtained from the City prior to commencing any construction operations on private property. A separate Construction Permit must also be obtained prior to any operations within the Chicago Avenue street Right-of-Way and/or the adjacent public storm drain easement.

A-2

The City of Riverside appreciates your consideration of the comments provided in this letter. Should you have any specific questions regarding the grading permit requirements, please contact the City's Public Works Department at 951-826-5341. Should you have any additional questions regarding this letter, please feel free to contact David Murray, Senior Planner at (951) 826-5773 or by email at [dmurray@riversideca.gov](mailto:dmurray@riversideca.gov).

Sincerely,

Jay Eastman, AICP  
Principal Planner

UCR

CAPITAL RESOURCE MANAGEMENT

DATE RECEIVED 9-25-14  
tbt

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | [RiversideCA.gov](http://RiversideCA.gov)

c: Scott Barber, City Manager  
Deanna Lorson, Assistant City Manager  
Kristi Smith, Supervising Deputy City Attorney  
Al Zelinka, Community Development Director  
Emilio Ramirez, Deputy Community Development Director  
Tom Boyd, Public Works Director/City Engineer  
Rob Van Zanten, Principal Engineer

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Dec\PSP14-0047 Creekside Terrace Slope Stabilization Project Letter.docx

## **Response to Comment A-1 (Introduction)**

The University appreciates the City's participation in the comment period for the Draft IS/MND. This introduction to the City's comments presents an accurate summary of the Project.

## **Response to Comment A-2 (City Requirements)**

This comment does not raise any new or altered environmental impacts. The City describes requirements for processing within the City of Riverside as the Project is partially within private land. The City states that (1) grading plans must be submitted to the Public Works Department for review and (2) a separate construction permit must be obtained prior to any operations within the Chicago Avenue street right-of-way and/or public storm drain easement. The University will comply with these requirements and no further response is required.

## Comment Letter B: State of California Department of Fish and Wildlife



State of California - Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 Inland Deserts Region  
 3602 Inland Empire Blvd., Suite C-220  
 Ontario, CA 91764  
 (909) 484-0459  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

*EDMUND G. BROWN, Jr., Governor*  
*CHARLTON H. BONHAM, Director*



### Comment Letter B

September 24, 2014

Ms. Tricia Thrasher  
 The Regents of the University of California  
 1223 University Avenue, Suite 200  
 Riverside, CA 92507

Subject: Creekside Terrace Slope Stabilization Project  
 Draft Initial Study/Mitigated Negative Declaration  
 State Clearinghouse No. 2014081086

Dear Ms. Thrasher:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Draft Initial Study/Mitigated Negative Declaration for the Creekside Terrace Slope Stabilization Project (Project) [State Clearinghouse No. 2014081086]. The Department is responding to the IS/MND as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

#### Project Description

The Project is located in a stream located 0.20 mile north of the intersection of Chicago Avenue and Central Avenue, east of Chicago Avenue, south of Creekside Terrace, in the City of Riverside. The applicant (University of California, Riverside) proposes to stabilize the north bank of the existing channel by removing all vegetation from the north bank and channel bottom, reshaping the channel and placing ungrouted rip-rap on the north bank. The proposed design includes channel excavation and reshaping into a v-channel with uniform slope face extending between the existing top of the north bank and the existing toe of riprap cover on the opposite bank. Riprap pads will be established at the inlet and outlet for energy dissipation. Water diversion will be necessary during project activities.

**B-1**

*Conserving California's Wildlife Since 1870*

Draft Initial Study/Mitigated Negative Declaration  
 Creekside Terrace Slope Stabilization Project  
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Biological Resources and Impacts

The Department has multiple questions, comments, and concerns, related to the Biological Resources section of the IS/MND, and requests that these questions, comments, and concerns be addressed in the subsequent CEQA document. The Department's questions, comments, and concerns include:

1. Regarding Mitigation Measure BIO-7: Please note that it is the Lead Agency's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.). In addition, sections 3503, 3503.5, and 3513 of the FGC prohibit the take of all birds and their nests. Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.
2. Mitigation Measure BIO-7 states that the breeding bird season includes "...February 15 through September 15..." Please note that some species of raptors (e.g., owls) may commence nesting activities in January. The Department encourages the Lead Agency to complete nesting bird surveys regardless of time of year to ensure compliance with all applicable laws related to nesting birds and birds of prey.
3. The Department recommends that pre-construction surveys be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner. As mentioned previously, it is the Lead Agency's responsibility to ensure that the project complies with all applicable laws related to nesting birds and birds of prey, and that violations of these laws do not occur.
4. The IS/MND does not include sufficient analysis of project related impacts to species identified as candidate, sensitive, or special status. Regarding the following rationale given on page D-17 on the "less than reasonable potential to occur" for Santa Ana speckled dace: "This species is known to occur both upstream and downstream of the project site. However, these populations are isolated from the project site due to flood control structures ..." that "...do not support habitat for this species," Please provide a reference for this statement.

B-2

B-3

B-4

B-5

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The Department recommends that the Lead Agency complete focused surveys for Santa Ana speckled dace and Arroyo chub and include the results of these surveys in the revised MND.

B-5  
cont.

5. The Department requests the clarification of project impacts and corresponding mitigation measures. Mitigation Measure BIO-5 states that "native riparian vegetation shall be allowed to reestablish through natural recruitment within the work limits...", yet the project description states that proposed activities would "require the removal of all vegetation on the north bank as well as the channel bottom" and "ongoing activity would maintain a vegetation-free condition on the north bank." Please clarify if the proposed impacts to the vegetation within the north bank will be ongoing and identify suitable mitigation for the associated impacts. Furthermore, Mitigation Measure BIO-6 identifies residual mitigation obligations. Please disclose any current or outstanding mitigation obligations associated with the Creekside Terrace development.

B-6

6. The mitigation measures as described in the IS/MND are insufficient to mitigate for the impacts to the Project will have to the Jurisdictional Areas and the areas designated for mitigation under previous permits. For this reason, the Department believes that it cannot fulfill its obligations as a Trustee and Responsible Agency for fish and wildlife resources. Permit negotiations conducted after and outside of the CEQA process are not CEQA-compliant, because they deprive the public and agencies of their right to know what project impacts are and how they are being mitigated (CEQA Section 15002). Please note that the Department requires mitigation to be placed within the same watershed. The purchase of mitigation bank credits for the creation of wetlands is also subject to Department approval.

B-7

7. The CEQA document should contain sufficient, specific, and current biological information on the existing habitat and species at the Project site; measures to minimize and avoid sensitive biological resources; and mitigation measures to offset the loss of native flora and fauna and State waters. The CEQA document should not defer impact analysis and mitigation measures to future regulatory discretionary actions, such as a Lake or Streambed Alteration Agreement.

B-8

8. If state or federal endangered or threatened species have the potential to occur on the Project site, species specific surveys should be conducted using methods approved by the Department or assume the presence of the species throughout the project site. The CEQA document should include recent survey data (CEQA Guidelines Section 15125(a)). The CEQA document should also address species of special concern and federal critical habitat. To assist with review, an accompanying map showing the areas of impact should be included in the subsequent CEQA document. Additional maps detailing the location of endangered, threatened, or special of special concern should also be included in the subsequent CEQA document.

B-9

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Natural Community Conservation Program (NCCP) and California Endangered Species Act (CESA)

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the CESA, and administers the Natural Community Conservation Plan Program (NCCP Program). Within the Inland Deserts Region, the Department issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

B-10

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <http://rctlma.org/epd/WR-MSHCP>.

Lake and Streambed Alteration Program

The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <http://www.dfg.ca.gov/habcon/1600forms.html>.

