Initial Study/Mitigated Negative Declaration

for the

Riverside Scrap Iron and Metal Remedial Action Plan Project

DTSC DOCKET NO. HAS-FY15/16-152

Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

February 2020

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1.0 PROJECT DESCRIPTION

1.1 Overview

The Department of Toxic Substances Control (DTSC) is considering approval of the *Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (GSI Environmental Inc.) July 23, 2019 (2019 RAP) for the site, driveways accessing the RSIM site, and targeted areas of residential properties that abut the RSIM site to the south (collectively, the "site" or "Project site").

The 2019 Draft RAP and associated elements presented in this Section describe the Project to be considered in the Initial Study/Mitigated Negative Declaration (IS/MND; Section 2). For the purposes of the California Environmental Quality Act (CEQA) and this IS/MND, DTSC is the Lead Agency for the Project.

In summary, the RAP identifies the nature and extent of Contaminants of Concern (COCs) affecting the Project site; proposes Remedial Action Plan Alternatives to achieve acceptable environmental standards; and identifies the preferred Remedial Action Plan. COCs affecting the site include polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs), and metals, including lead and arsenic.

The RAP includes the following primary components:

- Excavation Plan
- Pre-Field Activities
- Excavation Tasks
- Waste Management – Targeted Excavation
- Waste Management – On-Site Excavation
- Health and Safety
- Air Monitoring During Excavation

The above-listed components are incorporated in the Project Description and are summarized within this Section.

At completion of the RAP, the remediated RSIM site would comprise a clean level property with soils meeting conservative residential remediation screening criteria. As remediated, the RSIM site could be redeveloped without restriction regarding potential contamination or soils hazards. Driveways accessing the RSIM site and targeted areas of abutting residential properties would also be remediated to residential standards.

1.2 Project Objective

The Project Objective is to excavate contaminated soil from the RSIM site and from targeted areas at abutting residential properties. After the RAP has been implemented, the RSIM site could be redeveloped without restriction regarding potential contamination or soils hazards, and targeted areas at abutting residential properties would be remediated to residential standards.

1.3 Project Location

The Project site is located easterly of the downtown area of the City of Riverside, approximately 1,000 feet easterly of the 91 freeway. The Project site is bordered on the northwest by Commerce Street, on the southwest by Mission Inn Avenue/Seventh Street, and on the northeast by Fourth Street

The Project site comprises approximately 7 acres extending across multiple parcels. The predominance of the Project RAP activities would be located within the approximately 7-acre RSIM site. The RAP also addresses contaminants affecting driveways accessing the RSIM site, and limited areas (less than 0.1 acres) of abutting residential properties located southerly of the RSIM site. The approximate Project site boundaries are indicated on Figure 1.2-1 and 1.2-2.

1.4 Existing Land Uses and City of Riverside General Plan Land Use and Zoning Designations

Existing land uses and City of Riverside General Plan Land Use and Zoning Designations for the Project site and vicinity properties are summarized at Table 1.3-1. Existing land uses are illustrated at Figure 1.3-1; existing General Plan Land Use and Zoning designations are presented at Figure 1.3-2. Descriptions of existing land uses and land use designations are presented subsequently.

Table 1.3-1
Existing Land Uses and Land Use Designations

Location	Existing Land Use	General Plan Designations	Zoning Designations
Project Site	RSIM Site; Residential	B/OP - Business/Office Park; MDR - Medium Density Residential	Riverside Marketplace Specific Plan (MSP) - Business Park; Residential
West/Southwest	Vacant; Residential	O-Office	MSP - Business Park
East/Northeast	Light Industrial; Residential	B/OP - Business/Office Park; MDR - Medium Density Residential	MSP - Business Park; Residential
North	Light Industrial; Commercial	B/OP - Business/Office Park	MSP - Business Park
South	Residential	MDR - Medium Density Residential	MSP - Residential

Figure 1.2-1 Project Location

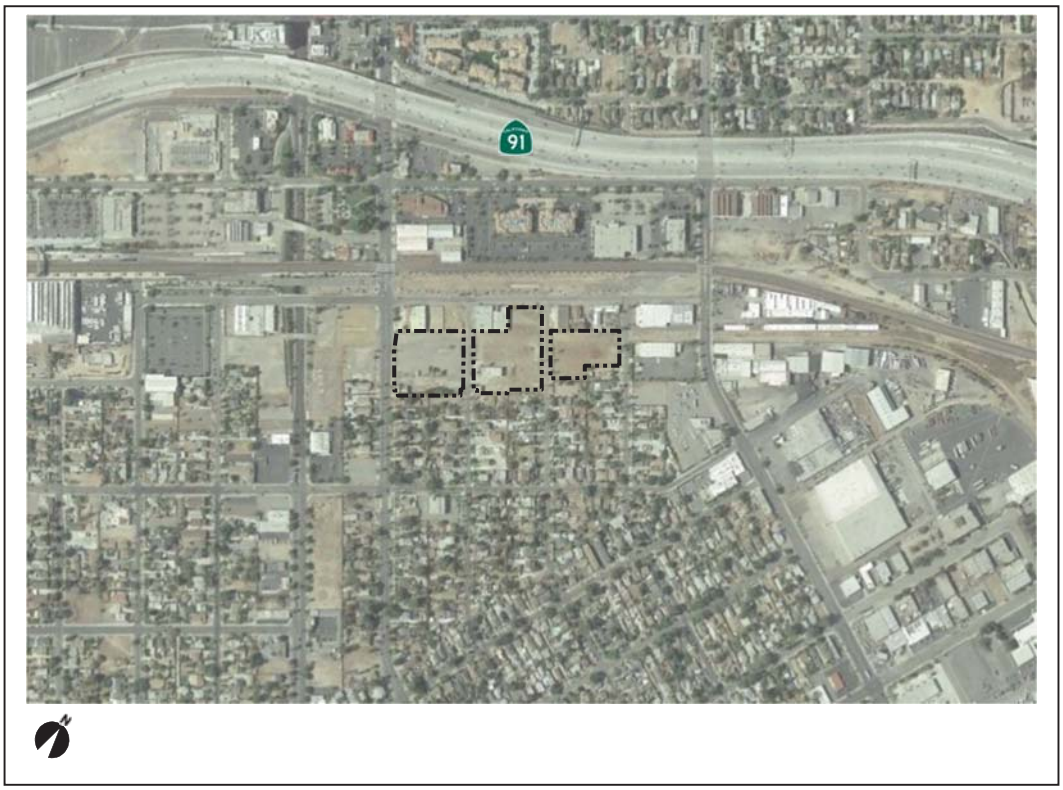


Figure 1.2-2 Project Site

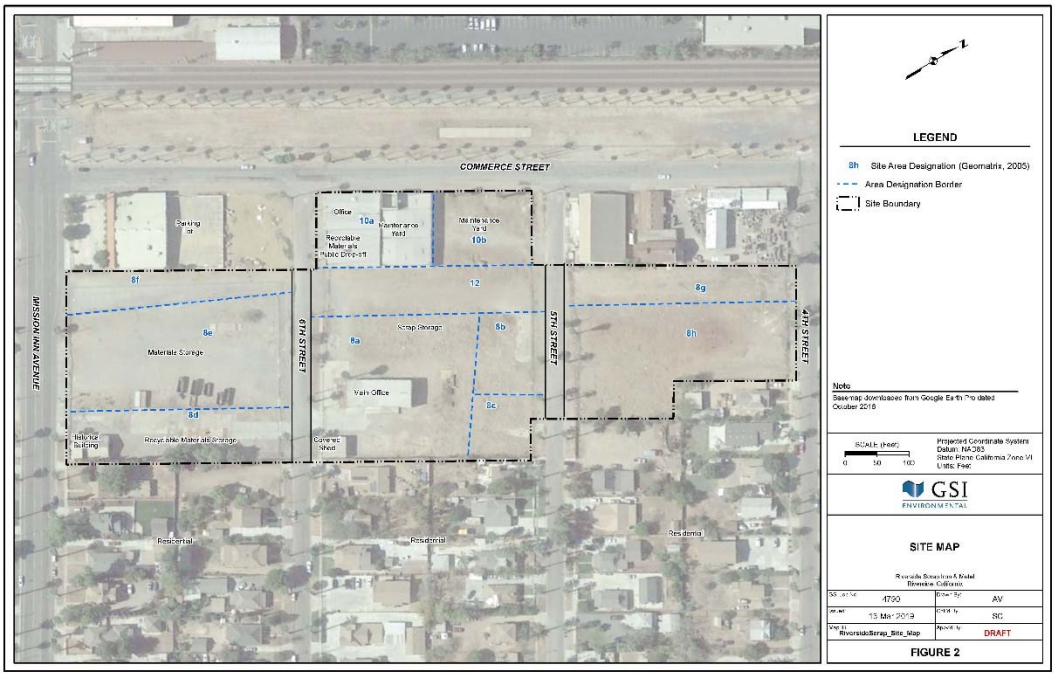
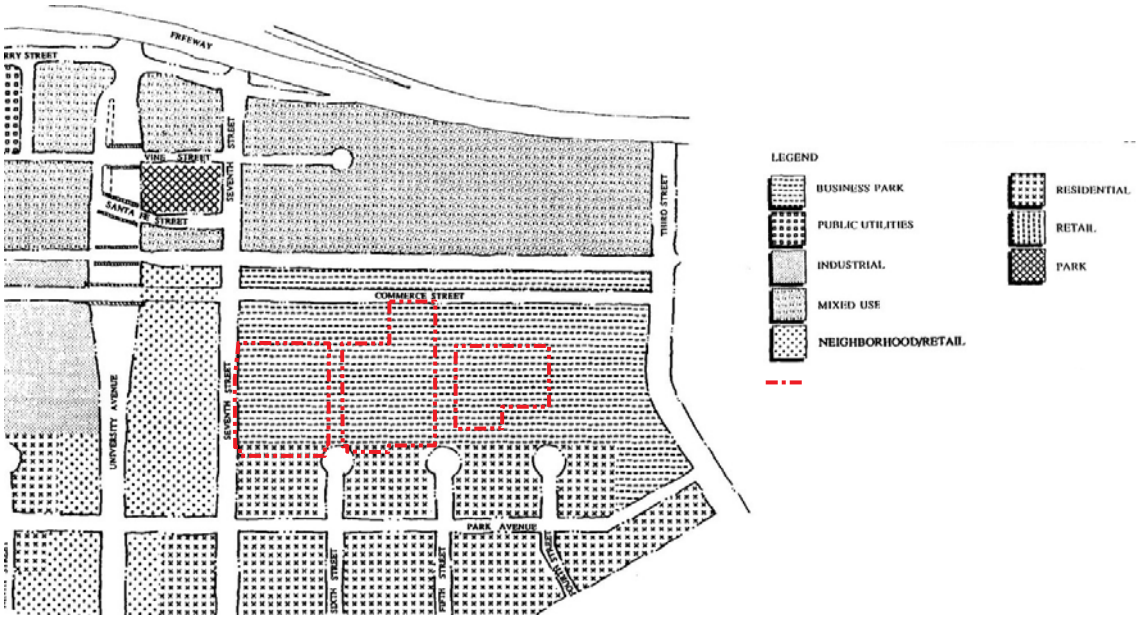


Figure 1.3-1 Existing Land Uses

Figure 1.3-2 General Plan Land Use and Zoning Designations

GENERAL PLAN 2025
LAND USE ELEMENT
A - AGRICULTURAL
A/RR - AGRICULTURAL/RURAL RESIDENTIAL
HR - HILLSIDE RESIDENTIAL
SRR - SEMI RURAL RESIDENTIAL
VLDR - VERY LOW DENSITY RESIDENTIAL
LDR - LOW DENSITY RESIDENTIAL
MDR - MEDIUM DENSITY RESIDENTIAL
MHDR - MEDIUM HIGH DENSITY RESIDENTIAL
HDR - HIGH DENSITY RESIDENTIAL
VHDR - VERY HIGH DENSITY RESIDENTIAL
C - COMMERCIAL
CRC - COMMERCIAL REGIONAL CENTER
DSP - DOWNTOWN SPECIFIC PLAN
OSP - ORANGECREST SPECIFIC PLAN
CBUSP - CALIFORNIA BAPTIST UNIVERSITY SPECIFIC PLAN
O - OFFICE
B/OP - BUSINESS/OFFICE PARK
I - INDUSTRIAL
MU-N - MIXED USE-NEIGHBORHOOD
MU-V - MIXED USE-VILLAGE
MU-U - MIXED USE-URBAN
PF - PUBLIC FACILITIES/INSTITUTIONAL
PR - PRIVATE RECREATION
P - PUBLIC PARK
OS - OPEN SPACE/NATURAL RESOURCES
RAT - KANGAROO RAT HABITAT



Source: Riverside General Plan; Riverside Marketplace Specific Plan; Applied Planning, Inc
Applied Planning, Inc.

1.4.1 Existing Land Uses

Existing Project site and vicinity land uses are presented at previous Figure 1.3-1 and are described below.

1.4.1.1 Project Site

The Site has been used as a scrap metal yard for over 45 years and was occupied primarily by the main office (Area 8a), a former machine shop (Area 8b), a storage building (Area 8d), and an office/maintenance building (Area 10a). The Site formerly maintained underground and aboveground storage tanks on the western portion of the Site (Area 8e) that were used to store and dispense fuel and oil. Historical railroad operations were conducted on Area 8f, Area 8g, and Area 12. The scrap metal and recycling business ceased operations in 2015. By August 2015, the Site had been cleared of utilities, mixed trash, debris and scrap metal and currently consists mostly of unpaved bare earth and paved surfaces. Surrounding land uses to the north, west and south are primarily commercial. Residential housing is located along the eastern border of the Site.

The Project site also includes targeted areas of residential properties abutting the RSIM site to the south. More specifically, targeted excavation and soil remediation identified in the RAP would affect approximately 1,600 square feet of the residential property located at 2981 Mission Inn Avenue; approximately 3,200 square feet of the property located at 2968 6th Street; and approximately 1,600 square feet of the property located at 2981 6th Street. A total of approximately 300 cubic yards of soil will be removed from the three properties (approximately 4,500 tons). The RAP also indicates that COCs may be present at the residential property located at 2980 5th Street. However, access to this property for the purpose of soils sampling could not be secured. This is considered a data gap in the off-site characterization that cannot be resolved without gaining access to the property. RAP activities and programs would not affect residential structures or surface improvements.

1.4.1.2 West/Southwest

Westerly/southwesterly of the Project site, across Mission Inn Avenue, properties are vacant or are developed with residential uses.

1.4.1.3 East/Northeast

Easterly/northeasterly of the Project site, across 4th Street, properties are developed with light industrial uses. Southerly of these industrial uses, properties are developed with residential uses.

1.4.1.4 North

Northerly of the Project site are vacant properties and various light industrial/commercial land uses.

1.4.1.5 South

Southerly of the Project site, properties are developed with residential uses.

1.4.2 Existing General Plan General Plan Land Use/Zoning Designations

General Plan Land Use and Zoning designations of the Project site and surrounding properties are presented at previous Figure 1.3-2. The Project does not propose or require amendment of any existing General Plan Land Use or Zoning designations.

1.4.2.1 Project Site

The City of Riverside General Plan Land Use designation of the RSIM site is "B/OP - Business/Office Park" (City of Riverside General Plan 2025 [General Plan], Figure LU-10, Land Use Policy Map). Zoning of the RSIM site is established by the Riverside Marketplace Specific Plan (MSP). The MSP designates the RSIM site as "Business Park" (MSP Figure 4, Land Use Plan). Properties abutting the RSIM site to the south are General Plan-designated as "MDR-Medium Density Residential" (General Plan, Figure LU-10, Land Use Policy Map). MSP designation of these properties is "Residential" (MSP Figure 4, Land Use Plan).

