Draft Initial Study and Proposed Mitigated Negative Declaration

July 2020

Hunter Substation Replacement Project

Prepared For:

City of Riverside Public Utilities Department
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MITIGATED NEGATIVE DECLARATION

Project Name: Hunter Substation Replacement Project

Project Location. The existing 69/12 kilovolt (kV) Hunter Electrical Substation (existing Hunter Substation) is located at 1731 Marlborough Avenue, near the intersection of Marlborough Avenue and Chicago Avenue, south of Columbia Avenue in the City of Riverside, California (refer to Figure 1, Project Vicinity Map and Figure 2, Project Location Map). The Project includes the existing substation site (APN 210-060-049), as well as the adjacent parcel (APN 210-060-033), which is also owned by the City of Riverside. The existing substation and the new substation areas (collectively referred to as the "Project Site") comprise approximately 2.5-acres of land located within an urban area.

Project Description: The Project includes the replacement of the existing Hunter 69/12kV/4kV Electrical Substation with a new 69/12kV substation which will be located immediately adjacent to the existing substation. The existing Hunter Substation is a 69/12kV/4kV distribution, air insulated substation (AIS) approximately one acre in size (fenced area). The existing Hunter Substation was constructed in approximately 1960 and has been operated continuously since then by Riverside Public Utilities (RPU). RPU has made upgrades and incrementally increased the capacity of the substation since its initial construction.

Access to the existing Hunter Substation is from the east (access directly to Chicago Avenue) and from the north where a substation gate is located at the end of an approximately 150-foot paved driveway that leads from Chicago Avenue to the gate that served as the pervious access to the eastern parcel. Access to the new substation will be from the same two entrances from Chicago Avenue.

The proposed new Hunter 69/12kV distribution substation will be constructed on an undeveloped parcel immediately adjacent to the existing Hunter Substation and will also be an AIS with four bays and a breaker-and-a-half configuration. A new storage building will be constructed where the existing substation equipment is located that will be utilized for the storage of substation and other parts and equipment for utilization by RPU for operation and maintenance of the RPU electrical system.

Findings: It is hereby determined that, based on the information contained in the attached Initial Study, the project would not have a significant adverse effect on the environment. There are mitigation measures included with the Initial study that are necessary to avoid the potentially significant environmental impacts. Riverside Public Utilities has hereby agreed to implement each of the mitigation measures, which would be adopted as part of the Mitigation Monitoring and Reporting Program.

_____ _____

Fady Megala, Principal Engineer Date

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APPENDICES

1.0 Introduction

This document includes an analysis of all California Environmental Quality Act (CEQA) Initial Study (IS) sections (CEQA Guidelines, Appendix G), based on the current Detailed CEQA Project Description (see Appendix A). Evaluation of potential impacts for the topics included herein are based on existing conditions and the project location (i.e., footprint).

1.1 Proposed Project Overview

The Proposed Project will replace the existing 69/12kV/4kV Hunter Substation with a new 69/12kV electrical substation (new or proposed Hunter Substation) to be located on an immediately adjacent vacant parcel (refer to Figure 1, Project Overview Map). Specifically, the Proposed Project will include the following main components:

1. Construction of a new 69/12kV Hunter Substation on previously disturbed land adjacent to and west of the existing Hunter substation;
2. Loop-in (i.e., connection to) four existing 69kV sub-transmission lines and 20 existing 12kV distribution lines to the new substation;
3. Decommissioning and removal of the existing substation; and
4. Construction and operation of a warehouse facility that will store equipment and materials used by RPU for operation and maintenance of the RPU electrical grid system.

Appendix A, CEQA Project Description, contains detailed descriptions of the Project, including purpose and need, design, construction, and operation.

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\\apaenvfile01\gis1-PROJECTS\City_of_Riverside\CA313254_HunterSubstation\Figure 3 Project Overview Map.mxd saved: 9/8/2019 by: R. Spring

Sources: TRC 2019; Parcel Boundaries Digital Map, 2019; Riverside Easement AGOL, 2019; Basemap: Esri/DigitalGlobe "World Imagery" Online Service Layer, 2018. 9/8/2019

- Overall Project Boundary
- Parcel Boundary
- Existing Hunter Substation Footprint
- Water Canal Easement

Hunter Substation Replacement Project
Project Overview Map
Figure 1

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1:1,200
1 inch = 100 feet
(when printed 8.5x11)

0 50 100 Feet

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1.2 Initial Study Sections

The following resource topics are covered within this document:

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

2.0 Supplemental Information

This section provides supporting information that will be included with the Public Draft Initial Study and Proposed Mitigated Negative Declaration.

2.1 Documents Used and/or Referenced in this Review

As part of the environmental evaluation contained within this document, numerous technical and general information reports, plans, maps, and other documents were reviewed. The relevant referenced documents are listed at the beginning of each impact discussion, and the full list of references is contained in Section 4. The key documents used to support the analysis herein are as follows:

a. City of Riverside General Plan 2025
b. General Plan 2025 Final Programmatic EIR
c. Hunter Substation Geotechnical Investigation Report (TRC, 2019)
d. Hunter Substation Phase I Cultural Resources Assessment (VCS Environmental, 2020)
e. Phase I ESA (LOR Geotechnical Group, 2018)
f. Hunter Substation Noise Technical Report (ESA, 2020)
g. Hunter Substation Trip Generation Memo (Kittelson & Associates, 2020)

2.2 Acronyms and Abbreviations

The following acronyms and abbreviations are used within the document.

AICUZ - Air Installation Compatible Use Zone Study
AQMP - Air Quality Management Plan
ARB - Air Resources Board
ASTM- American Society of Testing and Materials
AUSD - Alvord Unified School District
BMP- Best Management Practice
BSA - Biological Study Area
CARB - California Air Resources Board
CDG - Citywide Design Guidelines
CDFW - California Department of Fish and Wildlife
CEQA - California Environmental Quality Act
CIWMP - Countywide Integrated Waste Management Plan
CMP - Congestion Management Plan
CNDDB - California Natural Diversity Database
CNPS - California Native Plant Society
CO - Carbon monoxide
DPM - Diesel particulate matter

EMWD -	Eastern Municipal Water District
EOP -	Emergency Operations Plan
ESA-	Environmental Site Assessment
FEMA -	Federal Emergency Management Agency
FHSZs -	Fire hazard severity zones
FMMP -	Farmland Mapping and Monitoring Program
FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GIS -	Geographic Information System
GP 2025 -	General Plan 2025
HCP -	Habitat Conservation Plan
LHMP -	Local Hazard Mitigation Plan
LRAs -	Local Responsibility Areas
LST -	Localized Significance Thresholds
MARB/MIP -	March Air Reserve Base/March Inland Port
MBTA -	Migratory Bird Treaty Act
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MM -	Mitigation Measure
MND-	Mitigated Negative Declaration
MSHCP -	Multiple-Species Habitat Conservation Plan
MVUSD -	Moreno Valley Unified School District
NCCP -	Natural Communities Conservation Plan
NOx	Oxides of nitrogen
OEHHA -	Office of Environmental Health and Hazard Assessment
OEM -	Office of Emergency Services
RCALUC -	Riverside County Airport Land Use Commission
RCALUCP -	Riverside County Airport Land Use Compatibility Plan
RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RMC -	Riverside Municipal Code
RPD -	Riverside Police Department
RPU -	Riverside Public Utilities
RPW -	Riverside Public Works
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SKR	Stephens' Kangaroo Rat
SRA -	Source receptor area
SRAs -	State Responsibility Areas
SWPPP -	Storm Water Pollution Prevention Plan
TAC -	Toxic air contaminant

USC - United States Code
USEPA - U.S. Environmental Protection Agency
USFWS - U.S. Fish and Wildlife Service
USGS - United States Geologic Survey
VMT - Vehicle Miles Traveled
WMWD - Western Municipal Water District
WQMP - Water Quality Management Plan

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2.3 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 of lead agency cited 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 (MM) 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.

3.0 Initial Study Sections

The impact analysis for each section is included below, within separate headings by topic/ resource area, consistent with current CEQA Guidelines. Existing conditions information, where applicable, is provided first, and impact discussions are provided within a tabular format, consistent with the City of Riverside CEQA Initial Study guidance.

3.1 Project Design Features and Ordinary Construction/Operating Restrictions

The Project includes design features and ordinary construction and operating restrictions (Design Features) that avoid and minimize environmental impacts. The design features and ordinary construction and operating restrictions incorporated into the Project include measures that are routinely implemented by RPU on projects that involve ground disturbance. Many of these features and restrictions relate to compliance with applicable environmental laws and regulations. Consistent with its existing operations and maintenance practices, RPU will implement these Design Features as appropriate during construction, operation, and maintenance to avoid and minimize potential environmental impacts. These Design Features differ from CEQA mitigation measures because they would be implemented regardless of CEQA compliance.

Where Design Features help to reduce potential impacts to a less than significant level, they are denoted by topic area and numbered in order of reference, for example, Design Feature BIO-1.

3.2 Aesthetics

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
a. Response: **No Impact.** The new Hunter Substation would be constructed on the parcel adjacent to the existing substation within an urbanized and developed part of the City with very little scenic resources. There are no designated scenic vistas in the Project study area. There would be no substantial adverse effect on a scenic vista. ***(Sources: General Plan 2025 FPEIR, Section 5.1.6 – Aesthetics; General Plan 2025, Land Use and Urban Design Element)***				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
b. Response: **Less than Significant Impact.** The Project site is not visible from a state designated or eligible scenic highway. There are no rock outcroppings in the Proposed Project footprint or surrounding area. The City of Riverside does classify Marlborough Avenue as a Special Boulevard (FPEIR, Figure 5.1-1). However, the segment of Marlborough Avenue that is designated is east of Chicago Avenue, and starts approximately 350 feet southeast of the Project Site. Any changes to the Project Site as part of construction and operation of the Project will not have a significant effect on this section of Marlborough Avenue because the site visibility from this segment of Marlborough Avenue is very limited. Impacts will be less than significant.				

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Some landscape trees will be replaced on the east side of the perimeter security wall, adjacent to Chicago Avenue (refer to Appendix A). The replacement of these landscape trees will not have a substantial adverse effect on scenic resources. Impacts would be less than significant. ***(Sources: General Plan 2025 FPEIR, Section 5.1.6 – Aesthetics; General Plan 2025, Land Use and Urban Design Element)***				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

c. Response:

Less than Significant Impact. The Project Site is located within an urbanized area within the City of Riverside, surrounded by industrial, commercial, and residential land uses. Public views of the Project Site are looking east from Milton Street and Blenheim Street, looking west from Chicago Avenue, and looking North from Marlborough Avenue (refer to Figure 1).

Construction Impacts
The primary impacts to the visual character would occur during the construction phase. Construction is planned to last approximately 17 months. While construction activities may be visible from a limited number of public vantage points, the impact to visual character would be less than significant given the urbanized nature of the Project area, including the existing Hunter Substation and industrial land uses to the north, south, and east. In addition, the new substation perimeter wall would screen the majority of construction activities from public viewpoints.

Operation and Maintenance Impacts
Currently the Proposed Project contains plans to add a minimum 10-foot concrete masonry perimeter security wall around the substation site. This perimeter security wall may be raised to up to 14 feet for increased security. A taller perimeter security wall would also further reduce views of equipment within the substation footprint. A chain-link fence closes off the south side of the existing substation parcel. This fencing would be replaced as part of construction of the perimeter security wall.

The existing landscaping area located adjacent to the existing east perimeter security wall would remain in place. However, the taller trees would be replaced with trees of a lower height for security reasons. Attachment A to the Detailed Project Description contains the Landscaping Concept for the Project, including surface treatments, security wall treatments, and landscaping.

Decorative rock would be placed between the new perimeter security wall and the property line on the north and west sides of the new substation. Viewpoints from the west side of the new substation are already obstructed by thick amounts of vegetation. Artificial ivy would be placed on the perimeter security wall on the west side as well to assist in maintaining the vegetative nature of these viewpoints.

The new Hunter Substation will be unmanned, and as a result of the new parts and equipment will require less maintenance compared to the existing substation. Routine maintenance trips would be approximately six per year by a two- to four-person crew. Routine maintenance by one or two workers will occur on a weekly basis. One annual major maintenance inspection, lasting approximately one week, will be conducted by a 10-personnel crew. Maintenance for vegetation clearing will occur on an as-needed basis for safety, access, and aesthetics. Vegetation clearing will involve one or two small maintenance vehicles and one or more

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

employees to clear and trim the vegetation. One pickup truck visiting the site a few times per year for switching would be needed.

The Project Site is located within an industrial zoned area, with industrial zoning and land uses surrounding the project to the north, south, and east. Use of the project site for an electrical substation is consistent with the current use, and with industrial zoning in general. The Project would not conflict with applicable zoning and other regulations governing scenic quality. The City of Riverside Planning and Building departments will review Project Plans to ensure compliance with applicable City codes. Therefore, impacts to the existing visual character would be less than significant.

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

d. Response:

Less than Significant Impact. Nighttime activities are not anticipated to be required during Project construction. However, if nighttime construction is ultimately required for unforeseen reasons, construction crews would implement Project Design Feature AES-1 (see below), which would minimize the potential affects from construction lighting on surrounding land uses. Typical construction equipment and methods, as described in the Detailed Project Description, would not result in substantial light or glare during normal, daytime construction hours. Therefore, visual impacts due to light and glare from construction activities would be less than significant.

Lighting and glare from the operation of the new substation will be similar to that of the existing substation. The new substation will use galvanized steel (for what equipment/surfaces?), which reduces glare. Existing areas surrounding the site, such as Chicago Avenue, use lighting during nighttime hours. Lighting associated with the new substation will be similar in affect to these surrounding sources of light. In addition, the new substation perimeter security wall will minimize the light and glare that is visible from surrounding land uses, including the residential land uses located to the west. This represents a decrease in light and glare impacts on the adjacent residents, as the existing chain-link fence does little to block light and glare.

The new storage facility, located on the eastern parcel, would only be visible from the east and south, and would not create a source of glare. All facility lighting will be approved by the City of Riverside and will comply with the City's nighttime lighting requirements. Therefore, operation of the new storage facility would not generate a new source of substantial light or glare and impacts would be less than significant.

AES-1: If nighttime work is required, construction crews shall angle all required lighting down and away from adjacent land uses, especially the residential land uses located west of the Project Site (refer to Figure 1).

3.3 Agriculture and Forestry Resources

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

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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 (FMMP) of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

a. Response:

No Impact. Per the FMMP (2016) of the California Resources Agency, the Project is located within Urban and Built-up land. A review of Figure OS-2 - Agricultural Suitability of the General Plan 2025 also shows that the Project Site is not designated as, and is not adjacent to, or in proximity of, any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Project will have no impact directly, indirectly, or cumulatively to agricultural uses.

(Sources: General Plan 2025 - Figure OS-2 - Agricultural Suitability; FMMP [2016])

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

b. Response:

No Impact. A review of Figure OS-3– Williamson Act Preserves of the General Plan 2025 reveals that the Project Site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Moreover, the Project Site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the Project will have no impact directly, indirectly, or cumulatively.

(Source: General Plan 2025 - Figure OS-3 - Williamson Act Preserves)

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	☐	☐	☐	☒

c. Response:

No Impact. The Project Site is zoned as R106, General Industrial Zone, and not for forest use. Therefore, the existing substation and the vacant parcel would not result in rezoning of the property intended for forest use. Therefore, no impacts will occur from this Project directly, indirectly, or cumulatively.

(Sources: General Plan 2025 - Figure OS-2 - Agricultural Suitability; Title 19 - Zoning Code)

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

d. Response:

No impact. As discussed under responses a) through c) above, the Project is located in an urbanized area of the City, designated as Urban and Build-up lands on the Farmlands Mapping and Monitoring Program, and zoned as Industrial. Therefore, there are no agricultural lands or forest lands on the Project Site. As such, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use.

(Sources: General Plan 2025 - Figure OS-2 - Agricultural Suitability; FMMP [2016])

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

e. Response:

No impact. As discussed under responses a) through c) above, the Project is located in an urbanized area of the City, designated as Urban and Build-up lands on the Farmlands Mapping and Monitoring Program, and zoned as Industrial. Therefore, there are no agricultural lands or forest lands on the Project Site. As such, the Project would not result in conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use.