B-11

The Department's website has information regarding dryland streams in "A review of Stream Processes and Forms in Dryland Watersheds," available at this location: <http://www.dfg.ca.gov/habcon/1600/1600resources.html>.

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Additional information can also be found in "Methods to Describe and Delineate Episodic Stream Processes on Arid Landscapes for Permitting Utility-Scale Solar Power Plants, With the MESA Field Guide- Final Project Report" available here: <http://www.energy.ca.gov/2014publications/CEC-500-2014-013/index.html>

Although the proposed Project is within the MSHCP, a Notification of Lake or Streambed Alteration may be required by the Department, should the site contain jurisdictional areas, and the Project proposes impacts to these areas. Additionally, the Department's criteria for determining the presence of jurisdictional waters are more comprehensive than the MSHCP criteria in Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools).

The following information will be required for the processing of a Notification of Lake or Streambed Alteration and the Department recommends incorporating this information into the CEQA document to avoid subsequent documentation and project delays. Please note that failure to include this analysis in the project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue an LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the project:

- 1) Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
- 2) Discussion of avoidance and minimization measures to reduce project impacts; and,
- 3) Discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance. Please refer to section 15370 of the CEQA Guidelines for the definition of mitigation.

B-11  
cont.

#### Alternatives Analysis

The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6). The analysis should include a range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources. The Department considers Rare Natural Communities as threatened habitats, having both local and regional significance. Thus, these communities should be fully avoided and otherwise protected from Project-related impacts. The CEQA document should include an evaluation of specific alternative locations with lower resource sensitivity where appropriate. Off-site compensation for unavoidable impacts through acquisition and protection of high-quality habitat should be addressed.

B-12

Please note that the Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or



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endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

B-12  
cont.

Department Recommendations

The Department has the following concerns about the Project, and requests that these concerns be addressed in the CEQA document:

1. The CEQA document should quantify impacts to habitats and species as per the informational requirements of CEQA. An accompanying map showing the areas of impact should also be included.
2. The analysis in the CEQA document should satisfy the requirements of the Department's Lake and Streambed Alteration Program. The Department recommends that the project applicant provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. The subsequent CEQA document should include a Jurisdictional Delineation of jurisdictional waters and disclose specific impacts to existing mitigation areas, and should propose specific adequate mitigation measures for the loss of jurisdictional areas.
3. The CEQA document should provide a thorough analysis of direct, indirect, and cumulative impacts and identify specific measures to offset such impacts.
4. The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6).

B-13

In summary, the Department requests that the CEQA document include current information regarding biological resources, and provide an alternatives analysis. If you should have any questions pertaining to these comments, please contact Claire Ingel at 909-484-3979 or [Claire.Ingel@wildlife.ca.gov](mailto:Claire.Ingel@wildlife.ca.gov).

Sincerely,

  
 Kimberly Nicol  
 Regional Manager

cc: State Clearinghouse, Sacramento

## Response to Comment B-1 (Introduction)

The University appreciates the CDFW's participation in the comment period for the Draft IS/MND. This introduction to the CDFW's comments presents an accurate summary of the Project.

## Response to Comment B-2 (Migratory non-game bird species; number 1)

The comment provides information regarding migratory non-game bird species and does not specifically address an environmental issue relating to the impacts of the proposed Project.

## Response to Comment B-3 (Nesting bird surveys; number 2)

The comment recommends the completion of nesting bird surveys regardless of the time of year to ensure compliance with all applicable laws related to nesting birds and birds of prey. The potential impact on nesting birds were identified and adequately analyzed in the Draft IS/MND. In addition to standard LRDP measures and practices, project-specific Mitigation Measure BIO 7 has been revised (see response B-4 below) to address the need for earlier surveys to identify nesting raptors, and the changes provided below will be made to the Final IS/MND as a result of this comment.

An additional measure has been added specifically for roosting bats preconstruction surveys,

BIO 8 – Preconstruction Roosting Bat Assessment and Survey. To ensure potential impacts on bat species are reduced, the following measure will be implemented:

- a) Prior to project initiation (e.g., staging, clearing/grubbing, grading), a daytime preliminary assessment will be conducted by a qualified bat biologist to reexamine areas suitable for bat use (i.e., palm trees). If bat sign is observed, then preconstruction roosting bat surveys will be conducted to confirm whether the areas with suitable habitat identified during the preliminary assessment are utilized by bats for day roosting and/or night roosting and to ascertain the level of bat foraging and roosting activity at each of these locations.
- b) If preconstruction roosting bat surveys are warranted, prior to tree removal or trimming, large trees and snags will be examined by a qualified bat biologist to ensure that no roosting bats are present. Palm frond trimming, if necessary, should be conducted outside the maternity season (i.e., April 15–August 31) to avoid potential mortality of flightless young.
- c) If a maternity site is identified during the preconstruction roosting bat surveys, then no construction activities at that location will be allowed during the maternity season (i.e., April 15–August 31) unless a qualified bat biologist has determined the young have been weaned. If a maternity site is present, and it is anticipated that construction activities cannot be completed outside of the maternity season, bat eviction and exclusion at maternity roost sites will be completed by a qualified bat biologist either as soon as possible after the young have been weaned, outside of the maternity season, or as otherwise approved by the qualified bat biologist in coordination with the California Department of Fish and Wildlife (CDFW).

### **Response to Comment B-4 (Timing of pre-construction surveys; number 3)**

The comment requests a change in the timing of implementation of Mitigation Measure BIO 7 from a maximum of seven days, in accordance with the Migratory Bird Treaty Act (MBTA) to no more than three days prior to vegetation clearing for the completion of pre-construction surveys. To comply with this current CDFW standard practice, the University has revised the measure as follows, with no change in impact to the significance conclusion:

BIO 7 – Pre-construction Nesting Bird Surveys. Prior to the onset of construction activities that would result in vegetation removal between February 15 and September 15 or as early as January for raptors, nesting bird surveys shall be conducted by a qualified biologist no more than 3 days prior to initiation of ground disturbance activities. The survey area shall include the direct disturbance limits and a 250-foot buffer zone or as determined through project-related permits. If nesting birds are encountered within the survey area, the qualified biologist will flag an avoidance buffer zone around the nest. No ground disturbance activities shall occur within the avoidance buffer zone until the qualified biologist has determined that the nest is no longer active and the young are not dependent on the nest.

### **Response to Comment B-5 (Santa Ana speckled dace and Arroyo Chub; number 4)**

The comment states that there is not enough analysis to determine that the Santa Ana speckled dace and Arroyo Chub are not likely to occur on the project site. As stated in Appendices C and D (Biological Resources Assessments), the Santa Ana speckled dace has a less than reasonable potential to occur on site. This species is known to occur both upstream and downstream of the project site, typically found within the cool clear headwater streams of the Santa Ana and San Gabriel rivers. However, these populations are isolated from the project site due to flood control structures, i.e. dams, and fully channelized above and below ground sections of stream that do not support habitat for this species. Additionally, there lacks connectivity on both ends of the creek as Chicago Avenue blocks the Project downstream and Central Avenue blocks the creek from connecting upstream. As such, it was determined that under the current conditions (stream does not contain cool, clear headwater), this species would have a less than reasonable potential to occur on the project site. The Arroyo chub also has a less than reasonable potential to occur on site. The project site lacks slow moving back water areas required for this species as this species tends to be found in warm fluctuating streams with slow moving back water sections with sandy and/or muddy substrates, conditions not typical of the project site or directly adjacent areas.

During the pre-application meeting with the agencies on October 9, 2019, it was requested to confirm the arroyo chub was not present within the project site. The above-referenced information was confirmed. As such, it was determined that no further evaluation or survey would be required for either the Santa Ana speckled dace or Arroyo Chub.