1.4.2.2 West/Southwest

Westerly/southwesterly of the Project site, across Mission Inn Avenue, the General Plan Land Use designation of properties is "O-Office." MSP designation of these properties is Business Park (General Plan, Figure LU-10, Land Use Policy Map; MSP Figure 4, Land Use Plan).

1.4.2.3 East/Northeast

Easterly/northeasterly of the Project site across 4th Street, the General Plan Land Use designations of properties are B/OP - Business/Office Park and MDR - Medium Density Residential. MSP designations of these properties are Business Park and Residential (General Plan, Figure LU-10, Land Use Policy Map; MSP Figure 4, Land Use Plan).

1.4.2.4 North

Northerly of the Project site, the General Plan Land Use designation of properties is B/OP - Business/Office Park. MSP designation of these properties is Business Park (General Plan, Figure LU-10, Land Use Policy Map; MSP Figure 4, Land Use Plan).

1.4.2.5 South

Southerly of the Project site, the General Plan Land Use designation of properties is MDR-Medium Density Residential. MSP designation of these properties is Residential (General Plan, Figure LU-10, Land Use Policy Map; MSP Figure 4, Land Use Plan).

1.4.3 Marketplace Brownfields Study Area Parcel Designations

The DTSC characterizes Brownfields properties as "properties that are contaminated, or thought to be contaminated, and are underutilized due to perceived remediation costs and liability concerns. California recognizes that cleaning up Brownfields properties frees previously unavailable land for productive reuse, while taking development pressures off undeveloped open land, thereby improving and protecting the environment. Timely investigations and cleanups of Brownfields sites promotes economic development and reinvestment in California through post-cleanup development and sustainable reuse."

The RSIM site is located within the Marketplace Brownfields Study Area in the City of Riverside, bounded by Commerce Street to the northwest, Mission Inn Avenue/7th Street on the southwest, and by 4th Street on the northeast. The Marketplace Brownfields Study Area (Study Area) comprises 6 large parcels that were grouped into 23 smaller parcels based on parcel configuration ownership and historical use. The Project RAP maintains the Study Area parcel numbering system for continuity. The RSIM site includes Study Area parcels 8a-8h, 10a, 10b, 12. Study Area parcel designations for the RSIM site are indicated at previous Figure 1.2-2.

1.5 RSIM Site Background and Current Conditions

The Site has been used as a scrap metal yard for over 45 years and was occupied primarily by the main office (Area 8a), a former machine shop (Area 8b), a storage building (Area 8d), and an office/maintenance building (Area 10a). The Site formerly maintained underground and aboveground storage tanks on the western portion of the Site (Area 8e) that were used to store and dispense fuel and oil. Historical railroad operations were conducted on Area 8f, Area 8g, and Area 12. The scrap metal and recycling business ceased operations in 2015. By August 2015, the Site had been cleared of utilities, mixed trash, debris and scrap metal and currently consists mostly of unpaved bare earth and paved surfaces. Surrounding land uses to the north, west and south are primarily commercial. Residential housing is located along the eastern border of the Site.

1.6 Previous RSIM Site Investigations

Site characterization activities have been conducted at the Site since 2011. Site-specific investigation data has been included in four primary documents.

- 2011 – Phase II Environmental Site Assessment, Ami Adini & Associates, Inc.
- 2015 – Additional Phase II Environmental Site Assessment Report, Riverside Scrap Iron & Metal Site, AMEC Foster Wheeler
- 2019 – Additional On-Site PCB Sampling and Analysis
- 2017 – Off-Site Preliminary Environmental Assessment, Hillmann Consulting

In 2018, to further characterize the extent of PCBs in shallow soil as required by USEPA, GSI performed soil sampling in accordance with Toxic Substances Control Act (TSCA; 40 CFR 761) procedures and oversight by USEPA and DTSC.

1.6.1 2011 On-Site Investigation

In 2011, Ami Adini & Associates (AA&A) conducted a subsurface investigation at the Site that included the collection of 56 soil samples at depths of 0.5 to 1-foot bgs and collection of soil gas samples. Shallow soil samples were analyzed for TPH, PAHs, PCBs, semi-volatile organic compounds (SVOCs), and metals. The passive soil gas samples were analyzed for volatile TPH and VOCs.

Soil gas analysis identified volatile TPH and VOCs in soil gas at depths of 0.5 to 1 foot below ground surface (bgs) at various locations across the RSIM Site; however, the passive soil-gas sampling technology used did not provide data suitable for comparison with risk-based screening levels. Shallow soil analytical results indicated that PAHs, PCBs, and metals at concentrations exceeding their respective USEPA residential regional screening levels (RSLs).

1.6.2 2015 On-Site Investigation

In August-October 2015, AMEC Foster Wheeler (AMEC) conducted a supplemental investigation at the property. AMEC indicated that the objectives of the additional Phase II ESA were to address data gaps (i.e., vertical and lateral extent of COCs in soil and soil gas) to support preparation of a RAP to address known impacts to soil from operations related to scrap metal recycling at the Site. The objective was also to collect data on PCB concentrations in shallow soil near the

boundary between the Site and adjacent residential properties and evaluate the potential need for characterization of PCBs in soil at these off-Site properties (AMEC, 2015).

A total of 22 borings were installed with soil sampling conducted at 0.25, 1, 2.5, 5, 10, and 15 feet bgs at most locations. The soil samples were analyzed for carbon-chain hydrocarbons (TPH speciated in gasoline, diesel, and oil ranges), VOCs, metals, PCBs, PAHs, and SVOCs. The borings were completed as soil gas sampling probes installed at two depths; one at 5 feet bgs and one at 11-15 feet bgs.

Overall the results indicate the upper 1 foot of soil across the Site is impacted with lead, PCBs, and PAHs that are present in concentrations that exceed residential RSLs, with soil impacts extending deeper at some locations to 2.5 feet bgs. The results from soil gas sampling identified relatively low concentrations of VOCs;

The results of Site investigation indicated that the vertical and horizontal extent of lead, arsenic, and PAHs had been adequately characterized (on-Site) to depths of less than 2.5 feet bgs, with the exception of the location of NS20 samples in Area 8h (AMEC, 2015).1 In addition, soil and soil gas sampling results in the location of the former ASTs and USTs suggest no significant impact to soil. The results of this work are presented in AMEC's "Additional Phase II Environmental Site Assessment Report" dated December 9, 2015.

1.6.3 2017 Off-Site Investigation

To address possible contaminant impacts at residential properties abutting or adjacent to the RSIM site, targeted residential areas were evaluated in 2017 as part of the RAP (Hillman, 2017). Locations of these residential properties and areas of investigation relative to the RSIM site are presented on Figures 1.7-1 and 1.7-2.

Results of these investigations indicated that two residential properties (2981 Mission Inn Ave. and 2968 6th Street) each had two locations that had lead concentrations in excess of residential screening levels. Additionally, one sample obtained about 10 feet from the fence line at 2968 6th Street had PAH concentrations in excess of residential screening levels. None of the samples obtained nearer to the fence line exceeded residential screening levels. These results suggest that targeted remedial excavation at the 2981 Mission Inn Ave. and 2968 6th Street sites could be reasonably achieved.

Soil samples taken at the 2981 6th Street residence indicated concentrations of COCs greater than residential screening levels. The sampling results suggest remedial action would likely be required in the easterly portion of this property. The wider spread shallow soil contamination at this property would require a larger excavation than the targeted excavation at other affected residences.

An additional potentially affected residential property located at 2980 5th Street could not be sampled due to an access issue. The possibility of soil impact near the RSIM facility cannot be ruled out. This is considered a data gap in the site characterization that cannot be resolved without gaining access to the property.

Investigations were also conducted at 5th and 6th Street entries to the RSIM site. The results of the entry way investigation indicated significant contaminant concentrations that would require

[1] Note that PCBs were further characterized (pre-remedial confirmation sampling) during the 2018 investigation.

remediation. The RSIM site Mission Inn Avenue entry area appears to require no remediation, though the site remediation plan includes excavation of soil up to these areas. Please refer also to the *Off-Site Perimeter Soil Sampling Investigation Report (Hillman)*.

1.6.4 2019 On-Site Investigation

Procedures for conducting soil sampling for PCBs at the Site under TSCA were summarized in the *Revised Technical Memorandum Workplan for Delineation of RCRA Level PCB-Impacted Soil* prepared by Hillman in October 2017 (PCB Work Plan; Hillmann, 2017b).

Six historical sample locations with PCB concentrations exceeding 50 mg/kg are identified in the PCB Work Plan. Additional soil sampling and analysis was conducted by GSI in 2018 to define these areas. Soil samples were collected on a 1.5-meter grid pattern at stepped-out locations from the six identified locations from the surface (0.25 feet), 1.0, 2.5 and 5.0 feet bgs. Expansion of the grid continued until concentrations of PCBs equal to or greater than 50 mg/kg were defined vertically and laterally.

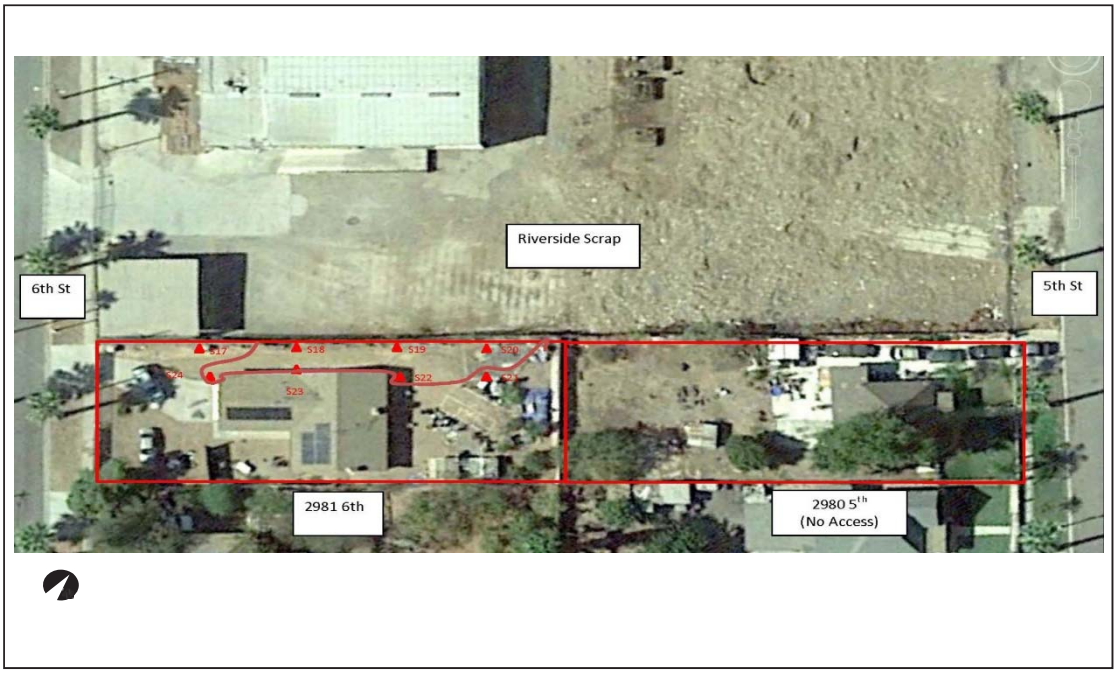
During the six sampling events, soil samples were collected from approximately 115 step-out borings from the six locations where PCBs had been detected above 50 mg/kg in shallow soil (A10b-SB4, S14, A8b-SB1, A8e-SB4, S6, and NS2). Soil samples were collected at one or more depths of 0.5, 1 , 2.5, and 5 feet bgs. In general, lateral (step-out) and vertical (deeper) samples were collected and placed on hold. If a primary sample reported PCB concentrations exceeding 50 mg/kg, then the corresponding step-out and/or deeper sample was analyzed.

After the 20 December 2018 sampling event, all six PCB-impacted areas were delineated laterally and vertically with the exception of one sample location, where concentrations of PCBs exceeded 50 mg/kg. On 5 February 2019 USEPA and DTSC concurred that the Site was characterized for PCBs and that no further sampling was necessary to complete preparation of this RAP, and further, that confirmation soil sampling could be conducted in the area south of KK26 to document that remedial excavation goals for PCBs are met.[2]

[2] Conference call between GSI, RSIM, USEPA, and DTSC representatives and e-mail from USEPA dated 8 February 2019.

Figure 1.7-1
Residential Site Soil Sampling Locations
Source: Hillmann Consulting

Figure 1.7-2
Residential Site Soil Sampling Locations
Source: Hillmann Consulting



1.7 Summary of Proposed RAP Actions and Programs

The RAP summarizes the results of the site investigations, presents a risk evaluation/feasibility study, and establishes the appropriate steps to remedy soil contamination at the RSIM site and affected adjacent properties. Component elements of the RAP are described below.

1.8 Excavation Plan

Implementation of the excavation plan includes excavation and removal of the on-Site impacted surficial soil to a depth of approximately 1.0 to 5 feet bgs, followed by soil confirmation sampling. Impacted soil is present across approximately 5.5 acres of the Site. The expected volume of soil to be removed is approximately 28,200 cubic yards. A small portion of this mass is highly impacted material that may be classified as RCRA waste, which requires special handling and is more costly to dispose. The remainder of the material may be classified as California hazardous waste or non-hazardous waste. The objective of this program is to remove soil impacted with COCs above residential criteria and dispose of it cost-effectively and safely. This will require a program of targeted removal followed by a broad Site-wide excavation plan. The off-Site residential areas will be excavated during the targeted on-Site excavation work and the impacted soil will be brought on-Site to be temporarily staged prior to off-Site disposal.

Site clearing and demolition of surface improvements would also generate demolition debris totaling approximately 410 cubic yards that would require classification and disposal. Soils and other materials determined to be non-hazardous would be directed to one of the proposed receiving facilities for wastes are identified in the 2019 RAP Transportation Plan (Appendix F).

A summary of RCRA-level, Cal-Haz, and non-hazardous waste to be removed from the Project site is presented at Table 4, 5 and 6 of the 2019 RAP and Table 1.8-1 below.

Soil Impacted with PCBs exceeding 50 mg/kg

Six areas of PCB-impacted soil with reported concentrations that exceed 50 mg/kg will be excavated prior to commencement of the Site-wide excavation program, in accordance with TSCA regulations. This soil will be disposed of as RCRA waste. These excavations are defined based on the 2018 pre-remedial PCB delineation data and are identified on Figures 4A and 4B of the 2019 RAP. Soil will be excavated using a backhoe excavator and loaded directly into a truck for off-Site disposal. Approximately 485 cubic yards of PCB-impacted soil above 50 mg/kg are anticipated for removal.

Soil Impacted with RCRA Levels of Lead

Areas where soil is impacted by lead at RCRA-level concentrations will be excavated prior to the commencement of the Site-wide excavation program. These areas are defined based on the information included in Table 5 and shown on Figure 4C of the 2019 RAP. Approximately 1,775 cubic yards of lead-impacted soil above RCRA Hazardous Waste levels are anticipated for removal. However, some of this volume of soil is co-located with PCB impacted soil.

Lead, PCB, Arsenic and PAH exceeding Residential Soil RBSLs

Based on historical data included in Appendix A.1, A.2, and A.3 of the 2019 RAP, COCs at the Site are present in the top approximately 1 foot of soil at the Site. Lead is present above RBSLs across a large portion of the Site and encompasses the areas where the other COCs are identified. As such, lead concentrations will primarily dictate the removal of soil. One exception is

Area 8g, where the soil excavation area is dictated by elevated concentrations of arsenic in soil. Figure 5 of the 2019 RAP identifies the overall excavation plan for the Site.

