Public Utilities Department

Draft Initial Study/Mitigated Negative Declaration

AGENDA ITEM NO.: (Pending)

WARD: 3

1. **Case Number:** N/A

2. **Project Title:** Magnolia-Plaza Reliability Project

3. **Hearing Date:** To be determined

4. **Lead Agency:** City of Riverside
   Public Utilities Department
   3750 University Avenue, 3rd Floor
   Riverside, CA 92501

5. **Contact Person:** Daniel Honeyfield, Utilities Senior Electrical Engineer
   Phone Number: (951) 826-2122

6. **Project Location:**
   Plaza Substation: 3716 Elizabeth Street
   Riverside, California 92506
   APN: 225-052-010, 225-052-008, 225-052-021, 225-052-019
   225-052-005, 225-052-004; 225-064-001, -002, -003

   Magnolia Substation: 3416 Central Avenue
   Riverside, California 92506
   APN: 223-150-009

   4-12kV Conversion Area (Magnolia): Varied (see Exhibit 5, attached)
   City of Riverside, California

7. **Project Applicant/Project Sponsor's Name and Address:**
   Applicant/Owner
   City of Riverside
   Public Utilities Department
   3750 University Avenue, 3rd Floor
   Riverside, CA 92501
   Contact: Daniel Honeyfield, Utilities Senior Electrical Engineer
   Phone Number: (951) 826-2122

8. **General Plan Designation:**

Project Component	General Plan Land Use	Zoning
Plaza Substation	MU-N (Mixed-Use Neighborhood); C – Commercial	PF – Public Facility; CR – Commercial Retail; CG – Commerical General
Magnolia Substation	C – Commercial	R-1-7000 (Single-Family Residential)
4-12kV Conversion Area	Varied	Varied

9. **Zoning:** See Table above.

10. **Description of Project:**

Project Summary

The proposed Magnolia-Plaza Reliability Project (MPRP or "Project") is intended to convert the 4kV circuits in the Magnolia neighborhood to 12kV infrastructure resulting in the demolition of existing Magnolia Substation and upgrade of existing Plaza Substation. The latter involves installation of new equipment that will provide the capacity needed to serve customers currently served by the Magnolia Substation. Thus, the MPRP will improve the distribution system while maintaining reliable power delivery.

The project site is located within the boundaries of the City of Riverside in Riverside County, California; refer to attached Exhibit 1, Regional Location Map, Exhibit 2A, Local Vicinity Map – Magnolia and Plaza Substations, and Exhibit 2B, Local Vicinity Map – 4kV-12kV Conversion Area. The City of Riverside – Public Utilities Department (RPU) will act as the Lead Agency under the requirements of the California Environmental Quality Act (CEQA).

Purpose and Need

The Electric System Master Plan (ESMP) recommends converting all 4kV distribution to 12kV to improve efficiency, modernize, and replace the obsolete equipment. The City's recent renovation of the Casa Blanca Substation eliminated a portion of the 4kV distribution from the system. The proposed project will facilitate the conversion of the remaining 4kV circuits served out of the Magnolia Substation and will facilitate the retirement and removal of the Magnolia Substation.

As stated above, in order to allow RPU to keep pace with growth and maintain service and reliability standards for the southwestern Riverside neighborhoods, the MPRP is required to provide needed 12kV support for conversion of the existing Magnolia Substation 4kV service areas. Without the MPRP, the neighboring station 12kV bank transformers, as well as many of their individual feeders, will not have sufficient capacity and tie points to handle contingencies, which will occur due to loads that will exceed maximum capacities, with the potential of resulting in long duration, wide-area and localized-area outages. In order to maintain the required schedule for 4-12kV conversion, it is required that the Plaza Substation upgrades and its new circuit ties be in-service by April 2015.

Phasing of Construction

The MPRP is comprised of five phases. The final phase is estimated to be completed by mid-2015. Project phases, which will occur concurrently and not necessarily chronologically, are as follows:

- Phase 1 Plaza T5 Addition
- Phase 2 4-12kV Conversion
- Phase 3 Distribution Feeders
- Phase 4 Transmission Line
- Phase 5 Magnolia Substation Demo/Decommission

Proposed Improvements

Phase 1 Plaza T5 Addition:

The Plaza Substation portion of the MPRP, which is called the Plaza T5 Addition, includes the following: addition of one 67-12.4 7kV transformer with non-segregated bus duct, one switchgear building, one 69kV circuit switcher, two 69 kV circuit breakers, four 69kV breaker disconnect switches, three 69kV single-phase potential transformers, one 12kV capacitor bank, relay and control panels for new 69kV bus and line positions, control and power pits, 12kV getaways and power vaults, and relocation of the 69kV Mt. View line to a new dead-end line structure with an integral line and ground disconnect switch and lightning arrestors. Refer to Exhibit 3A, Plaza Substation – Existing Conditions; Exhibit 3B, Plaza Substation – Ultimate Build-Out; and, Exhibit 3C, Plaza Substation – Restoration Plan.

Approximately 0.38 acres of land adjacent to the west side of the Plaza Substation will be acquired for adding the new T5 transformer and switchgear. A 10-foot high block wall will be installed around the perimeter of the new Plaza Substation property; the existing wall along the eastern boundary will remain. The existing security fence at the rear of the Substation will be removed. A new motorized, rolling gate with keypad entry will be added at the Project entrance from Elizabeth Street in order to access the site.

A small, permanent restroom will be constructed onsite as part of the project, limited to use by City maintenance staff over long-term operation of the Plaza Substation. Connections for electricity, water, and sewer service will be made; refer to Exhibit 3B, Plaza Substation – Ultimate Build-Out. An exhaust fan (rotary ventilator) and a water heater will also be housed within the onsite structure.

Drought-tolerant landscaping will be installed along the frontage of the expanded Plaza Substation on Elizabeth Street. A new irrigation system with backflow prevention will be installed to accommodate the new landscaping along the frontage wall. Further, in order to reduce the need for maintenance and eliminate regular maintenance access to the rear of the Substation property, the rear block wall will be covered with artificial ivy; refer to Exhibits 4A to 4C which provide visual simulations of the proposed improvements at the Plaza Substation site.

Transformer, 69kV breaker, circuit switcher, and switchgear foundations will be installed consistent with current RPU standard practices. The T5 transformer foundation will be a concrete slab and curbing, consistent with previous drilled-shaft foundation designs. The T5 transformer foundations shall drain into the existing T3 containment pit which shall be gravity fed through a PVC pipe from the T5 transformer foundation.

The existing onsite control building will be reused. The control cabling will enter the control building through the existing control cable pit and cable riser. A new control cable pit will be added to the expanded 69kV switchyard, and new conduit will be run from the new control cable pit to existing cable pits as needed.

Equipment to be located inside of the control building (such as line relay, communication, and security equipment) will include the following:

- Line protection for the relocated Mountain View line will utilize a new SEL-387L for line differential protection and a new SEL-421 for back-up protection including direct transfer trip and breaker failure protection for the line 69kV breaker.
- Bus protection for Bus "A" will utilize the existing SEL-487B bus differential relay.
- Bus protection for Bus "B" will utilize the existing CA-16 bus differential relay.
- Bus protection for new Bus "C" will utilize a new SEL-487B bus differential relay. This relay shall also provide breaker failure protection for one of the new 69 kV breakers.
- Transformer protection for T1, T2, T3, and T4 will utilize existing HU-4, SEL-387, and HU relays, respectively.
- Transformer protection for new T5 will utilize a new SEL-387 differential relay wired to separate CT's.

- The existing Substation Automation System (SAS) controller in the control building will be replaced with a new SAS panel that meets current standards. SAS input/output modules will be utilized for new control and status points.
- A new Substation Automation System (SAS) controller in the switchgear building will be installed to connect to new SEL relays in the switchgear. SAS input/output modules will be utilized for new control and status points.
- RPU's existing fiber optic system and Synchronous Optical Network (SONET) shall be upgraded as needed for protection and SAS requirements.
- Cameras, card access, and intrusion detection shall be added to the new security surveillance system installed in 2013; however, the security surveillance system installation is not included as part of the Plaza T5 Addition.

The arrangement of the Plaza Substation expansion will be designed to consider the ultimate build-out configuration in order to minimize future modifications; however, aside from conceptual design, design and construction for converting the Plaza Substation from a radial bus configuration to a ring bus configuration is not included as part of the proposed Project.

Phase 2: 4-12kV Conversion

All 4kV circuits at the Magnolia Substation will be converted to 12kV; refer to Exhibit 5, Magnolia 4kV-12kV Conversion Area. Additionally, the following components will be replaced as part of the 4-12kV conversion:

- Replacement of existing overhead poles and cross arms will occur; however, not all poles will require replacement.
- Replacement of top groove and dead insulators with new 15kV insulators.
- Replacement of overhead secondary open wire services on cross arms and rack configuration with updated RPU standard secondary service configurations.
- Replacement of 2.4/4.16 kV transformers and associated material, such as cutouts and fusing, with 7.2/12.47kV transformers.
- The possible replacement and upgrade of overhead conductors, due to customer load and future load growth.
- Replacement and coordination of fuses, lateral and sub-lateral fuse coordination.
- Replacement of obsolete 5kV insulated cable with new standard 15kV insulated cable. The new cable will be routed through existing conduits.
- Installation of overhead pole mounted and underground pad mounted switches in strategic locations.

Phase 3: Distribution Feeders (Plaza Substation and Street Getaways)

Existing distribution getaways and structure M9415 for Circuits 1251 and 1253 that extend out of Switchgear Building No. 3, out to the northwest corner of the existing Plaza Substation and along Elizabeth Street, will be retained in their existing location. Three new 12kV circuits from this switchgear will be installed in the west side of the existing property by fall 2013. However, this work is not part of the MPRP effort. The new T5 switchgear building and transformer will be positioned away from these getaways in order to retain their structural integrity.

Circuit 442 is a 4kV circuit that is currently routed through an underground electrical duct to a riser located in the northwest portion of the Plaza Substation property. The riser for Circuit 442 will require relocation to the upper northwest section of the new Substation property because this riser will block access to the Substation if it remains in its current location.

New 12kV feeder getaways and power vaults will be installed. The associated duct banks will exit the station from the southwest of the expanded area and routed under the railroad tracks via encased ducts. The 12kV feeder cables will exit the Plaza Substation switchgear through this power vault and duct work. In order to integrate the

new 12kV infrastructure resulting from the conversion at the street level, further duct work, power vaults, electrical poles, and overhead lines will be installed.

Phase 4: Transmission Work

The 69kV Plaza-Mt. View line will be relocated to the west of its existing dead-end structure. This will require installation of (a minimum of) one new steel riser pole located outside of the Substation. Easements will be acquired as needed for the steel pole. This new pole shall have mounting provisions to support utilities and distribution cables presently along the 69kV line overhead poles.

The Mt. View 69kV line position will be relocated to the west side of the existing Plaza Substation in order to maintain a reliable bus configuration. If the Mt. View line was left in its current position and T5 was added to the west of the Mt. View Line, loss of 69kV service to Bank T1 and T3 will also result in a loss of 69kV service to T5, which will result in sustained customer outages for 12kV Banks T3 and T5. This reliability issue is eliminated by relocating the 69kV position to the west of T5.

Phase 5: Magnolia Substation Demolition

Two 33kV transmission lines and six 2.3 Mega Volt Ampere (MVA) transformers (33kV-4kV) for distribution are present at the Magnolia Substation site. Six 4kV circuits are located at the site: Nos. 41, 42, 43, 44, 45, and 46. Refer to Exhibit 6, Magnolia Substation – Existing General Layout.

Magnolia Substation will be demolished after conversion of its circuits. Demolition will include removal of all above-grade structures and a majority of the below-grade structures, as deemed practical. The existing perimeter fence, landscaping, and driveway will be maintained for security, aesthetics, and access until the property is sold (which is yet to be determined). Following demolition, minor site restoration will occur in the form of rough grading.

Power is currently transferred to the Magnolia Substation over two 33kV subtransmission lines: Riverside-Magnolia and Magnolia-Freeman. During the decommissioning, a new 33kV sub-transmission bypass point at a nearby transmission pole of Magnolia Substation will form the Riverside-Freeman 33kV line. Likewise, the fiber optic connections to this facility will be re-routed to other stations such as to maintain integrity to the communications network throughout the City.

Further consideration will be given at a future date to decommissioning the Riverside-Freeman 33kV line, and a 33kV auto-transformer with associated equipment (i.e., circuit breakers, protection relays, etc.) at each substation.

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

	Existing Land Use	**General Plan Designation**	**Zoning Designations**
Plaza Substation			
North	Elizabeth Street; Commercial Office	MU-N - Mixed-Use Neighborhood	CR – Commercial Retail
East	Commercial Office Building	MU-N - Mixed-Use Neighborhood	O - Office
South	Railway (*Amtrak, Metrolink, and Union Pacific Railroad*)	C – Commercial	RWY – Railway
West	Vacant/Disturbed Lot	C – Commercial	CR – Commercial Retail / CG – Commercial General

	Existing Land Use	General Plan Designation	Zoning Designations
Magnolia Substation			
North	Central Avenue	Central Avenue	Central Avenue
East	Riverside Water Company Canal; Railway (*Atchison, Topeka, and Santa Fe Railroad*)	C – Commercial	RWY – Railway
South	State Highway 91 ROW	C - Commercial	R-1-7000 (Single-Family Residential)
West	State Highway 91 NB Off-Ramp/State Highway 91	State Highway 91 NB Off-Ramp/State Highway 91	State Highway 91 NB Off-Ramp/State Highway 91
4-12kV Conversion Areas	Varied	Varied	Varied

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

City of Riverside

- Traffic permits consistent with applicable City Codes

13. **Documents used and/or referenced in this review:**
    a. "Additional Site Assessment Report - Former Olympic Cleaners Property, 6186 Magnolia Avenue," prepared by AMEC Geomatrix, Inc., March 17, 2010.
    b. "Additional Assessment Report Addendum - Former Olympic Cleaners Property, 6186 Magnolia Avenue," prepared by AMEC Geomatrix, Inc., October 29, 2010.
    c. "Air Quality and Climate Change Assessment – Magnolia-Plaza Reliability Project," prepared by Entech Consulting Group, September 9, 2013.
    d. "Archaeological Resources Study for the Magnolia-Plaza Reliability Project, City of Riverside, Riverside County, California, prepared by Rincon Consultants, July 18, 2013.
    e. City of Riverside General Plan 2025, Adopted November 2007.
    f. City of Riverside General Plan 2025 Final Program Environmental Impact Report, Adopted November 2007.
    g. "Comments on Additional Subsurface Soil and Groundwater Investigations at Former Olympic Cleaners, 6186 Magnolia Avenue," California Regional Water Quality Control Board, March 16, 2011.
    h. "Historic Resources Assessment Report of Magnolia Substation and Plaza Substation, Magnolia-Plaza Reliability Project, Riverside, Riverside County, California," prepared by Daly & Associates, July 2013.
    i. "Hydrology and Hydraulic Basis of Design for Magnolia-Plaza Reliability Project," prepared by RBF Consulting, a company of Michael Baker Corporation, September 2013.
    j. "Initial Study and Mitigated Negative Declaration, Casa Blanca Power Project, City of Riverside, California," prepared by Michael Brandman Associates, August 10, 2010.
    k. "Limited Phase II Environmental Site Assessment, 6186 Magnolia Avenue," prepared by AMEC Geomatrix, Inc., July 17, 2009.
    l. "Magnolia Avenue Specific Plan," City of Riverside, Adopted November 10, 2009.
    m. MSHCP Habitat Assessment Report for the Magnolia-Plaza Reliability Project, City of Riverside, Riverside County, California," prepared by Rincon Consultants, July 19, 2013.
    n. "No Further Action Determination for Plaza Substation Expansion, Vacant Property on Elizabeth Street East of Magnolia Avenue, Riverside, California, prepared by Santa Ana Regional Water Quality Control Board. October 30, 2013.
    o. "Paleontological Resources Study for the Magnolia-Plaza Reliability Project," prepared by Rincon Consultants, July 18, 2013.

p. "Phase I Environmental Site Assessment for the Magnolia-Plaza Reliability Project, City of Riverside, Riverside County, California," prepared by Rincon Consultants, July 18, 2013.
q. "Project Specific Water Quality Management Plan for Magnolia-Plaza Reliability Project (MPRP)," prepared by RBF Consulting, a company of Michael Baker Corporation, July 23, 2013.
r. "Soil Vapor Investigation and Screening-Level Human Health Risk Assessment, 6222 Magnolia Avenue," prepared by AMEC Geomatrix, Inc., July 22, 2009.
s. "Soil Vapor Survey Report, Plaza Substation," prepared by Converse Consultants, August 22, 2013.
t. "Technical Noise Memorandum," prepared by Entech Consulting Group, July 13, 2013.
u. "Vapor Intrusion Mitigation Measures," prepared by Converse Consultants, October 17, 2013.

14. **Acronyms**

ACCA ..... Air Conditioning Contractors of America
ACM ..... Asbestos Containing Material
APN ..... Assessor's Parcel Number
AQMP ..... Air Quality Management Plan
ASHRAE ..... American Society of Heating, Refrigerating and Air Conditioning Engineers
Basin ..... South Coast Air Basin
BMP ..... Best Management Practice
C ..... Commercial
CARB ..... California Air Resources Board
CAS ..... Criteria Area Species
CDFW ..... California Department of Fish and Wildlife
CEC ..... California Energy Commission
CEQA ..... California Environmental Quality Act
CFR ..... Code of Federal Regulations
CG ..... Commercial General
CHRIS ..... California Historical Resources Information System
CIWMB ..... California Integrated Waste Management Board
CMP ..... Congestion Management Program
CNDDB ..... California Natural Diversity Database
CNEL ..... Community Noise Equivalent Levels
CNPS ..... California Native Plant Society
CO2e ..... Carbon Dioxide Equivalent
CO ..... Carbon Monoxide
CPTED ..... Crime Prevention Through Environmental Design
CR ..... Commercial Retail
CRHR ..... California Register of Historical Resources
dBA ..... Decibel
EDR ..... Environmental Data Resources, Inc.
EIC ..... Eastern Information Center
EIR ..... Environmental Impact Report
EMI ..... Emission Inventory Database
ESA ..... Environmental Site Assessment
ESMP ..... Electric System Master Plan
FMRP ..... Farmland Mapping and Monitoring Program
FPEIR ..... Final Programmatic Environmental Impact Report
GCC ..... Global Climate Change
GHG ..... Greenhouse Gas
HCP ..... Habitat Conservation Plan
HHRA ..... Human Health Risk Assessment
HI ..... Hazard Index
HVAC ..... Heating, Ventilating and Air Conditioning

kV ..... Kilovolt
LBP..... Lead Based Paint
LOS ..... Level of Service
MASP ..... Magnolia Avenue Specific Plan
LUST ..... Leaking Underground Storage Tank
MEI..... Maximally Exposed Individual
MGD..... Million Gallons per Day
MLD ..... Most Likely Descendant
MPRP ..... Magnolia Plaza Reliability Project
MRZ ..... Mineral Resource Zone
MS4 ..... Municipal Separate Storm Sewer System
MSHCP ..... Multiple Species Habitat Conservation Plan
MU-N ..... Mixed Use Neighborhood
MVA..... Mega Volt Ampere
NAGPRA..... Native American Graves Protection Repatriation Act
NAHC..... Native American Heritage Commission
NB ..... Northbound
NEPS ..... Narrow Endemic Plant Species
NO2 ..... Nitrogen Dioxide
NOX ..... Nitrogen Oxides
NPDES ..... National Pollutant Discharge Elimination System
NPS..... National Park Service
NRHP ..... National Register of Historic Places
O3 ..... Ozone
Pb..... Lead
PCE..... tetrachloroethene
PF..... Public Facility
PM10 ..... Particulate Matter Less than 10 microns
PM2.5 ..... Particulate Matter Less than 2.5 microns
PRC ..... Public Resources Code
PUC ..... Public Utilities Commission
PVC ..... Polyvinyl Chloride
RCALUCP - ..... Riverside County Airport Land Use Compatibility Plan
REC ..... Recognized Environmental Condition
ROW..... Right of Way
RPU ..... City of Riverside – Public Utilities Department
RTP..... Regional Transportation Plan
RUSD ..... Riverside Unified School District
RWQCB ..... Regional Water Quality Control Board
RWY..... Railway
SAS..... Substation Automation System
SCAB..... South Coast Air Basin
SCAG ..... Southern California Association of Governments
SCAQMD..... South Coast Air Quality Management District
SKR ..... Stephen's Kangaroo Rat
SMACNA..... Sheet Metal and Air Conditioning Contractor's National Association
SO2..... Sulfur Dioxide
SONET ..... Synchronous Optical Network
SOX..... Sulfur Oxides
SWPPP ..... Storm Water Pollution Prevention Plan
SPCCP ..... Spill Prevention Controls & Countermeasure Plan
TAC..... Toxic Air Contaminant
TCA..... trichloroethane
TCE ..... trichloroethene