(Sources: General Plan 2025 - Figure OS-2 - Agricultural Suitability; FMMP [2016])

3.4 Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

a. Response:

Less than Significant Impact. The proposed Project is located within the South Coast Air Basin (SCAB), a region that currently exceeds, and is in violation of, state and national ambient air quality standards for ozone (O3) and particulate matter (PM) less than 10 (federal only) and 2.5 microns in diameter (PM10 and PM2.5). The South Coast Air Quality Management District (SCAQMD) regulates air quality emissions within the SCAB and has prepared a series of Air Quality Management Plans (AQMP), the most recent of which was developed in 2016 and adopted by the Governing Board of the SCAQMD on March 3, 2017 (2016 AQMP). The 2016 AQMP is designed to meet applicable federal and state requirements, including attainment of ambient air quality standards. To assess the impacts of project-related construction and operational emissions, the SCAQMD has established air quality significance thresholds. For a project to be consistent with the 2016 AQMP, emissions should not exceed SCAQMD's significance thresholds and the project should not conflict with or exceed future emission-related assumptions within the 2016 AQMP.

As described below in Response b), emissions from the proposed Project would only result in temporary, less than significant impacts to air quality. Construction and operational emissions generated by the proposed Project will not exceed SCAQMD significance thresholds. The proposed Project consists of the replacement of an existing electrical substation and construction of a new warehouse adjacent to the substation. The warehouse will be used to store equipment and materials for operation and maintenance of the electrical grid system. Therefore, the proposed Project is in line with regional growth expectations and does not conflict with the development outlined in the 2016 AQMP. SCAQMD has also adopted Rule 403 for the purpose of reducing the amount of fugitive dust generated as a result of human activities. The Project will comply with Rule 403, which requires the implementation of best available dust control measures during active operations capable of generating fugitive dust. As such, the proposed Project would not conflict with or obstruct implementation of the 2016 AQMP or Rule 403.

b. Result in 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?	☐	☐	☒	☐

b. Response:

Less than Significant Impact. The SCAB currently exceeds and is in violation of state and national ambient air quality standards for O3, PM10, and PM2.5. The SCAQMD has established regional significance thresholds to help assess the impacts of Project-related construction and operational emissions. Temporary construction emissions would result from the use of heavy equipment exhaust, equipment and material deliveries, construction-related trips by workers, and fugitive dust generation from excavation and grading activities. SCAQMD regional construction emission significance thresholds and estimated construction emissions for the proposed Project are provided in Table 1 below.

The Project construction emissions are calculated using the latest version of the California Emissions Estimator Model (CalEEMod version 2016.3.2 – refer to Appendix B). The construction emissions are conservatively estimated assuming most pieces of equipment would operate for 10 to 12 hours per day. A more complete description of Project emissions modeling input parameters is provided in Appendix B.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 1: Estimated Maximum Daily Construction Emissions and Regional Significance Criteria

Criteria Pollutant	SCAQMD Regional Significance Threshold for Construction (lbs/day)	Estimated Maximum Daily Project Construction Emissions (lbs/day)
Nitrogen Oxides	100	67.0
Reactive Organic Gases	75	5.54
Sulfur Dioxide	150	0.09
Carbon Monoxide	550	39.0
PM_{10}	150	3.33
$PM_{2.5}$	55	2.53
*Lead	3	<3

*CalEEMod does not calculate lead emissions. Using the SCAQMD lead emission factor for diesel of 0.0083 lb/gal it was calculated that 361 gal/day of fuel would need to be combusted to exceed this threshold. Assuming a maximum fuel consumption of between 1 and 20 gallons per hour per piece of equipment (Hawthorne Cat, 2014), this Project would not consume diesel fuel in excess of the 361 gal/day and would therefore not exceed the significance threshold.

As shown in Table 1 above, the temporary construction emissions from the proposed Project would be less than the regional significance thresholds for construction. In addition, compliance with Rule 403 for the control of fugitive dust would ensure that the proposed Project would not violate fugitive dust standards. Operation and maintenance of the new Hunter Substation is expected to result in infrequent and minor air emissions associated with trucks used for inspection or maintenance purposes. These operational emissions are expected to be consistent with the emissions generated from the current maintenance of the existing Hunter Substation. Therefore, the Project's net increase in criteria pollutant emissions for which the Project region is non-attainment is not cumulatively considerable and impacts are considered less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

c. Response:

Less than Significant Impact. Temporary construction emissions would result from heavy equipment fuel combustion, construction-related vehicle trips, and fugitive dust generation. The Project site is a property currently developed as a substation and an adjacent undeveloped property. Surrounding the Project site are city streets, a stormwater canal, and residential, commercial, and industrial properties. For air quality impact analysis, a sensitive receptor is a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain on a 24-hour a day basis. The closest existing sensitive receptors are single-family residences located across the stormwater drainage channel approximately 50 feet west of the Project site.

The SCAQMD has developed suggested Localized Significance Thresholds (LSTs) to assist lead agencies in assessing potential air quality impacts to sensitive receptors near emission sources. LSTs are applicable to oxides of nitrogen (NOx), carbon monoxide (CO), particulate matter less than 10 microns in aerodynamic diameter (PM10), and particulates less than 2.5 microns in aerodynamic diameter (PM2.5). According to the SCAQMD, the LSTs represent the maximum emissions from a Project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. LSTs are also based on the ambient concentrations of the specific pollutants within each source receptor area (SRA) and the distance to the nearest sensitive receptor.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The recommended LSTs applicable to the Project were determined using the *SCAQMD LST Methodology Guidance Document, Appendix C – Mass Rate LST Look-up Tables C-1 through C-6*. Because LSTs are dependent on distance between the emission source and receptor, the emissions modeling in Appendix B includes a two-step analysis to ensure that all sensitive receptors are appropriately considered. First, the overall project construction emissions are compared to the LSTs for a 2-acre site and a 25-meter separation distance. Although the nearest receptor is approximately 15 meters from the Project site boundary, the SCAQMD LST guidance recommends using the 25-meter LSTs for projects with receptors closer than 25 meters. As shown in the table below, overall project emissions would be less than the LSTs for any sensitive receptor located 25 meters or more from the Project.

Table 2: Estimated Maximum Daily Construction Emissions and Localized Significance Criteria for 25 Meter Setback

Criteria Pollutant	SCAQMD Localized Significance Threshold for 25 Meter Setback* (lbs/day)	Estimated Maximum Daily Project Construction Emissions (lbs/day)
Nitrogen Oxides	170	67.0
Carbon Monoxide	883	39.0
PM_{10} (Total)	7	3.33
$PM_{2.5}$ (Total)	4	2.53

* Localized Significance Thresholds for construction in source receptor area (SRA) 23 – Metropolitan Riverside County

Construction activities would also result in short-term emissions of diesel particulate matter (DPM). DPM is recognized as a toxic air contaminant (TAC) by the Office of Environmental Health and Hazard Assessment (OEHHA). According to OEHHA guidance, human health risk from exposure to TACs such as DPM are based on both the concentration of the TAC and the duration over which exposure occurs. Based on the size of the Project, the limited number of off-road diesel equipment being used at the same time, and the relatively short construction period (17 months), and reductions in DPM emissions due to the use of newer construction equipment as required by U.S. Environmental Protection Agency (USEPA) and CARB regulations, construction emissions would not expose sensitive receptors to substantial emissions of DPM. Therefore, the impact of the Project to sensitive receptors would be less than significant.

Based on the modeling results summarized in the above tables and included in Appendix B, Project construction emissions would not exceed any SCAQMD localized or regional significance threshold. Therefore, the impact to sensitive receptors would be less than significant.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

d. Response:

Less than Significant impact. The Project site is currently developed as a substation and an adjacent undeveloped property. Surrounding the Project site are city streets, a stormwater canal, and residential, commercial, and industrial properties. The Project would not produce other emissions, such as those leading to odors, during construction or operation with the exception of the potential for localized odors from internal combustion engine exhaust during construction. The generation of any odors would be localized and of short duration and, therefore, not considered a significant impact.

3.5 Biological Resources

3.5.1 Existing Setting

The information in this section is based on the field survey conducted on July 19, 2019, and a review of several database sources and reports. The review included database searches for plant and animal special-status species and/or other special habitats having the potential to occur in the Biological Study Area (BSA), including a California Natural Diversity Database (CNDDB) report (2019), California Native Plant Society (CNPS) Rare and Endangered Plant Inventory results (CNPS, 2019), and an Official List of Species from the U.S. Fish and Wildlife Service (USFWS, 2019). The database searches identified a total of nine federally- and/or state-listed plant species, and seven federally and/or state-listed animal species, and four species considered sensitive or candidate by the USFWS, California Department of Fish and Wildlife (CDFW), or CNPS, which are either known to occur or have potential to occur in the region.

These species include federally- and state-listed western marsh sandwort (*Arenaria paludicola*), salt marsh bird's beak (*Chloropyron maritimum*), Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*), and yellow-billed cuckoo (*Coccyzus americanus occidentalis*); federally-listed plants: San Diego ambrosia (*Ambrosia pumila*), Santa Ana river wooly-star (*Eriastrum densifolium ssp. Sanctorum*), thread-leaved brodiaea (*Brodiaea filifolia*), spreading navarretia (*Navarretia fossalis*), Nevin's barberry (*Berberis nevinii*), and federally-listed wildlife Santa Ana sucker (*Catostomus santaanaae*), vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Catostomus santaanaae*), coastal California gnatcatcher (*Polioptila californica californica*), least bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), Stephens' kangaroo rat (*Dipodomys stephensi*); and state-listed California black rail (*Laterallus jamaicensis coturniculus*), and State Species of Concern and/or Watch List California glossy snake (*Arizona elegans occidentalis*), orange-throated whiptail (*Aspidoscelis hyperythrus*), red-diamond rattlesnake (C*rotalus rubber rubber*), and coast horned lizard (*Phrynosoma coronatum blainvillei*).

For the purpose of the biological analysis, a BSA was established. The BSA encompasses approximately 2.5 acres and all areas subject to temporary and permanent impacts that would occur from the Proposed Project and an approximately 100-foot buffer.

Results
The BSA includes three habitat types and one land use type (described below). These include barren, ornamental, concrete-lined channel, and developed.

Barren
The west portion of the Site is devoid of vegetation and consists of barren land. The soils are highly compacted. Some small vegetation samplings were observed (*Arundo donax, Helianthus annuus, Hordeum, Bromus madritensis rubens, Lactuca serriola, Nicotiana glauca, and Euphorbia maculate*). According to personal communication with the RPU staff (1) (Chris Summerfold, City QEW), the Site was cleared of vegetation about 2 to 3 weeks before the Site visit in July 2019.

Ornamental
Ornamental vegetation occurs in the form of a narrow sliver of plantings and shrubs located alongside the northern and eastern Site boundary. This vegetation consists of landscaped ornamental trees and plants.

Lined Channel
The Riverside Canal owned by the Riverside County Flood Control District runs to the west of the Site boundary. The canal is a manmade trapezoidal concrete channel that conveys flow to Temescal Wash, which ultimately flows to the Santa Ana River. During the Site visit, water was present in the canal; no vegetation was observed.

Developed
A developed area occurs on the east side of the BSA and specifically consists of the existing Hunter Substation, surrounding fence, paved and gravel road, and a gravel site.

Special-Status Plant Species
None of the plant species listed above have suitable habitat present on the Site.

Special-Status Wildlife Species
None of the federally- and state-listed wildlife species listed above have suitable habitat present on the Site. The Project Site is not within suitable habitat or designated critical unit for the Delphi Sands flower-loving fly. USFWS designated three recovery units for the fly: Colton, Jurupa, and Ontario; however, the Project is not located within any of these units.

Other Wildlife Species
Wildlife observed in the BSA included urban adapted birds: European Starling (*Sturnus vulgaris*), mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhyncos*), black phoebe (*Sayornis nigricans*), tree swallow (*Tachycineta bicolor*). No amphibian, reptile, or mammal species were observed; however, gopher burrows were noted onsite. Common reptile species expected to occur in the BSA include urban adapted western fence lizard (*Sceloporus occidentalis*). Common mammal species expected to occur in the BSA include urban adapted Virginia opossum (*Didelphis virginianus*), house mouse (*Mus musculus*), and common raccoon (*Procyon lotor*). Birds were observed on the utility poles. Due to the lack of trees onsite, none of these birds are expected to nest there. However, adjacent ornamental trees and shrubs may support nesting birds which are protected by the Migratory Bird Treaty Act (MBTA).

Pursuant to the MBTA of 1918, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 United States Code [USC] 703). Section 3513 of the California Fish and Game Code, and AB 454 duplicate the federal protection of migratory birds and prohibits the take and

possession of any migratory nongame bird, as designated in the MBTA. Activities having the potential to disturb active bird nests (i.e., vegetation removal) are prohibited by the MBTA and AB 454. This protection generally ceases once nesting activity is completed.

3.5.2 Impacts

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

a. Response:

Less than significant impact. As shown on Figure 4 in Attachment A, the Site is located in an urban setting. The eastern parcel is developed, and the western parcel is barren ground, devoid of vegetation. The Project is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project is located on San Timoteo Unit and is not subject to survey requirements for amphibians, burrowing owls, mammals, narrow endemic plants or other species. The Project is located outside of the MSHCP Cores and Linkages, Criteria Cell, and Subunit Areas. The Project Site is also located outside of designated Core Reserves for the Stephens' Kangaroo Rat (SKR) and is not located within designated critical habitat for Threatened and Endangered species such as Delhi Sands flower-loving fly.

The construction of the Project would consist of developing the western undeveloped parcel with a new substation, and subsequently demolishing the existing substation building structure from the eastern parcel.

The Project Site does not provide suitable habitat for the federally- and state-listed wildlife and plant species. The Site is currently devoid of vegetation and if maintained this way until construction, there will be limited potential for any species, including urban adapted avian species, to nest there. Should the vegetation onsite grow back, and construction occur during the bird nesting season, then prior to vegetation removal, a nesting bird survey would be completed to comply with the MBTA – refer to Design Feature BIO-1.

With implementation of the avoidance measures included in Design Feature BIO-1, the Project would not result in direct, indirect, or cumulative impacts to 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. Less than significant impacts are expected with avoidance measures.

BIO-1 If vegetation removal is necessary, it shall be scheduled during the non-nesting bird season (i.e., September 1 to January 31) in order to ensure compliance with the MTBA. If vegetation removal activities are planned to occur during the nesting season (i.e., February 1 to August 31), a pre-construction nesting bird survey shall be required within 3 days prior to clearing of any vegetation. If any active nests are detected, the biologist shall designate a buffer area around the nest (ranging from 100 feet to 500 feet depending on the sensitivity of the species and the location of the nest), which must be protected until the chicks have fledged or until the biologist has determined that the nest has failed.

(Sources: General Plan 2025 – Figure OS-6 –SKR Core Reserve and Other Habitat Conservation Plans [HCPs], 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,

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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, CNDDB [2019]; USFWS Delhi Sands flower-loving fly Map [2005]; USFWS IPAC [2019]; CNPS [2019])				
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 US Fish and Wildlife Service?	☐	☐	☐	☒

b. Response:

No Impact. No riparian habitat is present onsite, and no other sensitive natural community is present. The Project Site is located in an urban environment, fragmented from other natural areas by development. The General Plan, Open Space, and Conservation Element identifies this area as urban and built-up, and none of Riverside's arroyos or other sensitive habitats are present on the Site, as confirmed during the site visit. The Site is not within critical habitat for any federally- and state-listed species and no sensitive natural communities or plans are established on the Site. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service. No direct, indirect, or cumulative impact is expected.