Residential Property Excavations

The off-Site excavations on the residential properties will include targeted excavations intended to eliminate the contaminated soil in these areas. Table 6, Figure 7A and Figure 7B of the 2019 RAP identify Off-Site excavation activities, may require additional soil removal at the 2980 5th Street property in area(s) that could not be sampled but may have COC-impacted soil based on available data collected at the RSIM Site.

The off-Site residential excavations will be completed to 1-foot bgs over the area identified in approximately 300 cubic yards of soil is anticipated removal. Confirmation soil sampling will be used to ensure that the impacted soil had been adequately removed. If confirmation sampling suggests that soil with COCs above remedial goals has not been adequately removed, deeper targeted excavation will be conducted, and additional confirmation samples will be collected.

Table 1.8.1
Estimated Waste by Category, Weight, and Volume

Location/Source	RCRA-Level Waste		CAL-Haz Waste		Non-hazardous Materials			
					Soils		Surface Demolition	
	Tons	Cu. Yds.	Tons	Cu. Yds.	Tons	Cu. Yds.	Tons	Cu. Yds.
RSIM Site	3390	2260	TBD	TBD	42,300	28,200	831	410
Residential Target Areas	450	300	TBD	TBD	---	---	---	---
TOTALS	**3840**	**2560**	**TBD**	**TBD**	**42,300**	**28,200**	**831**	**410**

Notes:
1. Estimates rounded up to nearest whole number.
2. Soil density of 120 lb./ft^3.
3. Demolition debris density of 150 lb./ft^3.
4. Approximately 3840 tons of RCRA-level waste to be removed from the RSIM site (draft RAP pp. 20 – 21).
5. CAL-Haz waste TBD from the RSIM site (draft RAP pp. 20 – 21).
6. Approximately 450 tons of contaminated soils to be removed from targeted areas of residential properties (draft RAP pp. 22 – 23). For analysis purposes, excavated residential soils are assumed to be apportioned equally as RCRA-level and CAL- Haz wastes (3840 tons each).
7. Remainder of materials removed from the Project site assumed to be non-hazardous.
8. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.
9. TBD = To be determined based on soil disposal and confirmation sampling results.

1.9 Pre-field Activities

Prior to remediation activities, the contractor(s) will conduct initial mobilization activities.

These activities include:

- Identification of overhead and subgrade utilities that may be affected by the proposed remedy;

- Underground Service Alert/Dig Alert notification to identify underground utility lines that may conflict with the proposed paving activities.

- Dig Alert will mark each utility with the proper identification and coloring. A geophysical survey contractor may be used to locate utilities at the Site.

- Identification of access/egress for staff, vehicles and equipment, and

- Placement of temporary construction signage along roadways utilized for access/egress to and from the Site.

1.10 Excavation and Material Loading/Transport

The Site does not have significant impediments to the movement of trucks, and is located within close proximity to the Riverside 91 Freeway. Transportation Routes from the center of the Site to and from the 91 Freeway North and South are included as Appendix B.

1.10.1 Transportation On-Site

The Project is subject to the following and Appendix B includes the preliminary on-Site truck route.

1) Trucks will enter the Site from the designated entrance and exit locations. Proposed truck entrance and exit routes are shown on figure in Appendix B, however the final routes are subject to update based on the final chosen contractor. No trucks will be allowed to travel on any residential roads to the east of the Site.

2) Traffic control and a flag person will be located at the Site to assist the truck driver to safely drive onto and off the Site.

3) The Site will be vacant at the time of the removal action and trucks may be staged on the property while loading activities are being conducted.

4) While on the property, the vehicle will be required to maintain low speeds (i.e., less than 5 miles per hour) for safety purposes and for dust control measures.

5) All vehicles will be decontaminated prior to leaving the work area. For track-out prevention and control, all trucks will be broom cleaned after loading in an area covered with visqueen prior to Site exit. Proper hazardous waste placarding may be required for transportation of hazardous wastes. The soil decontamination area will be located close to the Mission Inn and 6th Street egresses.

6) Before leaving the Site, the truck driver will be instructed to notify the contractor's Site manager, who will then be responsible for inspection of the truck to ensure that the payload is adequately covered, the truck is free of overburdened soil, and the soil is properly manifested.

7) The trucks will vacate the Site by turning northwest onto either Mission Inn Avenue, 6th Street, or 5th Street (then turning left and right on to Mission Inn Avenue), to gain access to the nearby I-91 Freeway. As the truck leaves, an on-site crew member will assist the truck driver so that he can safely turn onto the street.

1.10.2 Loading

The Project is subject to the following and all soil will be transported using covered end dump trucks.

1) The soil will be loaded directly from the excavation and stockpile area into the trucks.

2) Dust suppression during soil loading and while the soil is in the dump trucks (before covering) will be performed by lightly spraying the work areas with water.

3) Efforts will be made to minimize the soil drop height from loader's bucket into the trucks. Additionally, the loader will be positioned so as to load soil from the leeward side of the bin, if possible.

4) After the soil is loaded into the bin, the soil will be covered and otherwise contained to prevent soil from blowing or spilling out of the trucks during transport to the disposal facility.

5) The trucking subcontractor will be required to provide a truck that does not allow soil to be spilled or blown out from bottom, sides or tops of the bin.

6) The soil will be covered after it is loaded into the dump trucks to prevent soil from blowing or spilling out of the truck during transport to the disposal facility.

1.10.3 Decontamination of Trucks

Trucks that enter the Site will be decontaminated before exit using either dry methods (i.e., shaker plates, brooms and brushes) or wet methods (i.e, pressure washer), as needed based on Site conditions. Shaker plates will be installed at all vehicle exits. Truck decontamination areas are shown on the Site Map included as Appendix C.

1.10.4 Transportation – Off Site

The Project will be subject to the following once the truck leaves the Site.

1) With the exception of traffic conditions encountered during hauling, in the event that an alternate route is taken, the contractor will verify the new truck route with the DTSC prior to initiating field activities.

2) The driver will be provided with the cellular phone number for the contractor's Site manager. It will be the responsibility of the driver to contact the contractor's Site manager if any problems arise after leaving the Site.

3) It will be the responsibilities of the contractor's Site manager to notify the DTSC of any unforeseen incidents.

4) The driver will be instructed to report any roadside emergency to the highway patrol and the Site manager.

5) While at the disposal facility, the truck will be weighed before and after offloading the payload.

6) A weight ticket or bill of lading will be provided to the contractor after the soil has been shipped offsite.

The soil removed from the RSIM Site as part of this removal action will be transported to one of the treatment facilities listed below by end-dump transfer trucks. The treatment facility will be selected based on the results of waste profile analysis and existing PCB data. When more than one COC is present in soil, the decision of which disposal facility to transport the soil to shall be based on the contaminant of concern with the most conservative option. Transportation routes are included in Appendix F.

1.10.4.1 RCRA Hazardous Waste Facilities

US Ecology Nevada
Highway 95, 11 Miles South of Beatty, Beatty, Nevada 89003
Phone Number – (775) 553-2203
EPA ID No. NVT3300100000

1.10.4.2 Non-RCRA and RCRA Hazardous Facilities

Clean Harbors, Buttonwillow Landfill
2500 West Lokern Road, Buttonwillow, CA 93206
Phone Number – (661) 257-3655
EPA ID No. CAD980675276

Waste Management, Chemical Waste Management (Kettleman Hills)
35251 Old Skyline Road, Kettleman City, CA 93239
Phone Number – (559) 309-7688
EPA ID No. CAT000646117

Republic Services La Paz County Landfill
26999 Highway 95, Parker, AZ 85344
Phone Number – (928) 669-8886
EPA ID No. AZC950823111

1.10.4.3 Non-Haz Waste Facilities

Waste Management, Azusa Land Reclamation
1211 W Gladstone Street, Azusa, CA 91702
Phone Number – (866) 909-4458
EPA ID No. N/A

Mecca Resource Facility
62-200 Gene Welmas Drive, Mecca, CA 92254
Phone Number – (760) 507-2062
EPA ID No. N/A

Chandler's Corporation, Maitri Road Recycling Facility
24980 Maitri Road, Corona, CA 92883
Phone Number – (310) 784-2904
EPA ID No. N/A

1.10.5 Waste Management - Targeted Excavations

Targeted RAP excavations that would require enhanced waste handling and disposal are summarized below.

1.10.5.1 Soil Impacted with PCBs > 50 mg/Kg

The excavated waste soil will be managed and disposed off-Site in compliance with applicable requirements. Selection of the appropriate waste disposal facility will be based on results of waste

characterization, receiving facility acceptance criteria, and the availability for the facilities identified in the Transportation Plan to accept such waste at the time of disposal.

To meet the requirements of EPA, the six areas with PCB concentrations equal to or greater than 50 mg/Kg would be targeted separately. These areas fall under the purview of EPA under the Toxic Substance Control Act (TSCA). As required by EPA, each of these 6 areas would require additional confirmation sampling to define the limits of significant contamination prior to targeted excavation. Detailed PCB sampling and testing protocols are presented in the 2019 RAP.

If the results of the PCB soil sampling and testing program indicate the area of significant PCB contamination is well-defined, then the RCRA category PCB waste would be targeted for removal. The maximum laboratory result from each area would be used to profile the material prior to excavation. The proposed receiving facilities for wastes are identified in the 2019 RAP Transportation Plan (Appendix F). [The receiving facility(ies) would be contacted prior to excavation of contaminated materials to ensure acceptance of materials.] When the receiving facility approves acceptance of the waste, it would be excavated by a licensed environmental contractor pursuant to RAP health and safety protocols. RCRA-level materials would be excavated on the same day and would be loaded on to a truck for transport and disposal. The remaining soil from target excavations would be set aside for the general excavation task that follows and would be re-characterized with batches of other excavated soil.

Decontamination of equipment contaminated by PCBs, tools, and sampling equipment will be completed using the double wash/rinse method specified in 40 CFR 761.372. The first wash will cover the entire surface of the equipment with organic solvent in which PCBs are soluble to at least 5 percent by weight (such as isopropyl alcohol). Any runoff solvent will be contained and collected for disposal. Scrub rough surfaces with a scrub brush or disposable scrubbing pad and solvent such that the surface is always very wet for 1 minute. Wipe smooth surfaces with a solvent-soaked, disposable absorbent pad such that each surface is wiped for 1 minute. The solvent is then drained from the surface and contained. The residual solvent is then drained of the surface using a clean, disposable absorbent pad until no liquid is visible on the surface. This process is then repeated with a second wash and rinse. Dispose of all solvents, cleaners, and absorbent materials in accordance with § 761.79(g).

1.10.5.2 Soil Impacted with RCRA Levels of Lead > 50 mg/Kg

Areas where soil is impacted by lead at RCRA-level concentrations will be excavated prior to the commencement of the Site-wide excavation program. These areas are defined based on the information included in 2019 RAP (Table 5 and Figure 4C).

- One area of RCRA-level waste lead concentrations was identified at location S14 based on TCLP testing (>5 mg/L).
- Fifteen sample locations are identified with California-hazardous waste level lead concentrations (<1,000 mg/kg total lead and > 5 mg/L soluble lead by STLC) and several other samples have high lead or concentrations that meet the criteria for California hazardous waste based on TTLC test results (>1000 mg/kg lead) and/or STLC guidelines based on WET test (5 mg/L).

Approximately 1,775 cubic yards of lead-impacted soil above RCRA Hazardous Waste levels are anticipated for removal. However, some of this volume of soil is co-located with PCB impacted soil

The proposed receiving facilities for wastes are identified in the 2019 RAP Transportation Plan (Appendix F). [The receiving facility(ies) would be contacted prior to excavation of contaminated materials to ensure acceptance of materials.] When the receiving facility approves acceptance of the waste, it would be excavated by a licensed environmental contractor pursuant to RAP health and safety protocols. The RCRA-level materials would be excavated on the same day and would be loaded on to a truck for transport and disposal. The remaining soil from target excavations would be set aside for the general excavation task that follows and would be re-characterized with batches of other excavated soil.

1.10.5.3 Residential Site Soils Contamination

After removal of the potentially hazardous targeted excavations within the RSIM site, known and potential targeted areas of affected residential properties will be excavated. This includes the residential properties at 2981 Mission Inn Avenue, 2968 6th Street, and 2981 6th Street. Remedial actions may also be required at the 2980 5th Street residential property. Access to this site could not be secured to allow for soils sampling. However, soils at this location may be impacted based on available data collected at the RSIM site. Evaluation of potentially contaminated soils and implementation of any appropriate remedial actions is contingent on the 2980 5th Street property owner providing access to the site for sampling and excavation of soil.

Targeted excavations at 2981 Mission Inn Avenue and 2968 6th Street would be completed to approximately one-foot below grade and are identified in Figure 7A and 7B of the 2019 RAP. Following excavation activities, commensurate confirmation soil sampling will be used to ensure that the impacted soil had been adequately removed.

Materials excavated from affected residential properties would be removed to the RSIM site and would be included in the general on-site excavation materials for profiling and disposal.

1.10.6 Waste Management - General

After the targeted soils excavation work described above is completed, the RSIM site-wide excavation work and soils removal will commence. The strategy for soil removal will be to initiate excavation on the southerly side of the RSIM site and progress northerly. Soils will be excavated to a depth of approximately 1 foot below grade. Any significantly discolored material will be segregated separately and tested as possible hazardous waste; otherwise the material will be stockpiled collectively. Confirmation of base native soil conditions will be accomplished after excavation of the RSIM site is substantively complete. Excavated soils will be temporarily stockpiled in northerly and westerly portions of the RSIM site prior to transportation to, and disposal at, designated hazardous waste acceptance facilities.

Preliminary sampling and testing detailed in the 2019 RAP indicate that a small portion of the excavated soils will require disposal at designated hazardous waste facilities. Remaining excavated soils will need to be defined as hazardous or non-hazardous. The actual amount of soil to be classified, and disposed of, as hazardous and non-hazardous is contingent upon soil sampling results of excavated soils and the sampling requirements of the prospective accepting waste handling facility. Results will be used to direct the fate of the excavated soil based on its category. Facilities receiving hazardous materials will be contacted prior to materials transportation to ensure acceptance of materials. Once soils are classified as hazardous and non-hazardous, soil can be removed from the site regularly to provide space for equipment and soil handling and storage.

1.10.6.1 Stockpile Management and Sampling

An environmental excavation contractor with appropriate safety training (OSHA 40-hour Hazwopper Trained) shall be responsible for stockpile management and sampling. Generated waste soil will be stockpiled on and covered with plastic sheeting or placed in roll-off bins for temporary staging pending off-Site disposal. Waste soil will be profiled for disposal in accordance with receiving facility requirements and procedures outlined in the USEPA Test Methods for Evaluating Soil Waste (SW-846), Chapter Nine (1986), and ASTM International

If soil exhibiting odors or staining is encountered, soil will be segregated/stockpiled for subsequent characterization and off-Site disposal, as applicable, based on soil disposition planning by the contractor.

1.10.6.2 Soil Stockpiling/Staging

It would be necessary to temporarily stockpile and stage excavated soils within the RSIM site until off-site transportation and disposal are available. Staging processes shall be conducted in a manner to minimize the generation of dust from soil stockpiles (e.g., low backhoe drop heights, low profile stockpiles etc.). Water spray or mist, as appropriate, shall be applied during soil loading operations. At staging areas, excavated soil will be placed on an impermeable barrier base (e.g., plastic sheeting). When work is not being conducted, staged soils shall be covered to prevent any run-on and/or fugitive dust generation. If significant rainfall is anticipated, staging areas shall be bermed to contain potential run-off.