### **Response to Comment B-6 (Mitigation obligations; number 5)**

The comment requests the clarification of project impacts and mitigation related to native riparian vegetation. As stated on pages 3 and 4, the Draft IS/MND clarifies that vegetation on the south side will be allowed to naturally reestablish, but the condition on the north side of the bank will maintain a vegetation-free condition:

“Specifically, the channel would be reshaped and rip-rap would be placed on the north bank to match existing conditions on the south bank. The proposed improvements would require the removal of all vegetation on the north bank as well as the channel bottom. Proposed ongoing activity would maintain a vegetation-free condition on the north bank and channel bottom to ensure channel flow capacity is maintained. Existing vegetation on the south bank would remain in place, and native vegetation would be allowed to naturally reestablish within the drainage channel bank on the south side. In addition to clearing vegetation from the work limits, the proposed improvements would include removal of non-native plants throughout the riparian area.”

Mitigation Measure BIO 5 will be revised as follows to clarify the measure:

BIO 5 – Monitor Revegetation. As part of the project design, a one-time removal of exotic plants would occur on the southern bank and native riparian species would be planted throughout the channel. No ongoing maintenance of vegetation within the channel is proposed. Because the channel enhancement is being done as part of the project design, it is not subject to performance criteria; however, it would provide a net benefit to the channel. Compensatory mitigation is addressed in BIO 6.

The comment also requests disclosure of any current or outstanding mitigation obligation associated with the Creekside Terrace residential development. The Creekside Terrace residential developer obtained permits from appropriate regulatory agencies for undergrounding of the tributary feature (USACE/RWQCB Reference Number 200400635-DPS and CDFG 1600 Agreement 1600-2005-0093-R6, Revision 1). These permits included a condition requiring a riparian restoration program and long-term conservation of the stream area that is the subject of this Project. Implementation of the restoration program was delayed due to obstacles with obtaining cooperation of the neighboring apartment landowner (the riparian area was not owned by the Creekside Terrace developer, but lies primarily within the legal parcels associated with the apartments bordering the south and west banks) and then was suspended when the Creekside Terrace developer lost their project in foreclosure. The Creekside Terrace property was acquired by the University for use as staff and faculty housing in 2008, and the University assumed responsibility to comply with the previous permits.

Through coordination with Ms. Kim Freeburn-Marquez, it was verified that the Creekside Terrace residential development was out of compliance. One such obligation was to place a conservation easement over the creek; however, the University does not own the land where the creek is located. The apartment site owner has entered a legal agreement with the University that grants access for due diligence inspections and construction of the proposed stabilization improvements. The University attempted to acquire the rights to place a conservation easement on the property from the property owner of the adjacent apartment development. However, no agreement was reached and it did not appear that the adjacent property owner is amenable to such an agreement. As such, the alternative option for mitigation compliance was to purchase off site mitigation credits through the established Santa Ana River mitigation bank operated by Riverside County Regional Parks and Open Space District (RCRPOSD) or other agency-approved mitigation bank or in-lieu fee agreement. In 2012, the University addressed the uncompleted compensatory mitigation obligations through coordination with the CDFW, and formally amending the LSA Agreement No. 1600-2005-0093-R6, Revision 1 that required onsite mitigation to be addressed off site at a mitigation bank. Once the mitigation obligation was satisfied, the University was able to move forward with seeking approvals for the proposed Project. Mitigation Measure BIO 6 summarizes that the mitigation obligation

associated with the Creekside Terrace residential development has been addressed. BIO 6 now only addresses compensatory mitigation associated with the proposed Project.

### **Response to Comment B-7 (Mitigation for jurisdictional areas; number 6)**

The comment states that proposed mitigation in the Draft IS/MND is insufficient to mitigate project impacts on jurisdictional areas and for mitigation under previous permits.

As stated in Response to Comment B-6, the University satisfied the unaddressed mitigation associated with the LSA Agreement for the Creekside Terrace residential development. The proposed mitigation measure has been revised because the prior mitigation obligations have been satisfied. Mitigation BIO 6 has been revised to address only the proposed Project.

Mitigation Measure BIO 6 will be revised as follows to clarify the measure:

BIO 6 – Purchase into a Mitigation Bank or In-Lieu Fee Program as Compensatory Mitigation.  
BIO 6 in the Draft IS/MND circulated in 2014 included language pertaining to the outstanding mitigation the previous landowner left unaddressed. In 2012, the University addressed the uncompleted compensatory mitigation obligations required by the prior landowner pursuant to the previously issued CDFW Streambed Alteration Agreement. Through cooperation with the CDFW, the University revised the required onsite mitigation to be addressed off site at a mitigation bank.

BIO 6 now only pertains to the compensatory mitigation associated with the proposed Project. Compensation for impacts on non-wetland WoUS and CDFW streambeds would occur at a 1:1 ratio, and impacts on wetland WoUS and CDFW riparian habitat would be at a 2:1 ratio primarily through offsite mitigation at an agency-approved mitigation bank or in-lieu fee program. The final credit purchase requirement will be determined through the regulatory permit process with the USACE, RWQCB, and CDFW.

Further, the University will be responsible for enforcing mitigation measures, such as those described in this document (Mitigation Measures BIO 1 through BIO 8). If alternative measures are identified that would be equally effective in mitigating the identified impacts, implementation of these alternative measures will not occur until agreed upon by the University in consultation with CDFW, as applicable, and in accordance with applicable protocols or guidelines.

### **Response to Comment B-8 (Include current biological information; number 7)**

The Draft IS/MND contains data and information along with technical reports to support the analysis of biological resources. Mitigation measures presented in the Draft IS/MND do identify specific, enforceable measures to be carried out that would avoid, minimize and/or mitigate for project impacts on natural resources and regulated habitats. Specifically, Mitigation Measures BIO 1 through BIO 8 address minimizing impacts on riparian habitat (BIO 1), conducting biological monitoring during construction (BIO 2), providing worker environmental awareness training (BIO 3), removal of exotic plant species (BIO 4), monitoring revegetation (BIO 5), purchase into a mitigation bank or in-lieu fee program (BIO 6), pre-construction nesting bird surveys (BIO 7), and pre-construction roosting bat assessment and survey (BIO 8). Further, LRDP PP 4.4-2(a) states that if avoidance of impacts is not feasible, then the impacts will be evaluated as part of the Clean Water Act (CWA) Section 404 permit, CWA Section 401 Water Quality Certification, and California Fish and Game Code Section 1602 LSA Agreement processes, which are currently on-going. The final

avoidance mitigation ratios, replanting plans and permits will require careful coordination to meet the needs for various agencies. Agency specific language in the Draft IS/MND may include measures that are counter to the needs of other approving agencies. The specific requirements of each responsible agency will be vetted out during the completion of the permit process, and all impacts as noted will be minimized to reduce project impacts. As such, the existing analysis and mitigation measures adequately address this comment and no changes are needed to the Final IS/MND as a result of this comment.

### **Response to Comment B-9 (Species specific surveys; number 8)**

The comment requests inclusion of recent survey data, and a map showing the areas of impact, and a map showing the location of endangered, threatened, or species of special status concern. A biological resource assessment was prepared for the Project in May 2019 (Appendix C), and prior assessments were prepared in 2013 and 2011 (Appendix D), to verify the conditions on the site to ensure that no further surveys would be required.

The direct impacts on the project stream are shown on Figure 6 of the Final IS/MND. There are no endangered, threatened, or species of special status concern located near the project site and therefore, no map is required.

### **Response to Comment B-10 (NCCP and CESA)**

The comment requests compliance with the MSHCP and a discussion of any inconsistencies between the Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. As stated in the Draft IS/MND in Section IV, f, the project site is within the plan areas of two regional conservation efforts—the Western Riverside County (WRC) MSHCP and the Long-term Habitat Conservation Plan for the SKR. Implementation of the SKR plan is at a stage in which all conservation lands have been acquired. For projects outside the reserve areas, plan conformance is achieved through payment of mitigation fees that support ongoing management of the reserve lands. The project site is not within an SKR reserve and the University is exempt from payment of SKR mitigation fees.