(Sources: General Plan 2025 – Figure OS-6 – SKR Core Reserve and Other HCPs, 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, CNDDB [2019]; USFWS IPAC [2019]; CNPS [2019])

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

c. Response:

Less than Significant Impact. The USFWS National Wetlands Inventory was obtained for the Project and does not show any blue lines streams, marsh, vernal pool, riparian, or wetlands located on the Project Site. The review of the General Plan, Open Space and Conservation Element maps does not identify any drainage features onsite. The Riverside Canal, located within the BSA and adjacent to the Project Site, is identified as a blue line stream – Riverine habitat. However, the Project would not affect this canal, would not alter its course, or result in filling or alteration of the canal such that authorizations and permits from the Regulatory Agencies for this type of activity would be required. However, due to proximity of the Riverside Canal, best management practices (BMPs) would have to be implemented during construction to ensure that the Project does not result in soil erosion, sedimentation, or runoff to this drainage feature, and trigger permitting requirements. No state- and federally-protected wetlands are located on the Project Site. Therefore, implementation of the Design Feature BIO-2 is recommended. With incorporation of Design Feature BIO -2, the Project would not result in direct removal, filling, or hydrological interruption to any wetlands. Therefore, the Project would not result in direct, indirect, or cumulative impacts related to the state- or federally-protected wetlands.

BIO-2 All equipment maintenance, staging, and dispensing of fuel, oil, or any other such activities shall occur in developed or designated non-sensitive habitat areas (e.g., ruderal, developed). A construction Storm Water Pollution Prevention Plan (SWPPP) and/or Soil Erosion and Sedimentation Plan (SESP) shall be developed to

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
minimize erosion and to identify specific pollution prevention measures that shall eliminate or control potential point and non-point pollution sources onsite during the Project's construction phase and during Project operation. The SWPPP shall identify specific BMPs to be implemented during Project construction to protect water quality. In addition, the SWPPP shall contain provisions for changes to the plan such that alternative mechanisms can be used, if necessary, during Project design and/or construction to achieve the stated goals and performance standards. ***(Sources: General Plan 2025 – Figure OS-6 – SKR Core Reserve and Other HCPs, 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, CNDDB [2019]; USFWS IPAC [2019]; CNPS [2019] National Wetlands Inventory)***				
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?	☐	☐	☐	☒
d. Response: **No Impact.** No native resident or migratory fish or wildlife species, or native wildlife nursery sites occurs on the Site. The Site is surrounded by urban uses devoid of wildlife corridors. The Riverside Canal located nearby will not be directly or indirectly impacted during the Project construction, because the Project would incorporate minimization measure BIO-2 which ensures that no pollution or runoff would enter the canal. Therefore, the Project would not interfere with 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. No direct, indirect, or cumulative impacts are expected. ***(Source: MSHCP; General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage)***				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
e. Response: **No Impact.** The City's Urban Forestry Policy Manual regulates removal and tree planting in the City. The Project Site does not contain any biological resources identified in the General Plan Open Space and Conservation Element, and will not remove any tree, because none are located on the Site. Therefore, the Project would not require a tree removal permit from the City and would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No direct, indirect, or cumulative impacts are expected. ***(Sources: 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 Forestry Policy Manual [2008])***				

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

f. Response:

No Impact. The Project Site is located within the boundaries of the Western Riverside County MSHCP; however, as discussed under question a) above, it is not located within any criteria cells, or area that would be subject to specific protocol level survey requirements. As discussed in question c) above, the Site does not contain any resources identified on the City of Riverside General Plan, Open Space and Conservation Element. Therefore, the Project would not conflict with the provisions of an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state HCP. No direct, indirect, or cumulative impacts are expected.

(Sources: MSHCP; General Plan 2025 – Figure OS-6 – SKR Core Reserve and Other HCPs; SKR HCP)

3.6 Cultural Resources

This section is based on the Phase I Cultural Resources Assessment report prepared by VCS Environmental (refer to Appendix C). The Phase I Cultural Resources Assessment contains detailed supporting information relating to potential impacts to cultural, historic, paleontological, and Tribal cultural resources.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒

a. Response:

No impact. The Project construction activities will include ground disturbance. The only built structure within the Project Site is the existing Hunter Substation. A historic review and evaluation of the existing substation was conducted by Daly & Associates, who meets the Secretary of Interior's Standards for Professional Qualifications for architectural historian and historian (refer to Appendix C). The existing substation was found to be ineligible for listing under National Register of Historic Places, the California Register of Historic Resources, the California Historical Landmarks Listing, the Historic Properties Directory, and the California Points of Historical Interest. Therefore, no impacts to historical resources pursuant to 15064.5 are expected to occur during construction or operation of the Project.

(Source: Phase I Cultural Resources Assessment for the Hunter Substation Replacement Project [VCS 2019])

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

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

b. Response:

Less than Significant Impact with Mitigation Incorporated. One potential cultural resource, an abalone shell fragment, was identified on the project site during the Phase I Cultural Resources Assessment (VCS 2019). It is not clear if this abalone shell fragment is prehistoric or a modern occurrence. In light of the general cultural sensitivity of the Project area, and because the western parcel of the Project Site footprint is currently undeveloped, and was historically partially undeveloped, there is potential for buried resources to be unearthed during construction of the Proposed Project. Implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4 would ensure there would be no substantial adverse changes in the significance of any cultural resources.

MM CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the RPU or its Engineering, Construction, and Procurement (EPC) Contractor shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

MM CUL-2 (Archaeological, Tribal and Paleontological Monitoring): At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the RPU or its EPC Contractor shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The project archaeologist, in consultation with consulting tribes, and the RPU, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:
    a. Project grading and development scheduling;
    b. The development of a rotating or simultaneous schedule in coordination with the RPU and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;
    c. The protocols and stipulations that the RPU, the EPC Contractor, tribes, and project archaeologist/ paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;
    d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and
    e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM CUL-4.

MM CUL-3 (Treatment and Disposition of Cultural Resources): In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. **Consulting Tribes Notified:** within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
2. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and

3. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
   a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
   b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
   c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and
   d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

MM CUL-4 (Cultural Sensitivity Training): The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

(Source: Phase I Cultural Resources Assessment for the Hunter Substation Replacement Project [VCS 2019])

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

c. Response:

Less than Significant Impact. No human remains are known to exist on the Project Site, and the site is not identified as a formal cemetery. However, the lack of past evidence of a Native American burial ground or human remains at the Project Site does not guarantee the absence of subsurface remains. Section 7050.5 of the California Health and Safety Code provides for the disposition of accidentally discovered human remains. Compliance with Section 5097.98 of the California Public Resources Code during Project construction, as outlined by Project Feature HR-1, would preclude significant impacts to human remains.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
HR-1: Section 7050.5 of the California Health and Safety Code provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. Section 5097.98 of the PRC states that, if remains are determined by the Coroner to be of Native American origin, the Coroner must notify the NAHC within 24 hours which, in turn, must identify the person or persons it believes to be the most likely descended from the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. The MLD's recommendation shall be followed, if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code, Section 7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code, Section 5097.98). ***(Source: Phase I Cultural Resources Assessment for the Hunter Substation Replacement Project [VCS 2019])***				

3.7 Energy Resources

3.7.1 Existing Setting

Warren-Alquist Act

The Warren-Alquist Act of 1975 gives statutory authority to the California Energy Commission (CEC), the State's primary energy policy and planning agency. The CEC adopted State-wide policies to reduce wasteful, inefficient, and unnecessary energy consumption. The core responsibilities of the CEC are advancing state energy policy, achieving energy efficiency, investing in energy innovation, developing renewable energy, transforming transportation, overseeing energy infrastructure, and preparing for energy emergencies.

California Energy Action Plan

The CEC prepared the California Energy Action Plan in 2008, identifying emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy to support the CEC's core responsibilities. The 2008 update to the plan addresses needed changes in the following policy areas: energy efficiency, demand response, renewable energy, electricity reliability and infrastructure, electricity market structure, natural gas supply and infrastructure, research and development, and climate change.

City of Riverside

The RPU is a public utility that currently provides and would continue to provide electricity to the City. The Open Space and Conservation Element of the General Plan (Riverside 2012) provides several policies relative to energy use in the City of Riverside. The City of Riverside adopted a Green Action Plan, and Climate Action Plan further stating that it has made energy efficiency and conservation a priority.

3.7.2 Impacts

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

a. Response:

Less Than Significant Impact. Due to its nature, the Project would result in more efficient operation of the substation. This is due to the replacement of the old infrastructure that can no longer maintain existing loads with upgraded components that would conform to the most recent State of California's Title 24 Building Standards and CalGreen requirements and efficiency standards. Construction activities would involve the use of gasoline and diesel fuel for operation of construction equipment and result in a short-term increase in the use of energy resources. There are several distinct construction stages associated with construction of the new substation, demolition of the old substation, and construction of the warehouse buildings. Phases and their expected duration are described in detail in the Project description. Each phase would require use of different equipment. Typical construction equipment would include: dozers, graders, scrapers, jack hammers, compactors, work trucks, haul/dump trucks, bucket trucks, drill rigs, work trucks, and truck-mounted cranes. Not all construction equipment would be operated at the same time. Each day, only a few vehicles or equipment would be utilized, thereby minimizing wasteful use of fuels. Total duration of construction of the Project is approximately 1.5 years. Once construction is completed, no further use of fuels would be needed. Construction equipment will only be used when needed to perform a particular action on the project, and as such no wasteful, inefficient, or unnecessary consumption of energy resources is anticipated. In addition, the contractor would use construction equipment and vehicles with the highest fuel efficiency standards available, whenever economically feasible, and would apply the energy related Design Features ERG-1 through ERG-3.

Once construction is completed, all construction equipment would be removed from construction and staging areas. There would be no continued activities in the Project site that would require consumption of fuels during operation of the Project beyond what currently occurs at the Site. Because the substation and the warehouse would be built to the most recent building standards, they would be more efficient in terms of operational energy use than the existing substation. Therefore, operation of the Project would not result in indirect, direct, or cumulative impacts to energy due to wasteful, inefficient, or unnecessary consumption of energy resources.

ERG-1 The Project shall use energy-efficient equipment where feasible and maintain older construction equipment to keep in good working order**.**

ERG-2 During construction, the contractor shall schedule construction operations to efficiently use construction equipment (e.g., only haul waste when haul trucks are full and combine smaller dozer operations into a single comprehensive operation, where possible).

ERG- 3 During construction, the construction contractor should promote employees carpooling.

(Sources: Warren-Alquist Act; General Plan 2025 Open Space and Conservation Element; Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan)

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

b. Response:

No impact. The Project would be required to comply with the State of California's Title 24 Building Standards and CalGreen requirements for energy efficiency. As discussed above, the Project would replace the existing deteriorated substation with a new substation and a warehouse building that would comply with the most recent standards. The new Hunter Substation would be also more efficient in terms of conveyance of energy and reduction of voltage levels because the substation infrastructure would be upgraded and would not result in the loss of energy that otherwise may happen if the substation is not replaced. As such, the Project would be consistent with the energy efficiency goals established in the General Plan, California Energy Commission, and California Action Plan because it allows RPU to meet the forecast energy demand by providing reliable energy infrastructure. The Project would not result in direct, indirect, or cumulative impacts in the context of state or local plans for renewable energy or energy efficiency.

(Sources: Warren-Alquist Act; General Plan 2025 Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan)

3.8 Geology and Soils

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

i. Response:

Less Than Significant Impact. The Project Site has not been mapped by the California Geological Survey (CGS) for fault rupture as part of the Alquist-Priolo Act. No known active or potentially active faults are known to cross the site. As shown on the General Plan 2025 Figure PS-1 - Regional Fault Zones, the closest potentially active fault is the San Jacinto fault located approximately 4½ miles northeast of the Project Site. This fault runs more than 125 miles, from northwest of El Centro in Imperial County to northwest of San Bernardino, passing through the intersection of Interstates 10 and 215, the City of Loma Linda, and the Box Springs Mountains. This fault has the capability of producing up to a 7.0M earthquake. Due to the distance, a fault rupture through the site is unlikely. Therefore, the Project would not directly, indirectly, or cumulatively cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault.

(Sources: General Plan 2025 - Figure PS-1 - Regional Fault Zones; Hunter Substation Geotechnical Investigation Report [TRC, 2019])

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	☐	☐	☒	☐

ii. Response:

Less Than Significant Impact. Southern California is a seismically active region. The City of Riverside is not located in a fault zone, but in the event of an earthquake, the City and the Project Site would be subject to seismic ground shaking. As shown on the General Plan 2025 Figure PS-1 – Regional Fault Zones, the San Jacinto fault is located nearby and has the potential to generate moderate to large earthquakes up to 7.0M that would cause intense ground shaking at the Project Site. Although earthquakes can cause damage at a considerable distance, shaking will be very intense near the fault rupture. The City of Riverside adopted several policies related to seismic hazards, including Policy PS-1.2: Locate important public facilities of City importance outside of geologically hazardous areas. The Project site is already developed with a substation, so the risk of loss, injury, or death involving seismic event would be less than under existing conditions as the Project would result in newer equipment designed and built according to existing seismic safety standards. The new Hunter Substation would be constructed according to the most recent California Building Code (CBC) that is more stringent than the code that the existing Hunter Substation site adhered to when it was built. Chapter 16 of the 2016 CBC outlines the procedure for seismic design of structures, and site seismic coefficients. Implementation of these design standards and standard engineering practices would reduce risks associated with seismic shaking to a level considered less than significant (refer to Design Features GEO-1 through GEO-3 below). Therefore, the Project directly, indirectly, and/or cumulatively would result in less than significant impact related to potential of substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

GEO-1 The Project at a minimum, should be designed in accordance with the seismic design criteria Equation 11.8-1 of ASCE 7-10, for peak ground acceleration of 0.57 g.

GEO-2 Prior to construction, the geotechnical seismic engineer shall review all plans, specifications, and constructability plans to ensure that all geotechnical aspects of the Project design conform with recommendations of the Geotechnical Report.

GEO-3 During construction, a geotechnical seismic engineer shall observe and confirm the geotechnical specifications of the Project construction to ensure general conformance of the Project plans and construction with our recommendations.

(Sources: General Plan 2025 - Figure PS-1 - Regional Fault Zones; Hunter Substation Geotechnical Investigation Report [TRC, 2019])

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

iii. Response:

No Impact. Within Riverside, the four primary liquefaction areas include the area along the Santa Ana River, a broad area south and west of the Riverside Municipal Airport, a portion in western Riverside spanning La Sierra Avenue, and a smaller area along the City's southern boundary. According to the General Plan 2025 Figure PS-2 – Liquefaction Zones and the Geotechnical Report, the site is located on soil that has low liquefaction potential. Soils most susceptible to liquefaction are loose to moderately dense, saturated, non-cohesive soils with poor drainage, such as sands and silts with interbedded or capping layers of relatively low permeability soil. The soils on site consist of a mixture of clay, sands, clay sand, and lean clay. Therefore, the Project would not result in seismic-related ground failure impacts, including liquefaction either directly, indirectly, and/or cumulatively.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(Sources: General Plan 2025, Figure PS-2 - Liquefaction Zones; Hunter Substation Geotechnical Investigation Report [TRC, 2019])				
iv. Landslides?	☐	☐	☐	☒

iv. Response:

No Impact. The site is flat and does not contain steep slopes. Landslides typically occur in areas on steep slopes, and may result from heavy rain, erosion, removal of vegetation, seismic activity, or combinations of these and other factors. The Project Site has not been mapped by CGS for seismically-induced landslide hazards. Because of the relatively flat topography of the Project Site, landslides are not considered a hazard for the site. Therefore, the Project would not result in landslides impacts, either directly, indirectly, and/or cumulatively.

(Sources: General Plan 2025; Hunter Substation Geotechnical Investigation Report [TRC, 2019])

b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

b. Response:

Less Than Significant Impact. The site is flat and does not contain steep slopes. The National Pollutant Discharge Elimination System (NPDES) Construction General Permit calls for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for establishing erosion and sediment control (BMPs) during construction activities. Design Feature WQ-2 (refer to Section 3.11) would also reduce and minimize soil erosion impacts. As such, Project construction activities would result in less than significant impacts related to soil erosion.