1.10.6.3 Dust Control Measures

Throughout site excavation and site remediation processes, at a minimum, dust suppression Best Available Control Measures (BACMs) shall be implemented pursuant to South Coast Air Quality Management District (SCAQMD) Rule 403, Fugitive Dust. The following measures shall also be implemented:

- sprinkling water to maintain soil moisture during excavation and loading activities;
- covering all trucks hauling soil, sand or other loose materials or require all trucks to maintain at least 2 feet of freeboard (trucks hauling soil off Site must secure the load in accordance with California and United States Departments of Transportation regulations);
- sweeping streets daily if visible soil material is carried onto adjacent public streets;
- restricting non-essential traffic in the project area;
- minimizing drop heights while loading transportation vehicles; and
- covering exposed affected soil or stockpiles with secured plastic sheeting.

To prevent heat-related illness, take frequent breaks and drink plenty of fluids throughout the day, and apply sunscreen.

Air quality monitoring will be performed by the Site Safety Officer (SSO) to 1) screen recovered soil and 2) monitoring air quality in work areas. Dust from the removal activity may contain all the COCs such as the PCBs, PAHs, arsenic and lead. Control and monitoring measures will be implemented at the Site to reduce the potential for dust inhalation. During the removal action the SSO will monitor the workspace for total air borne particulates. Dust and air monitoring will be

done in compliance with applicable South Coast Air Quality Management District (SCAQMD) Regulations.

General information related to SCAQMD Rules 1166 and 1466 are listed below. The provisions and permitting requirements of Rule 1166 and 1466 will be the responsibility of the excavation contractor selected for the project and details of their air monitoring program will be included in their HASP.

1.10.6.4 Air Quality Monitoring

The Project involves site disturbance including potential disturbance of COCs that could affect on-site workers and proximate off-site sensitive receptors. Accordingly, air quality monitoring measures and control actions described below are incorporated in the Project.

The air monitoring instruments utilized at the Site will be a Phocheck Tiger or MiniRAE 3000 Photo Ionization Detector (PID) (Isobutylene) or equivalent, and a SCAQMD pre-approved PM10 dust monitor.

SCAQMD Rule 1166

The contractor will abide by the provisions of SCAQMD Rule 1166. Rule 1166 applies to any operator conducting earth-moving activities in known or suspected volatile organic compound (VOC)-impacted soils.

A PID will be used to screen recovered soil and monitor worker's breathing zone for VOCs during soil sampling at least once every 15 minutes during excavation or grading and record the results of sampling.

In the event that sustained levels (1 minute) of 5 ppm in measured vapors are detected in the breathing zone, stop work and notify the SSO. Adjustments to the field practice such as ventilation and engineering controls will be implemented as needed prior to returning to the field activities.

SCAQMD Rule 1466

The contractor will abide by the provisions of SCAQMD Rule 1466. Rule 1466 applies to any operator conducting earth-moving activities at a Site with soil with toxic air contaminants of concern, which include Site COCs lead, arsenic, and PCBs.

- A SCAQMD pre-approved PM10 dust monitor will be utilized at the Site for ambient monitoring.
- When earth-moving activities or vehicular movement occurs, the owner or operator will conduct continuous direct-reading near real-time ambient monitoring of PM10 concentrations.
- A minimum of one upwind monitor will be installed where the location of the upwind monitor(s) are indicative of background PM10 levels and not generally influenced by fugitive dust sources from the Site.
- A minimum of one downwind monitor will be installed in the prevailing wind direction downwind of the area of earth-moving activity and as close to the property line as feasible.

- If the PM10 concentration averaged over 2 hours exceeds 25 micrograms per cubic meter, the owner or operator shall cease earth-moving activities, apply dust suppressant to fugitive dust sources, or implement other dust control measures as necessary until the PM10 concentration is equal to or less than 25 micrograms per cubic meter averaged over 30 minutes.

1.10.6.5 Post-Excavation Actions

Low levels of VOCs were detected in soil gas beneath the RSIM site. In certain instances, VOCs exceeded RSL guidelines. Accordingly, after removal of impacted soils, post-remediation soil gas testing shall be conducted to ensure that the RSIM site is suitable for redevelopment without restriction regarding potential VOC hazards.

Subsequent to removal and disposal of contaminated soils and other materials, the RSIM site will be over-covered with clean imported fill sufficient to achieve approximate pre-excavation site elevations and contours, thereby providing a significant barrier to the native soil and minimizing potential contaminant exposure pathways. Redevelopment of the property likely will require removal of several inches to 1 foot or more of surface soil to facilitate the import of base material and foundation construction on the Site. The rumble strips will be placed at the egress point where the Site meets a paved public road. Rumble strips are only anticipated if clean import soils are required to grade the area to facilitate design specification and drainage for paving.

1.10.7 Health and Safety

The following health and safety programs and policies shall be implemented, and are incorporated in the Project.

1.10.7.1 Health and Safety Plan

A Health and Safety Plan (HASP) shall be implemented as one component of the RAP. The HASP shall address all site activities, including but not limited to soil excavation, air monitoring, and soil stockpiling/staging. All site personnel shall be required to familiarize themselves with the HASP, and shall provide signature acknowledgement of the HASP provisions and requirements. The HASP shall identify the specific COCS that are likely to be encountered at the site and their properties. The HASP shall present health and safety risks associated with each proposed task. The HASP shall include a map showing directions between the site and the local hospital or emergency center. Specific HASP requirements, protocols, and responsibilities would include but would not be limited to the following:

- Contractor staff shall be provided a copy of the HASP. Contractor and subcontracted personnel involved with field work shall review proper health and safety practices presented in the HASP prior to initiating field work, and on a daily basis in the morning before field work begins.

- The Environmental Manager shall monitor all site excavation activities and shall direct the excavation, characterization, loading for off-site disposal of excavated materials.

- The Contractor's hazmat certified operator shall excavate soil at the direction of the Environmental Manager.

- All workers, visitors and all other people at this site must abide by the rules and procedures presented in the HASP.

- The Contractor shall be responsible for the health and safety of employees and their subcontractors. The Contractor and their subcontractors are responsible for preparation and enforcement of a Health & Safety Plan for all activities associated with their work at this site.

- Prior to excavation, Contractor shall verify the appropriate underground utility locating parties have completed the location and depths of underground utilities within the excavation limits and peripheral area.

- Excavated soil shall be loaded into appropriately licensed dump trucks for off-site disposal. Commonly utilized excavation methods and equipment shall be utilized for excavation of soil for removal. Equipment used for contaminated soil handling and transport shall be dedicated to such uses until contaminated soil handling and transport activities are concluded and affected equipment has been decontaminated.

- All contaminated equipment shall be decontaminated over visqueen and the contaminated debris and visqueen placed into the last truck heading for the appropriate disposal site. To minimize a potential spread of contamination, equipment used for decontamination purposes shall not be used for other purposes.

- Best Management Practices (BMPs) and Best Available Control Measures (BACMs) for dust control measures shall be followed. Excavation and soil loading shall be stopped when wind gusts exceed 20 miles per hour. The contractor shall use a water truck to spray work areas as necessary to control fugitive dust. The Environmental Manager shall monitor the work zone using a handheld photo ionization detector (PID) and stationary, strategically positioned (upwind and downwind) 8-hour vacuum pump samplers to document the concentration of heavy metals emanating from the excavation activities.

- SPECIAL NOTIFICATIONS: At least 30 days before site disturbance activities begin, Contractor(s) shall provide written notice of anticipated site disturbance to schools, playgrounds, daycares, or hospitals within 1,000 feet of the Project site.

1.11 RAP Schedule

Per the Preliminary Project Schedule, the duration of site remediation activities (not including soil import and restoration of the Project site) is estimated at 90 working days (no work on weekends). Dates specified are estimates only and subject to change.

Days	Date to Complete	Task
0	6/01/19	Revised RAP Submission to DTSC
90	December 2019	Public Participation
60	10/29/19	RAP Implementation Planning, Final Contracting, and Permitting
90	1/27/20	Site Preparation, Mobilization and Implementation of RAP
60	3/27/20	Remedial Action Completion Report (RACR)

1.12 Construction Equipment Use

Soil excavation equipment must be in good working condition. Particular attention will be paid to the condition of cables and hoisting equipment. Barricades, traffic cones, or caution tape will be used as needed to exclude unauthorized personnel from the work area.

During excavation activities, equipment will be positioned to allow for adequate work room and the area kept free of trip and slip hazards. Care will be taken to avoid the catching of loose clothing in moving parts, and to keep hands free of pinch points. Proper Personal Protective Equipment (PPE) including hard hat, safety glasses, gloves, hearing protection, and safety shoes must be worn.

1.12.1 Project Traffic Generation

The Project does not propose or require uses that would be substantive long-term traffic generators. Project activities would, however, result in temporarily increased truck traffic along local and regional roadway systems. Peak Project traffic generation would occur during export of contaminated soils and general debris from the Project site, and import of clean soil to the Project site. Nominal traffic volumes would also be generated by construction workers/employees accessing the Project site and transport of construction equipment to and from the Project site.

1.12.2 Hours of Operation

1) Trucks will enter the Site no earlier than 8:00 AM.

2) Soil transportation activities shall cease no later than 5:00 PM.

1.13 Discretionary Approvals and Permits

Discretionary actions, permits and related consultation(s) necessary to approve and implement the Project include, but are not limited to, the following.

1.13.1 Lead Agency Discretionary Actions and Permits

- Adoption of a Mitigated Negative Declaration.
- Approval of *Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (GSI Environmental) July 23, 2019 (RAP).

1.13.2 Other Consultation and Permits

Anticipated consultation and permits necessary to implement the RAP would likely include, but are not limited to, the following:

- Tribal Resources consultation with requesting Tribes as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*.
- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit.
- Permitting may be required by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment that may be implemented within the Project area.

- Permitting (i.e., temporary utility connection permits) may be required from utility providers.

- City of Riverside ministerial permits including, but not limited to, grading permits and encroachment permits.

1.14 Use of this IS/MND

This IS/MND addresses the potential environmental effects of the implementation of the proposed *Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (GSI Environmental) July 23, 2019 (RAP, the Project).

The California Department of Toxic Substances Control (DTSC) is the Lead Agency for the purposes of CEQA because it has the principal responsibility and authority for deciding whether or not to approve the Project, and how it would be implemented. As the Lead Agency, DTSC is also responsible for preparing the environmental documentation for the Project in compliance with CEQA.

The Lead Agency will utilize this IS/MND in its evaluation of potential environmental impacts resulting from, or associated with, approval and implementation of the Project, to include potential effects of the Project's component elements. It is anticipated that this IS/MND may also be utilized by Responsible Agencies, e.g., City of Riverside, Air Quality Management District(s), Regional Water Quality Control Board(s), et al.; as well as utilities and service providers for their related or dependent environmental analyses.

In this IS/MND, DTSC and other agencies recognize that Project plans and development concepts identified herein are subject to refinement as the Project is further defined. Recognizing the potential for these future minor alterations to the Project, this IS/MND in all instances evaluates likely maximum impact scenarios that would account for these minor alterations. These refinements and/or minor revisions do not typically warrant modified or revised environmental documentation. Notwithstanding, at the discretion and direction of DTSC, substantive modifications to the Project described herein may warrant additional environmental evaluation.

1.15 References

City of Riverside General Plan 2025 [General Plan],

Riverside Marketplace Specific

City of Riverside General Plan and Supporting Documents EIR (Albert A. Webb Associates) November 2007 (General Plan EIR)

Air Quality Modeling for Draft Remedial Action Plan, Riverside Scrap Iron & Metal (Urban Crossroads) December 4, 2017.

AMEC Foster Wheeler (AMEC), 2015, Additional Phase II Environmental Site Assessment Report, December 9.

Ami Adini & Associates (AA&A), 2011, Phase II Environmental Site Assessment. August 8.

GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.

Hillmann, 2017a, Off-Site Preliminary Environmental Assessment, February 27.

2.0 ENVIRONMENTAL EVALUATION – CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this Project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq.] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.].

PROJECT TITLE: Riverside Scrap Iron and Metal Remedial Action Plan Project		CALSTARS CODING: TBD
PROJECT ADDRESS: 2993 Sixth Street	CITY: Riverside	COUNTY: Riverside
PROJECT SPONSOR: Danny Frankel	CONTACT: Paige H. Gosney	PHONE: (909) 890-4499

☐ Initial Permit Issuance ☐ Permit Renewal ☐ Permit Modification ☐ Closure Plan
Removal Action Workplan ☒ Remedial Action Plan ☐ Interim Removal ☐ Regulations
☐ Other (specify):

DTSC PROGRAM/ ADDRESS: Site Mitigation and Restoration Program 5796 Corporate Avenue Cypress, CA 90630	CONTACT: Aslam Shareef	PHONE: (714) 484-5472

1.0 PROJECT DESCRIPTION: Please refer to attached Section 1.0, *Project Description*.

2.1 Environmental Impact Analysis.

2.1.1 Aesthetics

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project site comprises the Riverside Scrap Iron and Metal (RSIM) site and targeted portions of residential properties abutting the RSIM site to the south. The Project site comprises approximately 7 acres extending across multiple parcels. The predominance of the Project Remedial Action Plan (RAP) activities would affect, and would be located within, the approximately 7-acre RSIM site. The RAP also addresses contaminants affecting limited areas (less than 0.1 acres) of abutting residential properties located southerly of the RSIM site.

- **Project Site**
  The Site has been used as a scrap metal yard for over 45 years and was occupied primarily by the main office (Area 8a), a former machine shop (Area 8b), a storage building (Area 8d), and an office/maintenance building (Area 10a). The Site formerly maintained underground and aboveground storage tanks on the western portion of the Site (Area 8e) that were used to store and dispense fuel and oil. Historical railroad operations were conducted on Area 8f, Area 8g, and Area 12. The scrap metal and recycling business ceased operations in 2015. By August 2015, the Site had been cleared of utilities, mixed trash, debris and scrap metal and currently consists mostly of unpaved bare earth and paved surfaces. Surrounding land uses to the north, west and south are primarily commercial. Residential housing is located along the eastern border of the Site.

- **West/Southwest**
  Westerly/southwesterly of the Project site, across Mission Inn Avenue, properties are vacant or are developed with single-family residential uses.

- **East/Northeast**
  Easterly/northeasterly of the Project site, across 4th Street, properties are developed with light industrial uses. Southerly of these industrial uses, properties are developed with single-family residential uses.

- **North**
  Northerly of the Project site are vacant properties and various light industrial/commercial land uses.

- **South**
  Southerly of the Project site, properties are developed with single-family residential uses

Analysis as to whether or not Project activities would:

a. Have a substantial adverse effect on a scenic vista.

Impact Analysis: The *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007 (General Plan EIR) includes the following discussion

describing scenic vista resources:

> Although the majority of Riverside is urbanized, the hills and ridgelines that surround the City provide scenic vistas to residents of Riverside where they can experience long distance views of natural terrain. Vista points can be found throughout the City, both as viewed from urban areas toward the hills and from wilderness areas toward Riverside. The most notable scenic vistas in the City include the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. The peaks of Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, Alessandro Heights and the La Sierra/Norco Hills provide scenic views of the City and the region (General Plan EIR, p. 5.1-2).

There are no designated scenic vistas located within or proximate to the Project site. Nor does the Project propose or require uses or activities that would substantively affect any off-site scenic resources. Removal of surface improvements, stockpiled debris, and contaminated soil accomplished pursuant to the RAP would not affect or alter scenic resources. Based on the preceding, the potential for the Project to have a substantial adverse effect on a scenic vista is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: There are no scenic resources located within or proximate to the Project site. Mission Inn Avenue, which comprises the Project site west/southwesterly boundary, is however designated as a Scenic Boulevard by the City of Riverside (General Plan EIR Figure 5.1-1, *Scenic and Special Boulevards and Parkways*; General Plan EIR Table 5.1-A, *Scenic & Special Boulevards*). Removal of surface improvements, stockpiled debris, and contaminated soil accomplished pursuant to the RAP would not affect or alter a scenic resource, in this case, Mission Inn Avenue.