The project site is located within the plan area for the WRC MSHCP. The University is not a permittee under the WRC MSHCP and, therefore, is not afforded coverage under the State or federal Endangered Species Acts for impacts upon listed species covered by the plan. Even though the University is not a participant in the WRC MSHCP, it is necessary to address project consistency with the provisions of the plan in the context of the CEQA significance criteria regarding project consistency with adopted habitat conservation plans. As such, the Draft IS/MND was prepared to provide necessary information required to determine project consistency with the WRC MSHCP.

The project site is outside of the MSHCP Criteria Area, which identifies areas potentially subject to acquisition for long-term conservation. Beyond the evaluation of potential involvement of Criteria Area lands, determination that a particular activity is consistent with the MSHCP also entails consideration of a variety of plan policies directed at protection of specific species and resources. Plan policies potentially applicable to consistency evaluation for the project site are those related to burrowing owl and riparian/riverine/vernal pool resources. The biological survey conducted in support of the Draft IS/MND (Appendix D) and the 2019 biological resources survey (Appendix C) document the absence of habitat suitable for burrowing owls and the absence of vernal pools, so these MSHCP provisions do not apply.

However, the stream feature and associated riparian habitat are subject to the plan provisions for riverine and riparian resources. For riparian habitat, the plan requires consideration of suitability for three protected bird species—least Bell’s vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. The biological survey conducted in support of the Draft IS/MND (Appendix D) and the 2019 biological resources survey (Appendix C) document the absence of suitable habitat for southwestern willow flycatcher and western yellow-billed cuckoo. A focused survey was conducted for least Bell’s vireo (Appendices C and D). No individuals of these species were identified, and it is assumed to be absent.

Overall, as the proposed Project, including Mitigation Measures BIO 1 through BIO 6, would not conflict with applicable provisions of the two adopted habitat conservation plans that apply within the project area, potential impacts in this regard would be less than significant with mitigation incorporated.

Also stated in the Draft IS/MND in Section XI.b., the University is exempt from local land use controls pursuant to its constitutional authority, but the University has nonetheless analyzed the Project’s consistency with local zoning and permitting requirements. The City of Riverside provides a zoning designation for the Creekside Terrace residential development of R-1-8500 for single family residential, and the adjacent apartment complex is designated as R-3-3000 for multi-family residential. The drainage channel and adjacent lands totaling 0.92 acre are within the Watercourse overlay zone (roughly corresponds to the existing fenced area along the stream at the interface of the apartments and the Creekside Terrace development). This zoning designation is in recognition of the existing stream channel and periodic flooding hazards. The proposed improvements would stabilize the north stream bank and maintain the existing channel capacity; the Project would not compromise the water course protection objectives of the Municipal Code zoning provisions. On this basis, there is no potential for conflict with this land use policy adopted to avoid effects on water courses and associated flood zones.

## **Response to Comment B-11 (Lake and Streambed Alteration Agreement)**

The comment states that the project applicant should provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code, and the Project should fully identify the potential impacts on the stream and provide adequate avoidance, mitigation and monitoring and reporting commitments. As stated in Response to Comment B-6, the University and its designated consultant are currently engaged in conversations with the Department’s LSA Program, specifically Ms. Freeburn-Marquez, for an LSA Agreement for activities and impacts associated with the Creekside Terrace slope protection activities proposed by the Project.

The comment also requests information for the processing of a Notification of LSA with this information contained within the CEQA document. The Final IS/MND contains a complete analysis of the proposed Project with mitigation necessary to reduce impacts to less-than-significant levels. The Final IS/MND also contains associated documentation to support the conclusions contained within: a 2019 Biological Resources Assessment report (Appendix C)—which includes least Bell’s vireo survey results and a jurisdictional delineation—and a 2011 and 2013 Biological Resources Assessment (Appendix D). Mitigation measures presented in this Final IS/MND have been updated to identify specific, enforceable measures to be carried out that would avoid, minimize and/or mitigate for project impacts on natural resources and regulated habitats. LRDP programs, policies, and mitigation measures also establish standard campus practices to comply with all applicable laws governing those resources.

## Response to Comment B-12 (Alternatives Analysis)

It was not a requirement of an IS/MND to evaluate a range of alternatives to the proposed Project, therefore, no further response is provided here in that context. However, during a pre-application meeting on October 9, 2019, with the USACE, USFWS, Santa Ana RWQCB, and CDFW (collectively the agencies), the agencies asked the University to provide information on other options that were considered for the proposed Project. Remedial measures considered included a vertical concrete wall, sloped ungrouted rip-rap, and a sloped concrete wall. The slope with ungrouted rip-rap was selected as it would allow for some planting of vegetation. Based on the velocity in the channel, the rock rip-rap will not be larger than one-quarter ton. The proposed design would serve as a permanent solution to the ongoing erosion problem and would provide long-term stability and protection of the retaining wall.

During project development, widening the channel was also considered to increase the channel's flood capacity; however, due to the lack of physical space within the access road area, this was determined infeasible. A minimum 10-foot setback is needed between the drainage channel and retaining wall so that the structural integrity of the wall footers is not compromised. Where the channel bends there is a larger physical area on the northern bank. However, widening the channel would only allow for a 5- to 5.5-foot setback, thus compromising the integrity of the adjacent wall and homes. Although the portion of the access road east of the channel is narrower, the existing width is the minimum width allowable along that bank as those soils have already stabilized. As such, the option of widening the channel was not selected.

It should be noted that the Project considers offsite compensation for impacts (Mitigation Measure BIO 6).

## Response to Comment B-13 (Department Recommendations)

This comment summarizes the Department's major concerns and recommends analysis and additional information to be provided in the Final IS/MND. Responses are provided previously in this document, and no further responses are required. Further, the existing analysis and mitigation measures provided in the Draft IS/MND, and any small change to them, adequately address impacts and mitigation related to biological and jurisdictional resources and no additional changes are needed to the Final IS/MND as a result of this comment.



# Comment Letter C: State of California Governor's Office of Planning and Research



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KENALEX  
DIRECTOR

September 25, 2014

## Comment Letter C

Tricia D. Thrasher  
Regents of the University of California  
1223 University Avenue, Suite 200  
Riverside, CA 92507

Subject: Creekside Terrace Slope Stabilization  
SCH#: 2014081086

Dear Tricia D. Thrasher:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 24, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

C-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Director, State Clearinghouse

Scott Morgan

Enclosures

cc: Resource Agency

UCR  
CAPITAL RESOURCE MANAGEMENT  
DATE RECEIVED 9-29-14

lm

1400 10<sup>th</sup> Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2014081086  
**Project Title** Creekside Terrace Slope Stabilization  
**Lead Agency** University of California, Regents of the

**Type** **Neg** Negative Declaration  
**Description** The proposed project involves stabilization of the north bank of an existing drainage channel located adjacent to the University-owned residential development and partially located on property owned by others. The channel will be reshaped and rip-rap will be placed on the north bank to match existing conditions on the south bank. The proposed improvements will require the removal of all vegetation located on the north bank as well as the channel bottom. The proposed project involves the recommended remedial measures which consist of stabilization improvements within a previously improved stream channel to ensure long-term stability of the stream bank in proximity to substantial keystone retaining walls along the north side of the drainage.