The Project will also be required to prepare a Water Quality Management Plan (WQMP) which would identify long-term BMPs to be implemented on the site during the Project operation. Design Feature WQ-3 would reduce and minimize soil erosion impacts. Soil erosion impacts would be minimized through the incorporation of landscaped areas and permeable gravel that will cover all portions of the Site surrounding the new substation and storage building. This will reduce exposed soils on the Site that could lead to erosion. In addition, the Project will be required to follow the City of Riverside erosion control standards (in Title 18, Subdivisions, of the RMC) and grading code (Title 17 of the RMC). Because of this, the Project is not expected to result in substantial soil erosion or the loss of topsoil. Less than significant impacts would occur directly, indirectly, and/or cumulatively.

(Sources: General Plan 2025; Hunter Substation Geotechnical Investigation Report (TRC, 2019)

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

c. Response:

Less Than Significant Impact. As discussed above, the site is flat, and no slopes are on site or would be created by the Project. Additionally, the areas surrounding the site are generally flat. Therefore, it can be concluded that the site is currently relatively stable. The proposed Project would maintain the site's generally flat topography after project construction and would not create or contribute to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse as described in more detail below. Therefore, less than significant impacts related to soil stability would occur directly, indirectly, and/or cumulatively.

Landslides. The site and surrounding areas are generally flat and not subject to on- or off-site landslide risks. See response a) iv.

Lateral Spreading. Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material toward an open body of water, channel, or excavation. In soils, this movement may often be associated with liquefaction. As discussed above, the risk for liquefaction is low. Because of the low potential for liquefaction, the risk of lateral spreading is low.

Subsidence. According to the City of Riverside General Program 2025 - Geotechnical Report, large-scale subsidence due to fluid withdrawal is not reported in the City. In addition, the area of SR-60/I-215 Interchange was not noted for its potential for subsidence.

Liquefaction. The Project does not contain soils subject to liquefaction. See response a) iii.

Collapse. Adherence to the City's grading and building requirements, and recommendations of the Geotechnical Report will ensure that the property is adequately prepared to prevent the collapse of the graded pad. Compliance with the City's existing codes and the policies contained in the General Plan 2025 would help to ensure that impacts related to geologic conditions are reduced to less than significant impact levels directly, indirectly, and/or cumulatively.

(Sources: General Plan 2025 FPEIR; Hunter Substation Geotechnical Investigation Report [TRC, 2019]).

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

d. Response:

Less Than Significant Impact. According to the General Plan 2025 - Figure PS-3 - Soils with High Shrink-Swell Potential, the Project is not located on soils with high-shrink swell potential, otherwise referred to as expansive soils.

However, the Geotechnical Report advises that the Project is underlined by native, moderately expansive clays. Therefore, proper preparation of the subgrade for the site would be very important. The Geotechnical Report recommends that slabs-on-grade have sufficient reinforcement and be supported by a layer of a non-expansive fill. The recommendations from the Geotechnical Report have been incorporated into Design Features GEO-4 and GEO-5. In accordance with GEO-4, soils would be compacted to at least 90 percent as determined by American Society of Testing and Materials (ASTM) Test Designation D1557, except for the native expansive clays, and native expansive clays would be compacted to between 87 to 92 percent relative compaction at a

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
moisture content at least 3 percent over optimum. With incorporation of Design Features GEO-4 and GEO- 5 for the site preparation process, and other recommendations from the Geotechnical Reports, the Project would result in less than significant substantial direct or indirect risks to life or property. **GEO- 4** As outlined in the Geotechnical Report, the soils would be compacted to at least 90 percent as determined by ASTM Test Designation D1557 except for the native expansive clays. The native expansive clays would be compacted to between 87 to 92 percent relative compaction at a moisture content at least 3 percent over optimum. **GEO- 5** As outlined in the Geotechnical Report, to reduce the potential for damage to the planned structures due to the presence of moderately expansive surficial soils, it is required that slabs-on-grade have sufficient reinforcement and be supported on a layer of non-expansive fill. ***(Sources: General Plan 2025 - Figure PS-3 - Soils with High Shrink-Swell Potential; Geotechnical Report, RMC Title 16 - Buildings and Construction and Title 18 – Subdivisions and Geotechnical Investigation Report [TRC, 2019])***				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
e. Response: **No Impact.** The Project will be served by the Riverside Utilities public sewer system and will not utilize septic tanks, or other alternative wastewater disposal systems. Thus, it would have no impact related to septic tanks or alternative wastewater disposal systems directly, indirectly, and/or cumulatively. ***(Source: RPU, 2019)***				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
f. Response: **Less than Significant Impact with Mitigation Incorporated**. Sam McLeod of the Natural History Museum of Los Angeles County (NHMLAC) conducted a review of the museum's geologic and vertebrate paleontological records for the Project Site and vicinity on September 5, 2019 (refer to Appendix C). The record search determined no paleontological resources have been recorded on the Project site, although fossils have been found and recorded in similar sedimentary deposits nearby. While surface grading or shallow excavations are unlikely to encounter paleontological resources, excavations that extend into older Quaternary deposits could encounter significant resources. Therefore, Mitigation Measure MM CUL-2 is prescribed in order to ensure that impacts are less than significant. (***Sources: General Plan 2025 - Policy HP-1.3; Phase I Cultural Resources Assessment for the Hunter Substation Replacement Project [VCS, 2019]; Geotechnical Investigation Report [TRC, 2019])***				

3.9 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

a. Response:

Less than significant impact. On June 1, 2005, the Governor signed Executive Order S-3-05 which sets forth a series of target dates by which statewide greenhouse gas (GHG) emissions would be reduced, as follows: 1) 2000 levels by the year 2010; 2) 1990 levels by the year 2020; and 3) eighty percent (80%) below the 1990 levels by the year 2050. In 2006, the California State Legislature adopted AB 32 (Global Warming Solutions Act of 2006) and the Governor signed it into law. AB 32 requires the CARB, the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by the year 2020. GHG, as defined under AB 32, includes carbon dioxide (CO2), methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, and perfluorocarbons. CO2 has been identified as the most important anthropogenic GHG because it comprises the majority of total GHG emissions emitted per year and it has a long atmospheric lifetime.

The primary Project-related GHG emissions are short-term fuel burning emissions associated with construction. CalEEMod was used to estimate the Project construction emissions. CalEEMod has the option to output annualized emissions in addition to maximum daily emissions. The annualized CalEEMod results are provided in Appendix B and estimate the Project's total construction GHG impact to be 641.8 metric tons of CO2 equivalents ($MTCO_2e$).

Currently, there are no established GHG significance thresholds from federal or state agencies. However, in October 2008, the CARB issued the draft "Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act". In December 2008, SCAQMD adopted the " Interim CEQA Greenhouse Gas (GHG) Significance Threshold for Stationary Sources, Rules and Plans". Each agency's guidance material represents a potential analytical framework for addressing CEQA significance thresholds for GHG. In general, interim GHG thresholds of 7,000 and 10,000 CO2 equivalents per year ($MTCO_2e/yr$) are recommended by CARB and SCAQMD, respectively. For construction-related GHG emissions, SCAQMD recommends that total emissions from construction be amortized over a 30-years project lifetime and added to operational emissions for comparison to the interim GHG thresholds. The expanded substation will not require a change in operation and maintenance activities and will not result in a net change in long-term vehicle or equipment use. Additionally, the new circuit breakers will not use sulfur hexafluoride. Therefore, there is no change in operation and maintenance emissions expected from the proposed Project. The table below presents the total estimated GHG emissions generated by the Project, as well as the annual emissions amortized over 30-years.

Table 3: Estimated Greenhouse Gas Emissions Generated by the Project

Criteria Pollutant	Metric Tons CO_2e
Total Construction Emissions	641.8
Amortized Construction Emissions	21.4

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The estimated amortized Project GHG emissions of 21.4 $MTCO_2e$/yr is well below the interim GHG thresholds recommended by the CARB and SCAQMD. Therefore, the proposed Project would not generate GHG emissions that would cause significant direct or indirect impacts on the environment.				
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
b. Response: **Less than Significant Impact.** As discussed in Item b above, the GHG emissions generated by the proposed Project are temporary and less than the recommended significance thresholds. Therefore, the proposed Project would not conflict with any plan, policy or regulation adopted for the purpose of reducing emissions of GHG.				

3.10 Hazards and Hazardous Materials

3.10.1 Existing Conditions

A Phase I Environmental Site Assessment (ESA) was prepared for the Project Site on March 26, 2018. The Phase I ESA did not reveal any evidence of Recognized Environmental Conditions (RECs), Historic REC (HRECs), or controlled (CRECs) that would indicate the presence and/or release of hazardous substances, except for one REC for potential organochlorine pesticide-impacted soils from past agricultural use.

The site is fenced off and bordered by the Riverside Canal to the west, commercial/industrial land uses to the north and south, and Chicago Avenue to the east, with a railroad yard railroad right-of-way beyond. The eastern portion of the site is undeveloped and consists of bare ground, whereas the western portion of the site is used by the existing substation. Areas surrounding the substation are mostly covered by gravel. A small paved parking lot/driveway is located outside of the substation fence to the north.

Hazardous materials would be used and stored during construction, operation, and maintenance of the Proposed Project. The following subsections describe the typical hazardous materials to be utilized during construction, operation, and maintenance, as well as the hazardous materials that have the potential to be currently present in the Project area as a result of nearby hazardous materials sites.

Materials described below are considered to be hazardous. All materials will be tested before being disposed of appropriately and in accordance with all applicable regulations. Paint and other building materials will be tested for regulated or hazardous materials such as asbestos and lead-based paint.

3.10.2 Hazardous Materials Utilized during the Project

Construction activities would involve the periodic and routine transport and use of several common hazardous materials such as hydrocarbon fuels, lubricating oils, internal combustion engine oils, transmission fluid, hydraulic fluid, compressed gases for welding and other needs,

paint and epoxy coatings, adhesives, solvents and cleaning products. Demolition of the existing substation would involve handling, testing and disposing of materials that are regulated wastes, such as transformer oil.

Operation and maintenance of the Proposed Project, including the use of hazardous materials, would not be substantially different from existing operation and maintenance activities that are currently performed on the facilities in the Proposed Project area. Operation and maintenance of the Proposed Project would be subject to the same laws and regulations governing the handling and disposal of hazardous materials. All relevant local, state, and federal regulations would continue to be followed.

3.10.3 Hazardous Materials Sites near the Proposed Project

Table 4, Hazardous Materials Sites Adjacent to the Proposed Project, lists the known hazardous materials release sites in the Proposed Project area. These sites were determined from State agency database searches of the area surrounding the Proposed Project. Identified sites are shown in the Phase I ESA Report.

There are no sites with known hazardous materials releases or contamination on the Proposed Project site. Table 4, Hazardous Materials Sites Adjacent to the Proposed Project, lists the closest known hazardous materials release sites in the Proposed Project area. These sites were determined from the EDR database search (as well as searches using state-maintained online databases) of the Proposed Project area. The EDR data search included more than 60 different federal and state environmental data tracking sites that provide listings of sites with records of hazardous material handling or releases to the environment. Many of the lists that are included in the database search are not indicative of hazardous materials releases, but several of the lists specifically identify known past or present hazardous materials release sites and known waste disposal sites.

As shown in Table 4, three sites (two of which are at the same address) occur in proximity to the Project Site which indicate a past or present hazardous materials release or contamination. An additional 16 sites located within 0.25 mile of the Proposed Project indicate the use, storage, and/or transport of hazardous materials or wastes. These sites are further described in the Phase I ESA Report, but are not discussed here as there is little, if any, indication that they pose a potential threat to the Proposed Project from these sites.

As shown in the descriptions in Table 4, there are no hazardous materials releases or existing contamination sites in the immediate vicinity of the Proposed Project. The closest site with documented release or contamination is located approximately 611 feet south of the Proposed Project. This site is also the closest active site to the Proposed Project. All of the sites listed in Table 4 could be considered to be part of the “Cortese List”.

Table 4: Hazardous Materials Release or Contamination Sites within ¼ Mile of the Proposed Project

Map ID [a]	Site Name/ Site Address	Separation Distance/ Closest Project Structure	Hazardous Materials Database(s)	Description
A5	Champion Lumber Company 1600 Columbia Ave, Riverside, CA 92507	Approximately 611 feet north-northeast of Project Site	LUST, SWEEPS UST, HIST UST, CA FID UST	Leaking gasoline UST reported in 1987. Case closed in 1989.
B8	ARCO #100786 1855 Columbia Ave, Riverside, CA 92507	Approximately 813 feet north-northwest of Project Site	LUST, SWEEPS UST, CA FID UST, HIST CORTESE	Facility status – Remediation Plan. Gasoline leak from UST reported in 1989.
B11	EZ Serve #0091 (ARCO) 1855 Columbia Ave, Riverside, CA 92507	Approximately 813 feet north-northwest of Project Site	LUST Notify 65	Status dated 1/02/2015 - Open-Inactive. Listing indicates gasoline potentially affecting aquifer used for drinking water supply. Leak discovery listed as 06/21/1989. Numerous monitoring reports, work plans, and enforcement communication listed between 2000 and 2017.

Notes:
[a] Refer to the EDR report in the Phase I ESA Report .
Sources: *Environmental Data Resources, Inc., 2018; DTSC, 2015; SWRCB, 2015.*

3.10.4 Impacts

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

a. Response:

Less than significant impact. Project construction would require the transport, use, reuse, and disposal of hazardous materials. Hazardous materials used during construction would be typical of construction sites and would include materials such as petroleum fuels and lubricants, compressed gases for welding and other needs, paint and epoxy coatings, adhesives, solvents, and cleaning products. Once built, the Project's ongoing operations and maintenance also would require the use of similar types of hazardous materials, plus insulating oil for electric transformers. Use of hazardous materials during construction, operations, and maintenance would generate hazardous waste such as used oil, empty hazardous material containers, and off-specification products such as cleaned-up spill residue and old products no longer suitable for use onsite. The Project is not anticipated to require the use or storage of any hazardous material in excess of thresholds requiring a Risk Management Plan under State or Federal regulations. The routine use of hazardous materials during

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

construction, operation, and maintenance would require routine transport of these materials to the Site and transport of hazardous waste from the Site.

Following energization of the new Hunter Substation, the old substation will be dismantled and removed. All above-grade equipment will be removed and subsequently re-used at other RPU facilities, stored as back-up equipment, recycled, or as the last option disposed at a licensed facility. Existing wooden poles would be removed and replaced with new poles. These wooden poles may be treated and should be tested and disposed of at an appropriate facility. Paint and other building materials will be tested for regulated or hazardous materials such as asbestos and lead-based paint. Any such materials will be removed and disposed of according to all applicable local, state, and federal regulations.

Following removal of all aboveground equipment, the belowground facilities and foundations will be removed. Affected soils will be tested if signs of potential contamination are present (i.e., soil staining and/or odor). Any equipment or materials that can be salvaged for re-use or use as back-up will be treated as such. Inert materials will be sent to a recycling facility, where appropriate, or disposed of at a licensed landfill facility. All hazardous or otherwise regulated wastes, such as used transformer oils and impacted soils, will be disposed of at an appropriately licensed facility according to applicable local, state, and federal law.

Soils on the site may contain pesticides and other residual substances used at the time when the site was farmed. Because of this, all soils shall be tested for residual pesticides, and if they are not reused on the property, they will be disposed of at a licensed facility.

Routine transport, storage and use of hazardous materials during construction, operation or maintenance could create a significant exposure hazard to construction workers, the public or the environment if such materials are not properly contained and managed. Unsafe exposure to hazardous materials and hazardous waste can result in health effects to humans or the environment depending on the harmful constituents present in the material and extent of exposure. Depending on the materials and extent of exposure, human health effects from hazardous materials can include, but are not limited to, acute or chronic toxicity, skin corrosion/irritation, eye or respiratory damage, organ damage, carcinogenicity, reproductive toxicity, and asphyxiation. Conditions leading to fire, explosion, sudden pressure release, or other physical hazards can also occur if hazardous materials are not properly managed. Releases of hazardous materials to the environment can cause pollution and harm to wildlife, natural vegetation communities, and ecosystems.