TRIS ..... Toxic Release Inventory
U.S. EPA ..... United States Environmental Protection Agency
USACE..... United States Army Corps of Engineers
V/C ..... Volume to Capacity ratio
VI..... Vapor Intrusion
VOC..... Volatile Organic Compound
WEAP..... Worker Environmental Awareness Program
WMWD..... Western Municipal Water District
WQMP..... Water Quality Management Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

The City of Riverside finds that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

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

Signature Stephen Bodgett Date 10/24/13

Printed Name & Title Stephen H. Bodgett, GM For City of Riverside

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside

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

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

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

   b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

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

The Project includes the expansion of the existing Plaza Substation and demolition of the Magnolia Substation, along with improvements for the 4-12kV conversion. Therefore, the existing visual environment affected by the project presently supports utility-related facilities, and the project will not result in a substantial new land use that will adversely affect the visual landscape. The Plaza and Magnolia Substation sites are currently developed with substation facilities and are generally located on flat ground adjacent to railroad tracks, roadways, and/or developed/disturbed lands. The Aesthetics section of the City of Riverside 2025 FPEIR indicates that the Plaza and Magnolia Substation sites are not located within the viewshed of a City of Riverside Scenic or Special Boulevard. The Plaza Substation site is located approximately 0.6 mile to the east of Magnolia Avenue which is identified as a Scenic Boulevard, Special Boulevard, and Parkway within the vicinity of the Plaza Substation, according to Figure 5.1-1 of the General Plan FPEIR and Figure CCM-4 of the General Plan; however, due to intervening topography, the Substation site is generally not visible from Magnolia Avenue. Further, the site is currently developed with a similar utility use and the proposed improvements will not substantially vary visually from the present development. The existing Magnolia Substation sits is located adjacent to the Riverside Freeway. A number of roads designated as Scenic Boulevards, Special Boulevards, and Parkways traverse the area where the 4-12kV conversion work will occur; however, such improvements will occur on already disturbed/developed lands and will not result in a substantial change or new aesthetic impact on visual quality or resources within the affected areas. Therefore, there will be a **less than significant** impact to scenic vistas, directly, indirectly, and cumulatively, with project implementation.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

1b. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, Title 20 – Cultural Resources, and Historic Resources Assessment Report prepared by Daly & Associates in July 2013)***

The project area is located within the City of Riverside, which is highly urbanized. Per the City of Riverside General Plan 2025 FPEIR, the proposed Project site is not near a State Scenic Highway, or any other designated or eligible scenic highway. As stated above, the Plaza Substation site is located approximately 0.6 mile to the east of Magnolia Avenue which is identified as a Scenic Boulevard, Special Boulevard, and Parkway within the vicinity of the Plaza Substation, according to Figure 5.1-1 of the General Plan FPEIR and Figure CCM-4 of the General Plan; however, due to intervening topography, the Substation site is generally not visible from Magnolia Avenue. Further, the site is currently developed with a similar utility use and the proposed improvements will not substantially vary visually from the present development. The existing Magnolia Substation site is located adjacent to the Riverside Freeway which is not considered to be a State scenic highway.

All of the areas affected by the proposed project are presently developed or disturbed, and therefore, the project will not substantially alter the existing visual character of the sites, with exception of the Magnolia site, on which the Substation will be removed. The project area does not support any rock outcroppings, and the removal of any trees is not proposed. The improvements associated with the 4-12kV conversion work will be minor and will occur on already disturbed/developed lands and will not add new aesthetic impacts along area roadways within the project area. Therefore, such improvements will not substantially change the visual character of the existing setting. The Historic Resources Assessment Report determined that no historic resources exist on the either the Plaza or Magnolia Substation sites. Therefore, the proposed project will not alter or damage any scenic resources ultimately affecting the viewshed of a State Scenic Highway. The project will result in a **less than significant** impact either directly, indirectly, or cumulatively with regard to causing substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

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

Direct effects associated with expansion of the Plaza substation will not degrade the existing visual character of the project area or surroundings because the site is currently developed with the existing substation of similar structure in height and size. Therefore, the proposed improvements at the Plaza Substation site will not create direct visual impacts to other uses on neighboring ownerships. Proposed grading will also not significantly change the topography of the area, as the site is generally flat. Further, the project will result in demolition of the Magnolia Substation, thereby removing such facilities from the existing visual setting. The site will require minor re-grading once demolition is complete to provide a relatively flat site. No trees or other designated visual resources will be removed with the proposed project.

Improvements for the 4-12kV conversion work will also not result in the substantial visual degradation of the affected project area, as such lands are presently disturbed/developed and support similar utility-related structures and existing poles, and no new aesthetic impacts will result. Therefore, the project will not substantially alter or damage any scenic resource that will ultimately affect the existing visual character or quality of the project area or its surroundings. The project will result in **less than significant** direct, indirect, and cumulative impacts in this regard.

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

1d. Response: ***(Source: General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines, and Magnolia Avenue Specific Plan (for Plaza Substation site))***

Implementation of the proposed project will result in similar outdoor lighting sources to those that presently exist. Limited outdoor lighting for the purposes of security and emergency access will be installed at the Plaza Substation site; however, similar lighting currently exists at the Plaza Substation site. As the Magnolia Substation will be demolished, associated outdoor lighting will be removed, thereby eliminating the potential for adverse light or glare effects. Additionally, limited improvements related to the 4-12kV conversion are not be anticipated to result in any new sources of outdoor lighting, due to the nature of the improvements and location within already developed areas. The existing Plaza Substation has no sources of glare. The City will prepare a lighting plan for the site in order to prevent potential light spillover onto adjacent properties. Implementation of the lighting plan will ensure that the project will not cause a substantial source of light spillover onto adjacent properties. All project lighting will be shielded and directed downward and away from adjacent properties and public rights-of-way. In addition, the area affected by the proposed project is located outside of the boundary of the Mt. Palomar Nighttime Lighting Policy Area, per the City of Riverside General Plan 2025 FPEIR, Figure 5.1-2. Therefore, the project will not result in a new substantial source of light or glare, and impacts will be **less than significant**, directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effect, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

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

The land area affected by the proposed project is located within an urbanized area. Review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 indicates that the project area is not designated as, and is not adjacent to, any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the California Department of Conservation Farmland Mapping and Monitoring Program (FMRP) of the California Resources Agency. According to Figure OS-2, the area affected by the proposed project is located on land designated as (D) Urban and Built-up Land. Urban and Built-up Land is categorized as "Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes." All proposed improvements will occur on the presently developed Substation sites or within existing disturbed rights-of-ways or easements. Therefore, there will be no impact to classified farmland resulting from project development. The proposed project will have **no impact** directly, indirectly or cumulatively to a designated agricultural use.

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

2b. Response: ***(Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)***

As shown in Figure OS-3 of the City of Riverside General Plan 2025, the proposed project area is not located within or near any lands zoned for agricultural use. No lands affected by the project are currently under a Williamson Act contract. The land areas affected by the proposed project are located within an urban environment and are currently developed and/or disturbed. Therefore, there will be no conflicts with existing zoning for agricultural use resulting from project development. The City of Riverside has no forest land that can support 10-percent native tree cover, nor does it have any timberland. Therefore the proposed project will have **no impact** directly, indirectly, or cumulatively on an agriculturally-zoned or Williamson Act contracted property.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	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 in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

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

The project area is not zoned for Timberland Production, nor is the project area located within proximity to any lands zoned as forest land. The land area affected by the proposed project is located within an urbanized area of the City and does not support agricultural or forest land resources or operations. The project will not result in the conversion of designated farmland to non-agricultural uses. Further, the City of Riverside has no forest land that can support 10-percent native tree cover. Therefore, **no impact** will occur from project implementation, either directly, indirectly, or cumulatively with regard to conflict with existing zoning for, or cause rezoning of, forest land or timberland.

d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

Refer to Response 2c, above. The proposed project area does not include any lands designated as forest land. Therefore, the project will have **no impact** directly, indirectly, or cumulatively with regard to the potential loss or conversion of forest land to non-forest use.

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

2e. Response: (Source: General Plan – Figure OS-2 – ***Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data)***

As discussed in Response 2b above, the land area affected by the proposed project is not located within proximity to any lands zoned for agricultural use or under a Williamson Act Contract. Therefore, there will be no potential conversion of designated Farm land to non-agricultural use resulting with project implementation. **No impact** will occur from project implementation, either directly, indirectly, or cumulatively with regard to 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.

3. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

3a. Response: ***(Source: South Coast Air Quality Management District's 2012 Final Air Quality Management Plan (AQMP), and Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – See Appendix A)***

The proposed project is located within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over the Basin and has regional authority delegated by California Air Resources Board (CARB)

and the U.S. Environmental Protection Agency (U.S. EPA). Therefore, the regional and localized thresholds recommended by the SCAQMD are utilized for this assessment as shown in Table 1, below.

Regional Emission Significance Thresholds are designed to limit the impacts that emissions from a project will have in affecting the ability of the Basin to attain or maintain air quality standards. Such emissions may affect the attainment of air quality standards many miles from a proposed project location. This assessment will quantify regional emissions and compare them to regional emission thresholds for construction and operational activities to assess regional air quality impacts.

Localized Significance Thresholds are established to assess short-term construction activities and long-term operational air quality impacts on nearby sensitive receptors. Sensitive receptors are defined as those individuals who are sensitive to air pollution and include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as NO_x and CO), commercial and/or industrial facilities would be considered worker receptors for those purposes.

The closest sensitive receptors consist of a community of single-family residences along both sides of Elizabeth Street located approximately 200 feet east of the existing Plaza Substation property line. Air quality impacts will be assessed at these receptors to evaluate impacts.

Table 1 displays the regional and local SCAQMD significance thresholds applicable to the proposed project. The air quality assessment evaluated the operational and construction air quality impacts from the proposed project to determine whether significant adverse effects will occur on noise sensitive land uses in the project area. The conclusions of the air quality assessment are presented below for each threshold criteria.

Table 1. SCAQMD Significance Thresholds

SCAQMD Regional Significance Thresholds		
Pollutant	**Thresholds (lbs/day)**	
	Construction	**Operational**
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Particulate Matter (PM_{10})	150	150
Particulate Matter ($PM_{2.5}$)	55	55
Sulfur Oxides (SO_x)	150	150
Carbon Monoxide (CO)	550	550
SCAQMD Localized Significance Thresholds[(1)]		
Pollutant	**Thresholds (lbs/day)**	
	Construction	**Operational**
Nitrogen Oxides (NO_x)	148	148
Carbon Monoxide (CO)	887	887
Particulate Matter (PM_{10})	12	3
Particulate Matter ($PM_{2.5}$)	4	1
SCAQMD Health Risk Significance Threshold		
Toxic Air Contaminants	Maximum Incremental Cancer Risk >= 10 in 1 million Hazard Index >= 1.0	

Source: SCAQMD web page, www.aqmd.gov

Notes:

1) The localized significance thresholds are applicable to SCAQMD Source-Receptor Area (Metropolitan Riverside County) where the Project is located and for construction area of 1 acre and a distance of 50 meters to the nearest sensitive receptor.

The applicable air quality plan is the 2012 Air Quality Management Plan (AQMP) adopted by the SCAQMD on December 7, 2012. Two criteria were set in responding to this checklist question to assess compliance with the AQMP:

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Criterion 1: Does the proposed project's regional construction and operational emission impacts conform to the SCAQMD's regional emission significance thresholds?

Criterion 2: Are the emissions from the proposed project within the emission budgets assumed in the AQMP?

Criterion 1: Regional Construction and Operational Emission Impacts

With regard to the first criterion, the project's regional construction and operational emissions may add to an already existing emission burden in the South Coast Air Basin affecting the ability of the South Coast Basin to attain and maintain ambient air quality standards. The estimation of the project's regional emission was based on the CalEEMod land use emission model that is recommended by the SCAQMD. The estimate of regional emissions accounts for emissions that are generated from onsite activities such as the use of construction equipment and dust generated from onsite activities and from offsite sources of emissions from worker vehicles and delivery supply trucks.

Regional Short-term Construction Emissions

Construction emissions may occur during all facets of the construction activities involving demolition, underground work, overhead work, and substation infrastructure construction. Such emissions will come from construction equipment combustion exhaust, fugitive dust from the demolition of the existing public works building, grading and earth-moving activities, paving and emissions from vehicles driven to and from the site by construction workers and delivery vehicles. Construction emissions generate the following pollutants VOCs, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$.

An assessment of regional short-term construction air pollutant emissions was conducted using an estimated construction schedule provided by the City and an inventory of construction equipment typical of the type of construction contemplated for the proposed project. The rates of pollutant emissions from both onsite and offsite construction activities were derived from information provided by the SCAQMD.

In estimating construction emissions for the proposed project, the following construction activities were included:

- Demolition of the existing Magnolia Substation
- Grading of the empty parcel to the west of the existing Plaza Substation
- Trenching/Underground Utilities
    - Underground work – pulling cable and splicing into existing substructures
    - Underground work – installing a pad-mounted switch
- Infrastructure construction
    - Delivery of construction materials
    - Construction of the substation infrastructure
- Aggregate Paving
    - Delivery of paving materials
    - Paving of the entire area of the additional parcel.

From the information provided by the applicant, it was assumed that construction of the proposed project will commence in early 2014 and will span approximately 18 months. Demolition of the existing Magnolia Station is expected to commence in mid-2014 and will span approximately 11 months. Construction was assumed to occur over an 8-hour day during the construction period.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 2 presents the estimated maximum daily regional construction emissions for the proposed project and compares the estimated emissions with the daily mass regional emission significance thresholds for construction established by the SCAQMD. As shown in Table 2 below, the construction emissions from the proposed project will not exceed any of SCAQMD's regional construction significance thresholds. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

Table 2. Estimated Maximum Daily Regional Construction Emissions (lbs/day)

Construction Activity	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Phase 1 - Plaza T5 Addition						
Site Preparation	1.74	12.61	9.01	0.01	0.89	0.81
Trenching	3.09	21.12	16.58	0.03	1.37	1.38
Infrastructure Construction	2.27	16.85	11.48	0.02	1.17	1.07
Aggregate Paving	2.26	13.86	10.79	0.02	1.34	1.12
Regional Threshold	75	100	550	150	150	55
Significant Impact?	no	no	no	no	no	no
Phase 2 - 4-12 kV Conversion						
Site Preparation	1.63	11.82	8.96	0.01	0.91	0.73
Grading	1.99	13.17	11.18	0.02	3.61	1.8
Trenching	3.06	21.08	16.04	0.03	1.37	1.37
Regional Threshold	75	100	550	150	150	55
Significant Impact?	no	no	no	no	no	no
Phase 3 - Distribution feeders						
Site Preparation	1.63	11.82	8.96	0.01	0.8	0.73
Trenching	3.09	21.12	16.58	0.03	1.51	1.38
Regional Threshold	75	100	550	150	150	55
Significant Impact?	no	no	no	no	no	no
Phase 4 - Transmission Line						
Site Preparation	1.63	11.82	8.96	0.01	0.91	0.73
Trenching	3.09	21.12	16.58	0.03	1.51	1.38
Regional Threshold	75	100	550	150	150	55
Significant Impact?	no	no	no	no	no	no
Phase 5 - Magnolia Substation Demo/Decommission						
Demolition	1.9	13.07	9.96	0.02	1.08	0.95
Regional Threshold	75	100	550	150	150	55
Significant Impact?	no	no	no	no	no	no

Source: Entech Consulting Group, 2013

Regional Long-term Operational Emissions

Long-term emissions occur during the full operation of the proposed project. Such emissions will come from area sources including gasoline-powered landscaping, maintenance equipment, and from mobile sources (e.g. vehicle trips by Public Utilities employees). The proposed project represents an improvement of the existing substation to complete the 4-12kV conversion. Therefore, it is not anticipated that any new trips will occur by worker personnel. Negligible amounts of emissions will be generated from equipment used for any landscape maintenance activities. The maximum daily operational emissions are expected to be less than significant.

Therefore, the project's construction and operational emissions will not exceed any of the SCAQMD's regional significance

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

thresholds. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

Criterion 2: Project's Emissions are Within the AQMP Emission Budgets

The AQMP is based in large part on the general plans of the various local planning agencies in defining the type and intensity of land use in estimating future emissions budgets. The project land use is permitted with the General Residential designation within the City of Riverside General Plan 2025. The City's zoning ordinance allows public utilities, i.e., substations on parcels that are zoned Residential. As a result, the proposed project is consistent with the emission budget assumptions contained in the AQMP since it is consistent with the General Plan land use. Therefore, the project will not conflict with or obstruct implementation of the applicable air quality plan. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

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

3b. Response: ***(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2012 Final Air Quality Management Plan, CalEEMod, and Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – see Appendix A)***

The following criteria were used in evaluating the significance of impacts resulting with implementation of the project:

Criterion 1: Do the Project's regional construction and operational emission impacts conform to the SCAQMD's regional emission significance thresholds?

Criterion 2: Do the Project's localized construction and operational emissions conform to the SCAQMD's localized significance thresholds?

The application of these criteria in addressing this impact question is designed to insure that the air impacts of a proposed project will not cause a new exceedance or contribute to an existing or projected exceedance of an air quality standard either locally within the immediate area of the project or within the South Coast Air Basin.

Air quality is continuously monitored throughout the SCAB by the SCAQMD. The SCAQMD has positioned multiple air quality monitoring stations throughout the basin to monitor criteria pollutants CO, PM_{10}, $PM_{2.5}$, O_3, NO_2, SO_2, and Pb concentration levels in the atmosphere. The SCAQMD utilizes these monitoring stations to monitor exceedances of criteria pollutant concentrations in the environment. The project area is designated as a non-attainment area for O_3, PM_{10}, and $PM_{2.5}$. The project area is also categorized as a maintenance area for CO. Table 3 below presents the last three years of monitoring data to illustrate the air pollutant concentration trends for the pollutants of concern. The concentrations collected from nearby air quality monitoring stations show that O_3 has exceeded both state and federal standards for the last three years. $PM_{2.5}$ and PM_{10} concentrations increased from 2010 to 2011, but decreased to below State and federal standards in 2012. CO concentrations for the past three years have been well below State and federal standards.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 3. Ambient Air Quality at Nearby Air Monitoring Stations

	Ozone		Carbon Monoxide		$PM_{2.5}$ [1]	PM_{10}
	Max 1-hour Conc. (ppm)	Max 8-hour Conc. (ppm)	Max 1-hour Conc. (ppm)	Max 8-hour Conc. (ppm)	Max 24-hour Conc. (ppm)	Max 24-hour Conc. (ppm)[c]
Monitoring Station Location	5888 Mission Blvd., Rubidoux		7002 Magnolia Ave., Riverside		7002 Magnolia Ave., Riverside	5888 Mission Blvd., Rubidoux
Federal Standard	**No Federal Standard**	**0.075 ppm**	**35 ppm**	**9 ppm**	**35 μg/m³**	**150 μg/m³**
2012	0.126	0.102	2.7	1.5	30.2	67
2011	0.128	0.115	3.1	1.5	51.6	82
2010	0.128	0.098	2.5	1.7	43.7	75
State Standard	**0.09 ppm**	**0.07 ppm**	**20 ppm**	**9 ppm**	**35 μg/m³**	**50 μg/m³**
2012	0.126	0.102	2.7	1.5	30.2	67
2011	0.128	0.115	3.1	1.5	51.6	82
2010	0.128	0.098	2.5	1.7	43.7	75

Source: *EPA web page, http://www.epa.gov/airdata/ad_rep_mon.html*
Note:

1. Monitoring data was not available for the annual $PM_{2.5}$ emissions.

***Criterion 1*:** Regional Construction and Operational Emission Impacts

As noted from the information provided in the discussion above, the project's regional construction and operational emission impacts will not exceed any of the SCAQMD's regional significance thresholds.