**Lead Agency Contact**

**Name** Tricia D. Thrasher  
**Agency** Regents of the University of California  
**Phone** 951 827 1484 **Fax**  
**email**  
**Address** 1223 University Avenue, Suite 200  
**City** Riverside **State** CA **Zip** 92507

**Project Location**

**County** Riverside  
**City** Riverside  
**Region**  
**Lat/Long** 33° 57' 32.64" N / 117° 20' 50" W  
**Cross Streets** Central and Chicago Avenues  
**Parcel No.** 254-370-003  
**Township** 2S **Range** 4W **Section** 31 **Base**

**Proximity to:**

**Highways** 1-215  
**Airports**  
**Railways**  
**Waterways** drainage channel on site, Gage Canal  
**Schools** UCR  
**Land Use** City of Riverside: R-3-3000 (Multi-family Residential), R-1-8500 (Single Family Residential), and Watercourse Overlay

**Project Issues** Air Quality; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 8; Air Resources Board; State Water Resources Control Board, Division of Financial Assistance; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received** **Start of Re** 08/28/2014 **End of Review** 09/24/201

## **Response to Comment C-1 (Acknowledgement letter)**

This comment and response do not raise any new or altered environmental impacts. This letter merely acknowledges that the University has complied with the State Clearinghouse review requirements.

# Mitigation Monitoring and Reporting Program

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## Introduction

State CEQA Guidelines Section 15097 requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program must be designed to ensure compliance during project implementation.

Even though this analysis is not tiered from the LRDP EIR, it is University policy to extend established campus avoidance, minimization, and mitigation measures as contained in the adopted Mitigation Monitoring and Reporting Program (MMRP) for the LRDP EIR to relevant off-campus activities. For ease of tracking, the 2005 LRDP EIR Planning Strategies (PSs), Programs and Practices (PPs), and Mitigation Measures (MMs) incorporated by the proposed Project have been included in the Project's MMRP. The University Planning, Design & Construction office will coordinate monitoring and reporting of the implementation of the MMRP for the proposed Project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of records in the Creekside Terrace Slope Protection Project Mitigation Monitoring file.

## Purpose

A listing of the 10 project-specific mitigation measures and all applicable 2005 LRDP PSs, PPs, and MMs incorporated by the Project is provided in this MMRP. The objectives of the MMRP for the Creekside Terrace Slope Protection Project include the following:

- To provide assurance and documentation that mitigation measures are implemented as planned;
- To provide information to assist the campus administration in understanding the effectiveness of the adopted mitigation measures;
- To maintain a campus record of compliance with project mitigation measures.

The implementation of the mitigation measures applicable to the Project shall be performed and monitored by the campus staff, consultants, and appropriate agencies in conjunction with project implementation as follows:

- Development of the design
- Preparation of construction contracts
- Construction phase
- Post-construction and project operation

By including both monitoring and reporting provisions, the campus has voluntarily exceeded the minimum requirements of the State CEQA Guideline Section 15097(c), which allows selection of monitoring or reporting, but does not require both.

## Project Overview

The proposed Project is located partially on property owned by the University of California, approximately 770 feet from the southern boundary of the west campus area of the Riverside campus, and partially located on property owned by others within the Canyon Crest area of the City of Riverside, Riverside County, California. The site is generally east of Chicago Avenue and south of Le Conte Drive. Specifically, the project site consists of a drainage feature approximately 0.20 mile north of the intersection of Chicago and Central Avenues.

The proposed Project involves stabilization of the north bank of an existing drainage channel adjacent to the University-owned Creekside Terrace residential development (Tract 31671). Specifically, the channel would be reshaped and rip-rap would be placed on the north bank to match existing conditions on the south bank. The proposed improvements would require the removal of all vegetation on the north bank as well as the channel bottom. Proposed ongoing activity would maintain a vegetation-free condition on the north bank to ensure channel flow capacity is maintained. Existing vegetation on the south bank would remain in place, and native vegetation would be allowed to naturally reestablish within the drainage channel bank on the south side. In addition to clearing vegetation from the work limits, the proposed improvements would include removal of non-native plants throughout the riparian area. See *Project Description* in the preceding *Summary* section for a complete description.

## Responsibilities and Duties

The Campus Planning unit of the University's Planning, Design & Construction office would be responsible for coordinating the reporting of compliance with the mitigation measures listed in this MMRP. These responsibilities include:

- Coordination with units within the University's Planning, Design, & Construction office to ensure that design and construction contracts contain the relevant mitigation measures adopted in the Final IS/MND, and that these mitigation measures are implemented during the design and construction phases of the Project.
- Coordination with Project Inspectors to assure compliance and reporting during the construction phase of the Project.
- Coordination and assistance to other campus units and/or departments with monitoring and reporting responsibilities to ensure that they understand their charge and complete their reporting procedures accurately and on schedule, during construction and on-going project operations.

## Implementation and Monitoring Procedures

In general, monitoring would consist of the responsible units verifying that the relevant mitigation measures were implemented.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- Campus Planning distributes reporting forms to the appropriate responsible entity or employs the entity's existing reporting procedures for verification of compliance.
- Responsible entities verify compliance and document compliance by signing the monitoring form and/or documenting compliance using their own internal procedures when monitoring is triggered.
- Responsible entities provide Campus Planning with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented.

The project-specific reporting forms prepared by Campus Planning document the implementation status of the mitigation measures and applicable LRDP PSs, PPs, and MMs for the Project. Project reporting forms and documentation will be available at the Planning, Design & Construction office, upon request, during normal business hours.

## **List of Applicable Project-Specific Mitigation Measures and LRDP Planning Strategies, Programs and Practices, and Mitigation Measures**

The following summary table lists the Project-specific mitigation measures and LRDP PS's, PP's, and MM's, as well as the timing and responsible entities for their implementation, monitoring, and reporting.

**Table 4. Mitigation Monitoring and Reporting Program**

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
<b>Monitoring Triggers</b>		<b>University Responsible Entities</b>					
1. Design stage		CP – Campus Planning					
2. Construction documents		A&E – Architects & Engineers/Project Management					
3. Construction		TAPS – Transportation and Parking Services					
4. Commencement of occupancy							
5. Post-construction							
6. On-going through Project operation							
<b>Air Quality</b>							
Project construction activities would emit fugitive dust and other pollutants in an area with applicable standards.	<b>Programs and Practices (PP) 4.3-2(a).</b> Construction contract specifications shall include the following: (i) Compliance with all SCAQMD rules and regulations (ii) Maintenance programs to assure vehicles remain in good operating condition (iii) Avoid unnecessary idling of construction vehicles and equipment (iv) Use of alternative fuel construction vehicles (iv) Provision of electrical power to the site, to eliminate the need for onsite generators	A&E	2		Once to confirm inclusion in final construction documents.		
	<b>PP 4.3-2(b).</b> The campus shall continue to implement dust control measures consistent with South Coast Air Quality Management District (SCAQMD) Rule 403—Fugitive Dust during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation. The Campus shall implement	A&E	2, 3		Once to confirm inclusion in final construction documents; ongoing verification during construction.		