Project construction areas would not be open to the public. Construction would be required to occur in compliance with all applicable and relevant regulations including, but not limited to, Federal Occupational Safety and Health Administration (OSHA) and California OSHA General Industry Safety Orders for protection of workers. Key requirements in these regulations include Code of Federal Regulations Title 29 (29 CFR) Part 1910 and CCR Title 8 Section 5194 that would require a comprehensive hazard communication program to ensure that all workers are knowledgeable in the identification and proper handling of hazardous materials to prevent unsafe exposure, unsafe storage or use, and to avoid spills. These and other requirements of Federal and State OSHA General Industry Safety Orders for hazardous substances and hazardous materials are designed to prevent accidents and unsafe levels of worker exposure. Furthermore, stormwater pollution prevention BMPs that must be implemented during construction under the State General Permit would be required to include measures to prevent contact of hazardous materials with stormwater, preventing hazardous materials in runoff from the site. Hazardous wastes would be required to be managed, shipped offsite, and treated or disposed of in accordance with comprehensive environmental protection measures for human and environmental health and safety pursuant to CCR Title 22 Division 4.5. These regulations are designed under the authority of the Federal Resource Conservation and Recovery Act to ensure the safe management of hazardous wastes from “cradle to grave.” Other Federal and State regulations are in place to minimize the potential for a release of hazardous materials during transportation to or from the Site. At a federal level, transportation of hazardous materials is regulated by various Federal agencies within the U.S. Department of

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Transportation. Transportation of hazardous waste also falls under the jurisdiction of U.S. Environmental Protection Agency (EPA). These agencies implement and enforce a broad array of transportation safety regulations in CFR Title 49 including, but not limited to, requirements for federal motor vehicle safety standards, vehicle inspection standards, fitness requirements for commercial drivers, motor carrier routing regulations, hours of service of drivers, spill prevention and response preparedness, placarding, hazardous material container specifications, and other regulations addressing safety for commercial carriers and hazardous material transport. The State of California also requires licensing of commercial transporters of hazardous material and enforces various other safety requirements for transport of hazardous materials in CCR Title 13. Considering these regulatory requirements in place would apply to hazardous material transport, storage and use during construction, the routine transport, use and disposal of hazardous materials for construction would not create a significant hazard to the public or the environment.

Following construction, hazardous material transport, storage and use during project operations and maintenance would be required to comply with all of the regulations identified above for construction, plus additional project design and operations requirements including, but not limited to, California Fire Code hazardous material safety requirements (24 CCR Part 9 Chapter 50), California Office of Emergency Services 19 CCR Division 2, Chapter 4, Article 4 (Section 2650 et seq.) requirements for Hazardous Material Business Plans, and U.S. EPA 40 CFR 112 requirements for Spill Containment Control and Countermeasures Plans. Chapter 50 of the Fire Code provides and requires safe design requirements for buildings and other areas where hazardous materials are used or stored and safe practices for handling of hazardous materials. 19 CCR Division 2, Chapter 4, Article 4 requirements at 2659 requires an employee training program that includes methods for safe handling of hazardous materials. 40 CFR 112 would require that bulk oil storage, such as for oil-filled equipment like transformers, be designed and operated with safeguards such as secondary containment and routine inspections to prevent accidental releases of oil that could reach waters of the U.S. Considering these regulatory requirements in place with which the Project construction would be required to comply, the routine transport, use and disposal of hazardous materials for construction would not create a significant hazard to the public or the environment. Less than significant impacts are expected, with incorporation of the Project Design Features HAZ-1 through HAZ-5 below, which outline how the Project will conform to existing laws.

HAZ-1: The construction contractor will follow all applicable laws and regulations pertaining to the transportation, handling, and storage of hazardous materials.

HAZ-2: Prior to export of any materials or soils from the Project site, the contractor shall characterize (i.e., test) the material to ensure transport and disposal comply with applicable laws and regulations.

HAZ-3: Construction crews shall monitor excavated soils for signs of contamination, such as staining and odor. As outlined in Design Feature HAZ-2, all exported materials will be characterized (i.e., tested) to ensure transport and disposal are in compliance with applicable laws and regulations.

HAZ-4: Prior to removal and disposal or re-use of wood features (e.g., wood utility poles), the features should be tested to identify the presence and nature of treatment. These wood features should be handled, transported, and disposed of according to applicable regulations and the results of testing.

HAZ-5: Prior to demolition of the existing substation, a certified consultant should conduct asbestos containing materials (ACM) and lead-based paint (LBP) surveys of building structures that will be renovated or demolished as part of the proposed project in order to ensure that hazardous materials handling, transport, and disposal are complied with.

(Sources: OSHA 29 CFR Part 1910, 2020, CCR Title 22 Division 4.5, 2020, CFR Title 49, 2020, CCR Title 13, 2020, CCR Title 24 Part 9, 2020, EPA 40 CFR Part 112, 2020, CCR Title 19 Division 2, 2020)

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

b. Response:

Less than significant impact. As described in Response a) above, Project construction, operations and maintenance would require the transport, storage and use of various hazardous materials. Such materials have the potential to effect human health and the environment, as previously described, if an upset or accident condition were to result in release or exposure. However, upset or accident conditions, while possible, are a very low probability for the Project. Additionally, none of the hazardous materials that would be required for the Project, or hazardous wastes generated by the Project, would be of quantities or have characteristics that could comprise a hazard substantially different from typical construction sites and commerce throughout the region. The primary hazardous materials stored and used for construction and operations in terms of bulk container quantities would be diesel fuel and lubricating oils for construction equipment, and oil-filled transformers. Transformers are sealed once filled, and changing of transformer oil is rarely required, so the use is generally not consumptive. Considering these factors and the array of additional regulations that would apply to the Project's hazardous materials during construction, operation and maintenance, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving a release of hazardous materials into the environment. Less than significant impacts are expected.

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

c. Response:

No Impact. The Project is not anticipated to handle acutely hazardous materials, substances or waste, but will handle some hazardous materials as previously described, and will emit hazardous emissions in diesel exhaust. However, the Project is not located near existing or proposed schools. The closest school in the area, Fremont Elementary School, is located 0.81 mile west of the Project. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

(Source: General Plan 2025 FPEIR - Figure 5.13-2 - Riverside Unified School District [RUSD] Boundaries)

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?	☐	☐	☐	☒

d. Response:

No Impact. The Applicant has obtained a Phase I Environmental Site Assessment (ESA) for the western portion of the Project site (the western parcel) prepared for the City of Riverside, dated March 26, 2018. The Phase I ESA followed ASTM guidelines to determine if there is any evidence of a past release of hazardous materials on the site. The EDR report contained in the Phase I ESA indicates that the Project site (both western and eastern parcels) is not on any of the government lists compiled pursuant to Government Code Section 65962.5. However, the Phase I ESA did conclude that potential organochlorine pesticide-impacted soils from past agricultural use constituted a Recognized Environmental Condition (REC).

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
A TRC Environmental Professional (refer to §312.10 of 40 CFR 312) performed a hazardous materials site visit in October 2019 and found no evidence of contamination or spills of hazardous materials on either the vacant western parcel or on the existing substation. Based on the observations from this site visit and a review of environmental database listings, the Project Site is not included on a list of hazardous materials sites and would not create a significant hazard to the public or environment. Because the project is not located on a hazardous site as defined in Government Code Section 65962.5, no impacts are expected. ***(Sources: Phase I ESA [LOR Geotechnical Group, 2018]; Hunter Substation Geotechnical Investigation Report [TRC, 2019]; TRC Environmental Professional Site Reconnaissance (2019))***				
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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
e. Response: **No Impact.** The Project area is not within an airport land use plan or within 2 miles of a public or public use airport. The closest airport, Flabob Airport in Riverside, is more than 3 miles to the west of the Site. No impacts are expected. ***(Source: General Plan 2025 - Figure CCM-7 – Local and Nearby Airport Facilities)***				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
f. Response: **Less than Significant Impact.** The City of Riverside adopted an Emergency Operations Plan in 2002. The Plan addresses the City's planned response to emergencies associated with natural disasters and technological incidents, including both peacetime and wartime nuclear defense operations. The Project Site is not mapped on the City of Riverside, Final Response Map (September 2019) as a site of special significance or protection during war or other event. The Project would not impair emergency evacuation because Chicago Avenue is not a designated emergency route. In addition, only a limited number of workers (10-15) will be present during construction, and any construction activities within or above Chicago Avenue would be conducted pursuant to City-approved Traffic Control Plans, which would ensure that emergency access was not restricted (refer to Project Design Feature TR-1). Thus, the Project would not restrict traffic flow along the local designated evacuation routes at Columbia Avenue and Iowa Avenue. During the Project operation, the substation would be unmanned and thus would not result in impacts to adopted emergency routes. Therefore, during both construction and operation, the Project would not impact emergency evacuation. ***(Sources: General Plan 2025 - Figure PS 8.1 - Evacuation Routes, Riverside Final Response Map)***				

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

g. Response:

No Impact. The Project is located in an urban setting devoid of areas of dense, dry vegetation which could pose a fire hazard risk. Terrain features such as canyon areas and hillsides that pose the greatest potential for wildfire risks are not present at the Site or in the area surrounding the Site. California State Responsibility Areas (SRAs) are areas within the state where the State Department of Forestry and Fire Protection (or CAL FIRE) has the primary financial responsibility for fire prevention, protection, and suppression (fighting) of wildland fires. SRA areas are typically covered wholly or partially by forests or trees capable of producing forest products, vegetated areas that contribute to erosion control, and areas of range land with forage value. SRA areas are not located within incorporated cities or on federal lands. SRAs are legally defined by Public Resources Code Sections 4125 - 4128. The Project Site and surrounding areas are not located within an SRA, or nearby a SRA.

CALFIRE also designates fire hazard severity zones (FHSZs) based on key factors including weather conditions, fuel conditions, and terrain. Severity is determined based on a combination of how a fire is anticipated to behave and the probability of a fire to threaten structures. FHSZs can be designated as Moderate, High, or Very High. It is important to note that these designations are only assigned within SRAs where CAL FIRE has jurisdiction for fire prevention and protection services. Only Very High FHSZs can apply within Local Responsibility Areas (LRAs). CAL FIRE submits maps (recommendations) of Very High FHSZs to LRAs, but CAL FIRE does not have the authority to require the LRAs to adopt these designations. Box Springs Mountains area is designated as a Very High hazard zone and is located 0.87 mile east of the Project Site. Due to the distance, it would not expose people or structures at the Project Site to greater wildfire risk than exists under current conditions.

(Sources: General Plan 2025 - Figure PS-7 – Fire Hazard Areas; and CalFire Very High Fire Hazard Severity Zones in LRA)

3.11 Hydrology and Water Quality

3.11.1 Existing Setting

The Clean Water Act (CWA) was passed by Congress in 1972 and its main goal is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The following are important CWA sections that would apply to this Project:

- Sections 303 and 304 require states to issue water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the state is required to develop lists of Impaired Waterbodies, and to update those lists every other year. These lists of Impaired Waterbodies are typically referred to as the "303(d) List”. The listed waterbodies are considered Impaired because they do not meet Water Quality Standards necessary to maintain designated Beneficial Uses. A Total Maximum Daily Load (TMDL) specifies the maximum amount of a pollutant that a water body can receive and still meet Water Quality Standards.
- Section 401 requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the U.S. to obtain certification from the state

that the discharge will comply with other provisions of the act. This is most frequently required in tandem with a Section 404 permit request (see below).

- Section 402 establishes the National Pollution Discharge Elimination System (NPDES), a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the U.S. Regional Water Quality Control Boards (RWQCB) administer this permitting program in California. Section 402(p) requires permits for discharges of storm water from industrial/construction and municipal separate storm sewer systems (MS4s).
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the U.S. Army Corps of Engineers (USACE).

California's Porter-Cologne Act, enacted in 1969, provides the legal basis for water quality regulation within California. This act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state. It predates the CWA and regulates discharges to waters of the state.

According to the General Plan Conservation Element, the primary source of water pollution in the City is urban runoff. Stormwater runoff from streets, parking lots, agriculture operations, and commercial businesses contains oil, grease, pesticides and herbicides, heavy metals, paints, household chemicals, construction materials, sediment, and eroded soil. The City of Riverside is a co-permittee with the County of Riverside in the NPDES program, which is designed to reduce pollutants in runoff. According to the NPDES permit, all new development projects and substantial rehabilitation projects are required to incorporate (BMPs) as identified in the Santa Ana Regional Drainage Area Master Plan (SAR-DAMP).

The Project Site is located within the Santa Ana River watershed (General Plan 2025 Figure OS-9 - Watersheds) which consists of 2,600 square miles, extending from the San Bernardino Mountains to the Pacific Ocean. The Project is located in the Planning Watershed 4801270000, Middle Santa Ana River, Hydrologic Sub area 801.27, sub watershed East Etiwanda Creek-Santa Ana River. This area is under jurisdiction of Santa Ana Regional Water Quality Control Board, Region 8.

The Santa Ana River is an important recreational, habitat and visual resource for the City and the entire southern California region. The Riverside Canal, which is located adjacent to the Project Site conveys flows to Temescal Creek, which ultimately discharges to the Santa Ana River Reach 3 at the Prado Basin.

The SAR-DAMP establishes the following beneficial uses of the Santa Ana River: agriculture; groundwater recharge; water-contact recreation; non-contact water recreation; warm freshwater habitat; wildlife habitat; Rare, Threatened, or Endangered species; and spawning, reproduction, and development. The beneficial uses of Temescal Creek include non-contact recreation, warm freshwater habitat, and wildlife habitat. The beneficial uses of the Prado Basin include water-contact recreation; non-contact water recreation; warm freshwater habitat; wildlife habitat; and Rare, Threatened, or Endangered species.

Sustainable Groundwater Management Act

In 2014, Governor Brown signed into law the Sustainable Groundwater Management Act (SGMA). SGMA took effect in 2015. It requires groundwater resources be sustainably managed by local

agencies through the formation of Groundwater Sustainability Agencies (GSAs) in basins that are deemed high-priority or medium-priority by the Department of Water Resources (DWR). Western Municipal Water District of Riverside and Department of Water Resources voted for the formation of Riverside-Arlington Subbasin Groundwater Sustainability Agencies in order to develop a Ground Water Sustainability Plan for the Riverside-Arlington Subbasin. As a result of this effort, the Subbasin received a low-priority for management in DWR 2019 Sustainable Groundwater Management Act 2018 Basin Prioritization.

3.11.2 Impacts

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

a. Response:

Less Than Significant Impact.
Middle Santa Ana River within Reach 3 is on the 2014-16 303(d) List for Copper, Lead, and Indicator Bacteria, and TMDLs are required. Prado Basin is also on the 2014-16 303(d) List for pH, and TMDLs are required. Temescal Creek is on the 2014-16 303(d) List for pH. To address potential water contaminants, the Project is required to comply with applicable federal, state, and local water quality regulations. The Project Site encompasses 2.5 acres, and under existing conditions, the majority of the Site is permeable. The drainage pattern is generally to the west, and pollutants sheet flow to storm drains and the Riverside Canal. Potential pollutants include loose soil, oil and grease, trash, and heavy metals.

The Project would construct a new substation on the western parcel and subsequently demolish the existing substation from the eastern parcel and construct a new storage facility. During Project construction and decommissioning, pollutants that can be expected to enter the storm drains and contribute to pollution in the downstream water bodies include loose soils, oil, grease, trash, and heavy metals, fluids, paint, and other solvents. Some of these pollutants are the 303(d) List pollutants which Santa Ana River and Temescal Creek determined would need TMDLs. Therefore, the Project would need source BMPs to ensure that it does not contribute to violation of water quality standards established by the DAMP. Because the Project would disturb over 1 acre, it would be required to comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (NPDES No. CAS000002), Water Quality Order No 2009-009-DWQ1, or the latest approved Construction General Permit, and incorporate a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would prescribe the use of BMPs to be implemented on the Project Site to reduce construction-related pollutants and comply with the General Plan and NPDES.

As a result of the Project, the ratio of pervious to impervious surface would change. After construction is completed, the Project site would be covered by more impermeable surface. This would result in the need to implement site design, source control, and pollution reduction and treatment BMPs, as will be outlined within the WQMP that will be completed as part of final design.