***Criterion 2*:** Local Construction and Operational Emission Impacts

The estimation of local emissions focuses on the quantification of emissions generated from activities carried out only while on the project site (e.g., from construction equipment and fugitive dust) and does not include emissions generated from off-site sources such as from worker vehicles and delivery trucks.

Local Short-Term Criteria Pollutant Construction Emissions

The localized significance thresholds applicable to the project were derived from the SCAQMD mass rate daily emission tables for a one-acre construction area (the approximate construction area) in SCAQMD Source-Receptor Area 23 (Metropolitan Riverside County) where the project is located. A receptor distance of approximately 200 feet from the project fence line was also assumed as the distance to the nearest residences, which are located east of the Plaza Substation. Table 4 below provides the localized significance threshold analysis results for construction compared to the SCAQMD local construction thresholds applicable to the proposed project.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 4. Estimated Maximum Daily Local Construction Emissions

Construction Activity	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Phase 1 - Plaza T5 Addition				
Site Preparation	12.58	8.68	0.82	0.81
Trenching	21.07	15.97	1.37	1.37
Infrastructure Construction	16.33	10.77	1.04	1.04
Aggregate Paving	13.77	9.69	1.1	1.1
Localized Threshold[1]	148	887	12	4
Significant Impact?	no	no	no	no
Phase 2 - 4-12 kV Conversion				
Site Preparation	11.79	8.65	0.84	0.73
Grading	13.02	9.35	2.45	1.77
Trenching	21.07	15.97	1.37	1.37
Localized Threshold[1]	148	887	12	4
Significant Impact?	no	no	no	no
Phase 3 - Distribution feeders				
Site Preparation	11.79	8.65	0.73	0.73
Trenching	21.07	15.97	1.37	1.37
Localized Threshold[1]	148	887	12	4
Significant Impact?	no	no	no	no
Phase 4 - Transmission Line				
Site Preparation	11.79	8.65	0.84	0.73
Trenching	21.07	15.97	1.37	1.37
Localized Threshold[1]	148	887	12	4
Significant Impact?	no	no	no	no
Phase 5 - Magnolia Substation Demo/Decommission				
Demolition	13.02	9.35	0.94	0.94
Localized Threshold[1]	148	887	12	4
Significant Impact?	no	no	no	no

Source: Entech Consulting Group, 2013

Note:

1) Localized threshold is based on the project size of 1 acre and distance to the nearest sensitive receiver location, approximately 200 feet from the Plaza Substation property line.

As noted from the results shown in Table 4, the construction of the proposed project will not exceed the SCAQMD's localized significance thresholds. Therefore, the project will not cause any violations of any air quality standard or contribute substantially to an existing or project air quality violation.

Local Short-Term Greenhouse Gas Construction Emissions

According to the California Natural Resources Agency, "due to the global nature of GHG emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis. According to Appendix G of the CEQA Guidelines, the following criteria may be considered to establish the significance of Global Climate Change (GCC) emissions:

Would the project:

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?"

As discussed in Section 15064.4 of the CEQA Guidelines, the determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency, consistent with the provisions in Section 15064. Section 15064.4 further provides that a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or,
2) Rely on a qualitative analysis or performance based standards.

Section 15064.4 also advises a lead agency to consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and,
3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Based on the CARB's analysis that statewide 2020 business as usual GHG emissions would be 596 million metric tons of CO_2 equivalents ($MMTCO_2e$) and that 1990 emissions were 427 $MMTCO_2e$, local lead agencies have estimated that a reduction of 28.35% below business as usual is required to achieve the AB 32 reduction mandate.

To date, the SCAQMD Board has adopted an interim CEQA significance threshold for GHGs for industrial projects where the SCAQMD is the lead agency, and continues to consider screening levels under CEQA for residential, commercial, and mixed-use projects. Beginning in April 2008, the SCAQMD convened a working group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for industrial projects where the SCAQMD is the lead agency. The interim screening threshold for industrial projects is 10,000 $MTCO_2e$ per year ($MTCO_2e/yr$).

In September 2010, SCAQMD staff presented to the Working Group a proposed tiered approach to determining GHG significance for proposed residential and commercial projects. At Tier 1, GHG emissions impact would be less than significant if the project qualifies under a categorical or statutory CEQA exemption. At Tier 2, the GHG emissions impact would be less than significant if the project is consistent with a previously adopted GHG reduction plan that meets specific requirements. At Tier 3, the Working Group proposes extending the 10,000 $MTCO_2e/yr$ screening threshold applicable to industrial projects where SCAQMD is the lead agency, described above, to other lead agency industrial projects. For residential and commercial projects the Working Group proposes the following Tier 3 screening values: either (1) a single 3,000 $MTCO_2e/yr$ threshold for all land use types; or, (2) separate thresholds of 3,500 $MTCO_2e/yr$ residential projects, 1,400 $MTCO_2e/yr$ for commercial projects, and 3,000 $MTCO_2e/yr$ for mixed-use projects. A project with emissions less than the applicable screening value would have less than significant GHG emissions.

Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of two methods:

1) **A Percent Emission Reduction Target**. This method is used by the Sacramento Metropolitan and San Joaquin Valley Air Districts and the City of San Diego. The SCAQMD Working Group made no recommendation relative to this method.

2) **Efficiency Targets**. On the project level, 2020 GHG emissions should not exceed 4.8 $MTCO_2e$/yr per service population (SP) where SP is project residents plus employees. Further, 2035 GHG emissions should not exceed 3.0 $MTCO_2e$/yr per SP.

Projects with GHG emissions that do not meet the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other onsite methods, or by offsite actions, such as energy efficiency upgrade of existing buildings. This proposed screening and mitigation proposal from SCAQMD remains a work in progress; the Working Group has not convened since the fall of 2010. As of August 2013, the proposal has not been considered or approved for use by the SCAQMD Board. In the meantime, no GHG significance thresholds are approved for use in the Basin. The City of Riverside is located within the jurisdiction of the SCAQMD. Therefore, the recommended significance thresholds provided by the SCAQMD are applicable to projects within the City of Riverside.

Greenhouse gas emissions from construction were estimated utilizing the CalEEMod model using emission rates developed by the SCAQMD and the type of construction activities discussed previously. Table 5 below summarizes the carbon monoxide emission from the proposed project. Emissions of nitrous oxide and methane are negligible.

Table 5. Construction Greenhouse Gas Emissions

Phase of Construction	Emissions ($MTCO_2e$)
Phase 1 - Plaza T5 Addition	
Site Preparation	39.57
Trenching	24.09
Infrastructure Construction	44.73
Aggregate Paving	7.19
Phase 2 - 4-12 kV Conversion	
Site Preparation	3.3
Grading	1.6
Trenching	23.25
Phase 3 - Distribution feeders	
Site Preparation	3.3
Trenching	48.19
Phase 4 - Transmission Line	
Site Preparation	3.3
Trenching	24.09
Phase 5 - Magnolia Substation Demo/Decommission	
Demolition	50
Total	272.61
Total Amortized over 30-years	9.1

Source: Entech Consulting Group, 2013

Local Long-Term Criteria Pollutant Operational Emissions

The proposed project provides upgrade of electrical transmission and distribution equipment to an existing substation. No new emissions are expected to be generated from onsite operational activities, and therefore, the local operational emissions are less than significant. Therefore, the proposed project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Long-Term Operational Greenhouse Gas Emissions

Operational emissions occur over the life of the project; however, since the proposed project involves the upgrade of transmission and distribution equipment, no new vehicle trips are expected to be generated. The only new greenhouse gas emissions to be generated during operation of the proposed project are from the potential leakage of sulfur hexafluoride gas from the operation of the circuit breakers and transformers. Information from Casa Blanca Substation Initial Study (Michael Brandman Associates, 2010) indicates that maximum capacity of each breaker is 33 pounds of sulfur hexafluoride gas. The manufacturers of the circuit breakers warrant a gas leak rate of less than one percent per year. Assuming that two breakers are in operation at 33 pounds per breaker, the total amount of sulfur hexafluoride in operation is 66 pounds. Assuming a leak rate of one percent per year, the sulfur hexafluoride leakage rate amounts to 0.66 pounds per year from the operation of the proposed project. This amount of sulfur hexafluoride leakage is equivalent to approximately 7.2 metric tons per year of CO_2e. The SCAQMD recommends amortizing the construction emissions over a 30-year time period. As shown in Table 6, the total greenhouse gas emissions from construction and operation are approximately 16.3 CO_2e per year, which is far below the 10,000 CO_2e threshold for industrial land uses as a screening threshold. Project construction and operation emissions would therefore have a less than significant contribution to global climate change impacts.

Table 6. Construction and Operational Greenhouse Gas Emissions

Activity	Emissions ($MTCO_2e$)
Construction	9.1
Operation	7.2
Total	16.3

Notes: $MTCO_2e$=metric tons of carbon dioxide equivalent, converted from tons by multiplying 0.9072 and the global warming potential of 1.

As shown above, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

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)?	☐	☐	☒	☐

3c. Response: ***(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2012 Final Air Quality Management Plan, CalEEMod 2011.1Model, Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – See Appendix A)***

The CEQA guidelines indicate that the project will create a significant impact if it will "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)." The region where the project is located is a nonattainment area for PM_{10}, $PM_{2.5}$ and the ozone. The project will contribute criteria pollutants to the area during short-term project construction; however, as detailed above, these emissions will be less than all SCAQMD regional and localized significance thresholds including emissions of NO_x and VOC, which are ozone precursors. Because short- and long- term emissions associated with the project will be below SCAQMD thresholds, the project's contribution of these pollutants will not be cumulatively considerable and will represent a less than significant impact. The project is consistent with the current land use designated in the City of Riverside General Plan 2025, as well as with the SCAQMD's AQMP. Finally, because the project impacts will not exceed any SCAQMD significance threshold, impacts from the project will not result in any cumulative health impacts either locally or regionally.

The project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors). Impacts will be **less than significant**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

3d. Response: ***(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2012 Final Air Quality Management Plan, CalEEMod 2011.1 Model, Supplemental Guidelines for AB 2588 Air Toxics "Hot Spots," and Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – See Appendix A)***

The following criteria were used in evaluating the significance of impacts resulting with implementation of the project:

Criterion 1: Does the proposed project's local construction and operational emissions conform to the SCAQMD's localized significance thresholds?

Criterion 2: Would nearby sensitive receptors be exposed to substantial levels of toxic air contaminants?

***Criterion 1*: Local Construction and Operational Emission Impacts**

As discussed previously above, the results of the localized significance assessment concluded that the construction or operation emissions will not exceed any of the SCAQMD's localized significance thresholds. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

***Criterion 2*: Exposure to Substantial Levels of Toxic Air Contaminants**

Construction activities would result in short-term, project-generated emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, excavation, and grading); paving; and, building construction). CARB identified diesel PM as a toxic air contaminant (TAC) in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with a project. For the proposed project, there would be few pieces of off-road, heavy-duty diesel equipment in operation, and the construction period would be short when compared to a 70-year exposure period. When considering these facts in combination with the highly dispersive properties of diesel PM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations, it can be concluded that TAC emissions during construction of the proposed project would not expose sensitive receptors to substantial emissions of TACs. Therefore, impacts will be **less than significant**, directly, indirectly, and cumulatively.

e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

e. Response: ***(Source: Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – See Appendix A)***

Individual responses to odors are highly variable and can result in a variety of psychological effects (i.e., irritation, anger, or anxiety) to physiological (i.e., circulatory and respiratory effects, nausea, vomiting, and headache). Generally, the impact of an odor results from a variety of interacting factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works or visits; the type of activity they are engaged in, and the sensitivity of the impacted receptor.

The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the project will result in excessive nuisance odors, as defined under the California Code of Regulations and Section

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

41700 of the California Health and Safety Code, and thus will constitute a public nuisance related to air quality.

Land uses typically considered associated with odors include wastewater treatment facilities, waste- disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors. Diesel exhaust and VOCs will be emitted during construction and demolition activities associated with the project, which may be considered objectionable to some; however, emissions will disperse rapidly from the project site and will be temporary and limited to the construction phase. The closest sensitive receptors consist of residences located 200 feet east of the existing Plaza Substation. Because of the rapid dispersion of potentially objectionable odors, it is not anticipated that such odors will reach a level to induce a negative response at any nearby sensitive receptor.

Therefore, the project will not create objectionable odors affecting a substantial number of people. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

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

4a. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area and MSHCP Habitat Assessment prepared by Rincon Consulting in July 2013 – see Appendix B)***

According to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis which is included as part of the Habitat Assessment prepared for the project (see Appendix B), the project will result in the removal of ruderal vegetation within the expansion area of the Plaza Substation. A California Natural Diversity Database (CNDDB) query was performed for the project. In conjunction with the CNDDB and survey results, no special status species were identified as having the potential to occur within the land areas affected by the project. No impacts to sensitive species will therefore occur with the proposed improvements within the project area. There are no areas of natural habitats within the vicinity of the project area that will be affected by the project. Therefore, **no impacts** will occur, either directly, indirectly, or cumulatively, with regard to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

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

4b. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, MSHCP Habitat Assessment prepared by Rincon Consulting in July 2013 – see Appendix B)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

According to the Habitat Assessment included in Appendix B, the project site is not within an MSHCP Criteria Cell. The MSHCP establishes habitat assessment requirements for certain species of plants, birds, mammals, and amphibians. As the project is not within a mammal, amphibian survey area or riparian/riverine area, no additional analysis is required for the proposed project. Therefore, **no impacts** to sensitive habitats, either directly, indirectly, or cumulatively, will occur as a result of the proposed development.

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

4c. Response: ***(Source: City of Riverside GIS/CADME USGS Quad Map Layer, and MSHCP Habitat Assessment prepared by Rincon Consulting in July 2013 – see Appendix B)***

The United States Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. The State of California also regulates waters of the State and streambeds under regional board and California Department of Wildlife (CDFW) jurisdiction. These waters include wetlands and non-wetland bodies of water that meet specific criteria. The project area does not contain any features that are jurisdictional under the Clean Water Act or State regulation for isolated waters or streambeds. Therefore, the proposed project will have **no impact**, directly, indirectly, or cumulatively, with regard to federally protected waters.

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

4d. Response: ***(Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage and MSHCP Habitat Assessment prepared by Rincon Consulting in July 2013 – see Appendix B)***

According to the Habitat Assessment prepared for the proposed project, the project area is generally developed and contains non-native ruderal vegetation, non-native trees, and landscaping. No sensitive resources were found within the project sites, and no sensitive biological resources are anticipated to occur during project activities. No sensitive plant communities are located within the project area, and no regional wildlife linkages or corridors are mapped within or near the project site. Project implementation will therefore not interfere with the provisions of the MSHCP.

The Magnolia Substation site contains suitable habitat for nesting birds. Therefore, impacts to nesting birds may occur from project-related ground-disturbing or vegetation removal activities (if not conducted outside of the nesting bird season, generally from February to September). As common bird species were observed within the project area during the site survey conducted, and the potential for project-related activities at the Magnolia Substation site during the breeding/nesting season may occur, the following mitigation measure shall be implemented to reduce project impacts to a level of **less than significant**:

> **MM Biology-1:** Project-related ground-disturbing or vegetation removal activities may be conducted outside of the nesting bird season (February 1st through August 31st) at the Magnolia Substation. If such activities are to occur during the nesting season, a nesting bird survey shall be conducted within 7 days prior to any ground-disturbing activities in order to determine if any nesting birds are present within the project site. If nesting birds are not found within the project site, no further action is required. If nesting birds are observed onsite, no construction activity shall occur within 250 feet (500 feet for raptors) of any active nests. Construction activity may only occur within 250 feet of an active nest at the discretion of a biological monitor, or if the biologist determines that the young have fledged. Construction activity may occur within the buffer area at the discretion of the biological monitor. A barrier (fence) shall be installed during the construction phase, if it is determined to be necessary by the biological monitor.

e. Conflict with any local policies or ordinances protecting	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
biological resources, such as a tree preservation policy or ordinance?				

4e. Response: ***(Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, and MSHCP Habitat Assessment prepared by Rincon Consulting in July 2013 – see Appendix B)***

No street trees within the project area will be impacted by the proposed project improvements, and therefore, no mitigation or approval under the City of Riverside Urban Forestry Policy will be required. The proposed project will be subject to all applicable federal, State, and local policies and regulations pertaining to the protection of biological resources and tree preservation. In addition, the City of Riverside General Plan 2025 includes policies to ensure that future development will not conflict with any local policies or ordinances protecting biological resources, including tree preservation policies. The proposed project does not propose removal of any existing trees and will therefore be in compliance with such policies. Therefore, the proposed project will have **no impact** directly, indirectly, or cumulatively on local policies or ordinances protecting biological resources and tree preservation.

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

4f. Response: ***(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan)***

The MSHCP Habitat Assessment prepared for the project indicates that the project area is not located within a Multiple Species Habitat Conservation Plan (MSHCP) Narrow Endemic Plant Species (NEPS) or Criteria Area Species (CAS) Survey area, nor is the project area located within an MSHCP Criteria Cell. The MSHCP establishes habitat assessment requirements for certain species of plants, birds, mammals, and amphibians. The proposed project is not located within or near a required habitat assessment area, and therefore, no additional surveys or habitat assessments are required. There will be **no impact**, directly, indirectly, or cumulatively, to any MSHCP listed species as a result of the proposed project with regard to conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐

5a. Response: ***(Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code, and site-specific Historic Resources Assessment Report prepared by Daly & Associates in July 2013 – see Appendix C-2).***

Neither the Plaza Substation site nor the Magnolia Substation site is located within an established historic district. According to City of Riverside, Modernism Context Statement (November 2009), Elizabeth Street is located to the north of the potential Magnolia Center historic district. The Plaza Substation was constructed in 1956 and the Magnolia Substation was constructed in 1966. Due to the age of these structures, a Historic Resources Assessment was prepared for the proposed project to evaluate their potential for significance. The study determined that no historic resources as defined in §15064.5 of the CEQA Guidelines occur on either of the Substation sites and that neither site is eligible for listing in National Register, California Register, or as a City of Riverside significant historic resource. The Upper Riverside Canal (P-33-004495), determined eligible for listing in the National Register, lies to the east of the Magnolia Substation site; however, activities required for demolition of the Magnolia Substation will be distanced from the Canal, and the physical alteration or disturbance to this section of the Canal will not occur. Adequate access to/from the Magnolia Substation site is available without disturbance to the Canal, and ongoing regular maintenance activities presently occur within the utility alignment

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

adjacent to the Canal. No increased disturbance to this resource will occur with the demolition activities. Additionally, the historic linear path of what is now considered to be the Burlington Northern Santa Fe Railroad (formerly California Southern Railroad/Atchison Topeka & Santa Fe Railroad, P-30-176590) lies to the east of the Magnolia Substation and has been determined eligible for listing in the California Register; however, the proposed demolition activities will be distanced from the railway and will not adversely affect this resource. Minor improvements for the 4-12kV conversion will occur within already disturbed areas and will not significantly impact any designated historical resource. Therefore, the project will not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, and a **less than significant impact** will occur in this regard.

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

5b. Response: ***(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D – Cultural Resources Study, and site-specific Archaeological Resources Study prepared by Rincon Consultants on July 18, 2013 – see Appendix C-1).***

As shown in Figure 5.5-1 of the General Plan FPEIR, the majority of the project site is located within an area designated as having unknown archaeological sensitivity; however, a limited land area within the northwestern portion of the project area is identified as having medium archaeological sensitivity. Areas classified as unknown are generally areas that were urbanized prior to the mid-1970s, as well as extant citrus groves surrounding the urbanized, built environment. Areas classified as unknown may contain buried archaeological deposits that date back to the City's prehistoric and historical periods.