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p>these measures as necessary to reduce fugitive dust. Individual measures shall be specified in construction documents and require implementation by construction contractor:</p> <ul style="list-style-type: none"> <li>(i) Apply water and/or approved non-toxic chemical soil stabilizers according to manufacturer’s specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days)</li> <li>(ii) Replace ground cover in disturbed areas as quickly as possible</li> <li>(iii) Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content</li> <li>(iv) Water active grading sites at least twice daily</li> <li>(v) Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period</li> <li>(vi) All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (i.e., minimum (vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code</li> <li>(vii) Sweep streets at the end of the day if visible soil material is carried over to adjacent roads</li> <li>(viii) Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip</li> </ul>						



Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p>(ix) Apply water three times daily or chemical soil stabilizers according to manufacturers’ specifications to all unpaved parking or staging areas or unpaved road surfaces</p> <p>(x) Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.</p>						
	<p><b><u>Mitigation Measure (MM) 4.3-1a.</u></b>                      For each construction project on campus, the project contractor will implement Programs and Practices 4.3-2(a) and 4.3-2(b). In addition, the following PM10 and PM2.5 control measure shall be implemented for each construction project.</p> <ul style="list-style-type: none"> <li>• Post a publicly visible sign with telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond to corrective action within 48 hours. The phone number of the District shall also be visible to ensure compliance.</li> </ul>	A&E	2, 3	Once to confirm inclusion in final construction documents; ongoing verification during construction.			
	<p><b><u>MM 4.3-1b</u></b> For each construction project on the campus, the University shall require that the project include a construction emissions control plan that includes a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used for an aggregate of 40 or more hours during any portion of the construction project. During construction activity, the contractor shall utilize CARB certified equipment or better for all onsite construction equipment according to the following schedule:</p>	A&E	2, 3	Once to confirm inclusion in final construction documents; ongoing verification during construction.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<ul style="list-style-type: none"> <li>January 1, 2011 to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> <li>January 1, 2012 to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> <li>Post January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by</li> </ul>						

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p>CARB regulations.</p> <ul style="list-style-type: none"> <li>• A copy of each unit’s certified specification, BACT documentation and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit or equipment.</li> <li>• Encourage construction contractors to apply for AQMD ‘SOON’ funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate clean-up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <a href="http://www.aqmd.gov/tao/implementation/soonprogram.htm">http://www.aqmd.gov/tao/implementation/soonprogram.htm</a></li> </ul> <p>The contractor shall also implement the following measures during construction:</p> <ul style="list-style-type: none"> <li>• Prohibit vehicle and engine idling in excess of 5 minutes and ensure that all off-road equipment is compliant with the California Air Resources Board’s (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449.</li> <li>• Configure construction parking to minimize traffic interference.</li> <li>• Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.</li> <li>• Provide dedicated turn lanes for movement of construction trucks and equipment on- and off site.</li> <li>• Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent</li> </ul>						

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p>practicable.</p> <ul style="list-style-type: none"> <li>• Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.</li> <li>• Use diesel-powered construction vehicles and equipment that operate on low-NOx fuel where possible.</li> <li>• Reroute construction trucks away from congested streets or sensitive receptor areas.</li> <li>• Maintain and tune all vehicles and equipment according to manufacturers' specifications.</li> </ul>						
	<p><b><u>MM 4.3-2</u></b>                      Programs and Practices 4.3-2(a), (b), and (c), or their equivalent, shall be included in construction contract specifications. The contract specifications shall require the use of low NOx diesel fuel and construction equipment to the extent that is readily available at the time of development.</p>	A&E	2	Once to confirm inclusion in final construction documents.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
<b>Biological Resources</b>							
Proposed project improvements would result in temporary and permanent impacts on riparian habitat.	<b><u>BIO 1: Minimize Direct Impacts on Riparian Habitat.</u></b>						
	Prior to initiation of ground disturbance activities, disturbance limits shall be clearly defined at the construction site and demarcated on site plans (refer to Appendix A).	A&E	2	Once to confirm inclusion in final construction documents to verify limits are defined in construction plans.			
	Access and staging shall be limited to the existing gated entrance from Chicago Avenue, the existing maintenance path along the north bank, or paved/landscaped areas within the adjoining apartment development.	A&E	2, 3	One time prior to start of construction to verify limits are defined on site; ongoing verification during construction.			
	Protection measures for riparian habitat on the south bank will be established in consultation with the biological monitor.	Biologist	3	Biologist to provide written report to Campus Planning.			
Proposed project improvements would result in temporary and permanent impacts on	<b><u>BIO 2: Conduct Biological Monitoring During Construction.</u></b>						
	A qualified biologist shall monitor construction for compliance with best management practices outlined in LRDP Programs and Practices (PP) 4.4-1(b)	A&E, CP, Biologist	2, 3	Once to confirm prior to the commence-			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
riparian habitat and biological resources.	(reduce disturbance to Natural Open Space areas). Such measures may include minimizing vehicular access and parking in undisturbed areas or drainages; avoiding removal of native shrub or disturbance of drainages, except where necessary; avoiding overwatering; and not harassing wildlife species. Considering the nature of the work area and proximity of protected resources to the work limits, monitoring shall be continuous during the initial preparation and excavation phases. Once work transitions to placement of rip-rap, the frequency of monitoring may be reduced, as recommended by the monitoring biologist (taking into consideration the nature of the proposed work and time of year).			ment of construction —retain a biologist to perform scope noted in BIO 2.			
				Biologist will monitor daily during the initial preparation/ excavation phases of construction to document need for, and nature of, monitoring, then as needed. Biologist to provide written report to Campus Planning at the completion of construction to document required monitoring.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p><b><u>BIO 3: Provide a Worker Environmental Awareness Training.</u></b>                      To ensure compliance with best management practices identified in LRDP EIR MMRP PP 4.4-1(b) (reduce disturbance to Natural Open Space areas), a biologist shall provide to all construction personnel a worker environmental awareness training prior to personnel initiating ground disturbance activities. The training will include a discussion of the importance of the stream and associated riparian habitat, areas to be avoided (including during parking and staging of equipment), a discussion of native wildlife with the potential to occur, and education on not harassing native wildlife.</p>	A&E, Biologist	3	One time, provision of pamphlet and training to construction contractor prior to start of construction (pre-construction meeting).			
	<p><b><u>BIO 4: Remove Exotic Plant Species.</u></b>                      During the construction phase, exotic plant species shall be removed from the riparian zone, including the protected south bank area. Exotic plant material shall be properly handled to prevent sprouting or regrowth. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants/seed and inspected to reduce the potential of spreading noxious weeds before mobilizing to the work area and before leaving the work area. Cleaning of equipment shall occur outside the work area where the wastewater stream is contained so as to prevent any invasive plant material from entering natural areas.</p>	A&E, Restoration Specialist. Construction Contractor (cleaning of construction equipment only), Biologist	3	Weekly construction inspection reports to document compliance.  Once at completion of vegetation removal to document compliance.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p><b><u>BIO 5: Monitor Revegetation.</u></b>                      As part of the project design, a one-time removal of exotic plants would occur on the southern bank, and native riparian species would be planted throughout the channel. No ongoing maintenance of vegetation within the channel is proposed. Because the channel enhancement is being done as part of the project design, it is not subject to performance criteria; however, it would provide a net benefit to the channel. Compensatory mitigation is addressed in BIO 6.</p>	A&E, Restoration Specialist/Biologist	2, 3, 5	<p>Once prior to disturbance of native vegetation to confirm that the construction documents are consistent with BIO 5, including any outside agency approvals.</p> <p>Periodically, in accordance with the monitoring component for removal of exotic vegetation.</p> <p>Document completion of work.</p>			



Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
Project includes gap in mitigation compliance under previous permits.	<p><b><u>BIO 6: Purchase into a Mitigation Bank or In-Lieu Fee Program as Compensatory Mitigation.</u></b></p> <p>BIO 6 in the Draft IS/MND circulated in 2014 included language pertaining to the outstanding mitigation the previous landowner left unaddressed. In 2012, the University addressed the uncompleted compensatory mitigation obligations required by the prior landowner pursuant to the previously issued CDFW Streambed Alteration Agreement. Through cooperation with the CDFW, the University revised the required onsite mitigation to be addressed off site at a mitigation bank.</p> <p>BIO 6 now only pertains to the compensatory mitigation associated with the proposed Project. Compensation for impacts on non-wetland WoUS and CDFW streambeds would occur at a 1:1 ratio, and impacts on wetland WoUS and CDFW riparian habitat would be at a 2:1 ratio primarily through offsite mitigation at an agency-approved mitigation bank or in-lieu fee program. The final credit purchase requirement will be determined through the regulatory permit process with the USACE, RWQCB, and CDFW.</p>	CP	1/2	Provide documentation that payment was made in project file and to USACE, RWQCB, and CDFW.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
Project construction may result in impacts on nesting birds.	<p><b><u>BIO 7: Pre-Construction Nesting Bird Surveys.</u></b></p> <p>Prior to the onset of construction activities that would result in vegetation removal between February 15 and September 15 or as early as January for raptors, nesting bird surveys shall be conducted by a qualified biologist no more than 3 days prior to initiation of ground disturbance activities. The survey area shall include the direct disturbance limits and a 250-foot buffer zone. If nesting birds are encountered within the survey area, the qualified biologist will flag an avoidance buffer zone around the nest. No ground disturbance activities shall occur within the avoidance buffer zone until the qualified biologist has determined that the nest is no longer active and the young are not dependent on the nest.</p>	CP, Biologist	3	As needed, prior to start of construction. Biologist to provide written statement of survey and results to CP.			
Project construction may result in impacts on roosting bats.	<p>BIO 8 – Preconstruction Roosting Bat Assessment and Survey. To ensure potential impacts on bat species are reduced, the following measure will be implemented:</p> <p>a) Prior to project initiation (e.g., staging, clearing/grubbing, grading), a daytime preliminary assessment will be conducted by a qualified bat biologist to reexamine areas suitable for bat use (i.e., palm trees). If bat sign is observed, then preconstruction roosting bat surveys will be conducted to confirm whether the areas with suitable habitat identified during the preliminary assessment are utilized by bats for day roosting and/or night roosting and to ascertain the level</p>	CP, Biologist	3	As needed, prior to start of construction. Biologist to provide written statement of survey and results to CP.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p>of bat foraging and roosting activity at each of these locations.</p> <p>b) If preconstruction roosting bat surveys are warranted, prior to tree removal or trimming, large trees and snags will be examined by a qualified bat biologist to ensure that no roosting bats are present. Palm frond trimming, if necessary, should be conducted outside the maternity season (i.e., April 15–August 31) to avoid potential mortality of flightless young.</p> <p>c) If a maternity site is identified during the preconstruction roosting bat surveys, then no construction activities at that location will be allowed during the maternity season (i.e., April 15–August 31) unless a qualified bat biologist has determined the young have been weaned. If a maternity site is present, and it is anticipated that construction activities cannot be completed outside of the maternity season, bat eviction and exclusion at maternity roost sites will be completed by a qualified bat biologist either as soon as possible after the young have been weaned, outside of the maternity season, or as otherwise approved by the qualified bat biologist in coordination with the CDFW.</p>						

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
Proposed project improvements would result in temporary and permanent impacts on riparian habitat and biological resources.	<b>MM 4.4-3(a).</b> When habitat that could be regulated by the Clean Water Act (Section 404) would be impacted, either directly or indirectly, the University shall perform a jurisdictional and/or wetland delineation to assess the extent of the jurisdictional area(s).	CP, Biologist	1	Compliance established; report provided in IS/MND.			
	<b>MM 4.4-3(b).</b> If wetland or riparian habitat would be removed as a result of project development, the University shall restore or enhance wetland or riparian habitat as required by the applicable State and/or federal resource agencies.	CP	1	See above, evaluated as part of the IS/MND.			
	<b>MM 4.4-3(c).</b> Any proposal for wetland creation or enhancement (pursuant to MM 4.4 3(b) above) will be based upon the completion of soils, hydrologic and other studies confirming the feasibility of the creation or enhancement proposal and shall include United States Army Corps of Engineers (USACE)-approved measures intended to promote occupancy by special status and other wetland-dependent species (e.g., plantings, collection of topsoil and inoculation of target areas).	CP, Biologist	1	Compliance established; report provided in IS/MND.			
	<b>MM 4.4-4(a).</b> Prior to the onset of construction activities that would result in the removal of mature trees that would occur between March and mid-August, surveys for nesting special status avian species and raptors shall be conducted on the affected portion of the campus following USFWS and/or CDFG guidelines. If no active avian nests are identified on or within 250 feet of the construction site, no further				See <b>Mitigation Measures BIO 7 and BIO 8</b> above.		

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	mitigation is necessary.						
	<b>MM 4.4-4(b).</b> If active nests for avian species of concern or raptor nests are found within the construction footprint or a 250-foot buffer zone, exterior construction activities shall be delayed within the construction footprint and buffer zone until the young have fledged or appropriate mitigation measures responding to the specific situation have been developed and implemented in consultation with USFWS and CDFG.						See <b>Mitigation Measures BIO 7 and BIO 8</b> above.
Proposed project improvements would result in temporary and permanent impacts on biological resources.	<b>Planning Strategy (PS) Conservation 1.</b> Protect natural resources, including native habitat; remnant arroyos, and mature trees, identified as in good health as determined by a qualified arborist, to the extent feasible.	CP, Biologist	1				Compliance established; biological resources report provided in IS/MND.
	<b>PS Conservation 2.</b> Site buildings and plan site development to minimize site disturbance, reduce erosion and sedimentation, reduce storm water runoff, and maintain existing landscapes, including healthy mature trees whenever possible.	CP, A&E	1, 2				No buildings proposed.  Once to confirm inclusion in final construction documents; design for site improvements will be prepared to minimize impacts.

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p><b>PP 4.4-1(b)</b> To reduce disturbance of Natural and Naturalistic Open Space areas:</p> <ul style="list-style-type: none"> <li>(i) Unnecessary driving in sensitive or otherwise undisturbed areas shall be avoided. New roads or construction access roads would not be created where adequate access already exists.</li> <li>(ii) Removal of native shrub or brush shall be avoided, except where necessary.</li> <li>(iii) Drainages shall be avoided, except where required for construction. Limit activity to crossing drainages rather than using the lengths of drainage courses for access.</li> <li>(iv) Excess fill or construction waste shall not be dumped in washes.</li> <li>(v) Vehicles or other equipment shall not be parked in washes or other drainages.</li> <li>(vi) Overwatering shall be avoided in washes and other drainages.</li> <li>(vii) Wildlife including species such as fox, coyote, snakes, etc. shall not be harassed. Harassment includes shooting, throwing rocks, etc.</li> </ul> <p><b>PP 4.4-2(a)</b>. Impacts to riparian and wetland habitats shall be avoided, wherever feasible. If avoidance is not feasible, then the impacts will be evaluated as part of the Clean Water Act section 404 and California Fish and Game Code section 1602 permit application process. If mitigation is required, the University of California will develop and implement a resource mitigation program to be reviewed and approved by the ACOE and CDFG through the State and federal permit process. The permit shall mitigate the habitats such that they are consistent with</p>	CP, A&E	1, 3	<p>No designated Natural and Naturalistic Open Space areas on the project site.</p> <p>Ongoing verification of compliance with measures during construction.</p> <p>Evaluated as part of the IS/MND.</p> <p>See <b>Mitigation Measure BIO 1</b> above for reduction of impacts on riparian habitat.</p>			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	the Clean Water Act and CDFG policy of “no net loss” of wetland. Furthermore, impacted wetlands and/or riparian vegetation that cannot be avoided would be replaced at a ratio approved by the ACOE and CDFG. If replacement within the area is not feasible, then an approved mitigation bank or other off-site area will be used. The revegetation of impacted areas or mitigation parcels will be performed by a qualified restoration specialist and shall be conducted only on sites where soils, hydrology, and microclimate conditions are suitable for riparian habitat. First priority will be given to areas that are adjacent to existing patches of native habitat.						