In compliance with the General Plan Policy OS-10.6 and OS-10.7, the City will work with the RWQCB to ensure urban water quality standards and objectives are maintained. In compliance with OS-10.9 related to evaluation of development projects for compliance with NPDES requirements, the Project will be required to prepare a Preliminary Water Quality Management Plan (WQMP) that will identify strategies to reduce impacts to water quality during construction (short term) and during Project operation (long term). These BMPs would reduce the pollutant load into the storm drain system.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

With incorporation of Design Features WQ-1 through WQ-3, the Project would result in less than significant impact directly, indirectly, and cumulatively on any water quality standards or waste discharge.

WQ-1 The City of Riverside shall prepare and implement construction site BMPs in compliance with the provisions of the Construction General Permit; the Municipal Separate Storm Sewer System (MS4) Permit (if applicable); the State Water Resources Control Board (SWRCB) NPDES General Permit for Stormwater Discharges Associated with Construction Activity; and any subsequent permit as they relate to construction activities for the Project.

WQ-2 Prior to construction, a SWPPP, along with erosion control-specific elements, shall be prepared by the contractor and submitted to RPU for approval. The erosion-control measures shall be designed to limit the effects of soil erosion and water degradation during construction. This plan shall be prepared and implemented in accordance with the requirements of the RWQCB's NPDES permit requirements.

WQ-3 Prior to the final design, a WQMP shall be prepared. The project will incorporate all BMPs outlined within the WQMP.

(Sources: General Plan 2025 - Figure OS-9 – Watersheds; General Plan 2025 - Open Space and Conservation Element, Clean Water Act; Geotechnical Investigation Report [2019])

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

b. Response:

No Impact. The City of Riverside Public Utilities, Water Department provides potable water service to the majority of users within the Planning Area from groundwater wells tapped into the Arlington and Riverside Basins located directly beneath the City. Most of the groundwater sources are of high quality; however, in some areas concentrations of nitrate, the pesticide 1,2-Dibromo-3-chloropropane (DBCP), and dissolved solids have been identified.

During geotechnical investigation, groundwater depth was determined to be lower than 50 feet below ground surface (bgs) at the Project site. The California Geologic Survey (CGS) has not mapped the area as having historically high ground water levels. Geotracker data from ground water monitoring wells on a site located 500 feet northwest of the Project Site shows groundwater at depths ranging from 57 to 87 feet. The Project would not require use of groundwater during construction or operation. Water needed for construction would be potable water supplied by RPU. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. No direct, indirect, or cumulative impacts are expected.

(Sources: General Plan 2025 - Figure OS-9 - Watersheds, General Plan 2025 – Open Space and Conservation Element; Clean Water Act; Geotechnical Investigation Report [2019])

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site	☐	☐	☒	☐

c(i). Response:

Less Than Significant Impact. There are no drainages present on the Site, thus the Project would not result in alteration of the course of a stream or river. However, the Riverside Canal is adjacent to the western boundary of the Site and the Project construction activities may result in erosion and siltation impacts, if existing laws are not followed (refer to Design Features WQ-1 through WQ-3). The Project would alter the drainage pattern on the Site and result in over 1 acre of ground disturbance. During construction, the Site would be graded, excavated, and mostly covered with class II base (i.e., gravel). Demolition activities would occur on the eastern parcel. Because of these activities, erosion and siltation can occur. The potential for erosion and siltation both on- and off-site will be addressed as part of the WQMP and SWPPP to comply with NPDES requirements. With incorporation of the BMPs stemming from the WQMP and SWPPP, the Project would have a less than significant impact directly, indirectly, or cumulatively to existing drainage patterns.

(Sources: General Plan 2025 - Figure PS-4 - Flood Hazard Areas; and FEMA Flood Hazard Map 06065C0726G)

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐

c(ii). Response:

Less Than Significant Impact. As discussed above, the Project would result in construction activities that would physically alter the Site through grading, ground disturbance, and incorporation of new structures, and ultimately an increase in the impervious area on the Site, which typically results in increase of rate and/or amount of runoff. As a result, the Project would incorporate BMPs (as to be determined during preparation of the WQMP) that would ensure that storm drain capacity would not be compromised, such that no flooding would occur on- or off-site. As a result, the Project would not result in a substantial increase of the rate or amount of surface runoff. With implementation of Design Features WQ-1 through WQ-3, there will be less than significant impact directly, indirectly, or cumulatively in the rate or amount of surface runoff and it will not result in flooding on- or off-site.

(Sources: General Plan 2025 Figure PS-4 - Flood Hazard Areas; and FEMA Flood Hazard Map 06065C0726G)

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐

c(iii). Response:

Less Than Significant Impact. As discussed above, the Project would disturb over 1 acre and is required to have a coverage under the State General Permit for Construction Activities (SWPPP). As a result, BMPs would be implemented to reduce potential water quality impacts during construction. Furthermore, the Project will prepare a WQMP, pursuant to Municipal Separate Storm System (MS4) requirements. The Project will result in an increase the amount of impervious surface area on Site. However, the existing storm drain system is not undersized and has adequate capacity to serve the Project Site under future conditions, and all pollutants will be treated on site. Therefore, the Project would not create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With implementation of the Design Features WQ-1 through WQ-3, less than significant impacts directly, indirectly, or cumulatively would occur to existing drainage patterns.

(Sources: General Plan 2025 Figure PS-4 - Flood Hazard Areas; and FEMA Flood Hazard Map 06065C0726G)

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (iv) Impede or redirect flood flows?	☐	☐	☐	☒

c(iv). Response:

No Impact. According to the General Plan map Figure PS-4 Flood Hazard Areas, the Project Site is not located within the flood hazard area or dam inundation area. The FEMA Flood Hazard Map refers to this area as "Other Areas" Zone X, which is defined as an area determined to be outside of the 0.2 % annual chance floodplain. There are no drainages present on the Site, thus the Project would not impede or redirect the flood flows of stream or river. The Project would not impede or redirect the flow of the adjacent Riverside Canal. The Project is not located within or near a 100-year flood hazard area; therefore, there will be no impact caused by this Project directly, indirectly, or cumulatively which would impede or redirect flows.

(Sources: General Plan 2025 Figure PS-4 - Flood Hazard Areas; and FEMA Flood Hazard Map 06065C0726G)

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

d. Response:

No Impact. The Project is not located in the coastal zone, and thus would not be subject to tsunamis that occur in coastal areas. Thus, no impacts due to tsunamis would occur directly, indirectly, or cumulatively. Additionally, the Project Site topography is flat, and the Project is within an urbanized area and not in proximity to lakes, or dams. Thus, no potential for seiche would occur directly, indirectly, or cumulatively. The Project is not located in proximity to the Santa Ana River or its 100-year flood zone. While the Project is located adjacent to the Riverside Canal, the site is not located within a flood hazard zone. Thus, no impact due to flood hazard should occur.

(Sources: General Plan 2025 Figure PS-4 - Flood Hazard Areas; and FEMA Flood Hazard Map 06065C0726G)

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

e. Response:

Less Than Significant Impact. As discussed under a), the Project would not conflict or obstruct implementation of SAR-DAMP, which is the local water quality control plan. The Project would be in compliance with applicable water quality related regulations for short-term and long-term impacts. The Project would implement a SWPPP and WQMP that would ensure that construction-related and operation-related BMPs are implemented. As a result, the Project would not generate pollutants that would result in conflict with, or obstruct implementation of, the DAMP. Less than significant impact is expected with implementation of Design Features WQ-1 through WQ-3. As discussed under b), the only groundwater subbasin in the area that has sustainable groundwater management plan is the Riverside-Arlington subbasin, which received a low-priority for management in the basin ranking. In addition, the Project is not located in this subbasin, and thus is not subject to the sustainable groundwater management plan. Design Features WQ-1 through WQ-3 would reduce and mitigate impacts making them less than significant.

The Project construction would include excavation to depths of approximately 5 feet bgs. This is not deep enough to affect ground water resources, which during the geotechnical investigation were determined to be at a depth of greater than 50 ft. In addition, the Project is not located within the groundwater recharge area and would not necessitate use of ground water for Project construction and operation. Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. The Project will result in less than significant impacts directly, indirectly, or cumulatively to water quality control plan, or the sustainable groundwater management plan.

(Sources: General Plan 2025 Figure PS-4 - Flood Hazard Areas; and FEMA Flood Hazard Map 06065C0726G)

3.12 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒

a. Response:

No Impact. According to the City of Riverside General Plan 2025, the Project Site is located within the Hunter Business Park Specific Plan, Area Plan 1, General Industrial District. The Hunter Business Park Specific Plan (1988) designates the Project Site and surrounding area for industrial and commercial uses. Area 1 is located east of I-215, south of Columbia Avenue, and west of Iowa Avenue. Residential neighborhood, remnant residential farmhouses established a long time ago, are located to the west of the Project Site, and industrial and commercial uses are located to the north, east, and south. The project would be located on a western parcel and the storage units would be located on the eastern parcel when the existing substation is demolished. No subdivision of lands or construction of streets that could alter the existing surrounding pattern of development and communities would be needed. Therefore, the Project Site would not displace existing residences or divide an established community as no residences are present on the Project Site. The project would not physically divide or disrupt an established neighborhood. Therefore, no impact directly, indirectly, or cumulatively to an established community would occur with the Project.

(Sources: General Plan 2025 - Figure LU-10 - Land Use Policy Map, Table LU-5 - Zoning/General Plan Consistency Matrix, Figure LU-7 -Redevelopment Areas; The Hunter Business Park Specific Plan [1988]; Title 19 - Zoning Code, Title 18 – Subdivision Code)

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

b. Response:

Less Than Significant Impact. The General Plan 2025 identifies objectives and policies for each Specific Plan and Area Plan. The main objectives for the Hunter Industrial Park are to: retain its industrial and commercial purpose while establishing higher end businesses that could foster employment and economic growth in the City, enhance competitive position in the region (LU-56), while preserving existing residential neighborhood (LU-57). The General Plan Urban Design Framework map also designates the Project Site as Major Business Parks and Industrial Park, and as such the project type, substation, does not conflict with the intended purpose of the site, or with the General Plan goals and policies established for this area. The project would not remove residences and given its local importance for providing energy for over 4,750 users, would not inhibit the goal of the General Plan 2025 to keep a competitive position in the region. According to the City Zoning Map, the zoning designation for the Project Site is R106; General Industrial Zone.

The Project is not a "Project of Statewide, Regional or Areawide Significance" per Section 15206 of the CEQA Guideline. As such, the project would have less than significant impact and would not conflict with any applicable land use plan, policy, or regulation such as General Plan 2025, Specific Plan, and Zoning Plan.

As discussed in Section 3.5 (Biological Resources), response f), the Project is located within the MSHCP boundary; however, it is not located within any criteria cells or special areas that would require compliance with survey protocols. Because of this, the project would not conflict with applicable HCP or natural community conservation plan. Therefore, less than significant impact directly, indirectly, or cumulatively due to a conflict

with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would occur with the Project.

(***Sources: General Plan 2025 - Figure LU-10 - Land Use Policy Map, Table LU-5 - Zoning/General Plan Consistency Matrix, Figure LU-7 - Redevelopment Areas; Title 19 - Zoning Code)***

3.13 Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

a. Response:

No Impact. According to the General Plan 2025 Open Space and Conservation Element, the Project is located in the zone MRZ-3 which defines areas that contain known or inferred mineral occurrences of undetermined mineral resource significance. According to the California Division of Oil, Gas, and Geothermal Resources' (DOGGR's) Well Finder, there are no oil or gas wells located within the vicinity of the Site. The Project does not require mineral extraction, would not use any minerals for construction, and is not located on any sites that are known to contain minerals. Therefore, the Project would not result in direct, indirect, or cumulative impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

(Sources: General Plan 2025 - Figure OS-1 – Mineral Resources; Mineral Land Classification of the Greater Los Angeles Area)

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?	☐	☐	☐	☒

b. Response:

No Impact. According to the General Plan 2025 Open Space and Conservation Element, the Project is located in the zone MRZ-3 which defines areas that contain known or inferred mineral occurrences of undetermined mineral resource significance. Figure OS-1 does not indicate that there are mineral resources containing the locally important resources feldspar, silica, limestone, and rock products near the Site. The Project does not involve extraction of mineral resources. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No direct, indirect, or cumulative impacts are expected.

(Sources: General Plan 2025, Open Space and Conservation Element and Figure OS-1 - Mineral Resources)

3.14 Noise and Vibration

This section is based on the ESA technical report prepared and included as Appendix D.

3.14.1 Regulatory Setting

A number of statutes, regulations, plans, and policies that address noise concerns have been adopted. Below is a discussion of the relevant regulatory setting and noise regulations, plans, and policies.

State

California Code of Regulations (CCR) Title 24 establishes the California Building Code (CBC). The most recent building standard adopted by the legislature and used throughout the state is the 2016 version, which took effect on January 1, 2017. The State of California's noise insulation standards are codified in the CBC (Title 24, Part 2, Chapter 12). These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residences, schools, or hospitals, are near major transportation noises, and where such noise sources create an exterior noise level of 60 dBA CNEL, or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Local

The proposed project is located within the City of Riverside. Applicable City of Riverside noise standards and policies are described below.

City of Riverside

Noise Element of the General Plan. The objectives and policies of this noise element are aimed at protecting the citizens of Riverside from excessive noise levels that interfere with daily routine and comfort. Applicable policies are summarized below:

- Policy N-1.1: Continue to enforce noise abatement and control measures particularly within residential neighborhoods.
- Policy N-1.2: Require the inclusion of noise-reducing design features in development consistent with standards in Figure N-10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code.
- Policy N-1.3: Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.
- Policy N-1.4: Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.
- Policy N-1.5: Avoid locating noise-sensitive land uses in existing and anticipated noise impacted areas.
- Policy N-1.6: Educate the public about City noise regulations.
- Policy N-1.7: Evaluate noise impacts from roadway improvement projects by using the City's Acoustical Assessment Procedure.

- Policy N-8: Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.

Municipal Code. It is stated in the City's Municipal Code, Title 7, Noise Control, that all construction, maintenance, or demolition activities within the City's boundary shall be limited to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 am to 5:00 pm on Saturday. No construction work is permitted on Sundays and federal holidays. In Section 7.25, maximum allowable exterior noise levels in residential areas are set at 45 dBA between 10:00 p.m. and 7:00 a.m. and at 55 dBA between 7:00 a.m. and 10 p.m. Section 7.25 further states that unless a variance has been granted, it shall be unlawful for any person to cause or allow the creation of any noise which exceeds the following:

- The exterior noise standard of the applicable land use category, up to 5 decibels, for a cumulative period of more than 30 minutes in any 1 hour; or
- The exterior noise standard of the applicable land use category, plus 5 dBA for a cumulative period of more than 15 minutes in any 1 hour; or
- The exterior noise standard of the applicable land use category, plus 10 dBA for a cumulative period of more than 5 minutes in any 1 hour; or
- The exterior noise standard of the applicable land use category, plus 15 dBA for a cumulative period of more than 1 minute in any 1 hour; or
- The exterior noise standard, plus 20 dBA, or the maximum measured ambient noise level, for any period of time.

If the measured ambient noise level exceeds that permissible within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five decibel increments in each category as appropriate to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level. Maximum exterior noise standard for office/commercial, industrial, community support, public recreation facility, and nonurban land uses are 65, 70, 60, 65, and 70 dBA, respectively, at any time.

Maximum allowable interior noise levels for residential uses are set at 35 dBA between 10:00 p.m. and 7:00 a.m., and at 45 dBA between 7:00 a.m. and 10:00 p.m. Maximum allowable interior noise standard for school (7 a.m. to 10 p.m. while school is in session) and hospital (any time) is both 45 dBA.

For planning purposes, the 24-hour average sound levels (CNEL) are roughly equivalent to Leq measurements plus 5 dBA when traffic is the dominant noise source (Office of Noise Control, 1976:21).