An Archaeological Resources Study (see Appendix C-1) was prepared for the proposed project in conformance with CEQA, and included a records search, Native American scoping, intensive pedestrian survey, and reporting. During the records search, 17 previously recorded cultural resources were identified within a 0.5-mile radius of the Plaza Substation and the Magnolia Substation sites; however, no resources were identified within either of the project sites during the records search. Further, no archaeological resources were identified during the pedestrian surveys. Based on the results of the cultural resources records search, Native American scoping, and archaeological survey, no further archaeological resources work is recommended for the proposed project. As the conversion from 4-12 kV will occur on existing lines and at developed/disturbed locations supporting utility-related structures, the project will not have a significant impact on any known archaeological resources within these areas.

There is a possibility that ground-disturbing activities during construction will uncover previously unknown, buried cultural resources that may be potentially impacted by a project. The following standard measures are recommended in case of unanticipated discoveries of unknown cultural resources during project ground-disturbing activities to ensure that potential direct, indirect, and cumulative impacts resulting with the project remain **less than significant**:

> **MM Cultural-1: Unanticipated Discovery of Cultural Resources -** If cultural resources are encountered during project ground-disturbing activities, work in the immediate area shall halt, and an archaeologist meeting the Secretary of the Interior's *Professional Qualifications Standards* for archaeology (National Park Service [NPS] 1983) shall be contacted immediately to evaluate the find. The qualified archeologist shall make recommendations to the City of Riverside on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with §15064.5 of the CEQA Guidelines.

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

5c. Response: ***(Source: General Plan 2025 Policy HP-1, site-specific Paleontological Resources Study prepared by Rincon Consultants on July 18, 2013 – see Appendix C-3).***

The areas that will be affected by the proposed improvements are currently disturbed and/or developed, thereby reducing the potential for paleontological resources to exist; however, a single geologic unit, old alluvial fan deposit, is mapped at the surface within the project boundaries. This unit (and potential underlying units) has high paleontological sensitivity. No records of previously-recorded fossil occurrences were identified during the records search conducted for the Paleontological

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Resources Study in the near vicinity; however, Pleistocene aged alluvial deposits within five miles of the project site and throughout southern California are known to contain scientifically significant non-renewable paleontological resources including vertebrate, invertebrate, and plant fossils. Ground-disturbing activity is expected to include excavations of up to 15 feet in depth in some parts of the project area. Any excavations exceeding three feet in depth will have the potential to impact scientifically significant paleontological resources. Therefore, the proposed project will have the potential to significantly impact unknown paleontological resources.

To reduce potential direct, indirect, and cumulative adverse environmental impacts on paleontological resources from the project to a **less than significant** level, the following mitigation measures are recommended. The mitigation measures are consistent with Society of Vertebrate Paleontology (SVP) standard guidelines for mitigating adverse construction-related impacts on paleontological resources (SVP 2010).

MM Cultural-2: Paleontological Mitigation and Monitoring Program - Prior to any construction activity, the City shall ensure the following:

a. The City shall provide a qualified paleontologist to prepare a Paleontological Mitigation and Monitoring Program to be implemented during project ground disturbance activity. This program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications.
b. **Paleontological WEAP**: Prior to the start of construction, construction personnel shall be informed on the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.
c. **Paleontological Monitoring**: Any excavations exceeding 3 feet in depth shall be monitored on a full-time basis by a qualified paleontological monitor. Ground-disturbing activity that does not exceed three feet in depth will not require paleontological monitoring. Should no fossils be observed during the first 50% of excavations exceeding three feet in depth, paleontological monitoring may be reduced to weekly spot-checking under the discretion of the qualified paleontologist.
d. **Salvage of Fossils**: If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. Typically fossils can be safely removed by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.
e. **Preparation and Curation of Recovered Fossils**: Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the WSC or SBCM), along with all pertinent field notes, photos, data, and maps.
f. **Final Paleontological Mitigation and Monitoring Report**: Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.
g. The Paleontological Mitigation and Monitoring Program shall be supervised by a qualified paleontologist. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of southern California, and who has worked as a paleontological mitigation project supervisor for a least one year. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources.

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The proposed project will affect lands that are currently developed and/or that have been previously disturbed, thereby lowering the potential for the discovery of unknown human remains during project grading or excavation; however, ground disturbance could still have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries. Therefore, consistent with State laws protecting such remains, any sites containing human remains that are discovered must be identified and treated in a sensitive manner. With implementation of State Laws, including Health and Safety Code 7050.5, *State CEQA Guidelines* 15064.5(e), and Public Resources Code 5097.98, project impacts to human remains, including those interred outside of formal cemeteries, will be **less than significant** for direct, indirect, and cumulative impacts.

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

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

As shown on Figure PS-1, Regional Fault Zones, of the City of Riverside General Plan 2025, no Alquist-Priolo Earthquake Fault Zones are located within the boundaries of the City of Riverside or its Sphere of Influence. Additionally, lands affected by the proposed project are not located within one-half mile of a known earthquake fault. The Elsinore Fault zone is located approximately 13 miles to the southwest of the project area; the San Jacinto Fault zone is located approximately 14 miles to the northeast. These faults have the potential to create moderate to large earthquake events. All project-related construction will occur in compliance with applicable local and State building codes to minimize the risk of damage or loss as the result of a seismic event. Therefore, potential impacts from the rupture of a known earthquake fault will be **less than significant**, directly, indirectly, and cumulatively.

ii. Strong seismic ground shaking?	☐	☐	☒	☐

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

The City of Riverside is located in southern California which is a seismically-active region that typically experiences relatively small to larger earthquakes on a frequent basis. According to Figure PS-1 of the City of Riverside General Plan 2025, the project site is not located within a known fault zone or within one half mile of a known fault, as discussed above in 6(a)(i). Additionally, all structures proposed with the project will be built to applicable local and State building codes to minimize the risk of damage or loss from strong seismic ground shaking. Therefore, potential impacts from strong seismic ground shaking will be **less than significant**, directly, indirectly, and cumulatively.

iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

6iii. Response: ***(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report)***

As shown in Figure PS-2 of the City General Plan FPEIR, the majority of the area affected by the project, including the Plaza and Magnolia Substation sites, has a low potential for liquefaction to occur; however, several areas with a moderate

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
potential are located where the 4-12kV conversion work will take place. Compliance with the California Building Code regulations will ensure that impacts related to seismic-related ground failure, including liquefaction, will have a **less than significant impact** directly, indirectly, and cumulatively.				
iv. Landslides?	☐	☐	☒	☐
6iv. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code)***				
The Plaza and Magnolia Substation sites are generally flat, as confirmed during the July 2013 site visits. As shown on Figure 5.6-1 of the General Plan FPEIR, limited areas of steeper slopes may occur on lands on which the 4-12kV conversion activities will occur; however, the majority of such lands generally support limited topography, and only minor improvements will occur in these localized areas. No significant slopes occur within the project area that will be susceptible to landslides. Further, compliance with the California Building Code regulations will ensure that the project will have a **less than significant impact** directly, indirectly, and cumulatively relative to landslides.				
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
6b. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, and Water Quality Management Plan prepared by RBF Consulting in July 2013)***				
Erosion and loss of topsoil could occur as a result of the proposed project improvements. State and federal regulations require preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) to establish erosion and sediment controls for construction activities. The proposed project would also be required to comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, the Subdivision Code (Title 18) identifies erosion control standards for which development must comply. Additionally, the City's Grading Code (Title 17) also requires implementation of design measures to reduce the potential for soil erosion to occur. Compliance with applicable State and federal requirements, as well as with Titles 18 and 17 of the Riverside Municipal Code, will ensure that impacts relative to soil erosion or loss of topsoil will be **less than significant,** directly, indirectly and cumulatively.				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
6c. Response: ***(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report)***				
The majority of lands affected by the proposed project are located within an area having a low potential for liquefaction, as discussed above in Response 6a. The project area is not located at or near to a major fault rupture zone. Additionally, project grading and construction activities will occur on generally flat or gently sloping terrain, and not along hillsides conducive to increased soil or geologic unit instability. Of the new structures that will be constructed with the project (e.g. expansion of the Plaza Substation), a compaction report will be required by the City of Riverside Public Works Department, prior to construction to ensure structural stability. **Less than significant** impacts (direct, indirect, and cumulative) with regard to unstable soils are anticipated with the demolition of Magnolia Substation and minor improvements for the 4-12kV conversion work. Therefore, project impacts, direct, indirect, and cumulative, with regard to unstable soils and geologic units are considered to be **less than significant.**				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
6d. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California***				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)

The land areas affected by the proposed project are generally not associated with expansive soils; however, the proposed project activities will not create substantial risks to life or property associated with such soil types, as the project will result in facilities that are automated and unmanned. As identified in Figure 5.6-5 of the City General Plan FPEIR, the lands affected by the proposed project are not located within an area exhibiting soils having high shrink-swell potential. Therefore, the project will result in direct, indirect, and cumulative impacts that will be **less than significant** in this regard.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

6e. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)***

As a public utility use, the project does not propose the construction of habitable structures, nor does the project propose the use of septic tanks in support of any proposed improvements. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable to the project. **No impact**, either directly, indirectly, or cumulatively, with regard to soils being incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems will occur with the project as proposed.

7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

7a. Response: ***(Source: Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – See Appendix A))***

Refer to Response 3b, above. Impacts will be **less than significant**, directly, indirectly, and cumulatively.

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

7b. Response: ***(Source: Air Quality and Climate Change Assessment prepared by Entech Consulting Group on September 9, 2013 – See Appendix A)***

The project site is located within the boundaries of the SCAQMD which supports State and federal policies aimed at the reduction of levels of ozone-depleting gases through its Global Warming Policy and rules. The SCAQMD has also established an interim threshold for evaluating impacts relative to Greenhouse Gas (GHG). The project will be in compliance with the City of Riverside General Plan policies and provisions of the State Building Code aimed at the reduction of GHG emissions. Further, the project will conform to all applicable rules and regulations implemented by the SCAQMD during the construction phase. Therefore, the project will be consistent with the State's goals of reducing GHG emissions to 1990 levels by the year 2020 (as identified in AB 32) and with a targeted 80 percent reduction in GHG emissions below 1990 levels by 2050 (as stated in Executive Order S-3-05).

Based upon the CalEEMod analysis for the project and the discussion above, the project will not conflict with any applicable plan, policy, or regulation related to a reduction in GHG emissions. Therefore, a **less than significant impact** will occur directly, indirectly, and cumulatively in this regard**.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

8a. Response: ***(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan)***

The proposed project will result in expansion of the existing Plaza Substation, demolition of the Magnolia Substation, and minor improvements associated with the 4-12kV conversion. The proposed facilities (at Plaza Substation and the lands affected by the 4-12kV conversion) would be similar in operational nature to the existing utilities on the affected sites. Demolition of the Magnolia Substation and expansion of the Plaza Substation will potentially involve the transport, use, or disposal of hazardous materials that may be contained inside of certain components of the substations (e.g. transformers) and for use as building materials. Such activities would be short term and temporary, and therefore, not considered to be routine. Routine maintenance for the project facilities may involve the use of certain hazardous materials; however, all project operational activities will occur in conformance with applicable local, State, and federal regulations pertaining to the transportation, use, and/or storage of any hazardous materials. With project compliance with such regulations, there would be a **less than significant impact**, directly, indirectly, and cumulatively, in the form of hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials as a result of project implementation.

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?	☐	☒	☐	☐

8b. Response: ***(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan, Soil Vapor Survey Report (Plaza Substation) prepared by Converse Consultants on August 22, 2013 - See Appendix D-1, "Vapor Intrusion Mitigation Measures" letter prepared by Converse Consultants on October 17, 2013 - See Appendix D-2, "No Further Action Determination for Plaza Substation Expansion, Vacant Property on Elizabeth Street East of 6186 Magnolia Avenue" prepared by Santa Ana Regional Water Quality Control Board on October 30, 2013 - See Appendix D-3, site-specific Phase I Environmental Site Assessment (Magnolia Substation) prepared by Rincon Consultants on July 18, 2013 – See Appendix D-4)***

Refer to Response 8a, above. The proposed project involves improvements to the Plaza Substation and demolition of the Magnolia Substation which will involve the handling of components that may have hazardous materials inside of them. Construction of the improvements will also involve the use of other materials such as asphalt and concrete. The project will be required to comply with all local, State, and federal safety codes and regulations that regulate the transportation, use, and storage of any hazardous materials during construction-related activities.

A Phase I Environmental Site Assessment (ESA) was not conducted for the Plaza Substation site; however, several site assessments have previously been prepared for a property located at 6186 Magnolia Avenue (former "Olympic Cleaners" dry cleaning facility), just to the northwest of the Plaza Substation site, due to the presence of tetrachloroethene (PCE) and trichloroethene (TCE) detected in soil and soil vapor beneath the site and surrounding properties. These include a Limited Phase II ESA (July 17, 2009); Soil Vapor Investigation and Screening-Level Human Health Assessment (July 22, 2009); Additional Site Assessment Report (March 17, 2010); and, Additional Site Assessment Report Addendum (October 29, 2010), all prepared by AMEC Geomatrix, Inc. As a result of these studies, some shallow soil with elevated concentrations of PCE have been excavated and properly disposed of offsite. The reports determined that soil and groundwater impacts were limited to relatively low levels of concentrations in the vicinity of the property, and appear to attenuate with depth and

distance from the site.

Subsequently, the California Regional Water Quality Control Board (RWQCB) - Santa Ana Region - prepared a letter, dated March 16, 2011, acknowledging that the former dry cleaning site had been assessed through several phases of soil vapor, soil matrix, and groundwater sampling and analysis. The RWQCB indicated that, based on the low concentrations of PCE detected in the groundwater samples taken, the site does not appear to pose a threat of contamination to the underlying groundwater. Further, the RWQCB determined that, based on review of the analytical data for the site, it does not appear that additional soil excavation or groundwater investigation at the dry cleaners site is required.

To verify the absence of soil contamination, soil vapor testing was conducted for the proposed project at the Plaza Substation site in July 2013 to determine the presence of any contamination from the former dry cleaning operation. The testing was intended to evaluate potential impacts from VOCs in soil gas and potential vapor intrusion (VI) into future buildings on the site from VOCs in soil gas. The study determined that PCE concentrations in soil gas samples on the site generally decrease with increasing distance east and south of the former drycleaners. Such concentrations indicated that the PCE in soil gas samples onsite are apparently due to past releases from the former offsite drycleaners. The estimated cancer risks for VI of PCE were determined to all fall within the EPA discretionary range of 1×10^{-6} to 1×10^{-5} and were all less than the point of departure for commercial/industrial land use of 1×10^{-5}. Further, the carcinogenic risk and non-carcinogenic Hazard Index (HI) from potential migration of subsurface vapors into indoor air were estimated using the EPA Johnson-Ettinger Advanced Soil Gas Screening Model, modified to incorporate California toxicity criteria. The four estimated non-carcinogenic HIs for VI of PCE (0.0145 to 0.0418) were all less than the target HI of 1. Furthermore, the exposure frequency and duration for the commercial land use scenario, which was used for the Human Health Risk Assessment (HHRA) performed for the project as part of the Soil Vapor Survey Report, are very conservative for the type of buildings anticipated on the site, which will only be occupied for a maximum of a few hours per month. Based on the findings of the study, no additional assessment of the site was recommended or required.

The findings of the Soil Vapor Study were submitted to and reviewed by the RWQCB. Although the proposed restroom will be located outside of the perimeter of elevated soil vapor detections at the site, the RWQCB requested that, in consideration of the results of the soil gas investigation and the HHRA, conservative mitigation measures be required to minimize any potential vapor intrusion into the proposed restroom. In consultation with the RWQCB, Converse Consultants prepared and provided such mitigation language to the RWQCB for consideration. Upon review, the RWQCB accepted the proposed mitigation measures and issued a "No Further Action Determination" letter (dated October 31, 2013), indicating that no further evaluation of the project site was required, and that the mitigation measures identified were acceptable; refer to Appendix D-3.

Therefore, per request of the RWQCB, implementation of the following mitigation measures is required. Implementation of the mitigation measures identified will ensure that potential impacts resulting from human exposure to VOCs occurring with occupation of the (future) onsite restroom remain **less than significant,** directly, indirectly, and cumulatively:

> **MM Hazards-1:** Prior to any construction activity, the City shall ensure that the improvement plans for the Plaza Substation site include the following specifications for construction of the onsite restroom:
>
> a. An impermeable 20-millimeter high-density polyethylene (HPDE) membrane shall be installed under the proposed restroom floor slab, underlain by a select sand layer extending to the top of the footing; and,
> b. A flue-type vent shall be installed through the ceiling/roof of the proposed restroom, fitted with an external, wind-operated rotary ventilator.

Additionally, a Phase I ESA was prepared for the Magnolia Substation site by Rincon Consultants in July 2013 (see Appendix D-4). A reconnaissance of the site on July 1, 2013 was performed to observe existing site conditions and to obtain information indicating the possible presence of recognized environmental conditions (RECs) in connection with the property. Six large transformers and three circuit-breakers were identified on the subject property associated with the use as an electric substation. The transformers appeared to have old paint on the casings and the circuit-breakers had 'Non-PCB' stickers on them. Some minor stains were noted on the concrete. Twenty four (24) lead-acid batteries were located inside the one-story structure in use as part of the substation. Two pole-mounted transformers were located adjacent to the east of the

subject property. Railroad tracks are located approximately 50 feet east and up-slope of the subject property. The Riverside Water Company Canal separates the subject property from the railroad tracks. The railroad tracks are located within 50 feet (to the northeast, east and southeast) and up-slope of the subject property. While there is a concrete-lined canal separating the tracks from the subject property, overflow from major rain events could potentially transport contaminants from the railroad tracks onto the subject property, as railroad ties were historically treated with creosote, and the track beds were historically treated with herbicides for weed management. Therefore, hydrocarbons, metals, herbicides, and SVOCs (creosote, naphthalene) from the railroad activities are potentially present. A difference in existing subject property topography and the most recent topographic map in the northwestern portion of the subject property was observed during the site reconnaissance. Therefore, the presence of fill material is also likely.

A database search of public lists of sites that generate, store, treat or dispose of hazardous materials or sites for which a release or incident has occurred was conducted by Environmental Data Resources, Inc. (EDR). The Magnolia Substation site and adjacent properties were not listed in any of the databases searched by EDR as part of the Phase I ESA for Magnolia Substation. One property located approximately 100 feet to the east and southeast of the subject property was listed in several databases, including the leaking underground storage tank (LUST) database. The Olivewood Cemetery has previously involved soil sampling and soil removal as part of an underground storage tank (UST) removal. According to the records reviewed, the contamination only involved soil (and not groundwater) and the case is closed. Therefore, the site is considered de minimis.

The City of Riverside's 2012 Spill Prevention Controls & Countermeasures Plan (SPCCP) Section 10.0 details the number of transformers and circuit breakers on the subject property, as well as their total capacity for insulating oil. The SPCCP indicated no known documented spills on the subject property.

Additionally, the City of Riverside's *Remediation Plan for Electrical Substations Magnolia, Casa Blanca, Industrial, Plaza, and University, Due To Polychlorinated Biphenyl Contamination*, dated September 1990, summarizes the investigation and partial remediation of potential PCB contamination at five substations and recommended additional remediation. The Magnolia Substation property had the original transformer units in place until documented leaks were repaired and then eventually the transformers were removed in 1980. The property was found to have high levels of PCB contamination on the concrete pads, in the sludgy material under the transformer banks' casings and in the soil. The sludgy material contained up to 62 percent pure PCBs. Preliminary remediation at the property consisted of scraping, then washing the sludgy material off of the concrete several times using trichloroethane (TCA) as the cleaning solvent; however, there was found some remaining PCB-containing sludgy material in the space between the concrete pads and the casings of the metal transformer banks. Ultimately, the report recommended proper removal of the contaminated soil and sealing the transformer bank casings on the bottom to keep additional PCB contamination from leaching out onto the concrete in the future. No documentation was identified that confirmed that this remediation was completed.

Historical sources reviewed as part of the Phase I ESA for Magnolia Substation included building permits, topographic maps, aerial photographs, and City directories. The review indicated that the site was developed with a single structure for the City of Riverside Light Department in 1950, partially developed with the existing substation transformers and the structure in 1953, and fully developed as an electrical substation from 1963 to 2012. Due to the suspected age of the structure and the substation equipment, the presence of lead-based paint (LBP) and asbestos containing material (ACMs) is likely.