Based on the preceding, the potential for the Project to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Site disturbance and implementation of any site screening/buffering elements pursuant to the RAP does not constitute a substantive alteration of the site that would substantially degrade the existing visual character or quality of the site and its surroundings. Site disturbances and implementation of site screening/buffering elements would be temporary and transient with no permanent effect on perception of the Project site or its surrounding. Please refer also to remarks at Checklist Items 1. a., b. Based on the preceding, the potential for the Project to substantially degrade the existing visual character or quality of the site and its surroundings is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Site clearing and remediation proposed by the Project would not create or require new or additional sources of light or glare. The Project does not otherwise propose or require facilities or operations that would result in new or additional sources of light or glare. Based on the preceding, the Project would have no impacts related to light and glare that would adversely affect day or nighttime views in the area.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used: • *GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.2 Agricultural Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project site comprises the RSIM site and targeted areas of abutting residential properties. The Project site is classified "Urban and Built-Up Land," and is not currently used for agricultural purposes. The Project site is not designated as "Farmland" of any type, nor is the Project site designated as a grazing or water resource (General Plan EIR Figure 5.2- 1, *Designated Farmland*). The Project site is not subject to, or affected by any Williamson Act Contracts (General Plan EIR Figure 5.2-2, *Williamson Act Preserves*).

Please refer also to IS/MND Section 1.0, *Project Description*.

Analysis as to whether or not Project activities would:

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

Impact Analysis: The Project site is not designated as "farmland" of any type, nor is the Project site designated as a grazing or water resource. Nor would implementation of the Project result in uses or activities that would substantively affect off-site properties designated as Farmlands. Based on the preceding, the Project would have no impact regarding conversion of Farmlands to non-agricultural use.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

Impact Analysis: The Project site is not zoned for and is not used for agriculture purposes. The Project site is not subject to or otherwise affected by a Williamson Act Contract. Nor would implementation of the Project result in uses or activities that would substantively affect off-site properties zoned for, or used for agricultural purposes, or subject to a Williamson Act contract. Based on the preceding, the Project would have no impact regarding conversion of Farmlands to non-agricultural use.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Impact Analysis: Please refer to remarks at Checklist Items 2. a., b.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.3 Air Quality

Project Activities Likely to Create an Impact:

- Construction equipment air pollutant emissions.
- Building Demolition and Site Clearing.
- Fugitive dust and particulates generated by RAP activities including but not limited to: excavation, grading, soil stockpiling, soil loading and unloading, and equipment decontamination.
- Transport of impacted soil from the Project site to appropriate permitted disposal facilities.
- Transport of clean soil to the Project site.
- Compaction and rough grading of imported clean soils.
- Transportation of construction equipment to/from the Project site.
- Construction worker commutes.

Description of Baseline Environmental Conditions Refer to IS/MND Section 1.0, *Project Description*.

Analysis as to whether or not Project activities would:

a. *Conflict with or obstruct implementation of the applicable air quality plan*.

Impact Analysis: The Project is located within the South Coast Air Basin (Basin) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is locally responsible for administration and implementation of the Air Quality Management Plan (AQMP). Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

The SCAQMD AQMP incorporates the latest scientific and technical information and planning assumptions; updated emission inventory methodologies for various emissions source categories; and reflects information, plans, and programs presented in the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP). Air quality conditions and trends presented in the AQMP assume that regional development will occur in accordance with population growth projections identified by SCAG in its RTP. The AQMP further assumes that development projects within the region will implement appropriate strategies to reduce air pollutant emissions, thereby promoting timely implementation of the AQMP.

Criteria for determining consistency with the AQMP are identified at Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD *CEQA Air Quality Handbook* (1993), as listed below. Project consistency with, and support of, these criteria is presented subsequently.

- **Criterion No. 1**: The project under consideration will not result in an increase in the frequency or severity of existing NAAQS/CAAQS air quality violations or cause or contribute to new NAAQS/CAAQS violations; or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Criterion No. 2**: The project under consideration will not exceed the assumptions in the AQMP in 2011 or increments based on the years of Project build-out phase.

Criterion No. 1

The CAAQS and NAAQS comprise, and are reflected in, the SCAQMD Localized Significance Thresholds (LSTs). The Project LST analysis (presented under item b, below) substantiates that Project-source emissions would not exceed applicable LSTs, and therefore would not violate NAAQS or CAAQS. Further, the Project would implement applicable best available control measures (BACMs), and would comply with applicable SCAQMD rules, acting to further reduce already less-than-significant air pollutant emissions. On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

Criterion No. 2

Criterion No. 2 addresses consistency (or inconsistency) of a given project with approved local and regional land use plans, and associated potential AQMP implications. That is, AQMP

emissions models and emissions control strategies are based in part on land use data provided by local general plan documentation; and complementary regional plans, which reflect and incorporate local general plan information. Projects that propose general plan amendments may increase the intensity of use and/or result in higher traffic volumes, thereby resulting in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. However, if a given project is consistent with and does not otherwise exceed the growth projections in the applicable local general plan, then that project would be considered consistent with the growth assumptions in the AQMP and would not affect the AQMP's regional emissions inventory for the Basin.

The Project does not propose or require any change in City of Riverside General Plan Land Use designations, nor would the Project result in any increase in development intensity at the subject site. Because the land uses and development intensities proposed by the Project are consistent with the City General Plan, the Project complies with Consistency Criterion No. 2.

AQMP Consistency Conclusion
The Project would not result in or cause NAAQS or CAAQS violations (please refer to Table 3-2), presented subsequently). The Project does not propose or require any change in General Plan Land Use designations, nor any increase in development intensity. The potential for the Project to conflict with or obstruct implementation of the applicable air quality plan is therefore considered less-than-significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. *Violate any air quality standard or contribute substantially to an existing or projected air quality violation*.

I**mpact Analysis:** For the purposes of this analysis, RAP actions and programs are considered are modeled as construction activities. The Project would not result in any permanent facilities or programs that would generate long-term operational emissions.

The SCAQMD/California Air Pollution Control Officers Association (CAPCOA)-approved version of the California Emissions Estimator Model (CalEEMod, v2016.3.1) was utilized to estimate Project-related air pollutant emissions levels. Project emissions levels were then compared to applicable SCAQMD thresholds in order to determine if air quality standards would be exceeded; or if Project emissions would contribute substantially to existing or projected air quality violations. Unless otherwise noted, CalEEMod default values and assumptions were applied throughout. Air pollutant emissions generated by the Project as evaluated in the context of applicable

SCAQMD thresholds are summarized below.

Regional Impacts

Construction-Source Air Pollutant Emissions

Project construction-source air pollutant emissions would be generated by, or result from:

- Construction equipment air pollutant emissions.
- Building Demolition and Site Clearing.
- Fugitive dust and particulates generated by RAP activities including but not limited to: excavation, grading, soil stockpiling, soil loading and unloading, and equipment decontamination.
- Export of impacted soil from the Project site to appropriate permitted disposal facilities.
- Importation of clean soil to the Project site.
- Compaction and rough grading of imported clean soils.
- Transportation of construction equipment to/from the Project site.
- Construction worker commutes.

A summary of anticipated construction equipment use by activity is presented at Table 3-1.

Table 3-1
Summary of Construction Equipment Use by Activity

Activity	Equipment Type	Equipment Pieces	Hours per day	Total Days
Demolition of surface improvements (pavement, asphalt, etc.)	Concrete/ Industrial Saws	1	8	26
	Excavator	1	8	26
	Rubber Tired Dozer	1	8	26
Excavation/ Soil Stockpiling	Backhoe	1	8	30
	Tractor/Loader	1	8	30
Soil Loading/Export	Tractor/Loader/ Backhoe	2	8	30
Soil Import/ Soil Compaction/ Rough Grading	Tractor/Loader/ Backhoe	2	8	35
	Roller	1	8	35
	Grader	1	8	35

Notes:
1. Equipment assumptions are typical for this type of project.
2. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.

Modeled maximum daily Project construction-source air quality emissions reflecting the above-listed activities and equipment use are presented at Table 3-2.

Table 3-2
Maximum Daily (Winter/Summer) Construction-Source Air Pollutant Emissions Without Mitigation (pounds per day)

Year	Activity	VOC	NOX	CO	SOX	PM10	PM2.5
Peak Daily Total		5.77	104.33	29.47	0.21	10.89	4.07
SCAQMD Regional Threshold		75	100	550	150	150	55
Threshold Exceeded?		No	**YES**	No	No	No	No

Sources: Urban Crossroads CalEEMod Modeling Output (IS/MND Appendix B); Applied Planning, Inc.
Note: Values reported at Table 3-2 are highlighted in the CalEEMod Winter/Summer "Unmitigated Condition" modeling output presented at IS/MND Appendix B.

Level of Significance: *Potentially Significant* (NOx emissions only). As indicated at Table 3-2, maximum daily Project construction-source NOx emissions would exceed applicable SCAQMD regional thresholds, and would therefore be considered potentially significant. All other Project construction-source criteria pollutant emissions would not exceed applicable SCAQMD regional thresholds and would therefore be less-than-significant.

Mitigation Measure:
AQ-1 Use of off-road construction equipment rated at > 150 HP shall comply with EPA/CARB Tier 3 emissions standards, and shall be tuned and maintained in accordance with the manufacturer's specifications.

Level of Significance After Mitigation: Less-Than-Significant. Maximum daily mitigated Project construction-source emissions are summarized at Table 3-3. As indicated at Table 3-3, mitigated Project construction-source criteria pollutant emissions would not exceed SCAQMD regional thresholds and would be less-than-significant.

Table 3-3
Maximum Daily (Winter/Summer) Construction-Source Air Pollutant Emissions With Mitigation (pounds per day)

Year	Activity	VOC	NOX	CO	SOX	PM10	PM2.5
Peak Daily Total		2.86	76.08	29.47*	0.21	7.21	2.71
SCAQMD Regional Threshold		75	100	550	150	150	55
Threshold Exceeded?		No	No	No	No	No	No

Sources: Urban Crossroads CalEEMod Modeling Output (IS/MND Appendix B); Applied Planning, Inc.
Notes:
- Values reported at Table 3-3 are highlighted in the CalEEMod Winter/Summer "Mitigated Condition" modeling output presented at IS/MND Appendix B.
***** CalEEMod inaccurately reports mitigated CO emissions reflecting EPA/CARB tier 3 equipment mitigation. Mitigated CO emissions presented at Table 3-3 are conservatively assumed equal to unmitigated CO emissions.

Regional Air Quality Impact Summary

As mitigated, Project maximum daily construction-source emissions would not exceed applicable SCAQMD thresholds and would therefore be less-than-significant with application of mitigation.

Localized Impacts

Localized Significance Threshold Analysis

Pursuant to SCAQMD criteria, air quality impacts are potentially significant if there is a potential to contribute or cause localized exceedances of the national and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, the NAAQS/CAAQS establish Localized Significance Thresholds (LSTs).

LSTs were developed in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. More specifically, to address potential Environmental Justice implications of localized air pollutant impacts, the SCAQMD adopted LSTs indicating whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter less than 10 microns (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$). LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. Use of LSTs by local government is voluntary. Lead agencies may employ LSTs as another indicator of significance in air quality impact analyses.

Emissions Considered/Methodology

LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter less than 10

microns (PM10), and particulate matter less than 2.5 microns (PM2.5). The Project LST analysis incorporates, and is consistent with, protocols and procedures established by the SCAQMD *Final Localized Significance Threshold Methodology* (Methodology) (SCAQMD, June 2003). The SCAQMD Methodology clearly states that "off-site mobile emissions from the Project should NOT be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis, only "on-site" emissions were considered.

Construction-Source Emissions LST Analysis

The LST mass rate look-up tables provided by the SCAQMD were employed to determine if Project construction-source or operational-source air pollutant emissions could result in significant localized air quality impacts. If the calculated on-site air pollutant emissions do not exceed the LST mass rate look-up table levels, then localized emission impacts would be less-than-significant.

The LST Methodology (Methodology) presents mass emission rate thresholds for each Source Receptor Area (SRA); and for projects of 1, 2, and 5 acres, with nearest receptor distances of 25, 50, 100, 200, and
500 meters. For intervening project areas and receptor distances, the Methodology employs linear interpolation to determine applicable mass emission rate thresholds. If receptors are within 25 meters of the subject development site, the Methodology employs the 25-meter distance threshold.

The Project is located in SRA 23 (Metropolitan Riverside County). The nearest existing sensitive land uses are the residences abutting the RSIM site to the south. Applicable SRA 23 mass emission rate thresholds presented at Table 3-4 are conservatively based on 1 acres/day disturbance and the minimum 25- meter source – receptor distance.[1] Table 3-4 summarizes the Project's maximum potential localized construction-source emissions impacts.

Table 3-4
Maximum Construction-Source Localized Emissions – Unmitigated (pounds per day)

	Pollutant			
	CO	**NOx**	**PM10**	**PM2.5**
Peak Daily Total	11.38	34.02	3.51	1.43
SCAQMD Localized Threshold	118	602	4	1
Threshold Exceeded?	No	No	No	**YES**

Sources: Urban Crossroads CalEEMod Modeling Output (IS/MND Appendix B); Applied Planning, Inc.

[1] Use of the one-acre disturbance LST criteria establishes the most restrictive threshold condition. The Methodology explicitly states that "[i]t is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Accordingly, a minimum source – receptor separation of 25 meters is reflected in the LST analysis.

Note: Values reported at Table 3-4 are highlighted in the CalEEMod Winter/Summer "Unmitigated Condition" modeling output presented at IS/MND Appendix B.

Level of Significance: *Potentially Significant* ($PM_{2.5}$ emissions only). As indicated at Table 3-4, maximum daily Project construction-source $PM_{2.5}$ emissions would exceed applicable SCAQMD LSTs, and would therefore be considered potentially significant. All other Project construction-source criteria pollutant emissions would not exceed applicable SCAQMD LSTs and would therefore be less-than-significant.

Mitigation Measure: Mitigation Measure AQ-2 is incorporated to ensure monitored implementation and compliance with applicable SCAQMD Rule 403 provisions.

AQ-2 The following measures are incorporated to ensure monitored implementation and compliance with applicable SCAQMD Rule 403 provisions:

- *All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.*
- *Contractor(s) shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.*
- *Contractor(s) shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.*

Level of Significance After Mitigation: Less-Than-Significant. Maximum daily mitigated Project construction-source localized emissions are summarized at Table 3-5. As indicated at Table 3-5, mitigated Project construction-source criteria pollutant emissions would not exceed SCAQMD LSTs and would be less-than-significant.

Table 3-5
Maximum Construction-Source Localized Emissions – Mitigated (pounds per day)

	Pollutant			
	CO	**NOx**	**PM10**	**PM2.5**
Peak Daily Total	11.38	34.02	2.16	0.65
SCAQMD Localized Threshold	118	602	4	1
Threshold Exceeded?	No	No	No	No

Sources: Urban Crossroads CalEEMod Modeling Output (IS/MND Appendix B); Applied Planning, Inc.

Note: Values reported at Table 3-5 are highlighted in the CalEEMod Winter/Summer "Mitigated Condition" modeling output presented at IS/MND Appendix B.

Localized Air Quality Impact Summary
As mitigated, Project maximum daily construction-source localized emissions would not exceed applicable SCAQMD LSTs would therefore be less-than-significant with application of mitigation.

Conclusion:
☐ Potentially Significant Impact
☒ Potentially Significant Unless Mitigated
Less Than Significant Impact
☐ No Impact

c. *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)*.