3.14.2 Existing Conditions

Some land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities typically involved. Residential areas are considered to be the most sensitive type of land use to noise and industrial/commercial areas are considered to be the least sensitive. Existing noise sensitive uses on the project site and in the immediate vicinity include:

- On-site: existing substation facility
- To the north: commercial building; 100 feet

- To the south: commercial building; 50 feet
- To the west: Riverside Canal, then residences along the west side of the canal; 130 to 390 feet
- To the east: Chicago Avenue is located along the project's eastern boundary.

3.14.3 Impacts

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	☐	☐	☒	☐

a. Response:

Less than Significant Impact.

Construction Phase
Construction phase noise impacts are separated into two types of short-term impacts. The first type of short-term impacts would be generated by construction crews commuting to and from the project site as well as the transport of construction equipment and materials. Passing trucks could generate up to 87 dBA Lmax at a range of 50 ft; however, this would be a single event noise exposure. Other longer-term (hourly or daily) ambient levels would be small.

The second type of short-term impacts would be generated during site preparation and onsite construction of the Proposed Project. Each period of the construction phase has its own distinct activities and construction with its own distinct noise characteristics. Furthermore, construction of the Proposed Project must be phased so there would be no loss of electric service. Construction is anticipated for a total duration of 17 months in distinct phases such that service to the thousands of end users would not be interrupted. Typical construction equipment and associated maximum noise levels that could be used on the Proposed Project site are listed below.

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Table 5: Typical Equipment Noise Levels Measured at 50 Feet

Equipment Type	Sound Level
Bulldozer	82 dBA Lmax
Water and Pickup Trucks	75 dBA Lmax
Concrete Pump Truck	81 dBA Lmax
Excavators	81 dBA Lmax
Jaw Crushers	72 to 81 dBA Lmax
Concrete Mix Truck	79 dBA Lmax
Front End Loader	79 dBA Lmax
Backhoe	78 dBA Lmax
Forklift	75 dBA Lmax
Grader	85 dBA Lmax
Scraper	84 dBA Lmax
Jack hammer	89 dBA Lmax
Compactor	83 dBA Lmax
Drill rig	79 dBA Lmax
Truck-mounted crane	75 dBA Lmax
Large Crane	81 dBA Lmax
Stringing rig	79 dBA Lmax
Portable generator	73 dBA Lmax
Puller/tensioner	75 dBA Lmax

Equipment used during site preparation, such as backfillers, bulldozers, front loaders, compactors, scrapers, and graders generate the highest noise levels during the construction phase. Up to six pieces of construction equipment would be operating at the same time for a maximum noise level of 93 dBA L_{max} at a distance of 50 feet. The nearest residential noise receptors are located to the west, 130 feet to 390 feet from the project site. The nearest commercial noise receptors are located to the north and south, 59 feet to 100 feet from the project site. The highest noise levels generated during this phase would tend to be from site preparation. Demolition activities would use less heavy-duty equipment and generate less noise than site preparation. During other construction phase activities, noise levels would be lower than those generated during grading. Based on the distance to receptors, and short-term nature of noise generating activities, impacts from construction would be less than significant.

Operational Phase

Once construction activities are complete, ambient noise levels in the vicinity of the Proposed Project during operation would be similar to the existing substation. The new substation will be unmanned. Necessary maintenance would be less than that for the existing substation due to the use of new parts and equipment. Routine maintenance of vegetation would occur on an as-needed basis with a small crew of 1 to 2 vehicles and 1 or more employees. The maximum noise levels at nearest sensitive receptor would 55 dBA L_{max}. This is lower than the limits for nighttime and daytime hours respectively specified in the City's Municipal Code.

The Proposed Project would not generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. This impact would be less than significant.

(Source: ESA, 2020)

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

b. Response:

Less than Significant Impact.

Construction Phase

Building Damage

Similar to noise, the greatest levels of vibration would occur during site preparation of the Proposed Project. Site preparation is expected to use a bulldozer, loader, water truck, concrete truck, earth mover, and forklift. Table 6 shows equipment expected to be used on the Project Site and their associated vibration levels. Other construction that would be used over the entire construction phase are shown in Table 6.

Table 6: Vibration Source Amplitudes for Construction Equipment at 25 feet

Equipment	PPV (inch/sec)	L_v (VdB)
Earth Mover	0.011	69
Forklift	0.047	81
Wheel Loader	0.076	86
Loaded Truck	0.076	86
Small Bulldozer	0.003	58

Vibration impacts occur normally within buildings, and therefore the distance to the nearest sensitive uses, for vibration impact analysis purposes, is measured between the nearest off-site sensitive use buildings and the project boundary. The closest commercial building to the north is approximately 105 feet (-19 vibration decibels [VdB] compared to the vibration level measured at 25 feet) from the project boundary. The closest commercial building is approximately 59 feet (-11 VdB) to the south. The closest commercial building to the east, across Chicago Avenue, is approximately 332 feet (-34 VdB) to the east. The closest sensitive receptors are residences to the west of Riverside Canal, approximately 130 feet (-21 VdB) from the project boundary.

To potentially cause damage to any buildings, construction activities would need to generate a vibration PPV level of more than 0.5 inch/sec (or 102 VdB). As shown in Table 6, none of the construction activities expected on the Project Site would reach these levels. Any other off-site buildings further away from the Project Site would be exposed to even lower levels. Therefore, construction activities of the Proposed Project would not result in damage to any buildings.

Human Annoyance

Table 7 lists typical construction equipment that will be used during the construction phase of the Proposed Project. The equipment with the highest vibration potential is the bulldozer, which would generate 87 VdB at 25 feet.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 7: Typical Equipment Vibration Levels Measured at 25 feet

Equipment	Vibration Level
Bulldozer	87 VdB
Water and Pickup Trucks	69 VdB
Concrete Pump Truck	69 VdB
Excavators	81 VdB
Jaw Crushers	72 VdB
Concrete Mix Truck	69 VdB
Front End Loader	86 VdB
Backhoe	69 VdB
Forklift	81 VdB
Grader	75 VdB
Scraper	69 VdB
Jack hammer	79 VdB
Compactor	81 VdB
Drill rig	79 VdB
Truck-mounted crane	75 VdB
Large Crane	81 VdB
Stringing rig	79 VdB
Portable generator	73 VdB
Puller/tensioner	69 VdB

The FTA's threshold for vibration levels at the nearest noise-sensitive receiver locations during daytime hours or of annoyance of occupants in commercial/industrial office buildings is 78 VdB and 84 VdB, respectively. The highest vibration levels at residential buildings nearest to the Project Site would be 66 VdB or lower. The highest vibrations at commercial buildings adjacent to the Project Site would be 78 VdB or lower.

Operational Phase
Once construction activities are complete, vibration impacts in the vicinity of the Proposed Project during operation would be similar to the existing substation.

The Proposed Project would not generate excessive groundborne vibration or groundborne noise levels. This impact would be less than significant.

(***Source: ESA, 2020***)

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a major public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

c. Response:

No impact.

The Proposed Project is not located within the limits of an airport land use plan. The nearest airport to the Proposed Project is the Flabob Airport, approximately 3.5 miles away. No impact would occur.

3.15 Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

a. Response:

Less Than Significant Impact. The Project is in an urbanized area and does not propose new homes or businesses that would directly induce substantial population growth and does not involve the addition of new roads or infrastructure that would indirectly induce substantial population growth.

Currently, no dwelling units or residents are present on the Project Site. The existing Riverside Utilities Hunter substation provides energy to 4,750 residents in the City of Riverside. The new substation would not expand its services or number of residents served; however, it would accommodate the forecasted load. Therefore, it is not expected to directly or indirectly induce population growth.

The Riverside substation is unmanned and after the Project implementation, the station would remain unmanned. Routine substation operations would be commensurate with current operation and maintenance of the existing substation. However, because the new Hunter Substation will be constructed with new parts and equipment, it will require less maintenance and repaint compared to existing conditions. Only occasional staff maintenance visits will be necessary. The Project would generate temporary jobs for construction workers for the duration of construction, likely from the local pool of workers. Once operational, the substation would be serviced by a similar number of staff. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Less than significant impacts are expected.

(Source: General Plan 2025 - Table LU-3 - Land Use Designations)

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

b. Response:

No Impact. The Project Site is currently developed with a substation with no housing on Site. As a result, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impacts are expected either directly, indirectly, or cumulatively.

3.16 Public Services

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

a. Response:

Less Than Significant Impact. The Project would not create a demand for fire protection and emergency services that would be provided by the Riverside County Fire Department. Fire Station 6 - Northside I located 0.63-mile northeast, at 1077 Orange Street, Riverside, provides its services to the area. The Project is a replacement of the old deteriorated substation, with the new substation at almost the same location as the previous facility. The Project would not expand the services, or the service area, and thus there will be no need for additional fire protection services in excess of the services required for the existing substation. The Project is located in the urban area, and not in the urban and rural interface typically prone to fires. Because the Project is being developed and operated by a local government agency, it is exempt from payment of fire station development fees.

During construction, construction crew (4-15 workers) would commute to the Site for a period of 17 months. This number of workers would not result in a substantial temporary increase in traffic, and thus it would not affect emergency access routes, service response times, and acceptable services ratios in the area.

In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be less than significant impacts on the demand for additional fire facilities or services either directly, indirectly, or cumulatively.

(Sources: General Plan 2025 FPEIR - Table 5.13-B - Fire Station Locations; RMC Title 16 - Buildings and Construction; Chapter 16.52 - Development Fees for Fire Stations)

b. Police protection?	☐	☐	☒	☐

b. Response:

Less Than Significant Impact. The Project would not create a demand for police protection and emergency services that would be provided by the Riverside County Police Department. The Project would not require additional police patrol services other than that under existing conditions. The main Police Department is located at 4102 Orange Street and provides services to the North area of the City where the substation is located. Because the Project is not a proposed new land use type, the Project would not generate need for police services. During construction, the construction crew (4-15 workers) would commute to the Site for a period of 17 months. This number of workers would not result in a substantial temporary increase in traffic, and thus it would not affect emergency access routes, service response time and acceptable services ratios in the

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
area. Therefore, there will be less than significant impacts on the demand for additional police facilities or services either directly, indirectly, or cumulatively. ***(Source: General Plan 2025, Public Safety Element - Figure PS-8 - Neighborhood Policing Centers)***				
c. Schools?	☐	☐	☐	☒
c. Response: **No Impact**. The RUSD services approximately 43,000 students in Riverside. The Project is not a development project and would not increase population in the area or result in an increased need for school facilities. The Project would not increase the number of students in the area or otherwise affect nearby schools. The Project is not located near schools. The closest school in the area, Fremont Elementary School, is located 0.81 mile west of the Project. During construction, the construction crew (4-15 workers) would commute to the Site for a period of 17 months. This number of workers would not result in a substantial temporary increase in traffic, and thus it would not affect access to schools in the area. Therefore, the Project would not result in impacts to school services or generate need for school services either directly, indirectly, or cumulatively. ***(Sources: General Plan 2025 FPEIR - Figure 5.13-2 - RUSD Boundaries; RUSD Boundary Maps; Long Range Facilities Master Plan; and RMC Chapter 16.56 - School Development Fee)***				
d. Parks?	☐	☐	☐	☒
d. Response: **No Impact.** The Project would not increase the population on or near the Project Site, and thus would not generate the need for additional parks services and/or facilities or result in deterioration of recreational facilities. One recreational park is located within a 0.5-mile radius, Hunter Park, which is located 0.32 mile east of the Project Site. Another park facility, Northwest Park is located 0.72-mile northwest. During construction, the construction crew commutes are not expected to substantially increase traffic nearby, and thus are not expected to impact access to the Hunter Park, or Northwest Park. Due to the distance, the Project would not result in demand for these facilities and would not affect these facilities or their services in the short term or long term either directly, indirectly, or cumulatively. ***(Sources: General Plan 2025, Land Use and Urban Design Element, and Parks and Recreation Element - Figure PR-1 - Parks, Open Spaces and Trails, and Table PR-1 - Park and Recreation Facilities)***				
e. Other public facilities?	☐	☐	☐	☒
e. Response: **No Impact.** According to the FPEIR Figure 5.13-6 Community Centers, there are no public facilities located within 0.5 mile from the Project Site. Two libraries are located approximately 2 miles from the Project Site: Highgrove Library located at 530 Center Street, north of the Site, and Eastside Library located at 4033 Chicago Avenue C, south of the Site. Fairmount Senior Center and Ruth Lewis Community Center are also located within an approximately 2-mile radius of the Site. Due to the distance, the Project would not result in demand for these facilities and would not affect these facilities or their services in the short term or long term either directly, indirectly or cumulatively. ***(Source: General Plan 2025 - Figure LU-8 - Community Facilities)***				

3.17 Recreation

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

a. Response:

No Impact. The Project is not a residential development project and would not contribute to population growth which could result in an increased need for recreational spaces. The Project is a utility project (electric substation) and would not result in change of land use type on the Site. Thus, it would not result in an increased need for neighborhood and regional parks, nor other recreational facilities such that it would physically deteriorate these facilities. Therefore, there will be no impact directly, indirectly, or cumulatively.

(Sources: General Plan 2025 - Figure PR-1 - Parks, Open Spaces and Trails, Table PR-1 - Park and Recreation Facilities, and Figure CCM-6 - Master plan of Trails and Bikeways; Parks Master Plan [2003]; Bicycle Master Plan [May 2007])

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?	☐	☐	☐	☒

b. Response:

No Impact. The Project does not include recreational facilities and is not located at a recreational facility or adjacent to one (park, trail, or community area). The Project will not cause or require the addition of new workers or residents in the City. As a result, the Project would not require an expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, there will be no impact directly, indirectly or cumulatively.

(Sources: General Plan 2025 - Figure PR-1 - Parks, Open Spaces and Trails, Table PR-4 - Park and Recreation Facilities, and Figure CCM-6 - Master plan of Trails and Bikeways; Parks Master Plan [2003]; Bicycle Master Plan [May 2007])

3.18 Transportation

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

a. Response:

Less than Significant Impact. The Circulation Element of the 2025 General Plan prescribes that City streets should operate at a minimum Level of Service of D. Kittelson & Associates prepared a Trip Generation Memo (see Appendix E) to assess whether the Project required a Traffic Impact Analysis pursuant to the City of Riverside Guidelines. Traffic Impact Studies are used to analyze the effect of projects on the existing circulation system from newly generated traffic trips. The maximum daily trips over the entire construction phase of the project would be 80, with the peak hourly trips estimated to be eight (refer to Appendix E, Table 1). Per the City of Riverside Traffic Impact Analysis Preparation Guide, projects generating less than 50 daily peak hourly trips do not require preparation of a Traffic Impact Analysis. Given the Project's relatively low number of trips generated during the peak hour, and over the overall construction day, impacts to traffic circulation would be less than significant.

The closest bicycle facility is approximately 0.1 mile to the north of the project footprint (City of Riverside 2012). Construction activities are not expected to have impacts at this distance from the Project Site. Therefore, no impacts are anticipated to occur to bicycle facilities.

Impacts during operation and maintenance would decrease slightly due to the new substation requiring less maintenance. The newer substation will require less maintenance activity, and as such will generate fewer overall trips to the substation site throughout its operation. There would be no impact in this respect. Operation of the Project similarly has slightly less impacts on bicycle, pedestrian, and public transportation systems when compared to existing conditions. Project operations overall will have no impact on local transportation.

(Sources: General Plan 2025, Circulation and Community Mobility Element; Kittelson Trip Generation Memo for the Hunter Substation Project City of Riverside Traffic Impact Analysis Preparation Guide)

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

b. Response:

Less than Significant Impact. CEQA Guidelines section 15064.3 (b) outlines methods for assessing the significance of transportation impacts from land use projects and transportation projects. Specifically, CEQA Guidelines Section 15064.3 (b) prescribes that for transportation impacts, "…vehicle miles traveled is the most appropriate measure…" CEQA Guidelines Section 15064.3 (b) outlines specific methods for assessing the impacts from land use projects and transportation projects. The Proposed Project is neither a land use project nor a transportation project. Section 15064.3 (b)(s) states that "For many projects, a qualitative analysis of construction traffic may be appropriate."