To reduce potential impacts associated with the REC and potential RECs identified to less than significant, implementation of the following mitigation measures is recommended:

RECs:

- **MM Hazards-2:** The City shall be responsible for the removal of the contaminated soil and contaminated material with confirmatory sampling analyzing for PCBs, hydrocarbons, metals, and VOCs. To reduce project-related adverse impacts to sites containing hazardous materials and/or sites where known hazardous materials contamination may have existed that may be inadvertently discovered during construction, soils testing shall be conducted by a qualified soils engineer and submitted to the City for the evaluation of hazardous chemical levels in the soil. The report submitted to the City should indicate if remediation of the soils is necessary to achieve less than significant levels of hazardous chemical in the soils. Proper investigation, and remedial actions, if necessary,

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

including a workplan, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. All such activities shall occur in compliance with applicable local, State, and federal regulations pertaining to the testing and/or removal of soils containing hazardous materials.

Potential RECs:

- **MM Hazards-3**: The City shall be required to conduct soil sampling on the subject property and analyze such soils for the potential presence of PCBs, hydrocarbons, metals, and VOCs, and the presence of herbicides and/or pesticides. To reduce project-related adverse impacts to sites containing hazardous materials and/or sites where known hazardous materials contamination may have existed that may be inadvertently discovered during construction, soils testing shall be conducted by a qualified soils engineer and submitted to the City for the evaluation of hazardous chemical levels in the soil. The report submitted to the City should indicate if remediation of the soils is necessary to achieve less than significant levels of hazardous chemical in the soils. Proper investigation, and remedial actions, if necessary, including a workplan, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. All such activities shall occur in compliance with applicable local, State, and federal regulations pertaining to the testing and/or removal of soils containing hazardous materials.

- **MM Hazards-4**: The City shall conduct a lead and asbestos survey of the building and lead sampling of paint on the transformers at the Magnolia Substation site, prior to any demolition activities, to ensure that, if present, these materials are managed properly during demolition. All such activities shall occur in compliance with applicable local, State, and federal regulations pertaining to the testing and/or removal of lead and/or asbestos containing materials.

Furthermore, operation of the Plaza Substation will occur in compliance with the City's SPCCP to prevent and/or manage the potential for accidental release of hazardous substances into the environment. The SPCCP has been updated to address the additional oil-filled equipment installed at Plaza Substation in accordance with Title 40, Code of Federal Regulations (CFR), Part 112. The document describes the steps used to prevent contaminants from entering into navigable waters of the U.S. The oil-filled equipment is exempted from secondary containment, according to Section 112.7(k); however, the project will require secondary containment around the transformer.

With implementation of the proposed mitigation measures, impacts will be reduced to **less than significant**, directly, indirectly, and cumulatively as a result of the proposed project development with regard to a release of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

8c. Response: ***(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)***

Refer to Responses 8a and 8b, above. Pachappa Elementary School is located approximately 0.25 mile to the southeast of Plaza Substation; Central Middle School is located approximately one mile northeast of Plaza Substation. Alcott Elementary School is located approximately one mile northeast of Magnolia Substation. Certain construction elements of the proposed project may therefore involve development of new or expanded utility components or electrical transmission lines and supporting facilities, or demolition of existing facilities, within a quarter mile of a school; however, the project does not represent new land uses that differ substantially from that which are already presently operating on the project site(s). It is not anticipated that the operation of the Plaza Substation or components relative to the 4-12kV improvements will result in the emission of hazardous materials, substances, or waste; however, the project will adhere to all applicable local, State and federal requirements regulating the emission or handling of hazardous materials. Therefore, there will be a **less than**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
significant impact, directly, indirectly, and cumulatively, as a result of development of the proposed project.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐

8d. Response: ***(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites and Supplemental Guidelines AB 2588 Air Toxics "Hot Spots")***

Refer to Responses 8a and 8b, above. As indicated in the Phase I ESA prepared for the project, the Magnolia site is not listed on the CORTESE, Toxic Release Inventory (TRIS), or Emissions Inventory Database (EMI). Mitigation measures are recommended to ensure that any known (or potential) hazardous materials or substances located on the lands affected by the project will be properly evaluated and removed, as appropriate, consistent with all applicable local, State, and federal regulations pertaining to the handling and disposal of hazardous materials or substances. With implementation of the proposed mitigation measures, impacts will be reduced to **less than significant**, directly, indirectly, and cumulatively.

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

8e. Response: ***(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)***

The Riverside Airport is located approximately three miles southwest of the Plaza Substation; the Flabob Airport is located approximately 2.5 miles to the northwest. According to Figure PS-6 of the City of Riverside General Plan 2025, the Plaza Substation site is located within Zone E of the Flabob Airport and the Riverside Municipal Airport, as identified in the Riverside County Airport Land Use Compatibility Plan (RCALUCP). Portions of the areas where the 4-12kV conversion work will occur are located within Area 3 of the March Air Reserve Base, as identified in Figure PS-6 of the City General Plan and in the March Air Reserve Base/March Inland Port (MARB/MIP) Comprehensive Land Use Plan (CLUP) and Draft MARB/MIP Joint Land Use Study (JLUS). Further, Plaza Substation is located within the "Other Airport Environs," Zone of the designated Airport Safety Zones of the Riverside Municipal Airport, and the "Other Airport Environs" Zone of the designated MARB/MIP Safety Zones (Figure 5.7-2, Airport Safety and Compatibility Zones, of the General Plan Final PEIR). Due to the nature of the proposed utility improvements, the project will be consistent with the compatibility zones and will comply with the land use standards in the RCALUCP, MARB/MIP CLUP, and Draft JLUS. Therefore, the project will not result in a safety hazard for people residing or working in the project area. Impacts related to hazards with regard to airport operation will be **less than significant,** directly, indirectly and cumulatively.

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

8f. Response: ***(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999) and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)***

The proposed project area is not within the vicinity of a private airstrip and will not result in a safety hazard for people residing or working in the area. Therefore, there will be **no impact**, either directly, indirectly, or cumulatively, as a result of the proposed project development.

g. Impair implementation of or physically interfere with an	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
adopted emergency response plan or emergency evacuation plan?				

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

Development of the proposed project is not anticipated to interfere with an adopted emergency response plan. The project represents a public utility project that will not result in a substantial permanent increase in traffic or adverse effects on circulation on local streets adjacent to or near the proposed project area. The land areas affected by the proposed project are currently developed and/or disturbed. Adequate emergency access is presently provided to all project areas, and implementation of the proposed project will not interfere with the provision of such access. No roadway or access improvements are proposed, with exception of the extension of Elizabeth Street and access drive improvements at the Plaza Substation site. Therefore, the project will result in **less than significant** impacts on a direct, indirect, and cumulatively level with regard to inadequate emergency access.

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

8h. Response: ***(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, City of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM's Strategic Plan)***

As shown on Figure PS-7 of the City of Riverside General Plan 2025, the proposed project area is not located within a Moderate to Very High fire hazard area. The areas affected by the project are located within the City, within a largely urbanized environment, and are developed/disturbed with limited vegetation that will potentially fuel a wildfire. The closest area of Very High fire hazard rated area is located approximately two miles to the southeast of the Magnolia Substation site, and approximately 2.5 miles to the southeast of the Plaza Substation site. Therefore, the proposed project will result in **less than significant impacts** with regard to exposure of people or structures to a significant risk of loss, injury or death involving wildland fires.

9. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

9a. Response: ***(Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, Project-Specific Hydrology and Hydraulic Basis of Design (September 2013) and Water Quality Management Plan (July 19, 2013), both prepared by RBF Consulting – See Appendices E-1 and E-2)***

Improvements resulting with the proposed project will have the potential to result in short-term and long-term impacts from storm water runoff. Project construction would result in ground-disturbance from excavation and grading activities, thereby loosening onsite soils and increasing the potential for erosion and sedimentation deposition, and/or polluted runoff from the site to occur. Standard temporary storm water best management practices (BMPs) (e.g. straw waddles, street sweeping, temporary concrete washouts, etc.) will be implemented during the construction phase to minimize or avoid potential storm water runoff from the site or an increase in sediment contribution to downstream receiving waters.

Additionally, surface runoff from the site over the long-term will also have the potential to adversely affect water quality. As a standard design feature and in conformance with existing applicable regulations, the City will implement the recommendations of the Water Quality Management Plan (WQMP) prepared for the project (see Appendix E-2). Further, a Municipal Separate Storm Sewer System (MS4) and a National Pollutant Discharge Elimination System (NPDES) permit will be implemented in order to manage and reduce polluted urban runoff from the affected sites. The WQMP identifies specific Site Design, Source Control, and Treatment BMPs that are aimed at reducing potential urban runoff pollution,

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
erosion, sedimentation, and/or non-permitted discharge of materials. Improvements proposed with the project will conform to all applicable local, State, and federal water quality and water discharge standards, as appropriate, project impacts will be **less than significant**, directly, indirectly, and cumulatively.				
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)?	☐	☐	☐	☒

9b. Response: ***(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, and RPU Urban Water Management Plan)***

The project will not result in the depletion of groundwater supplies or interfere substantially with ground water recharge such that there will be a net deficit in aquifer volume or a lowering of the local groundwater table level. The project will result in the 4-12kV conversion improvements, demolition of Magnolia Substation, and upgrade of Plaza Substation. The proposed project structures will be uninhabited and automated and will not require the use of groundwater for construction or operation. Although a slight increase in impervious surfaces will occur with the improvements at Plaza Substation, such surfaces will not substantially interfere with groundwater recharge. Further, demolition of Magnolia Substation will result in a decrease in impervious surfaces, thereby enhancing the potential for stormwater to filtrate through the soil and recharge groundwater supplies. Therefore, the project will have a **less than significant impact** directly, indirectly, and cumulatively on groundwater supplies or recharge.

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?	☐	☐	☒	☐

9c. Response: ***((Source: Preliminary grading plan, and Project-Specific Hydrology and Hydraulic Basis of Design (September 2013) and Water Quality Management Plan (July 19, 2013), both prepared by RBF Consulting – See Appendices E-1 and E-2)***

Expansion of the Plaza Substation and demolition of the Magnolia Substation will result in ground disturbance associated with grading and excavation activities that could change the existing drainage patterns onsite. Excavation will be required to allow for installation of the new equipment at the Plaza Substation and at Magnolia for the removal of the existing structures. The Plaza Substation and Magnolia Substation sites are generally flat, minor grading will be required to ensure a relatively level ground surface, including at the Magnolia site following demolition of the existing structures. A Storm Water Pollution Control Plan will be required to address potential storm water pollution during construction, and measures provided in the Water Quality Management Plan (which has been prepared to date – see Appendix E-2) will be implemented to address post-construction impacts on storm water quality. Improvements at the Plaza Substation site will change the existing runoff co-efficient by 0.002, as only minor amounts of pervious surfaces will be replaced with impervious surfaces, as compared to existing conditions. As indicated in the Hydrology and Hydraulic Basis of Design report prepared for the project, the increase in peak flow stormwater runoff from the Plaza Substation site with project implementation will increase by approximately 0.3 cubic feet per second (cfs), which is considered to be negligible. Runoff from the Plaza Substation site will be discharged at the same location as it currently is and the project will therefore not substantially change the existing drainage patterns. Similarly, following demolition, minor grading will be required at the Magnolia Substation site to return the site to a relatively level (vacant) pad, and will occur so as to mimic existing onsite drainage patterns and minimize any change in the existing rate or quantity of runoff. Only minor ground disturbance will be required for the 4-12kV conversion work, and therefore, is not anticipated to substantially change drainage patterns or result in a substantial increase in the potential for erosion or siltation. The project will therefore not significantly alter existing drainage patterns, including through the alteration of the course of a stream or river, in a manner which will result in substantial erosion or siltation on- or

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
off-site. Project impacts will be **less than significant,** directly, indirectly, and cumulatively.				
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?	☐	☐	☒	☐

9d. Response: ***(Source: Preliminary grading plan, and Project-Specific Hydrology and Hydraulic Basis of Design (September 2013) and Water Quality Management Plan (July 19, 2013), both prepared by RBF Consulting – See Appendices E-1 and E-2)***

Refer to Response to 9c, above. The project is subject to NPDES requirements. Erosion, siltation, and other possible pollutants potentially occurring with long-term implementation of the project will be addressed by implementing the recommendations of the Water Quality Management Plan prepared for the project, and through the grading permit process. As indicated in the Hydrology and Hydraulic Basis of Design report prepared for the project, the increase in peak flow stormwater runoff from the Plaza Substation site with project implementation will increase by approximately 0.3 cfs, which is considered to be negligible. Runoff from the site will be discharged at the same location as it currently is and the project will therefore not substantially change the existing drainage patterns. Similarly, following demolition, minor grading will be required at the Magnolia Substation site to return the site to a relatively level (vacant) pad, and will occur so as to mimic existing onsite drainage patterns. Only minor ground disturbance will be required for the 4-12kV conversion work, and therefore, is not anticipated to substantially change drainage patterns or result in a substantial increase in the potential for erosion or siltation. Therefore, the project will have a **less than significant impact** directly, indirectly, or cumulatively with regard to the alteration of existing drainage patterns and the potential for resultant flooding onsite or offsite.

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?	☐	☐	☒	☐

9e. Response: ***(Source: Preliminary Grading Plan, and Project-Specific Hydrology and Hydraulic Basis of Design (September 2013) and Water Quality Management Plan (July 19, 2013), both prepared by RBF Consulting – See Appendices E-1 and E-2)***

Refer to Responses 9a and 9c, above. A **less than significant** impact directly, indirectly, and cumulatively will occur with project implementation.

f. Otherwise substantially degrade water quality?	☐	☐	☒	☐

9f. Response: ***(Source: Project Specific Water Quality Management Plan prepared by RBF Consulting, July 2013)***

Refer to Response 9a, above. As noted above, during and subsequent to the project construction phase, standard BMPs will be implemented in order to reduce or avoid any adverse impacts on water quality resulting from the proposed improvements. Additionally, the City has ensured that the development will not result in adverse water quality impacts, pursuant to its Municipal Separate Storm System (MS4) permit through implementation of the WQMP prepared for the project. The proposed development will result in a minor increase the amount of impervious surface area at the Plaza Substation site; however, impervious area will be decreased at the Magnolia Substation site with following demolition. Other improvements for the 4-12kV conversion will affect only minor land areas and will occur on lands that have been previously disturbed. Final BMP's will be installed/constructed as part of the project so that any pollutants generated will be treated in perpetuity to ensure project impacts are reduced over the life of the project. Therefore, impacts related to degrading water quality will be **less than significant,** directly, indirectly and cumulatively.

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?	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

8g. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps – Map No. 06065C0710G)***

The Plaza Substation and Magnolia Substation sites are not located within a flood hazard area as depicted on Figure 5.8-2 of the General Plan 2025 FPEIR, or the National Flood Insurance Rate Map (Map Number 06065C0710G, Effective Date August 28, 2008). The project will result in improvements at the Plaza Substation, demolition of the Magnolia Substation, and associated work for the 4-12kV conversion. The facilities will be automated and no habitable structures or residential housing is proposed. Therefore, there will be **no impact,** directly, indirectly, or cumulatively.

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

9h. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps – Map No. 06065C0710G)***

The Plaza Substation and Magnolia Substation sites are not located within a flood hazard area as depicted on Figure 5.8-2 of the General Plan 2025 FPEIR, or the National Flood Insurance Rate Map (Map Number 06065C0710G, Effective Date August 28, 2008). Portions of the land area affected by the proposed improvements for the 4-12kV conversion work will be subject to dam inundation, as shown on General Plan 2025 FPEIR Figure 5.8-2. The project does not propose the construction of any habitable structures, and improvements will be limited to expansion of the Plaza Substation and work associated with the 4-12kV conversion. Therefore, the project will not place a structure within a 100-year flood hazard area that will impede or redirect flows. Therefore, a **less than significant impact** directly, indirectly, and cumulatively will occur with project implementation.

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?	☐	☐	☐	☒

9i. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps – Map No. 06065C0710G)***

The Plaza Substation and Magnolia Substation sites are not located within a flood hazard area as depicted on Figure 5.8-2 of the General Plan 2025 FPEIR, or the National Flood Insurance Rate Map (Map Number 06065C0710G, Effective Date August 28, 2008). Portions of the land area affected by the proposed improvements for the 4-12kV conversion work will be subject to dam inundation, as shown on General Plan 2025 FPEIR Figure 5.8-2. The project does not propose the construction of any habitable structures, and improvements will be limited to expansion of the Plaza Substation and work associated with the 4-12kV conversion. Therefore, the project will not place a structure within a flood hazard or dam inundation area that will 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. Therefore, **no impact** directly, indirectly, or cumulatively will occur with project implementation.

j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

9j. Response: ***(Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)***

The proposed project is not located in the vicinity of any large water body that is susceptible to the occurrence of seiche or tsunami. Additionally, the proposed project is not located in an area where mudflows occur, and the majority of affected lands are relatively flat. Therefore, the project will have **no impact,** either directly, indirectly, or cumulatively, with regard to the exposure of people or structures to inundation by seiche, tsunami, or mudflow.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. LAND USE AND PLANNING: Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

10a. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element, Project improvement plans (refer to Exhibits 3B and 3C, attached), City of Riverside GIS/CADME map layers)***

The proposed project will not divide an established community. The project will involve improvements at the Plaza Substation site and demolition of the Magnolia Substation. These lands are presently disturbed and currently support utility-type uses. A new land use that could potentially conflict with surrounding uses will therefore not result with proposed improvements at the Plaza Substation site. Furthermore, all improvements required for the 4-12kV conversion work will occur on developed/disturbed land within existing rights-of-way or easements, and will therefore not result in new land uses or development on vacant lands that will have the potential to conflict with existing surrounding uses. All areas affected by the proposed project are located within the City of Riverside, which offers a highly urbanized setting. Developed/disturbed lands generally surround all areas where project improvements will occur. Additionally, the project does not propose the construction of any new roadways (with exception of extension of Elizabeth Street) that could create a physical barrier or restrict existing circulation patterns. Therefore, the proposed project will not physically divide an established community. The project will result in **no impact**, directly, indirectly, or cumulatively, with regard to physical division of a community.

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

10b. Response: ***(Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Magnolia Avenue Specific Plan (for Plaza Substation site), Title 19 – Zoning Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code)***

According to the City General Plan (Figure LU-10 – Land Use Policy Map) and City Municipal Code, the properties affected by the proposed project at the (expanded) Plaza Substation site have a General Plan land use designation of MU-N (Mixed-Use Neighborhood) and C (Commercial) and are zoned PF (Public Facility), CR (Commercial Retail), and CG (Commerical General). The Magnolia Substation site has a General Plan land use designation of C (Commercial) and is zoned R-1-7000 (Single-Family Residential). The project does not require or propose a General Plan Amendment or rezone, and therefore, the existing land use designation and zoning of all affected lands will remain unchanged. None of the lands affected by the project are located within the coastal zone, and therefore, are not affected by a local coastal program.

The Plaza Substation is located within the boundaries of the Magnolia Avenue Specific Plan; however, as the site presently supports an existing substation, and the proposed project will result in a similar land use on the expanded site, the proposed improvements will not conflict with surrounding land uses. Similarly, the improvements proposed at the Magnolia Substation site and those associated with the 4-12kV conversion will occur on disturbed/developed lands and will not introduce new land uses that could conflict with the surrounding land use setting. All proposed improvements will occur in conformance with the objectives or policies identified in the Magnolia Avenue Specific Plan and City General Plan, as applicable. Further, all improvements proposed with the project will be built in accordance with City Building Codes, setbacks, vegetation, and height requirements, as appropriate.

Therefore, the proposed project will not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project will result in a **less than significant impact**, directly, indirectly, or cumulatively.