Impact Analysis: The Project area is designated as an extreme non-attainment area for ozone; a serious non-attainment area for PM_{10}; and a non-attainment area for $PM_{2.5}$. Germane to these regional non- attainment conditions, the Project-specific evaluation of emissions presented in herein substantiates that Project air pollutant emissions would not exceed applicable SCAQMD significance thresholds. The fact that the Project emissions would not exceed applicable SCAQMD thresholds indicates that the Project impacts in these regards would be less-than-significant on an individual basis, and under SCAQMD significance criteria, would not be cumulatively considerable. Based on the preceding, the potential for the Project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard is less-than-significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. *Expose sensitive receptors to substantial pollutant concentrations*.

Impact Analysis: Sensitive receptors as defined by SCAQMD can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The nearest sensitive receptors that would be affected by RAP actions and programs are the single-family residences abutting the RSIM site to the south. As concluded in the above discussion of Localized Air Quality Impacts, with the implementation of Mitigation Measure AQ-1, the sensitive receptors nearest the Project site would not be subject to criteria pollutant emissions exceeding SCAQMD LSTs. Moreover, air quality monitoring is incorporated in Project

to ensure that RAP activities and programs would not otherwise expose sensitive receptors to substantial pollutant concentrations. Please refer to Section 1.0, *Project Description*, 1.7.6.2 *Air Quality Monitoring*.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. *Create objectionable odors affecting a substantial number of people*.

Impact Analysis: Temporary, short-term odor releases are potentially associated with Project site remediation activities. Potential odor sources include, but are not limited to construction equipment emissions, and emissions associated with use of oils, fuels and solvents. It is expected that these odors would quickly dissipate and would not substantively affect vicinity properties. Odors that would result from site remediation are controlled as a byproduct of hazardous/potentially hazardous materials handling plans and Best Management Practices implemented under SCAQMD Rule 402 et al. The Project would comply with all SCAQMD Rules regulating and controlling odors and odor sources. The Project does not propose permanent facilities or long-term operations that would create objectionable odors affecting a substantial number of people. Based on the preceding, the potential for the Project to create objectionable odors affecting a substantial number of people is considered less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Result in human exposure to Naturally Occurring Asbestos.

Impact Analysis: The Project site is not a known source of naturally occurring asbestos. The RAP does not indicate that naturally occurring asbestos is a contaminant of concern at the Project site. Based on the preceding, the potential for the Project to result in human exposure to naturally occurring asbestos is considered less-than-significant. Please refer also to potential exposure to asbestos that may result from demolition of on-site structures presented at Checklist Item 8., *Hazards and Hazardous Materials*.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; *Air Quality Modeling for Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (Urban Crossroads) December 4, 2017.

2.1.4 Biological Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The RSIM site has historically been used as a scrap metal yard, is extensively disturbed by human activities, and evidences no substantive or sensitive biological resources. Similarly, targeted areas of residential properties that would be affected by the RAP are extensively disturbed/improved properties evidencing no substantive or sensitive biological resources.

Analysis as to whether or not Project activities would:

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*.

Impact Analysis: There are no known sensitive habitats or candidate, sensitive, or special status species located within the Project site or its immediate vicinity (General Plan EIR Figures: 5.4-1, *Habitat Areas and Vegetation Communities*; 5.4-3, *Stephens' Kangaroo Rat (SKR) Core Reserves and Other Habitat Conservation Plans (HCP)*; 5.4-4, *MSHCP Criteria Cells*; 5.4-5, *MSHCP Cores and Linkages*; 5.4-6, M*SHCP Narrow Endemic Plant Species Survey Area*; 5.4-7, *MSHCP Criteria Area Species Survey Area*; and 5.4-8, *MSHCP Burrowing Owl Survey Area*. Nor does the Project propose or require facilities or programs that would substantively affect off-site sensitive or protected biological resources. Moreover, the Project site is an extensively disturbed urban property surrounded by other urban development and does not provide substantive potential for existence or establishment of habitat that could potentially accommodate candidate, sensitive, or special status species.

Additionally, if/as determined appropriate by the City of Riverside, the Project Applicant would pay biological resources impact fees consistent with City of Riverside Municipal Code requirements (City of Riverside Municipal Code Chapter 16.72 *Western Riverside Multiple*

Species Habitat Conservation Plan Fee Program; and City of Riverside Municipal Code Chapter 16.40, *Threatened and Endangered Species Preservation Development Fees*). Payment of these fees acts to offset general effects of urban development on protected habitat and protected species.

Based on the preceding, the potential for the Project to 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 is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: There are no known sensitive riparian habitats or natural communities located on the Project site or in the immediate vicinity. Nor does the Project propose or require facilities or programs that would substantively affect off-site sensitive or protected biological resources. Moreover, the Project site is an extensively disturbed urban property surrounded by other urban development and does not provide substantive potential for existence or establishment of riparian habitat or any other sensitive natural community. To offset area-wide impacts to species and habitat resulting from development in the City generally, if/as determined appropriate by the City, the Project Applicant would pay biological resources impact fees consistent with City of Riverside Municipal Code requirements (City of Riverside Municipal Code Chapter 16.72 *Western Riverside Multiple Species Habitat Conservation Plan Fee Program*; and City of Riverside Municipal Code Chapter 16.40, *Threatened and Endangered Species Preservation Development Fees*). Based on the preceding, the potential for the Project to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service is less-than-significant. Please refer also to remarks at Checklist Item 4. a.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: There are no known federally protected wetlands as defined by Section 404 of the Clean Water Act within the Project site or in the immediate vicinity. Nor does the Project propose or require facilities or programs that would substantively affect off-site federally protected wetlands. Moreover, the Project site is an extensively disturbed urban property surrounded by other urban development and does not provide substantive potential for existence or establishment of federally protected wetlands. Based on the preceding, the Project would have no impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption. Please refer also to remarks at Checklist Items 4. a., b.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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*.

Impact Analysis: There are no known wildlife movement corridors or wildlife nurseries within the Project site or in the immediate vicinity. Nor does the Project propose or require facilities or programs that would substantively affect off-site wildlife movement corridors or wildlife nurseries. Moreover, the Project site is an extensively disturbed urban property surrounded by other urban development and does not provide substantive potential for existence or establishment of wildlife movement corridors or wildlife nurseries. Based on the preceding, the Project would have no impact on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. Nor would the Project impede the use of native wildlife nursery sites. Please refer also to remarks at Checklist Items 4. a., b., c.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. *Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance*.

Impact Analysis: There are no substantive biological resources or trees subject to preservation within the Project site. To offset area-wide impacts to species and habitat resulting from development in the City generally, if/as determined appropriate by the City, the Project Applicant would pay biological resources impact fees consistent with City of Riverside Municipal Code requirements (City of Riverside Municipal Code Chapter 16.72 *Western Riverside Multiple Species Habitat Conservation Plan Fee Program*; and City of Riverside Municipal Code Chapter 16.40, *Threatened and Endangered Species Preservation Development Fees*). The Project is not subject to other local policies or ordinances protecting biological resources. Based on the preceding, the potential for the Project to conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance is less-than-significant. Please refer also to remarks at Checklist Items 4. a., b., c., d.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ 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*.

To offset area-wide impacts to species and habitat resulting from development in the City generally, if/as determined appropriate by the City, the Project Applicant would pay biological resources impact fees consistent with City of Riverside Municipal Code requirements (City of Riverside Municipal Code Chapter
16.72 *Western Riverside Multiple Species Habitat Conservation Plan Fee Program*; and City of Riverside Municipal Code Chapter 16.40, *Threatened and Endangered Species Preservation Development Fees*). The Project would not however result in direct impacts protected habitat or species. The Project is not subject to and would not affect or be affected by any other Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Based on the preceding, the potential for the Project to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan is less-than-significant. Please refer also to remarks at Checklist Items 4. a., b., c., d., e.

Impact Analysis:

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.5 Cultural Resources

Project Activities Likely to Create an Impact: Project site excavation and general site disturbance.

Description of Baseline Environmental Conditions:. The RSIM site has historically been used for scrap metal storage and stockpiling. Targeted areas of residential properties within the Project site are unimproved or evidence typical residential landscaping features. The Project site is not a known source or location of sensitive or protected cultural resources. Nor is there considered to be a substantive potential for presence of sensitive or protected cultural resources.

Analysis as to whether or not Project activities would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

Impact Analysis: There are no known historical resources within the Project site (General Plan EIR, Appendix D, Cultural Resources Study for the City of Riverside General Plan 2025 Update Program EIR [Melinda C. Horne and Dennis P. McDougall] November 2007, Table 1, Historical cultural resources within the City of Riverside Core Area and Sphere of Influence). Nor does the Project propose or require uses or activities that would affect any known off-site historical resources. As a Condition of Approval, if potentially sensitive or protected cultural resources of any type (historical, archaeological, paleontological) are encountered during site disturbance activities, all work must be halted in the vicinity of the discovery until a registered and qualified cultural resources professional can visit the site of discovery and assess the significance and origin of the encountered resource. If the resource is determined to be protected, sensitive, or otherwise potentially significant, the City, in consultation with the cultural resources professional and Applicant, shall determine the course of action. This may include data recovery, retention in situ, or other appropriate treatment and mitigation depending on the resource discovered. In the event that potential Native American cultural resources are discovered, potentially affected

Tribe(s) will be contacted and shall be provided information and permitted/invited to perform a site visit when the cultural resources professional makes their assessment, so as to provide Tribal input. Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a historical resource as defined at CEQA Guidelines Section 15064.5 is less-than- significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: There are no known archaeological resources within the Project site. Nor does the Project propose or require uses or activities that would affect any known off-site archaeological resources.

The Project site and surrounding areas are designated as being of "Unknown" sensitivity for archaeological resources (General Plan EIR, Figure 5.5-1, *Archaeological Sensitivity*). This designation indicates "areas that were urbanized prior to the mid-1970s, as well as extant citrus groves surrounding the urbanized, built environment. Areas classified as Unknown may contain buried archaeological deposits dating to the City's prehistoric and historical periods" (General Plan EIR, p. 5.5-4). After DTSC approves the RAP, if potentially sensitive or protected cultural resources of any type (historical, archaeological, paleontological) are encountered during site disturbance activities, all work must be halted in the vicinity of the discovery until a registered and qualified cultural resources professional can visit the site of discovery and assess the significance and origin of the encountered resource.

If the resource is determined to be protected, sensitive, or otherwise potentially significant, the City, in consultation with the cultural resources professional and Applicant, shall determine the course of action. This may include data recovery, retention in situ, or other appropriate treatment and mitigation depending on the resource discovered. In the event that potential Native American cultural resources are discovered, potentially affected Tribe(s) will be contacted and shall be provided information and permitted/invited to perform a site visit when the cultural resources professional makes their assessment, so as to provide Tribal input. Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of an archeological resource pursuant to *CEQA Guidelines* Section 15064.5 is less- than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: There are no known paleontological resources or unique geologic features within the Project site. Nor does the Project propose or require uses or activities that would affect any known off- site paleontological resources or unique geologic features. The Project site and surrounding areas are designated as being of "Unknown Sensitivity" for prehistoric resources (General Plan EIR, Figure 5.5-2, *Prehistoric Cultural Resources Sensitivity*). This designation indicates "those areas confined to the City's downtown area that were urbanized during the early and mid-1900s where the current environmental conditions may not reflect the original environmental conditions (General Plan EIR, p. 5.5-4).

If potentially sensitive or protected cultural resources of any type (historical, archaeological, paleontological) are encountered during site disturbance activities, all work must be halted in the vicinity of the discovery until a registered and qualified cultural resources professional can visit the site of discovery and assess the significance and origin of the encountered resource. If the resource is determined to be protected, sensitive, or otherwise potentially significant, the City, in consultation with the cultural resources professional and Applicant, shall determine the course of action. This may include data recovery, retention in situ, or other appropriate treatment measures depending on the resource discovered. Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines Section 15064.5 is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Project site is not a cemetery and does not contain any known human remains. If human remains are encountered in the course of site disturbance, the steps and procedures specified at Health and Safety Code Section 7050.5, *CEQA Guidelines* Section 15064.5(e), and Public Resources Code Section 5097.98 must be implemented. Pursuant to Public Resources Code Section 5097.98, the Riverside County Coroner must be notified within

24 hours of the discovery of potentially human remains. The Coroner will then determine within 2 working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, in accordance with PRC Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification. Whenever the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the MLD and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.6 Energy

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**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?	□	□	X	□
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	□	□	□	X

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings.

ENVIRONMENTAL SETTING (BASELINE):

Established in 1895, Riverside Public Utilities (RPU) is a customer-owned water and electric utility governed by a board of nine community volunteers, and the City Council of Riverside, that provides high -quality, reliable services to more than 108,000 metered electric customers and over 64,000 metered water customers (serving a population of more than 300,000) in and around the City of Riverside. RPU's water supplies come from underground sources fed by rain and snow falling in the San Bernardino Mountains and local foothills. This supply is replenished by numerous storms each year. 100% of Riverside's water comes from these groundwater basins. Wells continuously pump the water up from a variety of different aquifers located throughout the Bunker Hill Basin in San Bernardino, as well as the Colton and Riverside Basins. Over the years, RPU has constructed facilities that have allowed RPU to wisely utilize our groundwater resources to become completely water independent.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of energy resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of significant increase in energy demand from the Proposed Project Site, no environmental studies relating to energy resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Analysis:
To implement the Proposed Project, it is expected that construction equipment (e.g., tractors, excavators, loaders, generators, trucks, light-duty vehicles) would use petroleum fuels (diesel and gasoline products) and would not use on-site electricity or natural gas sources. Implementation of the proposed) and, therefore, the wasteful, inefficient, or unnecessary use of petroleum fuels would not occur. Implementation of the proposed project would not result in adding any new facilities that would increase the demand for energy resources.

Conclusion:
The Proposed Project would not add new facilities that could increase the demand for energy resources. Construction activities would use equipment in accordance with manufacturer's specifications. Therefore, implementation of the proposed would not result

in a wasteful, inefficient, or unnecessary consumption of energy resources. In addition, implementation of proposed would not result in a new permanent energy demand.

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ☐ No Impact

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

Impact Analysis:
In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings. Implementation of proposed would not result in constructing any new buildings that would increase the demand for energy resources, renewable or otherwise.

Conclusion:
The Proposed Project would not construct new facilities or permanent structures and would not generate any new energy demands. Therefore, the Proposed Project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used California Legislative Information. 2015. SB-350 Clean Energy and Pollution Reduction Act of 2015. October. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350 (Accessed November 2019).
https://www.riversideca.gov/utilities/PDF/RPU_101_Web_2015.pdf

2.1.7 Geology and Soils

Project Activities Likely to Create an Impact: Project site excavation and general site disturbance.

Description of Baseline Environmental Conditions: The Project site comprises disturbed properties. The RSIM site has historically been used for scrap metal storage and stockpiling. Targeted areas of residential properties within the Project site are unimproved or evidence typical residential landscaping features. The Project site is not affected by known geologic hazards or unstable soils hazards.

Analysis as to whether or not Project activities would:

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

- 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).
- Strong seismic ground shaking.
- Seismic-related ground failure, including liquefaction.
- Landslides.