The Hunter Substation Project would not be expected to have a substantial effect on total vehicle miles traveled (VMT) or per capita VMT countywide. The most significant traffic impacts would occur during construction of the new Hunter Substation, which is broken down into 12 phases. The construction phase that would generate the most daily trips would be Phase 5 – Underground Distribution Getaways with 40 total daily trips, including workers, hauling, and delivery truck trips (Appendix E, Table 1). This is below the suggested threshold for small projects which states that projects generating or attracting fewer than 110 trips per day may be assumed to cause a less than significant impact. The VMT Technical Advisory states that VMT as the preferred metric of analysis of transportation impacts is primarily due to the State's commitment to the reduction of greenhouse gases.

Operation and maintenance of the new Hunter Substation would have a net positive impact because there would be less vehicle trips generated due to new parts and equipment compared to the aging existing substation. The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 (b).

(***Sources: Kittelson Trip Generation Memo for the Hunter Substation Project; OPR Technical Advisory on Evaluating Transportation Impacts in CEQA. 2020)***

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous	☐	☐	☒	☐

intersections) or incompatible uses (e.g., farm equipment)?				

c. Response:

Less Than Significant Impact. Construction of the Proposed Project does not require the construction of new roads or modification of the geometric design of existing roads. Construction of sub-transmission and distribution line getaways may require temporary lane or road closures during construction. All work within or over City streets, such as Chicago Avenue, will be conducted pursuant to encroachment permits and approved traffic control plans from the City of Riverside (Design Feature TR-1). In addition, delivery of large construction equipment or materials will include traffic control during ingress and egress from the Project Site, where required by the City.

TR-1: Any construction activities that could affect traffic circulation on Chicago Avenue or Marlborough Avenue shall be performed pursuant to a Traffic Control Plan approved by the City.

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

d. Response:

Less than Significant Impact. Construction activities are expected to generate a maximum of eight trips during the peak hour. All construction within or above City streets will be conducted pursuant to City-approved Traffic Control Plans, which will ensure that emergency access is not significantly obstructed (Design Feature TR-1). Therefore, impacts would be less than significant.

During operation, the substation would be unmanned. Maintenance vehicles would access the project site via two existing driveways located on Chicago Avenue. Furthermore, operation and maintenance activities would be less than for the existing aging substation due to new parts and equipment. Trips to and from the storage structure would also not occur daily. No impacts would occur during operation and maintenance.

3.19 Tribal Cultural Resources

3.19.1 Native American Consultation

On behalf of RPU, VCS initiated Native American consultation by submitting a request to the Native American Heritage Commission (NAHC) for a Sacred Lands File search on September 24, 2019 (refer to Appendix C). This started the consultation process as prescribed by AB52. The results of the Sacred Lands File search were negative. To continue the AB52 Consultation process, Tribal Contact Letters were sent to all Tribal representatives that have requested to be on the City of Riverside's (i.e., RPU) AB52 contact list in March 2020. The full list of Tribal Representatives that received AB52 letters is in Appendix C, Section 5.4.

RPU received three responses to the AB52 letters, as summarized in Table 8 below. Two of the three tribes requested formal consultation under AB52 (Rincon and Soboba Bands). RPU completed AB52 consultation with these two tribes. The Tribes were provided project documents, including preliminary grading plans, Phase I Cultural Resources Assessment, and RPU's proposed Mitigation Measures relating to Cultural Tribal Resources. While San Manuel Band of Mission Indians did not request formal consultation under AB52, their input was received and incorporated into this IS/MND.

Table 8: AB52 Summary

Tribe Name	AB52 Consultation?	Key Tribal Concerns	Resolution
Rincon Band of Luiseño Indians	Yes	Final Mitigation Measures, including Native American Monitoring.	The Rincon Band was provided project materials, including proposed tribal and cultural mitigation for review and approval. Rincon accepted the proposed mitigation.
Soboba Band of Luiseño Indians	Yes	Final Mitigation Measures, including Native American Monitoring and treatment and disposition of tribal materials.	The Soboba Band was provided project materials, including proposed tribal and cultural mitigation for review and approval. Soboba accepted the Proposed Mitigation.
San Manuel Band of Mission Indians	No	Final Mitigation Measures.	San Manuel Band input was consistent with the proposed mitigation measures.

3.19.2 Impacts

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐

i. Response:

Less than Significant Impact with Mitigation Incorporated. The Phase I Site Assessment performed for the new Hunter Substation did not identify any tribal cultural resources on the Project Site, including record search and survey. Therefore, no known tribal historical resources exist on the Project Site that are eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. It is possible for unknown tribal cultural resources to be unearthed and affected by grading or construction activities for the Proposed Project. Implementation of Mitigations Measures CUL-1 through CUL-4 would ensure impacts would be less than significant. RPU completed AB52 consultation with two tribes (Soboba and Rincon Tribes). Both tribes agreed that implementation of these measures would ensure impacts to Tribal Resources would be less than significant.

(Source: Phase I Cultural Resources Assessment for the Hunter Substation Replacement Project [VCS 2019])

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

ii. Response

Less than Significant Impact with Mitigation Incorporated. As mentioned above, no tribal cultural resources were identified on site during cultural resources surveys. If any tribal cultural resources are discovered, implementation of Mitigation Measures CUL-1 through CUL-4 would ensure impacts to tribal cultural resources would be less than significant impact.

(Source: Phase I Cultural Resources Assessment for the Hunter Substation Replacement Project [VCS 2019])

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3.20 Utilities and Services Systems

3.20.1 Existing Conditions

Table 9: Existing Landfill Capacity

Facility	Distance from Project Site	Max Permitted Capacity per Day	Remaining Capacity	Remaining Capacity Date	Total Max Permitted Capacity	Closing Date
Mid Valley Landfill	11 miles	7,500 tons	61,219,377 cubic yards	6/30/2019	101,300,000 cubic yards	4/1/2045
Badlands Landfill	13.5 miles	4,800 tons	15,748,799 cubic yards	1/1/2015	34,400,000 cubic yards	1/1/2022
El Sobrante Landfill	15 miles	16,054 tons	143,977,170 cubic yards	4/1/2018	209,910,000 cubic yards	1/1/2051

3.20.2 Impacts

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

a. Response:

Less than Significant Impact. The Project Site is currently partially developed, and has connections for power, water, wastewater, and telecommunications. While the new substation and storage facility will need updated connections to these required utilities, these connections will not result in significant environmental effects.

(Source: RPU, 2019)

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

b. Response:

Less than Significant Impact. Water use during construction activities of the project would primarily be for dust control and cleaning of equipment. Water would be sourced from the RPU Water Division. The project would have sufficient water supplies available to serve the project.

Operation of the Project would not substantially change water demand for the Project Site. No additional landscaping will be created. While the proposed storage facility (to be constructed on the western parcel of the Project Site, primarily where the current Hunter Substation is located) will include facilities such as restrooms,

the storage facility is not anticipated to be subject to daily use. As for construction water use, RPU has verified that sufficient water supply is available for Project operations. Impacts would be less than significant.

(Source: RPU, 2019)

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

c. Response:

Less Than Significant Impact. Construction of the project would generate minimal amounts of wastewater. Impacts to the demand of existing wastewater treatment facilities would be minor. Operation and maintenance of the project would be similar to existing conditions. Once the existing Hunter Substation is removed and the new substation is under operation, the remaining unused space on the eastern parcel will be redeveloped into a storage facility to be used by the RPU. The new storage facility will include a new single-story storage structure (25 feet tall, 40 feet wide, and 80 feet long), with a mezzanine, parking, office and storage space, and water and sewer connections for restrooms. The wastewater would connect to the existing wastewater conveyance located at the project site. Existing wastewater treatment facilities would have adequate capacity to serve the project and impacts would be less than significant.

(Source: RPU, 2019)

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals?	☐	☐	☒	☐

d. Response:

Less than Significant Impact. During construction, the project would not generate large amounts of solid waste. Most of the exported materials, such as soils, steel, conductor, gravel, and concrete can be reused, recycled, or otherwise diverted from disposal at a landfill. Solid waste generating construction activities include demolition of buildings, foundations, security wall, vegetation, etc., located on the western parcel. Once the new substation is constructed and energized, the existing substation will be dismantled and removed. Equipment from the old substation will be re-used if possible, stored as back-up equipment, recycled, or disposed of as a last option. Operation and normal maintenance of the project would generate a very small amount of solid waste. Nearby landfills that would serve the project are Mid Valley, Badlands, and El Sobrante Landfills. Information about these landfills is shown above in Table 9: Existing Landfill Capacities. Surrounding landfills would have more than adequate capacity to dispose of solid waste generated by the project. Therefore, impacts to landfill capacity or solid waste reduction goals would be less than significant.

(***Source: RPU, 2019)***

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

e. Response:

Less than Significant Impact. AB 939 required cities to divert solid waste from landfills at a minimum of 25% by 1995 and 50% by 2000. Countywide Integrated Waste Management Plan was developed in accordance with AB 939 and maintains the 50% diversion mandate. AB 341 "declares that it is the policy goal of the state that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter." It also contains an ordinance for any business that generates more than four cubic yards of commercial solid waste per week. As discussed under response to Criteria d) above, most of the exported material from construction of the Project can be reused, recycled, or otherwise diverted from disposal at a landfill. Therefore, impacts will be less than significant.

3.21 Wildfires

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

a. Response:

No Impact. The Project is located in the urban setting devoid of areas of dense, dry vegetation which could pose a fire hazard risk. Particularly canyon areas and hillsides pose the greatest potential for wildfire risks; however, these types of terrain features are absent from the Site. California State Responsibility Areas (SRAs), are areas within the state where the State Department of Forestry and Fire Protection (or CAL FIRE) has the primary financial responsibility for fire prevention, protection, and suppression (fighting) of wildland fires. SRAs are typically covered wholly or partially by forests or trees capable of producing forest products, vegetated areas that contribute to erosion control, and areas of range land, or forage value. SRAs are not located within incorporated cities or on federal lands. SRAs are legally defined by Public Resources Code Sections 4125 - 4128. The Project Site and surrounding areas are not located within SRAs, or nearby SRAs.

CALFIRE also designates fire hazard severity zones (FHSZs) based on key factors including weather conditions, fuel conditions, and terrain. Severity is determined based on a combination of how a fire is anticipated to behave and the probability of a fire to threaten structures. FHSZs can be designated as Moderate, High, or Very High. It is important to note that these designations are only assigned within SRAs where CAL FIRE has jurisdiction for fire prevention and protection services. Only Very High FHSZs can apply within Local Responsibility Areas (LRAs). CAL FIRE submits maps (recommendations) of Very High FHSZs to LRAs, but CAL FIRE does not have the authority to require the LRAs to adopt these designations. Box Springs Mountains area is designated as a Very High hazard zone and is located 0.87 mile east of the Project Site. Due to the distance, it would not expose the substation to additional wildfire risk more than it is under existing conditions.

In addition, and as discussed under Section IX(f), the Project would not impair emergency evacuation because Chicago Avenue is not a designated emergency route. In addition, only a limited number of workers (10-15) will be present during construction, and thus the Project would not restrict traffic flow along the local designated evacuation routes at Columbia Avenue and Iowa Avenue. During the Project operation, the substation would be unmanned and thus would not result in impacts to adopted emergency routes.

The City of Riverside adopted an Emergency Operations Plan in 2002. The Plan addresses the City's planned response to emergencies associated with natural disasters and technological incidents – including both peacetime and wartime nuclear defense operations. The Project Site is not mapped on the City of Riverside, Final Response Map (September 2019) as a site of special significance or protection during war or other event.

The center of emergency is located at 3085 Saint Lawrence Street, approximately 7 miles south of the Project Site. Because the Project is not located in a fire prone zone, the Project would not result in direct, indirect, or cumulative impact to adopted emergency response plan or emergency evacuation plan.

(***Sources: General Plan 2025 - Figure PS 8.1 - Evacuation Routes, Figure PS-7 – Fire Hazard Areas; and CalFire Very High Fire Hazard Severity Zones in LRA, Riverside Final Response Map)***

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

b. Response:

No Impact. The Project is located in a flat urban setting, and is not located within an SRA or a designated Very High FHSZ within an LRA. In addition, the Project involves the construction of a substation that replaces an existing deteriorating substation in a similar location. As discussed under Response a), the Project does not create slopes, and thus does not affect prevailing winds and other factors; therefore, this Project would not exacerbate wildlife risk. The Project does not include any habitable structures and would not include occupants. The substation would be unmanned, and only routine maintenance inspections would be necessary. It is assumed that approximately six inspections would be conducted annually by a staff of two. Furthermore, the Project would not create or exacerbate key factors such as steep slopes, prevailing winds, or fuel management, thereby exposing Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire directly, indirectly or cumulatively; therefore, no impact is expected.

(***Sources: General Plan 2025 - Figure PS-7 – Fire Hazard Areas; and CalFire Very High Fire Hazard Severity Zones in LRA)***

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

c. Response:

No Impact.
The Project is located in the urban setting where there is limited risk for wildfire hazard. In addition, the Project would replace an old, deteriorating substation and connect infrastructure (gateways, poles, sub-transmission lines) with new infrastructure that complies with existing regulations and standards. The proposed Hunter Substation will be connected to four 69kV sub transmission lines and 20 distribution lines. The proposed gateways will mirror the existing substation gateways, including re-use of overhead support structures, underground duct banks, and underground vaults where possible. Refer to Figure 5, Proposed Site Layout Map in Appendix A for the layout of this infrastructure. The Project would require installation of new sub-transmission line gateways, and realignment of existing sub-transmission lines to enter the proposed Hunter Substation in the new location, and replacement of at least two sub-transmission poles. The new gateways will be constructed by trenching and installing new duct bank from the new substation yard until reaching connection points with the existing underground distribution line gateways. Three new underground distribution line vaults

will be installed, and one existing underground distribution line vault will be utilized in place as part of the distribution line gateways. After the Project is completed, the new distribution and sub-transmission gateways, and support structures are expected to result in less fire risk than under existing conditions, because they would be upgraded. As a result, the Project would not result in any impacts, directly, indirectly, or cumulatively, with respect to fire risk.

(Sources: General Plan 2025 - Figure PS-7 – Fire Hazard Areas; and CalFire Very High Fire Hazard Severity Zones in LRA)

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

d. Response:

No Impact. As discussed in Response b), the Project does not expose people to wildfires risks, or other risks such as flooding or landslide because the substation would be unmanned, and the Project is located in an urban setting. Only occasional routine inspection would be performed. Because the Project is located in a flat urban setting and does not involve slopes, it would not create runoff or post-fire slope instability resulting in drainage changes. The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes either directly, indirectly or cumulatively; therefore, no impact is expected.

(***Sources: General Plan 2025 - Figure PS-7 – Fire Hazard Areas; and CalFire Very High Fire Hazard Severity Zones in LRA)***

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3.22 Mandatory Findings of Significance

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒

a. Response:

No Impact. The entire Proposed Project is located with an urban environment. The eastern parcel, containing the existing substation, is developed. The western parcel, where the new substation will be constructed, is barren ground and devoid of vegetation, terrestrial habitat, or fish habitat. There would be no threat to plant or animal communities. There is no suitable habitat in the Proposed Project site for state- and federally-listed wildlife or plant species. No impacts would occur.

b. Have impacts that are individually limited, but cumulatively considerable?	☐	☐	☐	☒

b. Response:

No Impact. The Proposed Project would result in temporary impacts during the construction phase of the project. Once the new substation is completed and the old substation is decommissioned, operation would be similar to the existing conditions. Impacts from maintenance would decrease due to new equipment over the aged existing substation. Individually limited, but cumulatively considerable impacts would not be expected.

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

c. **Response:**

Less than Significant Impact. There are no features of the Proposed Project that would cause substation adverse effects on human beings during construction and operation of the Project. All project impacts relating directly to impacts to human beings including air quality, land use, noise, population and housing, public services, traffic, recreation, and utilities, are less than significant.

4.0 References

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APPENDIX A

Detailed CEQA Project Description

APPENDIX B

Air Quality Modeling Files

APPENDIX C

Phase I Cultural Resources Assessment

APPENDIX D

Noise Technical Report

APPENDIX E

Trip Generation Memo