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

10c. Response: ***(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
and Other Habitat Conservation Plans (HCP)) **No impact.** Please refer to Response 4f, above.				
11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
11a. Response: ***(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)*** The proposed project is a utility project and will not involve the extraction of mineral resources. No mineral resources have been identified on any lands affected by the project, and none of the sites have been historically utilized for purposes of mineral extraction. The Plaza and Magnolia Substation sites are not identified as, or adjacent to, a locally important mineral resource recovery site as identified in the City General Plan 2025 or other land use plan. The General Plan identifies the project area as within the Mineral Resource Zone 3 (MRZ-3), indicating that "the area contains known or inferred mineral occurrences of undetermined mineral resource significance." Therefore, the project will not result in the loss of a mineral resource that will be of value to the region or State, and there will be no loss of availability of a mineral resource of Statewide importance. The project will have **no impact** on mineral resources directly, indirectly, or cumulatively.				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
11b. Response: ***(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)*** The lands affected by the proposed project are not identified as, or adjacent to, a locally important mineral resource recovery site as identified in the City General Plan 2025, specific plan, or other land use plan. The project will not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, the project will have **no impact,** directly, indirectly, or cumulatively, on any locally-important mineral resource recovery site.				
12. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
12a. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, and site-specific Noise Technical Memo prepared by Entech Consulting Group in July 2013 – See Appendix F)*** The Plaza Substation is located approximately 200 feet from a Medium Density Residential zone and is located on land zoned for Mixed Use-Neighborhood. The project will affect noise sensitive land uses in the area and will be subject to the requirements of the City of Riverside Municipal Code. Section 7.25.010 of the City's Municipal Code establishes standards to control noise within the City. In particular, this Section limits exterior noise levels for residential uses to 45 decibels (dBA) during night (10 p.m. to 7 a.m.) and 55 dBA during the day (7:00 a.m. to 10:00 p.m.). In addition, Section 7.35.020(f) of the City's Municipal Code exempts Public Health, Welfare and Safety activities that are associated with construction maintenance and repair operations conducted by public agencies and/or utility companies or their contractors which are				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

deemed necessary to serve the best interests of the public including but not limited to restoring electrical service. The proposed project falls under this exemption.

During construction of the proposed project, temporary increase to ambient noise levels may occur. Noise levels may increase due to the operation of construction equipment and increased traffic volumes from workers commuting to and from the project sites and delivery of construction material. The City does not provide specific noise control standards during construction hours but limits the hours that construction activities may occur. According to the City's Section 7.35.010 (General Noise Regulations), temporary construction activities are allowed provided they do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between 5:00 p.m. on Fridays and 8 a.m. on Saturdays, after 5:00 p.m. Saturdays or at any time on Sunday or federal holidays. As noted above, Section 7.35.020(f) may exempt the proposed project from this noise restriction, but adhering to the above listed limitations on working hours, which are standard conditions for typical projects in the City, the proposed project will avoid creating offensive noise during nighttime hours and/or when noise standards are more stringent; however, despite the restrictions on operating hours, construction noise levels may exceed the City's exterior noise standards. To decrease construction noise levels experienced at noise sensitive land uses, the following mitigation measures will be implemented. Implementation of the mitigation measures will ensure that noise levels experienced at nearby noise sensitive land uses do not exceed the City's established limits and that direct, indirect, and cumulative impacts will be reduced to a less than significant level.

MM Noise-1: During project construction, equipment shall be maintained in proper operating condition and equipped with appropriate mufflers.

MM Noise-2: During project construction, staging areas shall be located as far as practical from existing residential dwellings and other noise sensitive land uses.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

12b. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions Report, and site-specific Noise Technical Memo prepared by Entech Consulting Group in July 2013 – See Appendix F)***

During operation of the proposed project, there are no activities that will occur to cause ground borne vibration; however, construction activities associated with grading, excavation, trenching, and compaction of the substrate soils could potentially cause ground borne vibration impacts to nearby sensitive receivers. These activities will be temporary and relatively minor in nature. Due to the limited construction hours and the limited construction duration of the proposed project, construction noise impacts will be **less than significant**, directly, indirectly, and cumulatively.

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

12c. Response: ***(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, and site-specific Noise Technical Memo prepared by Entech Consulting Group in July 2013 – See Appendix F)***

Existing noise levels experienced in the project area are influenced by noise generated by adjacent railroad tracks. According to the City of Riverside's Noise Element section of the General Plan 2025 ambient noise levels (Community Noise Equivalent Levels [CNEL]) in areas adjacent to railroad tracks, CNEL values are naturally high, averaging 70 dB CNEL. CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10 dB penalty applied

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

to A-weighted sound levels occurring during the nighttime hours between 10:00 p.m. and 7:00 a.m., and a 5 dB penalty applied to the A-weighted sound levels occurring during evening hours between 7:00 p.m. and 10:00 p.m. CNEL is used to establish ambient noise thresholds within communities. The City's General Plan 2025 has established acceptable thresholds for noise in a residential area of no more than 45 CNEL at night and 55 CNEL in the daytime; however, the proposed project is located next to the BNSF tracks and is allowed a threshold of 70 CNEL (Figure N-7 of the City's 2025 General Plan).

According to City of Riverside Public Utilities, there is no operational noise dB rating for the proposed project substation. Most of the constant source of noise will be from the new transformers installed as part of the Plaza T5 Substation Addition. The level of noise generated from the new transformers will be similar to the anticipated 60 dB rating reference in the Casa Blanca Power Project Initial Study. The dB level associated with the new transformers will be reduced by distance from the source and intervening topography. It is anticipated that operation of the upgrades made to the Plaza T5 Substation will not create any noticeable noise exposure that will exceed the existing 70 CNEL at nearby single-family residences because older model equipment will be replaced with newer and quieter equipment which will result in a negligible change in ambient noise levels. Furthermore, the substation will be constructed and surrounded by a 10-foot block wall, which will further reduce ambient noise levels. In addition, the demolition of the existing Magnolia Substation will remove all equipment located onsite, allowing for further reductions in ambient noise levels experienced at nearby noise sensitive land uses. Therefore, project impacts on ambient noise levels will be **less than significant**, directly, indirectly, and cumulatively.

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

12d. Response: ***(Source: FPEIR Table 5.11-J – Construction Equipment Noise Levels, Appendix G – Noise Existing Conditions Report and site-specific Noise Assessment prepared by Entech Consulting Group in July 2013 – See Appendix F)***

As stated above, the proposed project will not create a substantial temporary or periodic increase in ambient noise levels within the proposed project area during construction with the implementation of mitigation measures. In addition, project compliance with the City's Municipal Code to limit construction hours (and resulting noise exposure) will reduce project impacts to a **less than significant** level.

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?	☐	☐	☐	☒

12e. Response: ***(Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUCP, March Air Reserve Base/March inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005), and site-specific Noise Study prepared by Entech Consulting Group in July 2013 – See Appendix F)***

The proposed project is located within the boundaries of the Riverside County Airport Land Use Compatibility Plan (ALUCP). According to the ALUCP Background Data for the Riverside Municipal Airport (2005), the project site is located outside of any noise contours. Therefore, the proposed project will have **no impact**, directly, indirectly, or cumulatively with regard to the exposure of people residing or working in the project area to excessive noise levels.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

12f. Response: ***(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999)and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)***

There are no private airports or helipads in the vicinity of the proposed project. Therefore, the proposed project will have **no impact**, directly, indirectly, or cumulatively in this regard.

13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

13a. Response: ***(Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections– 2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG's RCP and RTP)***

The proposed project does not involve the construction of new residential homes or businesses that would have the potential to generate additional substantial population growth. The proposed project will result in expansion of the existing Plaza Substation and demolition of the existing Magnolia Substation, combined with other minor improvements (4-12kV conversion) in support of the Substation work. The upgrades at the Plaza Substation will provide the capacity needed to serve customers currently served by the Magnolia Substation and improve the distribution system while maintain reliable power delivery. The project will increase power capacity to address the growing energy needs of area residents and businesses, as anticipated within the City of Riverside General Plan (2025). Therefore, the proposed project will have a **less than a significant** direct, indirect, or cumulative impact.

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

13b. Response: ***(Source: CADME Land Use 2003 Layer, Photographs from Site Visits to Plaza Substation and Magnolia Substation (July 2013); Google Earth (November 2012)***

The Plaza and Magnolia sites are presently developed with existing substation facilities. The land upon which the Plaza Substation will be expanded is currently disturbed and vacant. The lands upon which the 4-12kV conversion work will occur are currently disturbed/improved with utility-related facilities. No existing residential housing exists on any lands that will be affected by the proposed project, and therefore the project will not involve the displacement of any existing housing, nor will the project directly impact any existing residential housing adjacent to the project sites. Therefore, the project will have **no impact** either directly, indirectly, or cumulatively on existing housing, thereby necessitating the construction of replacement housing elsewhere.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

13c. Response: ***(Source: CADME Land Use 2003 Layer, Photographs from Site Visits to Plaza Substation and Magnolia Substation (July 2013); Google Earth (November 2012)***

See Response 13b, above. Lands affected by the proposed project are currently developed and/or disturbed and support utility-related facilities. Such lands do not support any existing residential housing. Therefore, the proposed improvements will have **no impact**, either directly, indirectly, or cumulatively, with regard to the displacement of substantial numbers of people, thereby necessitating the construction of any replacement housing.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐

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

Fire protection for the Plaza Substation and the Magnolia Substation is provided by the City of Riverside Fire Department from Fire Station No. 1 – Downtown, located approximately two miles northeast of Plaza Substation at 3420 Mission Inn Avenue. If needed, fire protection services may also be provided by Fire Station No. 5 – Airport, which is located approximately four miles southwest of Plaza Substation at 5883 Arlington Avenue. The proposed project will upgrade the existing Plaza Substation and result in demolition of the Magnolia Substation (thereby decreasing existing demands on such City services). Therefore, the project will not alter the existing land uses to a use that will substantially increase the need for fire protection services. Project impacts with regard to fire protection services will be **less than significant,** directly, indirectly, or cumulatively.

b. Police protection?	☐	☐	☒	☐

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

The City of Riverside Police Department currently provides police protection services for the proposed project area. The City's North Policing Center (NPC) currently serves the Plaza Substation; the East Policing Center presently serves Magnolia Substation. The North and East NPC Field Operations are based at the Fairmount Station at 3775 Fairmount Boulevard. The proposed project will not add any new residences or businesses that will increase the demand for police protection services, and established police service ratios will therefore be adequately maintained following the proposed improvements. Further, as Magnolia Substation will be demolished, overall police protection services will be reduced. The project design will also be subject to review by the City Police Department and Public Works Department to ensure that proper police protection services can be provided during the construction phase. As such, impacts on police protection services are considered **less than significant** with regard to direct, indirect, or cumulative impacts.

c. Schools?	☐	☐	☐	☒

14c. Response: ***(Source: FPEIR Figure 5.13-2 – RUSD Boundaries, and Table 5.13-D – RUSD)***

The land areas affected by the proposed project are within the service boundaries of the Riverside Unified School District (RUSD). As a utility improvement project, the proposed activities will not result in the construction of any new residential units or businesses that will generate additional school-aged population or increase the number of students in the area. Therefore, the proposed project will not adversely affect the ability of the RUSD to provide adequate school services within its boundaries. The addition of new facilities or the expansion of existing facilities will not be required as a result of the project. Therefore, the project will have **no impact,** either directly, indirectly, or cumulatively, with regard to schools.

d. Parks?	☐	☐	☐	☒

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

The proposed project will result in expansion of the Plaza Substation, demolition of the Magnolia Substation, and minor

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
improvements for the 4-12kV conversion work. As a utility project, the facilities will be automated and unmanned, and will not generate the construction of new housing or businesses that will result in additional population that will increase the demand for public recreational services within the City. The project will therefore not adversely affect the use of public parks within the area. As such, there will be **no impact**, directly, indirectly, or cumulatively, as a result of project construction. Refer also to responses to Section 15. Recreation, below.				
e. Other public facilities?	☐	☐	☐	☒
14e. Response: ***(Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)***				
The proposed project is intended to convert the existing 4kV circuits in the affected area to 12kV infrastructure, and will result in the demolition of Magnolia Substation and upgrade of Plaza Substation. No residential housing or other land uses are proposed that will result in impacts to other public facilities, due to increased population or demand. Therefore, there will be **no impact** on the demand for additional public facilities, either directly, indirectly, or cumulatively, as the result of project development.				
15. RECREATION.				
h. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
15a. Response: ***(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)***				
As a utility project, the project will not result in the construction of any new residential homes or other land uses that could generate additional population. As such, the proposed improvements will not result in additional population that will potentially increase the use of existing neighborhood and regional parks or other recreational facilities, such that a substantial physical deterioration of existing recreational facilities will result or be accelerated. Therefore, the proposed project will have **no impact**, either directly, indirectly, or cumulatively on existing recreational resources.				
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?	☐	☐	☐	☒
15b. Response:				
As a utility project, the construction of new residential homes or other land uses that will generate population will not result. The project does not propose the construction of any new recreational facilities or require the expansion of existing recreational facilities that will have the potential to result in adverse physical environmental effects. Therefore, the project will have **no impact**, either directly, indirectly, or cumulatively, on recreational resources.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. TRANSPORTATION/TRAFFIC. Would the project result in:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐

16a. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP)***

The project area is currently developed and/or disturbed, and a substantial increase in intensity of use resulting in a measurable increase in traffic will not occur with project implementation. The only traffic associated with operation of the proposed project will be from City employee vehicles as they conduct routine maintenance visits to the areas affected by the project. It is anticipated that project operation will generate approximately one to two vehicle trips per week, as the project facilities will be automated. As the proposed facilities will be designed to be automated, and will not generate substantial population growth or project-related traffic as a utility project, the project will not be required to fulfill alternative transportation demands addressed in such plans and policies. Furthermore, demolition of the Magnolia Substation will decrease the number of maintenance visits to this site. The project will create a limited increase in traffic due to the ingress and egress of construction-related traffic during activities associated with the Plaza Substation and Magnolia Substation; however, such traffic will be short-term in nature. In addition, the project will be consistent with the City of Riverside Municipal Code Title 10 (Vehicles and Traffic), as applicable. Consistency with the City of Riverside Municipal Code Title 10 will reduce short-term construction-related traffic to a level of less than significant. Therefore, there will be a **less than significant impact**, directly, indirectly, and cumulatively, with regard to an applicable traffic-related plan, ordinance or policy as a result of project development.

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?	☐	☐	☐	☒

16b. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP)***

Refer to Response 16a, above. The lands affected by the proposed project will not directly affect a State highway or principal arterial within Riverside County's Congestion Management Program (CMP), and the project is consistent with the Transportation Demand Management/Air Quality components of the Program. Therefore, the project will result in **no impact,** either directly, indirectly or cumulatively, to the CMP.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
in substantial safety risks?				

16c. Response: ***(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999) and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)***

The proposed project is a utility improvement project and will not result in a change air traffic patterns, increase air traffic levels, or change the location of air traffic patterns. The Riverside Airport is located approximately three miles southwest of the Plaza Substation; the Flabob Airport is located approximately 2.5 miles to the northwest. According to Figure PS-6 of the City of Riverside General Plan 2025, the Plaza Substation site is located within Zone E of the Flabob Airport and the Riverside Municipal Airport, as identified in the Riverside County Airport Land Use Compatibility Plan (RCALUCP). Portions of the areas where the 4-12kV conversion work will occur are located within Area 3 of the March Air Reserve Base, as identified in Figure PS-6 of the City General Plan and in the March Air Reserve Base/March Inland Port (MARB/MIP) Comprehensive Land Use Plan (CLUP) and Draft MARB/MIP Joint Land Use Study (JLUS). Further, Plaza Substation is located within the "Other Airport Environs," Zone of the designated Airport Safety Zones of the Riverside Municipal Airport, and the "Other Airport Environs" Zone of the designated MARB/MIP Safety Zones (Figure 5.7-2, Airport Safety and Compatibility Zones, of the General Plan Final PEIR). Due to the nature of the proposed improvements, the project will be consistent with the compatibility zones and will comply with the land use standards in the RCALUCP, MARB/MIP CLUP, and Draft JLUS.

Improvements at the Plaza Substation will result in project features that will be similar in height to those that are currently present at the existing Substation and therefore, will not increase or create any safety risks with regard to air traffic. Further, as a utility project, project construction or operation will not result in activities that will interfere with or change existing air traffic patterns. As such, the proposed project will have **no impact,** directly, indirectly or cumulatively, on air traffic patterns with regard to creating substantial safety risks.

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

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

The project does not involve the construction of any new roadways, with exception of the extension of Elizabeth Street located to the north of the Plaza Substation. Adequate emergency access is currently provided to the Plaza Substation and Magnolia Substation sites, as well as to areas where the 4-12kV conversion work will occur. The proposed improvements will occur on lands that are currently developed/disturbed or within existing right-of way or easements, and will therefore not permanently interfere with existing adjacent roadways. None of the proposed improvements to the existing utility facilities will result in a new use that will be incompatible or conflict with surrounding uses. Therefore, there will be **no impact** either directly, indirectly, or cumulatively with regard to increased traffic hazards resulting from project implementation.

e. Result in inadequate emergency access?	☐	☐	☒	☐

16e. Response: ***(Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code)***

The land areas affected by the proposed project are currently developed and/or disturbed. Adequate emergency access is presently provided to all project areas, and implementation of the proposed project will not interfere with the provision of such access. No roadway or access improvements are proposed, with exception of the extension of Elizabeth Street and access drive improvements at the Plaza Substation site. Therefore, the project will result in a **less than significant** impact on a direct, indirect, and cumulatively level with regard to inadequate emergency access.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

16f. Response: ***(Source: FPEIR, General Plan 2025 Land Use and Urban Design, Circulation and Community Mobility and Education Elements, Bicycle Master Plan May 2007, School Safety Program – Walk Safe! – Drive Safe!)***

The proposed project is intended to convert the 4kV circuits in the affected area to 12kV infrastructure, ultimately resulting in the demolition of Magnolia Substation and upgrade of Plaza Substation. Once completed, the expanded Plaza Substation will continue to operate as an automated facility and will not require improvements or facilities in conformance with alternative transportation plans and policies. The extension of Elizabeth Street adjacent to the Plaza Substation will be constructed consistent with City roadway design standards and requirements, with curb, gutter, and sidewalk on both sides. Project improvements that will occur on the Magnolia Substation site or within City street rights of-way will not conflict with any local alternative transportation plan. The project improvements will occur on lands that are presently developed, where no site modifications will occur that will result in conflicts with adopted policies, plans, or programs supporting alternative transportation modes (e.g. bicycle racks, bus turnouts, etc.). As such, the project will have **no impact** directly, indirectly, or cumulatively on adopted policies, plans, or programs supporting alternative transportation.

17. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

17a. Response: ***(Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR, site-specific Water Quality Management Plan prepared by RBF Consulting in July 2013 – see Appendix E-2)***

The proposed project does not include or propose any habitable structures; however, the project design includes extension of existing water and sewer lines within Elizabeth Street to the project site to allow for future construction and operation of an onsite restroom, as shown in Exhibit 3B, Plaza Substation – Ultimate Build-Out. Stormwater runoff from the project site will be addressed through implementation of the Water Quality Management Plan (WQMP) to be conditioned by the City of Riverside's Public Works Department, in order assure project compliance with applicable local and regional storm drain requirements. The project will not result in improvements that will cause an exceedance of wastewater requirements of the RWQCB. Therefore, project impacts with regard to exceeding wastewater treatment requirements will be **less than significant**, directly, indirectly, and cumulatively.

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?	☐	☐	☒	☐

17b. Response: ***(Source: General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Figure 5.16-4 – Water Facilities, and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR)***

The proposed project will not result in the construction of new or expanded water or wastewater treatment facilities. No habitable structures or other uses are proposed that will generate a substantial increase in the need for water or wastewater treatment services. The project is consistent with the Typical Growth Scenario of the City's General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). Therefore, the project will have a **less than significant impact** with regard to the construction of new water or wastewater treatment facilities, or the expansion of existing facilities, directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

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

The proposed project will result in the demolition of Magnolia Substation and upgrade of Plaza Substation, with minor improvements for conversion of the 4kV circuits to 12kV infrastructure. The project will not require the construction of new stormwater drainage facilities to accommodate stormwater from the project area. The project will result in a limited increase in impervious area at the Plaza Substation site; however, a decrease will occur at the Magnolia Substation site with demolition of the existing facilities. None of the proposed improvements, including minor improvements associated with the 4-12kV conversion work, will substantially increase any stormwater flows from the project area. Therefore, storm flow runoff will be minimal, and likely less than current levels, and will be accommodated by existing City storm drainage infrastructure (i.e., drains) along adjacent streets. Impacts in this regard will be **less than significant**, directly, indirectly, and cumulatively.