Impact Analysis: There are no Alquist-Priolo zones within the City of Riverside (General Plan EIR, p. 5.6-18). The Project site does not contain any known fault lines. Southern California in general is subject to earthquake hazards including strong seismic shaking. Impacts related to strong seismic shaking are addressed through mandated compliance with the California Building Code. The Project does not however propose or require structures or facilities that would be affected by strong seismic ground shaking. The Project site and surrounding area are considered to have a low potential for liquefaction (General Plan EIR Figure 5.6-3, *Generalized liquefaction Zones*). The Project site and surrounding properties evidence no substantive terrain elevation differentials and are therefore not subject to landslides. The Project Health and Safety Plan (HASP) (RAP Appendix G) contains safety protocols to be implemented should a seismic event should occur during RAP implementation. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; Strong seismic ground shaking; Seismic-related ground failure, including liquefaction; and Landslides is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Project site is essentially level. Soils beneath the site consist primarily of silty sand and sandy silt with occasional thin layers of clay from near surface to 20 feet below grade, the maximum depth of exploration (RAP, p. 4). Project site disturbance and excavation activities pursuant to the RAP would temporarily expose underlying soils, thereby increasing their susceptibility to erosion. Potential erosion impacts incurred during site remediation activities

are mitigated below the level of significance through the Project's mandated compliance with a City-approved Storm Water Pollution Prevention Plan (SWPPP) and compliance with SCAQMD Rules that prohibit grading activities and site disturbance during high wind events. The SWPPP is incorporated in the Project as described at IS/MND Section 1.0 *Project Description*, 1.7.2 *Pre-Field Activities*. Potential soil erosion impacts in the area would be resolved with over covering of the Project site remediated areas with clean compacted soils. On the basis of the preceding, the potential for the Project to result in substantial soil erosion or the loss of topsoil is less than significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ 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.

Impact Analysis: The Project site and surrounding area are considered to have a low potential for liquefaction (City of Riverside General Plan EIR [General Plan EIR] Figure 5.6-3, *Generalized Liquefaction Zones*). The Project site is essentially level. Soils beneath the site consist primarily of silty sand and sandy silt with occasional thin layers of clay from near surface to 20 feet below grade, the maximum depth of exploration (RAP, p. 4). The Project site and surrounding properties evidence no substantive terrain elevation differentials and are therefore not subject to landslides. The Project does not propose or require any new structures or facilities that would be potentially affected by unstable soils or geologic conditions.

As discussed in the General Plan EIR, "as part of the construction permitting process and reflected in the Subdivision Code (Section 18.090.050), the City requires completed reports of soil conditions at specific construction sites to identify potentially unsuitable soil conditions including landslides, liquefaction and subsidence. The reports must be written by a registered soil professional, and measures to eliminate inappropriate soil conditions must be applied. The design foundation support must conform to the analysis and implementation criteria described in CBC Chapter 15. Additionally, if any development is proposed on terrain where slopes are greater than 10%, provisions will have to meet to comply with Title 17, Grading, of the City's Municipal Code" (General Plan EIR, p. 5.6-20). The Project would comply with applicable City codes and regulations addressing soils evaluation and elimination inappropriate soils conditions.

Based on the preceding, the potential for the Project to 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 is less-than-

significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Please refer to remarks at Checklist Item 6. c.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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.

Impact Analysis: Sanitary sewer service is available to the Project site. The Project does not propose or require uses that would generate municipal wastewater. The Project does not propose or require septic tanks or alternative disposal systems. On this basis, the Project would have no impacts related to use of septic tanks or alternative wastewater disposal systems for the disposal of wastewater.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.8 Greenhouse Gas Emissions

Project Activities Likely to Create an Impact:

- Construction equipment air pollutant emissions.
- Building Demolition and Site Clearing.
- Transport of impacted soil from the Project site to appropriate permitted disposal facilities.
- Transport of clean soil to the Project site.
- Transportation of construction equipment to/from the Project site.
- Construction worker commutes.

Description of Baseline Environmental Conditions: The Project site is largely vacant, and is not a substantive source of GHG emissions.

Analysis as to whether or not Project activities would:

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

Impact Analysis: The Project does not propose facilities or uses that would be long-term sources of GHG emissions. Project construction activities listed above would, however, be sources of temporary/intermitted GHG emissions. In its most recent guidance, the SCAQMD Working Group has proposed a screening-level threshold of 3,000 metric tons of carbon dioxide equivalent per year (MTCO2e/year) for all land use types. Projects that generate GHG emissions of less than 3,000 MTCO2e/year would not be considered substantive sources of GHG emissions. For the purposes of this analysis, GHG emissions not exceeding the SCAQMD 3,000 MTCO2e/year screening-level would be less-than-significant. Estimated annual Project GHG emissions are summarized at Table 8-1.

Table 8-1
Project GHG Emissions (Metric Tons/Year)

	CO2	CH4	N2O	CO2EQ
Annualized Construction Emissions	534.84	0.05	0.00	536.18
SCAQMD Threshold	**3,000**			
Threshold Exceeded?	No			

Source: *Air Quality Modeling for Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (Urban Crossroads) December 4, 2017.
Note: Values reported at Table 3-2 are highlighted in the CalEEMod Annual "Unmitigated Condition" and "Mitigated Condition" modeling output presented at IS/MND Appendix B.

As indicated at Table 8-1, Project GHG emissions would not exceed 3,000 MTCO2e/year and would be less-than-significant. On this basis, the potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Project GHG emissions would not exceed the SCAQMD Working Group threshold of 3,000 MTCO2e, and would not result in *a* significant impact on the environment. Because the Project would not result in a potentially significant net increase in GHG emissions, Project GHG emissions would not interfere with applicable state GHG emissions reductions polices (AB 32, Executive Order B-30-15). Nor would the Project obstruct emissions reductions targets established under AB 32 and Executive Order B-30-15 (reduce GHG emissions to 1990 levels by 202; reduce GHG emissions to 40 percent below 1990 levels by 2030; reduce GHG emissions to 80 percent below 1990 levels by 2050).

Further, the Project would comply with all applicable GHG emissions reduction policies and strategies articulated within *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (City of Riverside) January 2016 (Climate Action Plan, CAP). Specifically, the Project would implement CAP construction and demolition (C&D) waste and diversion policies acting to reduce construction/demolition- source GHG emissions (see: CAP Measure SR-13: *Construction & Demolition Waste Diversion*, CAP p. B.3-23). Project compliance with the City CAP furthers attainment of state GHG emissions reductions and policies noted above. Additionally, all vehicles accessing the Project site and Project construction equipment would utilize low carbon fuels as provided for under the state's Low Carbon Fuel Standards (LCFS). This would reduce Project transportation and equipment-source GHG emissions, the primary contributors to Project GHG emissions.

Based on the preceding, the potential for the Project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron &*

Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR (Albert A. Webb Associates) November 2007; *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (City of Riverside) January 2016; *Air Quality Modeling for Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (Urban Crossroads) December 4, 2017.

2.1.9 Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Project site disturbance and excavation and would generate criteria air pollutants, and could release potential Contaminants of Concern identified in the RAP (COCs).
- Building demolition could result in release of, or exposure to, asbestos and/or lead.
- Project site disturbance and excavation could encounter as yet unidentified hazardous conditions and buried utilities.
- Equipment decontamination could release or transfer COCs.
- Transportation of impacted soil to disposal facilities could result in accidental release of COCs.
- Import and distribution of clean soils would generate criteria air pollutants.

Description of Baseline Environmental Conditions: The shallow soil beneath the Project site is impacted with four Contaminants of Concern including lead, poly chlorinated biphenyls (PCBs), poly- nuclear aromatic hydrocarbons (PAH), and arsenic (RAP, p. 1). RSIM site buildings and facilities to be demolished may contain Asbestos Containing Materials (ACMs) and Lead Based Paint (LBP).

Analysis as to whether or not Project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

Impact Analysis: The Project proposes excavation and removal of impacted soil to a depth of approximately 5 feet below grade over the approximately 7-acre RSIM site. Excavation and removal of soil is also proposed in targeted areas (less than 0.1 acres) of adjacent residential properties located along the RSIM site's southeasterly property line.

The volume of soil to be excavated and removed from the RSIM site is approximately 28,200 cubic yards. Assuming a soil density of 120 lb./ft^3 the amount of material to be disposed is approximately 42,300 tons. An additional 450 tons (300 cubic yards) of soil would be excavated and removed from affected residential properties located adjacent to the RSIM site.

As part of the general RSIM site remediation, the site would be cleared of all surface

improvements, and general debris. Demolished material to be removed from the Project site is estimated at 831 tons (410 cubic yards).

Certain of the soils to be removed from the Project site are highly-impacted and can be classified as Resource Conservation and Recovery Act (RCRA)-level waste, which requires enhanced handling and disposal. The remainder of the soils may be classified as California hazardous (CAL-Haz) waste or non- hazardous waste depending on its condition. Hazardous and non-hazardous waste would be transported from the Project site to designated waste acceptance and disposal facilities. Waste export and clean soils import estimates are summarized at Tables 9-1, 9-2.

Table 9-1
Estimated Waste by Category, Weight, and Volume

Location/Source	RCRA-Level Waste		CAL-Haz Waste		Non-hazardous Materials			
					Soils		Surface Demolition	
	Tons	Cu. Yds.	Tons	Cu. Yds.	Tons	Cu. Yds.	Tons	Cu. Yds.
RSIM Site	3390	2260	TBD	TBD	42,300	28,200	831	410
Residential Target Areas	450	300	TBD	TBD	---	---	---	---
TOTALS	**3840**	**2560**	**TBD**	**TBD**	**42,300**	**28,200**	**831**	**410**

Notes:
. Estimates rounded up to nearest whole number.
. Soil density of 120 lb./ft^3.
. Demolition debris density of 150 lb./ft^3.
. Approximately 3840 tons of RCRA-level waste to be removed from the RSIM site (draft RAP pp. 20 – 21).
. CAL-Haz waste TBD from the RSIM site (draft RAP pp. 20 – 21).
6. Approximately 450 tons of contaminated soils to be removed from targeted areas of residential properties (draft RAP pp. 22 – 23). For analysis purposes, excavated residential soils are assumed to be apportioned equally as RCRA-level and CAL-Haz wastes (3840 tons each).
. Remainder of materials removed from the Project site assumed to be non-hazardous.
. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.
. TBD = To be determined based on soil disposal and confirmation sampling results.

Prior to transportation of materials, whether hazardous or non-hazardous, proposed receiving facilities would be contacted to ensure their acceptance of materials. Implementation of the RAP Transportation Plan (*Transportation Plan Riverside Scrap Iron and Metal Riverside, California*, RAP Appendix F) would ensure that materials transported from the Project site are conveyed along the most direct feasible route, acting to minimize the potential for accidental release of materials.

Requirements and control measures outlined in the RAP and incorporated as components of the Project, would act to avoid or minimize potential hazards and potential exposure to hazardous conditions during site disturbance and excavation activities. Please refer also to Section 1.0 *Project Description* - 1.7.1 *Excavation Plan Overview*, 1.7.2 *Pre-field Activities*; 1.7.3 *Excavation and Material Loading/Transport*, 1.7.4 *Waste Management - Targeted Excavations*, 1.7.5 *Waste Management - General*, and 1.7.6 *Health and Safety*. The Project air quality modeling and LST

analysis substantiate that Project site disturbance and excavation activities would not expose sensitive receptors to potentially hazardous criteria pollutant concentrations.

Table 9-2
Waste Export and Clean Soil Import

Waste Export				
Waste Category	**Tons**	**Cubic Yards**	**Destination/Source**	**Approximate Travel Distance (one-way)**
RCRA-Level	3,390	2,260	Kettleman Hills, Kettleman City, California.	230 miles
CAL-Haz	TBD	TBD	US Ecology, Beatty, Nevada	280 miles
Non-Hazardous (soils + demolition debris)	(42,300 tons soils, 831 tons demolition) 43,131	(28,200cu. yds. soils, 410 cu. s. demolition) 28,610	Thermal Remediation Services (TRS), Azusa, California.	43 miles
Export Totals	**46,521**	**30,870**	---	---
Soil Import				
Clean Soil (1.25 x soil export)	**58,151**	**38,587**	TBD	20 Miles (CalEEMod default)

Sources: 2019 Draft RAP

Notes:
1. All estimates rounded up to nearest whole number.
2. Clean soil import assumed to be 1.25 x waste export to account for soil settling and compaction.
3. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.

With incorporation of requirements and control measures outlined in the RAP and included as components of the Project, the potential for the Project to create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials is less-than- significant. In total, the Project remedial actions would yield a net reduction in the potential for exposure to hazards/hazardous material when compared to existing conditions. At completion of the RAP, the RSIM site could be redeveloped without restriction regarding potential contamination or soils hazards. Targeted areas at abutting residential properties would be remediated to residential standards.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ 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.

Impact Analysis: Please refer to remarks at Checklist Item 2.1.9 a.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Project Site is not located adjacent to any existing or proposed school. The nearest school is the Longfellow Elementary School on 6th Street, approximately 0.3 miles southeasterly of the Project Site. The potential for the Project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school is therefore considered less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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 public or the environment.

Impact Analysis: The Project site is listed as an EnviroStor Clean-Up Site (DTSC ID number 60002350). The Project would remediate the contaminants on-site to prevent human health and ecological impacts. Requirements and control measures outlined in the RAP and incorporated as components of the Project. In total, the Project remedial actions would yield a net reduction in the potential for exposure to hazards/hazardous material when compared to existing conditions. At completion of the RAP, the RSIM site could be redeveloped without restriction regarding potential contamination or soils hazards, and targeted areas at abutting residential properties would be remediated to residential standards.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis: The RAP Transportation Plan (RAP Appendix F) and the Project Construction Traffic Management Plan (*Project Description* Section 1.10) ensure that appropriate access and traffic controls are in place for the duration of Project activities, acting to preclude or minimize the potential for the Project to impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project would not remove or add any emergency access points to or from the Project Site. Nor would the Project otherwise affect designated emergency access routes, an emergency response plan or an emergency evacuation plan. On this basis, the potential for the Project to Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan is less- than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.10 Hydrology and Water Quality

Project Activities Likely to Create an Impact: General Project site disturbance and excavation; soil import and site grading.

Description of Baseline Environmental Conditions: The RSIM portion of the Project site, including driveway access to the site, comprises approximately 7 acres. Surface improvements and stockpiled materials within the RSIM site would be demolished/removed as part of the Project. The RSIM site would be subsequently excavated and contaminated materials removed. The RSIM site would then be backfilled with clean compacted soils, returning the RSIM site to its approximate pre-remediation elevation and contours.

The Project site also includes certain areas of residential properties abutting the RSIM site to the south. More specifically, targeted excavation and soil remediation identified in the RAP would affect approximately 300 square feet (18 tons of soil excavation) of the residential property located at 2981 Mission Inn Avenue; approximately 450 square feet (27 tons of soil excavation) of the property located at 2968 6th Street; and 1,700 square feet (102 tons of soil excavation) of

the property located at 2981 6th Street. The RAP also indicates that COCs may be present at the residential property located at 2980 5th Street. Contaminated soils at affected residential properties would be excavated and removed. Affected areas of residential properties would then be backfilled with clean compacted soils, returning these properties to their approximate pre-remediation elevation and contours.

Analysis as to whether or not Project activities would:

a. Violate any water quality standards or waste discharge requirements.

Impact Analysis: Site disturbance and excavation activities would expose soils to erosion and could result in stormwater pollutant discharges**.** Soil imported to the remediated Project site would also be subject to potential erosion and stormwater pollutant discharges. All Project RAP activities and programs would comply with applicable DTSC, City of Riverside and California Regional Water Quality Control Board (RWQCB) regulations and water quality standards. Compliance with applicable existing City Stormwater Pollution Prevention Programs (SWPPPs) and National Pollution Discharge Elimination System (NPDES) permitting requirements would minimize the potential for the Project to substantively contribute additional polluted runoff during Project Site disturbance, excavation, and backfill activities. The Project SWPPP and any subsequent Project stormwater management system requirements stipulated by the DTSC and the City would be realized consistent with applicable DTSC, City, and RWQCB requirements. Additionally, the Project would implement a remediation contingency plan, including a Spill Control and Countermeasures Plan. The Spill Control and Countermeasures Plan would act to preclude or minimize accidental potential spill and discharge of contaminants that may occur over the course of RAP activities. The Project specifically incorporates SWPPP requirements; mandated compliance with City, RWQCB, and NPDES water quality standards; and implementation of the above- referenced Spill Control and Countermeasures Plan (please refer to Section 1.0 *Project Description*, 1.7.2 *Pre-Field Activities*). In combination, these measures would act to preclude or minimize the potential for Project activities to violate water quality standards or waste discharge requirements.