**Cultural Resources**

Project earthwork would not cause a substantial adverse change in the significance of an archaeological resource.	<b>MM CUL 1.</b> If an archaeological resource is discovered during construction, all soil-disturbing work within 100 feet of the find shall cease and the University Representative shall contact a qualified Archaeologist meeting the Secretary of Interior standards within 24 hours of discovery to inspect the site. If a resource within the project area of potential effect is determined to qualify as a unique archaeological resource (as defined by the California Environmental Quality Act [CEQA]), the University shall devote adequate time and funding to determine if it is feasible, through project design measures, to preserve the find intact. If it cannot be preserved, the University shall retain a qualified non-University Archaeologist to design and implement a treatment plan, prepare a report, and salvage the material,	A&E	2, 3	Once to confirm inclusion in final construction documents. As needed during ground disturbance phases to document evaluation and disposition of any artifacts.			
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Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p>as appropriate. Any important artifacts recovered during monitoring shall be cleaned, catalogued, and analyzed, with the results presented in a report of findings that meets professional standards.</p> <p>a) If significant Native American cultural resources are discovered, as determined by the consulting Archaeologist for which a Treatment Plan must be prepared, the contractor or his Archaeologist shall immediately contact the University Representative. The University Representative shall contact the appropriate tribal representatives.</p> <p>b) If requested by tribal representatives, the University, the contractor, or the project Archaeologist shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, return of artifacts to tribe).</p> <p>c) In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find shall halt immediately and the area of the find shall be protected. The University shall immediately notify the Riverside County Coroner of the find and comply with the provisions of California Health and Safety Code Section 7050.5.</p>						
Project earthwork would not cause a substantial adverse change	<b>PP 4.5-5</b> In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find shall halt immediately and the area of the find shall be protected and the	A&E	3	As needed during ground disturbance phases			



Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
in the significance of an archaeological resource.	University immediately shall notify the Riverside County Coroner of the find and comply with the provisions of P.R.C. Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary.						
<b>Geology and Soils</b>							
Proposed project improvements would result in impacts from stormwater runoff and erosion.	<b>PP 4.4-2(b)</b> In compliance with NPDES, the campus would continue to implement Best Management Practices, as identified in the UCR Stormwater Management Plan (UCR 2003): (i) Public education and outreach on stormwater impacts (ii) Public involvement/ participation (iii) Illicit discharge detection and elimination (iv) Pollution prevention/good housekeeping for facilities (v) Construction site stormwater runoff control (vi) Post-construction stormwater management in new development and redevelopment	A&E, EH&S	3		Ongoing oversight through campus Storm Water Management Program – MS4 permit and Construction General Permit requirements.		
There is potential for soil erosion and water runoff to pollute waters during construction.	<b>PP 4.8-1.</b> The campus will continue to comply with all applicable water quality requirements established by the SARWQCB.	A&E	2, 3		Ongoing oversight through design, construction.		
<b>Hazards and Hazardous Materials</b>							
There is potential for hazardous materials spills during	<b>PP 4.7-1.</b> The campus shall continue to implement the current (or equivalent) health and safety plans, programs, and practices related to the use, storage, disposal, or transportation of hazardous	A&E, EH&S	3		Ongoing oversight during construction.		

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
construction.	materials, including, but not necessarily limited to, the Business Plan, the Broadscope Radioactive Materials License, and the following programs: Biosafety, Emergency Management, Environmental Health, Hazardous Materials, Industrial Hygiene and Safety, Laboratory/Research Safety, Radiation Safety, and Integrated Waste Management. These programs may be subject to modification as more stringent standards are developed or if the programs are replaced by other programs that incorporate similar health and safety protection measures.						
<b>Hydrology and Water Quality</b>							
There is potential for flooding due to an upset condition involving a breach in the pipe or hose during construction.	<b>HYD 1: Temporary Diversion Design.</b> The temporary diversion works shall be designed such that the inundation limits (including those resulting from an inadvertent breach of flows contained in a pipe or hose) are confined to the existing Watercourse overlay zone boundary. The University shall ensure that construction contracts provide sufficient detail for the design and method of temporary diversion.	A&E	2	Once to confirm inclusion in final construction documents.			
<b>Noise</b>							
Project construction would result in a temporary increase in off-campus ambient noise.	<b>NOI 1: Restrict Construction Hours.</b> The University will ensure that the construction contractor limits construction activities, where feasible, to occurring between 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. and 5:00 p.m. on Saturday. An exception is made as to operation of a generator and/or pump for temporary stream diversion, subject to Mitigation Measure NOI 2, below.	A&E	2, 3	Once to confirm inclusion in final construction documents.  Ongoing verification through construction.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<p><b><u>NOI 2: Attenuation for diversion pump and generator.</u></b></p> <p>The University will ensure construction contracts specify that any generator or diversion pump will be equipped with mufflers, silencers, shrouds, shields, or other noise-reducing features so as to achieve a maximum exterior operational noise level not exceeding 45 A-weighted decibels (dBA) (one-hour equivalent sound level [Leq]) at exterior locations of nearby noise-sensitive land uses.</p> <p>Measures that can be implemented to achieve this include but are not limited to:</p> <ul style="list-style-type: none"> <li>• enclosing equipment in solid wall structures,</li> <li>• using low-noise equipment, and</li> <li>• placing sound barriers (earth berms or constructed barriers) around equipment.</li> </ul> <p><b><u>PP 4.10-2</u></b> The UCR campus shall limit the hours of exterior construction activities, where feasible, from 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturday when necessary. Construction traffic shall follow transportation routes prescribed for all construction traffic to minimize the impact of this traffic (including noise impacts) on the surrounding community.</p> <p><b><u>PP 4.10-7(b)</u></b> The campus shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contract shall specify that engine-driven equipment be fitted with appropriate noise mufflers.</p>	A&E	2, 3	Once to confirm inclusion in final construction documents.			
							Ongoing verification through construction.
							See <b>Mitigation Measure NOI1</b> above.
		A&E	2	Once to confirm inclusion in final construction documents.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	<b>PP 4.10-7(c)</b> The campus shall continue to require that stationary construction equipment, material and vehicle staging to be placed to direct noise away from sensitive receptors.	A&E	2	Once to confirm inclusion in final construction documents.			
	<b>PP 4.10-8</b> The campus shall continue to conduct meetings, as needed, with off-campus constituents that are affected by campus construction to provide advance notice of construction activities and ensure that mutual needs of the particular construction project and of those impacted by construction noise are met, to extent feasible.	A&E	3	Ongoing oversight through construction.			
<b>Traffic and Transportation</b>							
Project construction would result in short-term hazards due to temporary lane closures and the presence of construction vehicles and equipment on local roads.	<b>PP 4.14-5</b> To the extent feasible, the campus shall maintain at least one unobstructed lane in both directions on campus roadways. At any time only a single lane is available, the campus shall provide a temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls to allow travel in both directions. If construction activities require the complete closure of a roadway segment, the campus shall provide alternate routes and appropriate signage.	A&E	3	Ongoing verification during construction to ensure access is maintained.			

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
<b>Tribal Cultural Resources</b>							
Project earthwork would not cause a substantial adverse change in the significance of a tribal cultural resource.	See <b>Mitigation Measure CUL 1</b> above for reduction of impacts on Tribal Cultural Resources.	A&E	2, 3	Once to confirm inclusion in final construction documents. As needed during ground disturbance phases to document evaluation and disposition of any artifacts.			

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Appendix A  
**Project Plans**

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Appendix B

**Air Quality and Greenhouse Gas  
Technical Memorandum**

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Appendix C

## **2019 Biological Resources Assessment**

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Appendix D

**2011 and 2013 Biological Resources Assessments**

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Appendix E

## **2019 Cultural Resources Report**

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Appendix F

**Noise Impact Analysis Technical Memorandum**

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