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

17d. Response: ***(Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, Table 5.16-H – Current and Projected Domestic Water Supply (acre-ft/year) WMWD Table 5.16-I Current and Projected Water Use WMWD, Table 5.16-J – General Plan Projected Water Demand for WMWD Including Water Reliability 2025, RPU Master Plan, EMWD Master Plan, WMWD Master Plan, and Highgrove Water District Master Plan)***

As stated above, the proposed project will result in the demolition of Magnolia Substation and upgrade of Plaza Substation, with minor improvements for conversion of the 4kV circuits to 12kV infrastructure. Once such activities are completed, the project facilities will have little to no demand on existing City water supplies, due to their nature as utility infrastructure (no habitable structures are proposed). Minimal amounts of water will be required to irrigate the proposed landscaping along the proposed frontage wall on Elizabeth Street at the Plaza Substation site. Therefore, the project will not have an adverse effect on available water supplies, and existing supplies will be sufficient to serve the project without the need for new or expanded entitlements. Therefore, the project will have a **less than significant impact** directly, indirectly, and cumulatively on available water supplies.

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

17e. Response: ***(Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 - Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, and Wastewater Integrated Master Plan and Certified EIR)***

See Responses to 17a and 17b, above. The proposed project will not exceed the wastewater treatment provider's ability to adequately provide service to the project area, due to the nature of the improvements proposed and operation characteristics of public utility-type uses. The project will be consistent with the growth assumed under buildout of the General Plan 2025 where future wastewater generation and treatment capacity were determined to be adequate. Therefore, project impacts will be **less than significant**, directly, indirectly, and cumulatively.

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

17f. Response: ***(Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Solid waste will be generated as a result of the proposed demolition and construction activities; however, daily operation of the project facilities will generate limited to no solid waste, due to their automated nature. According to the City of Riverside General Plan 2025 FPEIR, non-hazardous solid waste collected is taken to the Robert A. Nelson Transfer Station, which is owned by the County of Riverside and operated by a private company under a 20-year franchise. The waste is subsequently transferred to the Badlands Landfill for disposal. The General Plan 2025 determined that future landfill capacity is adequate to serve the City's existing and future needs (refer to Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area of the General Plan 2025 FPEIR). The proposed project will be consistent with the development anticipated by the General Plan, and construction and/or operation of the project will not produce a substantial amount of solid waste in excess of the Badlands Landfill maximum daily amount. Therefore, project impacts on landfill capacity, directly, indirectly, or cumulatively, will be **less than significant.**

g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

17g. Response: ***(Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)***

Under the Public Resource Code, the California Integrated Waste Management Act requires local jurisdictions to divert a minimum of 50% of all solid waste generated (by January 1, 2000). The City of Riverside currently conforms to (or exceeds) this requirement for diversion. The California Green Building Code also requires the diversion of a minimum of 50% of non-hazardous construction and demolition debris for all projects, and 100% of excavated soil and land clearing debris for all non-residential projects (as of January 1, 2011). Construction and demolition activities required for the proposed project will conform to all applicable local, State, and federal solid waste disposal regulations, including the California Green Building Code. Project compliance with all applicable local, State, and federal solid waste disposal regulations will reduce project-related impacts related to solid waste generation to **less than significant**, directly, indirectly, and cumulatively.

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

18a. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and MSHCP Habitat Assessment Report for the Magnolia-Plaza Reliability Project prepared by Rincon Consultants on July 19, 2013, FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code, and site-specific Archaeological Resources Study for the Magnolia-Plaza Reliability Project prepared by Rincon Consultants on July 18, 2013)***

Potential impacts related to habitat of fish or wildlife species are evaluated in the Biological Resources Section of this Initial Study. As discussed in the Habitat Assessment Report (Appendix B), the proposed project does not contain any features that are jurisdictional under the Clean Water Act or State regulation for isolated waters or streambeds. Therefore, the proposed project will have **no impact**, directly, indirectly, or cumulatively, with regard to federally protected waters. Further, according to the Habitat Assessment included in Appendix B, the project site is not within an MSHCP Criteria Cell. The

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

MSHCP establishes habitat assessment requirements for certain species of plants, birds, mammals, and amphibians. As the project is not within a mammal, amphibian survey area or riparian/riverine area, no additional analysis is required for the proposed project, and no impacts will occur as a result of the proposed development. Additionally, no impacts will occur, either directly, indirectly, or cumulatively, with regard to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service will occur with the project.

As the Magnolia Substation site contains suitable habitat for nesting birds, impacts may occur from project-related ground-disturbing or vegetation removal activities (if not conducted outside of the nesting bird season, generally from February to September). Mitigation Measure Biology-1 is therefore proposed to reduce project impacts to a level of **less than significant**.

Additionally, potential impacts to cultural, archaeological, and/or paleontological resources related to major periods of California and /or the City of Riverside's history or prehistory are evaluated above in the Cultural Resources Section of this Initial Study. Information provide in this Initial Study supports the conclusion that the project will not result in the substantial degradation of any known environmental or cultural resources; however, Mitigation Measures MM Cultural-1and MM Cultural-2 will reduce project impacts to unknown resources to less than significant.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

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

The project is a utility improvement project that will largely affect existing facilities owned and operated by the City. No new land uses or changes to the existing land use designations are proposed, and the project will therefore be consistent with the City's General Plan 2025. No new cumulative impacts were identified as resulting with project implementation. Therefore, cumulative impacts beyond those previously considered in the General Plan 2025 Final PEIR will be **less than significant.**

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

18c. Response: ***(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)***

The proposed project is a utility improvement project and will largely affected disturbed/developed lands within the City of Riverside. Potential effects of the project on human beings (e.g. aesthetics, air quality, hydrology/water quality, noise, population and housing, hazards and hazardous materials, and traffic) have been evaluated herein within this Initial Study. Impacts resulting with the project have been found to be less than significant or it has been determined that impacts could be reduced to less than significant with implementation of mitigation measures. Therefore, based on the above analysis and the conclusions identified in this Initial Study, the project will not cause substantial adverse effects, directly or indirectly, to human beings. Therefore, potential direct and indirect impacts on human beings resulting from the proposed project will be **less than significant**.

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

Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
Biological Resources	**MM Biology-1:** Project-related ground-disturbing or vegetation removal activities may be conducted outside of the nesting bird season (February 1st through August 31st) at the Magnolia Substation. If such activities are to occur during the nesting season, a nesting bird survey shall be conducted within 7 days prior to any ground-disturbing activities in order to determine if any nesting birds are present within the project site. If nesting birds are not found within the project site, no further action is required. If nesting birds are observed onsite, no construction activity shall occur within 250 feet (500 feet for raptors) of any active nests. Construction activity may only occur within 250 feet of an active nest at the discretion of a biological monitor, or if the biologist determines that the young have fledged. Construction activity may occur within the buffer area at the discretion of the biological monitor. A barrier (fence) shall be installed during the construction phase, if it is determined to be necessary by the biological monitor.	Site-Specific Environmental Review and/or prior to the issuance of a demolition, grading, and/or building permit.	Public Utilities Department Public Works Department	Compliance with Project Conditions of Approval.
Cultural Resources	**MM Cultural-1: Unanticipated Discovery of Cultural Resources:** If cultural resources are encountered during project ground-disturbing activities, work in the immediate area shall halt, and an archaeologist meeting the Secretary of the Interior's *Professional Qualifications Standards* for archaeology (National Park Service [NPS] 1983) shall be contacted immediately to evaluate the find. The qualified archeologist shall make recommendations to the City of Riverside on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with §15064.5 of the CEQA Guidelines.	Site-Specific Environmental Review and/or prior to the issuance of a demolition, grading, and/or building permit.	Public Utilities Department Individual grading contractors Registered Professional Archaeologist	Compliance with Project Conditions of Approval.

[1] All agencies are City of Riverside Departments/Divisions unless otherwise noted.

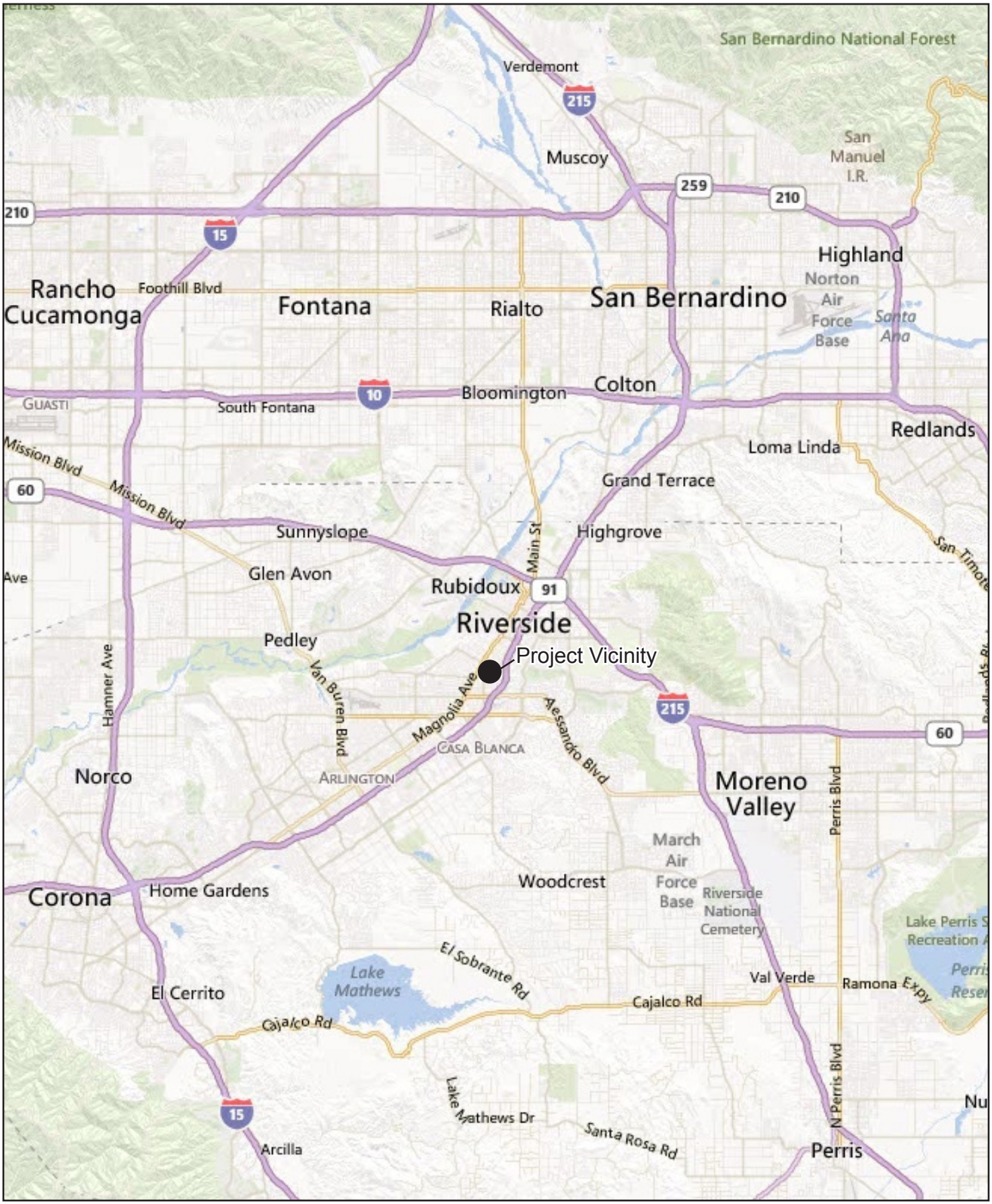
Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
	MM Cultural-2: Paleontological Mitigation and Monitoring Program - Prior to any construction activity, the City shall ensure the following: a. The City shall provide a qualified paleontologist to prepare a Paleontological Mitigation and Monitoring Program to be implemented during project ground disturbance activity. This program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications. b. **Paleontological WEAP**: Prior to the start of construction, construction personnel shall be informed on the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. c. **Paleontological Monitoring**: Any excavations exceeding 3 feet in depth shall be monitored on a full-time basis by a qualified paleontological monitor. Ground-disturbing activity that does not exceed three feet in depth will not require paleontological monitoring. Should no fossils be observed during the first 50% of excavations exceeding three feet in depth, paleontological monitoring may be reduced to weekly spot-checking under the discretion of the qualified paleontologist. d. **Salvage of Fossils**: If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. Typically fossils can be	Site-Specific Environmental Review and/or prior to the issuance of a demolition, grading, and/or building permit.	Public Utilities Department Individual grading contractors Registered Professional Paleontologist/Archaeologist	Compliance with Project Conditions of Approval.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
	safely quickly by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. e. **Preparation and Curation of Recovered Fossils**: Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the WSC or SBCM), along with all pertinent field notes, photos, data, and maps. f. **Final Paleontological Mitigation and Monitoring Report**: Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. **g.** The Paleontological Mitigation and Monitoring Program shall be supervised by a qualified paleontologist. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
	techniques, who is knowledgeable in the geology of southern California, and who has worked as a paleontological mitigation project supervisor for a least one year. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources.			
Hazards and Hazardous Materials	**MM Hazards-1:** Prior to any construction activity, the City shall ensure that the improvement plans for the Plaza Substation site include the following specifications for construction of the onsite restroom: a. An impermeable 20-millimeter high-density polyethylene (HPDE) membrane shall be installed under the proposed restroom floor slab, underlain by a select sand layer extending to the top of the footing; and, **b.** A flue-type vent shall be installed through the ceiling/roof of the proposed restroom, fitted with an external, wind-operated rotary ventilator.	Site-Specific Environmental Review and/or prior to the issuance of a demolition, grading, and/or building permit.	Public Utilities Department Planning Division County of Riverside Environmental Health Department	Compliance with Project Conditions of Approval.
	MM Hazards-2: The City shall be responsible for the removal of the contaminated soil and contaminated material with confirmatory sampling analyzing for PCBs, hydrocarbons, metals, and VOCs. To reduce project-related adverse impacts to sites containing hazardous materials and/or sites where known hazardous materials contamination may have existed that may be inadvertently discovered during construction, soils testing shall be conducted by a qualified soils engineer and submitted to the City for the evaluation of hazardous chemical levels in the soil. The report submitted to the City should indicate if remediation of the soils is necessary to achieve less than significant levels of hazardous chemical in the soils. Proper investigation, and remedial actions, if necessary, including a	Site-Specific Environmental Review.	Public Utilities Department Planning Division County of Riverside Environmental Health Department	Compliance with Project Conditions of Approval.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
	workplan, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. All such activities shall occur in compliance with applicable local, State, and federal regulations pertaining to the testing and/or removal of soils containing hazardous materials.			
	MM Hazards-3: The City shall be required to conduct soil sampling on the subject property and analyze such soils for the potential presence of PCBs, hydrocarbons, metals, and VOCs, and the presence of herbicides and/or pesticides. To reduce project-related adverse impacts to sites containing hazardous materials and/or sites where known hazardous materials contamination may have existed that may be inadvertently discovered during construction, soils testing shall be conducted by a qualified soils engineer and submitted to the City for the evaluation of hazardous chemical levels in the soil. The report submitted to the City should indicate if remediation of the soils is necessary to achieve less than significant levels of hazardous chemical in the soils. Proper investigation, and remedial actions, if necessary, including a workplan, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. All such activities shall occur in compliance with applicable local, State, and federal regulations pertaining to the testing and/or removal of soils containing hazardous materials.	Site-Specific Environmental Review.	Public Utilities Department Planning Division County of Riverside Environmental Health Department	Compliance with Project Conditions of Approval.
	MM Hazards-4: The City shall conduct a lead and asbestos survey of the building and lead sampling of paint on the transformers at the Magnolia Substation site, prior to any demolition activities, to ensure that, if present, these materials are managed properly during demolition. All such activities shall occur in compliance with applicable local, State, and federal regulations pertaining to the testing and/or removal of lead and/or asbestos containing materials.	Site-Specific Environmental Review.	Public Utilities Department Planning Division County of Riverside Environmental Health Department	Compliance with Project Conditions of Approval.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
Noise	**MM Noise-1**: During project construction, equipment shall be maintained in proper operating condition and equipped with appropriate mufflers.	During Construction.	Public Utilities Department Planning Division Public Works Department	Compliance with Project Conditions of Approval.
	MM Noise-2: During project construction, staging areas shall be located as far as practical from existing residential dwellings and other noise sensitive land uses.	During Construction.	Public Utilities Department Planning Division Public Works Department	Compliance with Project Conditions of Approval.



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A Baker Company

N
Not to Scale

Source: Bing.com, 7/24/2013
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REGIONAL LOCATION MAP

Exhibit 1

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Source: Google earth, Imagery Nov. 2012.

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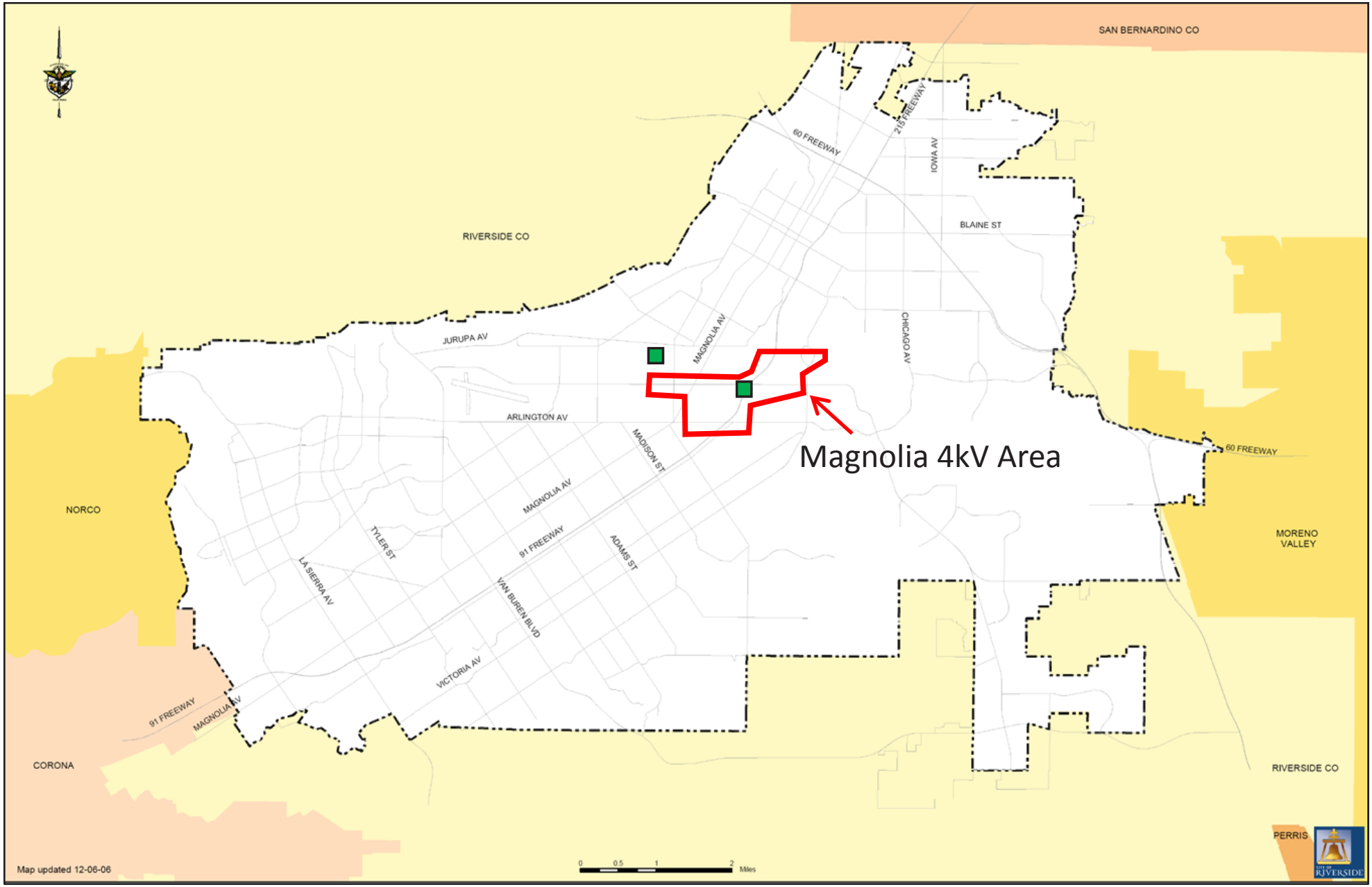
LOCAL VICINITY MAP - MAGNOLIA AND PLAZA SUBSTATIONS

Exhibit 2A



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Source: City of Riverside - Public Utilities, September 2013.

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LOCAL VICINITY MAP - 4kV - 12kV Conversion Area

Exhibit 2B

Photograph 1: Plaza Substation looking southwest.

Photograph 2: Proposed Plaza Substation expansion area looking north.

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Source: Rincon Consultants, July 2013.
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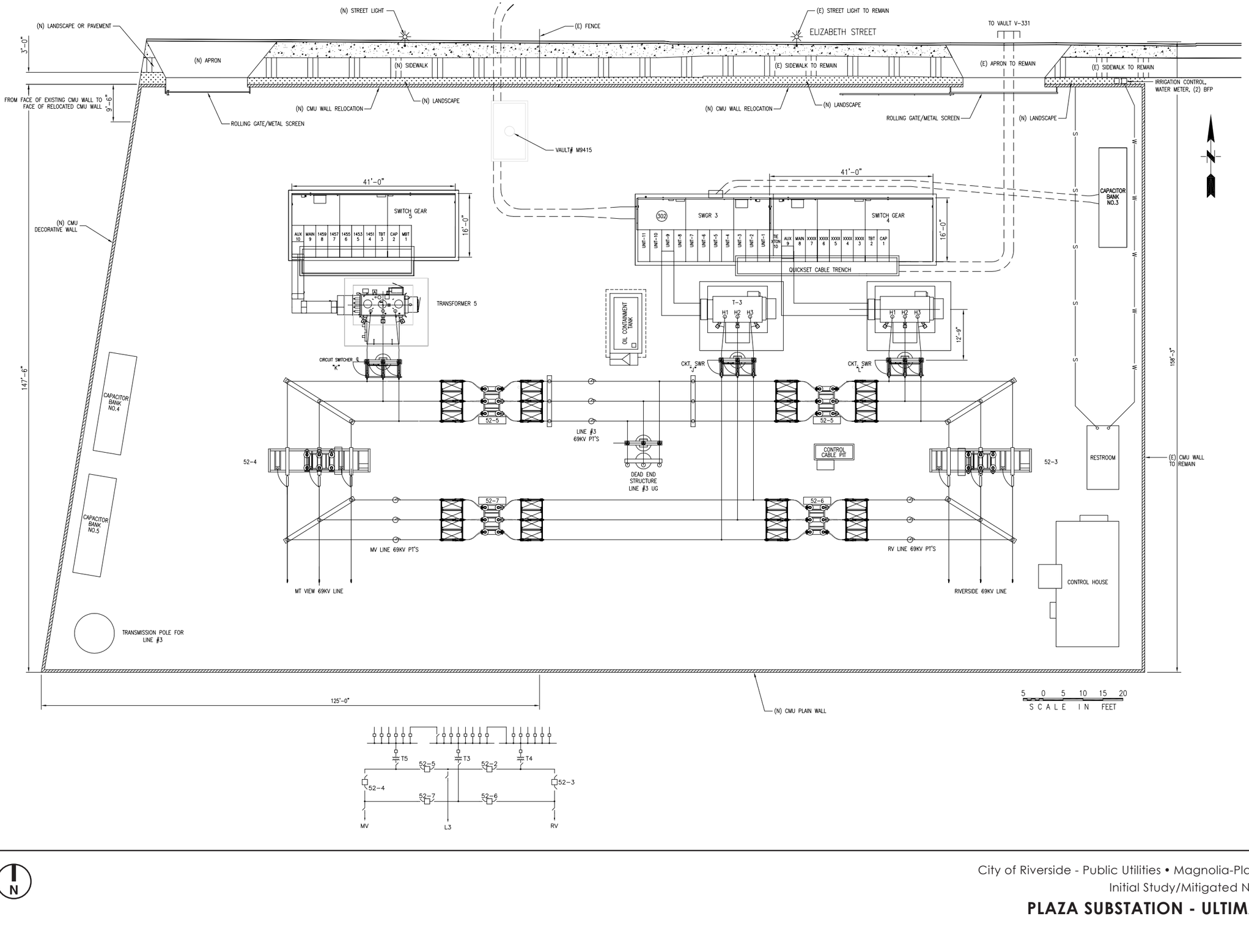
PLAZA SUBSTATION - EXISTING CONDITIONS

Exhibit 3A



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Source: Engineering Partners, Inc., 2013
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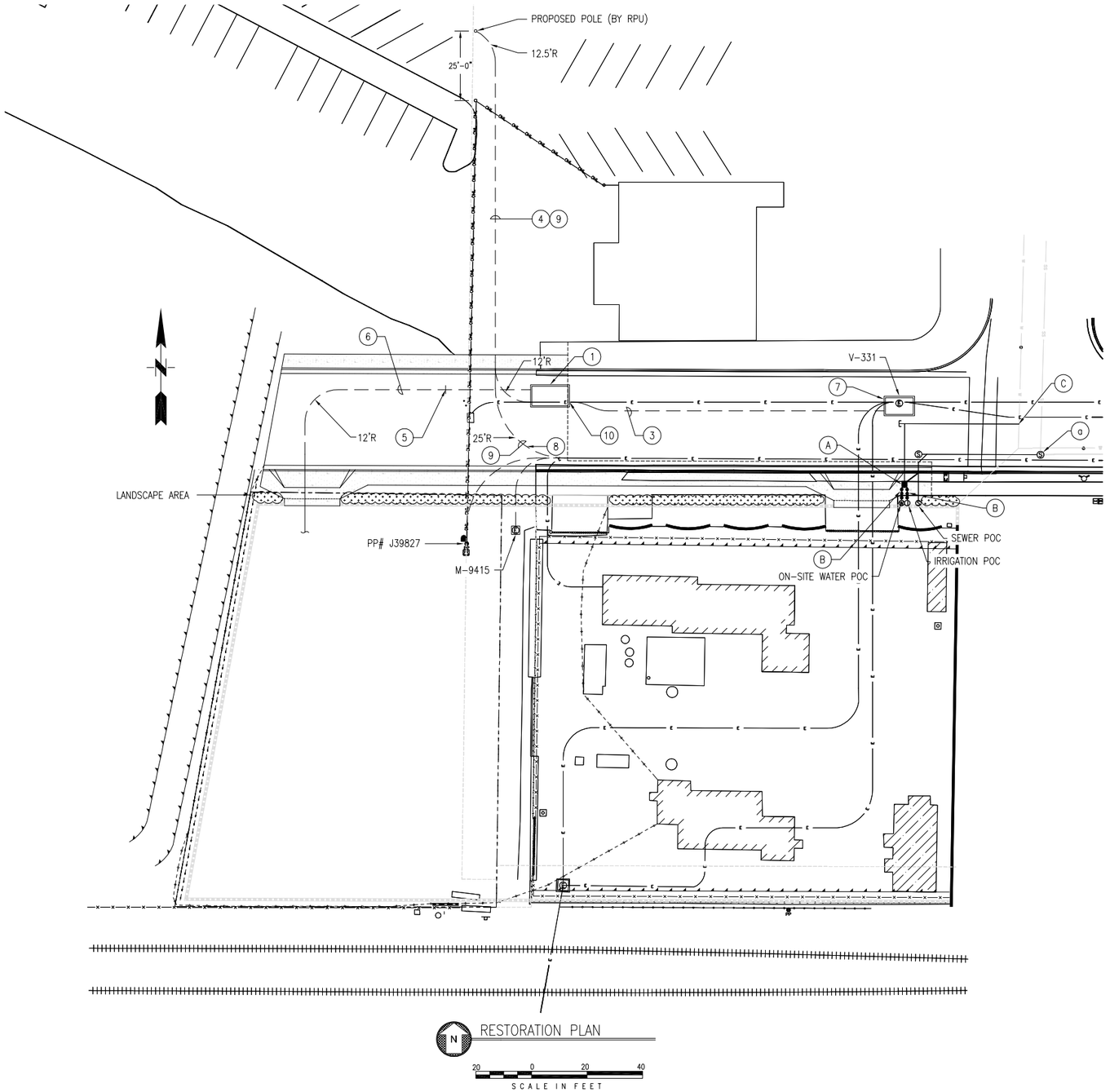
PLAZA SUBSTATION - ULTIMATE BUILD-OUT

Exhibit 3B



SANITARY KEYNOTES:

(a) CONNECTION TO EXISTING SANITARY SEWER MANHOLE LINE. INSTALL XX L.F. OF VCP SEWER PIPE

WATER KEYNOTES:

(A) FURNISHED AND INSTALLED NEW WATER METER (WM) AND 66 L.F. OF 2" DIA. COPPER WATER SERVICE LINE PER CWD 601.

(B) INSTALLED 2" BACKFLOW DEVICE W/ STEEL ENCLOSURE PER CWD-616.1

(C) CONNECTION TO EXISTING WATER LINE.

ELECTRICAL KEYNOTES:

(1) INSTALL 8'x14'x9'-4" VAULT #1.

(2) THIS NOTE IS NOT USED, INSTALLATION OF VAULT #2 NOT NEEDED.

(3) PROVIDE 6-6" DB CONDUITS FROM V-331 TO NEW VAULT #1.

(4) PROVIDE 2-5" SCH40 CONDUIT FROM NEW VAULT #1 TO PROPOSED POLE, 45-XXXXXJ-13.

(5) STUB AND CAP 2-6" DB CONDUITS.

(6) PROVIDE 8-6" DB CONDUITS FROM NEW VAULT #1.

(7) CORE DRILL EXISTING VAULT, V-331 TO INSTALL 6-6" DB CONDUITS.

(8) INTERCEPT EXISTING ATT CONDUIT/TELEPHONE LINE AND PROVIDE SPLIT WYE FOR NEW EXTENSIONS. SEE REFERENCE DRAWING #1.

(9) PROVIDE 1-4" CONDUIT FOR TELEPHONE LINE (SAME TRENCH WITH THE 2-5" ELECTRIC LINE) FROM ITEM #8.

(10) INTERCEPT AND CONNECT EXISTING 2-5" CONDUITS TO NEW VAULT #1.

REFERENCE DRAWINGS:

1. SEE AT&T DWG. LB(29)9072951 L1.

UTILITY GENERAL NOTES:

1. THE PIPE BEDDING CASE IS SPECIFIED TO BE PER CITY OF RIVERSIDE STANDARD DRAWING NO. 452 AND BACKFILLED PER STANDARD DRAWING 453. ALL PROVISIONS OF THE GEOTECHNICAL REPORT SHALL BE FOLLOWED.
2. IF SANITARY SEWER LATERALS INTERFERED WITH OTHER UTILITIES, CONTRACTOR ARE REQUIRED TO REFER TO CITY OF RIVERSIDE STANDARD DRAWING NO. 554.
3. CONCRETE PAVEMENT SURROUNDING SEWER IS REQUIRED TO SLOPE AWAY FROM CLEAN OUT STRUCTURE.

LEGEND:

- EXISTING RIGHT-OF-WAY LINE
- EXISTING CENTERLINE
- 6"W — EXISTING WATERLINE
- 96"SD — EXISTING STORM DRAIN LINE/SIZE (APPROXIMATE LOCATION)
- 8"S — EXISTING SANITARY SEWER LINE/SIZE (APPROXIMATE LOCATION)
- PROPOSED SANITARY LINE
- PROPOSED WATER LINE
- EXISTING SECURE MESH FENCE
- CLEAN OUT

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Source: Engineering Partners, Inc., 2013
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PLAZA SUBSTATION - RESTORATION PLAN

Exhibit 3C

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Source: obr ARCHITECTURE, September 2013.

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PLAZA SUBSTATION - VISUAL SIMULATION (STREET VIEW)

Exhibit 4A

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Source: obr ARCHITECTURE, September 2013.

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PLAZA SUBSTATION - VISUAL SIMULATION (SOUTH WALL)

Exhibit 4B

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Source: obr ARCHITECTURE, September 2013.

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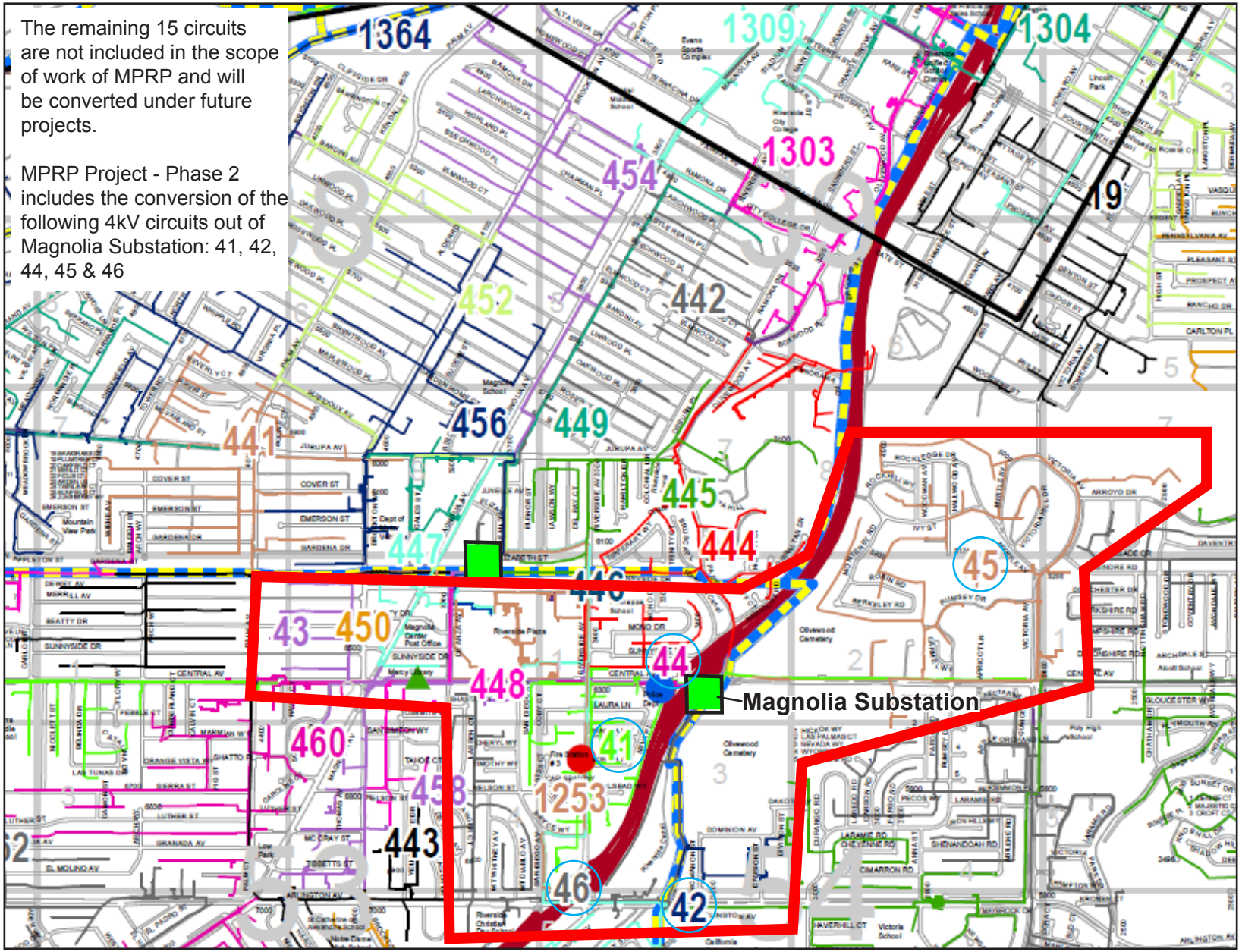
PLAZA SUBSTATION - VISUAL SIMULATION (CORNER RENDERING)

Exhibit 4C



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Not to Scale

Source: City of Riverside - Public Utilities, September 2013.

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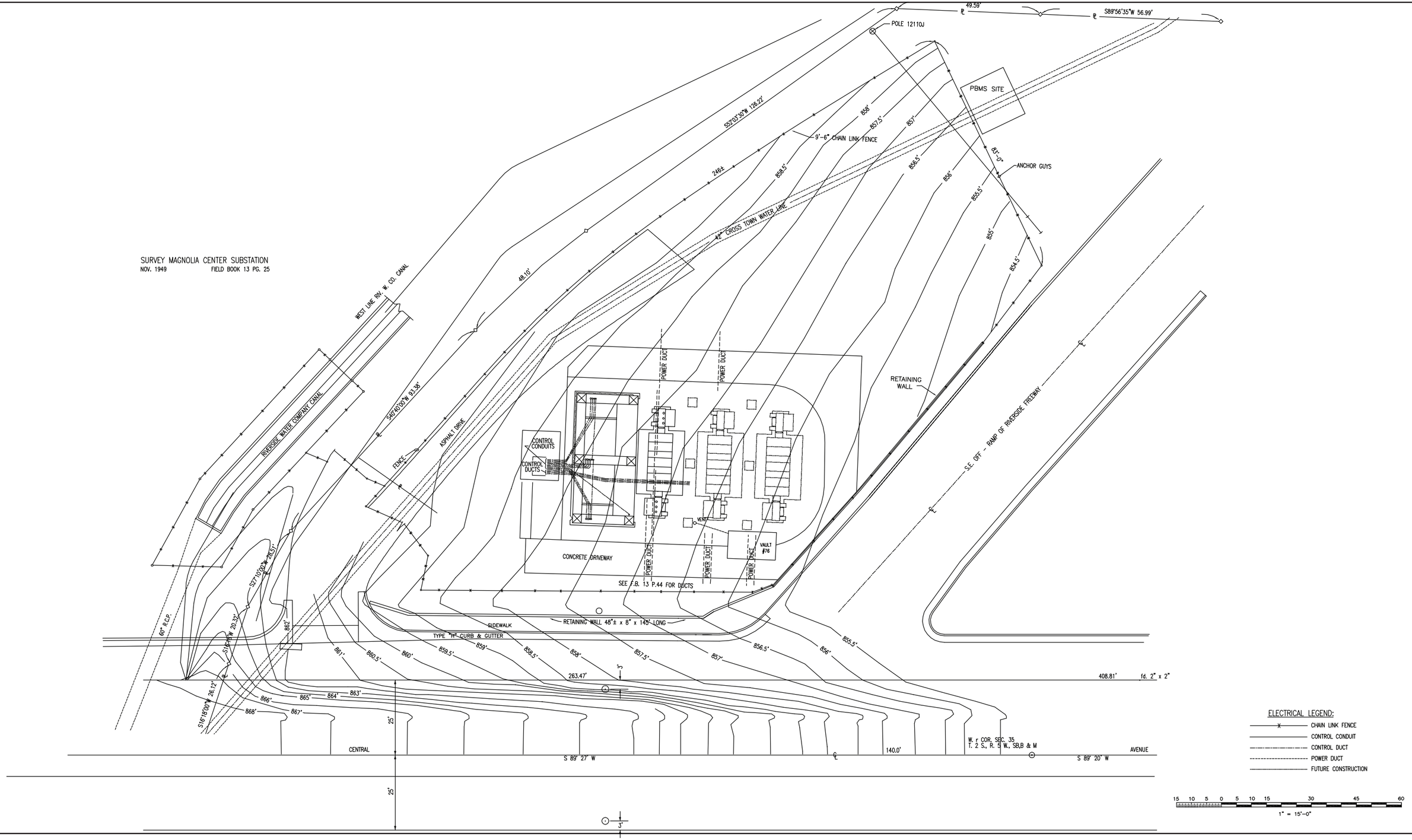
MAGNOLIA 4kV-12kV Conversion Area

Exhibit 5

SURVEY MAGNOLIA CENTER SUBSTATION
NOV. 1949 FIELD BOOK 13 PG. 25



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Source: City of Riverside - Public Utilities. Prepared Sept. 1994, Drawing No. SS-10334.
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MAGNOLIA SUBSTATION - EXISTING GENERAL LAYOUT

Exhibit 6