Based on the preceding, the potential for the Project to violate any water quality standards or waste discharge requirements is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Substantially deplete groundwater supplies or interfere substantially with groundwater

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

Impact Analysis: The Project site is located in the Riverside-Arlington sub-basin of the Upper Santa Ana Valley Groundwater Basin (Basin Number 8-2.03). The depth to groundwater at the Project site ranges from 114 to 125 feet below ground surface (bgs) with a southwestern groundwater gradient direction in December 2009 at the former Ken's Arco site, located approximately 650 feet southeast of the property (2871 University Avenue). More recent groundwater data from other nearby sites indicates a depth to groundwater of about 117-120 feet bgs in June 2014 (RAP, p.4).

Given the depth to groundwater underlying the Project site (>110 feet bgs), it is unlikely that Project remediation activities (affecting approximately the upper 5 feet of soil within the Project site) would affect underlying groundwater. The Project does not propose or require withdrawal of groundwater. The Project site is not designated for, and does not function as, a groundwater recharge facility. The Project does not propose or require activities or facilities that would otherwise interfere with obstruct groundwater resources or groundwater recharge capabilities.

Following completion of remediation activities at the Project site, clean soils would be imported to, and dispersed across the Project site. Imported soils would be compacted/engineered consistent with City requirements

Based on the preceding, the potential for the Project to substantially deplete groundwater supplies or interfere substantially with groundwater recharge is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Santa Ana River is the principal regional surface water drainage feature, and is located approximately 2 miles westerly of the Project Site. The Project does not propose or require uses or facilities that would substantively affect off-site drainage courses or water courses.

There are no streams or water courses within the Project site. At the completion of excavation and remediation activities, affected areas of the Project site would be backfilled with clean imported soil and would be restored to pre-remediation elevations and contours. The remediated and restored Project site would substantively maintain pre-remediation drainage patterns.

The implemented Project SWPPP would act to ensure that substantive soil erosion or siltation would not occur during site disturbance/site remediation activities. Further, the Project would be required to comply with the provisions of City of Riverside Municipal Code Title 17- *Grading.* Pursuant to Title 17, appropriate drainage patterns and stormwater runoff conditions would be maintained, and appropriate erosion control measures would be implemented throughout Project site remediation and restoration activities.

Based on the preceding, the potential for the Project to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Please refer to remarks at Checklist Item 9. c.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Please refer to remarks at Checklist Items 9. c., d.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis: Please refer to remarks at Checklist Items 9. c., d., e.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis: The Project is not located within a 100-year flood hazard area (General Plan EIR, p. 5.8-6, Figure 5.8-2, *Flood Hazard Areas*). The Project does not otherwise propose or require uses or facilities that would place within a 100-flood hazard area structures which would impede or redirect flood flows. The Project would therefore have no potential to place within a 100-flood hazard area structures which would impede or redirect flood flows.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis: The Project site is not in the inundation zone of any known dam or levee (General Plan EIR, p. 5.8-6, Figure 5.8-2, *Flood Hazard Areas*). The Project does not otherwise propose or require uses or facilities that would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. The Project would therefore have no potential to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the

failure of a levee or dam.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

i. Inundation by seiche, tsunami, or mudflow.

Impact Analysis: The Project Site is approximately 48.3 miles inland from the Pacific Ocean and at an elevation of approximately 880 feet above mean sea level (MSL). The Project Site is thus not susceptible to tsunami-related damage and impacts related to inundation by a tsunami would not be expected to occur. There are no substantive proximate bodies of water that would potentially expose the Project site to inundation by seiche. The Project site and vicinity properties are essentially level evidencing little or no grade differentials. No arroyos or flood channels exist within or adjacent to the Project site. The Project site is therefore not considered susceptible to inundation by mudflows. The Project site not located within a landslide zone or in an area that is historically or geologically susceptible to mudflows. Therefore, there is minimal potential for impacts related to inundation by a mudflow at the Project Site.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.11 Land Use and Planning

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The RSIM portion of the Project site, including driveway access to the site, comprises approximately 7 acres. The Project site also includes certain areas of residential properties abutting the RSIM site to the south. Existing Land Uses and City of Riverside Land Use Designations for the Project site and adjacent properties are summarized at Table 11-1. Please refer also to IS/MND Section 1.0 *Project Description,* 1.3 *Existing Land Uses and City of Riverside General Plan Land Use and Zoning Designations***.**

Table 11-1
Existing Land Uses and Land Use Designations

	Existing Land Use	General Plan Designations	Zoning Designations
Project Site	RSIM Site; Residential	B/OP-Business/Office Park; MDR-Medium Density Residential	Riverside Marketplace Specific Plan (MSP)-Business Park; Residential
West/Southwest	Vacant; Residential	O-Office	MSP-Business Park
East/Northeast	Light Industrial; Residential	B/OP - Business/Office Park; MDR-Medium Density Residential	MSP-Business Park; Residential
North	Light Industrial; Commercial	B/OP - Business/Office Park	MSP-Business Park
South	Residential	MDR-Medium Density Residential	MSP-Residential

Sources: City of Riverside General Plan 2025; Riverside Marketplace Specific Plan and Environmental Impact Report; Google Earth

Analysis as to whether or not Project activities would:

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

Impact Analysis: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. The City of Riverside General Plan Land Use designation the RSIM site is "B/OP - Business/Office Park" (City of Riverside General Plan 2025 [General Plan], Figure LU-10, *Land Use Policy Map*). Zoning of the RSIM site is established by the Riverside Marketplace Specific Plan (MSP). The MSP designates the RSIM site as "Business Park" (MSP Figure 4, *Land Use Plan*). Residential properties abutting the RSIM site to the south are General Plan-designated as "MDR-Medium Density Residential" (General Plan, Figure LU-10, *Land Use Policy Map*). MSP designation of these properties is "Residential" (MSP Figure 4, Land Use Plan).

Activities proposed by the RAP are allowed under the site's current General Plan Land Use and Zoning designations. Moreover, the implemented RAP would allow for full use and development of the Project site as allowed under the General Plan. Nor does the Project propose or require uses or activities that would otherwise conflict with the City General Plan or Zoning Ordinance. The Project does not propose or require amendment to the Project site existing City General Plan Land Use or Zoning Designations. Moreover, the implemented RAP would allow for full use and development of the Project site as allowed under the General Plan. The Project site is not otherwise affected by or subject to an applicable land use plan.

Based on the preceding, the potential for the Project to conflict with any applicable land use plan,

policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis: The Project site is an extensively disturbed urban property surrounded by other urban development and does not provide substantive potential for existence or establishment of habitat that could potentially accommodate candidate, sensitive, or special status species. There are no known sensitive habitats or candidate, sensitive, or special status species located within or proximate to the Project site (General Plan EIR Figures: 5.4-1, *Habitat Areas and Vegetation Communities*; 5.4-3, *Stephens' Kangaroo Rat (SKR) Core Reserves and Other Habitat Conservation Plans (HCP)*; 5.4-4, *MSHCP Criteria Cells*; 5.4-5, *MSHCP Cores and Linkages*; 5.4-6, M*SHCP Narrow Endemic Plant Species Survey Area*; 5.4-7, *MSHCP Criteria Area Species Survey Area*; and 5.4-8, *MSHCP Burrowing Owl Survey Area*. Nor does the Project propose or require facilities or programs that would substantively affect off-site sensitive or protected biological resources.

Additionally, if determined required by the City of Riverside, the Project Applicant would pay biological resources impact fees consistent with City of Riverside Municipal Code requirements (City of Riverside Municipal Code Chapter 16.72 *Western Riverside Multiple Species Habitat Conservation Plan Fee Program*; and City of Riverside Municipal Code Chapter 16.40, *Threatened and Endangered Species Preservation Development Fees*).

Based on the preceding, the potential for the Project to conflict with any applicable habitat conservation plan or natural community conservation plan is less-than-significant.

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; Riverside Marketplace Specific Plan and Environmental Impact Report (The SWA Group, The Arroyo Group, Parsons Brinckerhoff) April 1991; City of Riverside Municipal Code.

2.1.12 Mineral Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. The Project site and the predominance of the City of Riverside is designated as "MRZ-4 – Mineral Resource Zone – there is insufficient data to assign any other MRZ designation" (General Plan EIR Figure 5.10-1, *Mineral Resources*).

Analysis as to whether or not Project activities would:

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.

Impact Analysis: No mineral resources of local value or of value to the region or state are known to exist within the Project site. The Project does not otherwise propose or require uses or facilities that would interfere with or obstruct extraction and recovery of mineral resources.

On this basis, the potential for the Project to 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 is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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.

Impact Analysis: Please refer to remarks at Checklist Items 11. a.

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.13 Noise

Project Activities Likely to Create an Impact: On-site remediation activities including heavy equipment operations. Transport of material from the Project to receiving facilities. Import of clean soil to the Project site, soil distribution, and rough grading.

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. Ambient noise conditions at the Project site are defined by noise emanating from the 91 freeway and rail corridor located north/northwesterly of the Project site. The General Plan EIR indicates that Year 2003 ambient noise conditions at the Project site approximated 60 – 65 dBA CNEL[2] (General Plan EIR Figure 5.11-3, *2003 Freeway Noise*; 5.11-4, *2003 Railway Noise*). Year 2025 ambient noise conditions at the Project site would approximate 65 – 70 dBA CNEL (General Plan EIR Figure 5.11-7, *2025 Freeway Noise*; 5.11-8,
2025 Railway Noise).

Analysis as to whether or not Project activities would result in:

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

Impact Analysis: The Project does not propose or require facilities or operations comprising long-term operational noise sources. Project activities would however generate short-term transient construction- source noise. Construction-source noise is regulated at City of Riverside Municipal Title 7, *Noise Control*. Construction-source noise is exempt from Title 7 provisions pursuant to Title 7, Section 7.35.020 *Exemptions*, Paragraph G., excerpted in pertinent part below.

> *G. Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. (Ord. 7341 § 6, 2016; Ord. 6917 § 1, 2006; Ord. 6328 § 2, 1996; Ord. 6273 § 1 (part), 1996)*

Project construction activities would comply with day/hourly limits for construction activities identified at Section 7.35.020 Exemptions, Paragraph G. The Project does not propose or require activities or facilities that would otherwise potentially generate of noise levels in excess of City of Riverside standards.

Based on the preceding, the potential for the Project to result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies is less-than-significant.

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[2] Community Noise Equivalent Level (CNEL) represents 24-hour weighted average noise conditions. To account for increased human sensitivity at night, the CNEL level includes a 5 dB penalty on noise during the 7:00 P.M. to 10:00 P.M. time period and a 10 dB penalty on noise during the 10:00 P.M. to 7:00 A.M. time period.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Project does not propose or require uses or activities that would be considered substantive sources of on-going vibration. However, Project construction activities would generate groundborne vibration that could affect abutting properties. The City of Riverside has not adopted quantitative vibration thresholds. Acting to reduce its potential effects, occurrence and generation of construction-source vibration would be limited consistent with general restrictions on construction activities identified at Municipal Code Section 7.35.020 *Exemptions*, Paragraph G. (please refer also to Checklist Item 12. a).

For the purposes of this analysis, and to substantiate whether the Project would result in "exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels," applicable criteria developed by the California Department of Transportation (Caltrans) were employed. The Caltrans *Transportation and Construction Vibration Guidance Manual* indicates that received vibration levels of 0.10 Peak Particle Velocity (PPV) (0.071 Root Mean Square [RMS])[3] could be distinctly perceptible.[4] For the purposes of this analysis, received vibration levels exceeding 0.10 PPV (0.071 RMS) would be considered potentially significant.

Groundborne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). Typical Project construction equipment would generate vibration levels of 0.003 PPV (small bulldozer) to 0.089 PPV (larger bulldozer) as measured at 25 feet. As with received noise levels, received vibration levels attenuate with distance. In general, manmade ground-borne vibrations attenuate rapidly with distance from the source.

Heavy construction equipment could temporarily and intermittently operate within approximately 25 feet of the nearest residential land uses (located southerly of the Project site). However, even at 25 feet, the maximum anticipated received vibration level (0.089 PPV) would not exceed the 0.10 PPV threshold condition. At greater distances these vibration levels would be further reduced. Additionally, any perceived vibration levels would be temporary and transient limited to

[3] To assess the human perception of vibration levels in PPV, the PPV values are converted to RMS vibration levels based on the Caltrans Transportation and Construction Vibration Guidance Manual conversion factor of 0.71.
[4] *Caltrans Transportation and Construction Vibration Guidance Manual* (Caltrans) September 2013, p. 38.

days and hours specified at Municipal Code Section 7.35.020 *Exemptions*, Paragraph G., and would terminate at the conclusion of Project site disturbance activities. Such temporary and intermittent short-term vibration exposures are typical of construction activities within an urban environment, and are not considered excessive

Based on the preceding discussions, there is little (if any) potential for the Project to result in or cause exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise. This potential impact is therefore less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Project does not propose or require facilities or operations comprising permanent noise sources. Nor does the Project otherwise propose or require facilities or uses that could permanently increase ambient noise conditions. Project construction-source noise would be short-term, temporary, and transient. Project construction-source noise would terminate at the conclusion of site disturbance activities.

Based on the preceding, there is no potential for the Project for the Project to result in a substantial permanent increase in ambient noise levels in the vicinity above levels existing without the Project.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis: The City of Riverside exempts noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday (Municipal Code Section 7.35.020). Project

construction activities would comply with Municipal Code Section 7.35.020 requirements, acting to control construction-source noise consistent with City requirements and standards. Construction-source noise that complies with applicable City requirements and standards is not considered to represent a substantial temporary or periodic increase in ambient noise levels.

Based on the preceding, the potential for the Project to result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project is less- than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; City of Riverside Municipal Code.

2.1.14 Population and Housing

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. No housing exists within the RSIM site. Targeted areas of residential properties south of the RSIM site would be affected by Project activities, but with no substantive effect on housing assets.

Analysis as to whether or not Project activities would:

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

Impact Analysis: There are no residential uses within the Project, neither does the Project propose or require residential uses. The Project proposes temporary remediation and site restoration activities and would not implement infrastructure or improvements that could potentially induce substantial growth.

On this basis, there is no potential for the Project to induce substantial population growth in area, either directly or indirectly.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis: No housing exists within the RSIM site. Targeted areas of residential properties south of the RSIM site would be affected by Project activities, but with no substantive effect on housing assets. The Project does not otherwise propose or require uses or facilities that would potentially displace substantial numbers of existing housing.

On this basis, there is no potential for the Project to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis: No housing or resident population exists within the RSIM site. Targeted areas of residential properties south of the RSIM site would be affected by Project activities, but with no substantive effect on housing assets or housing occupancies. Specifically, based on the analysis presented here, the Project would not result in environmental impacts that would require residents to relocate, necessitating the construction of replacement housing elsewhere. The Project does not otherwise propose or require uses or facilities that would potentially displace substantial numbers of people.

On this basis, there is no potential for the Project to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*

2.1.15 Public Services

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. All public services are currently available to the Project site.

Analysis as to whether or not Project activities would:

a. *Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services*:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

Impact Analysis: The Project proposes site remediation activities that would temporarily disturb the subject site, excavate and remove contaminated material and debris, and then restore the subject site to its approximate previous grade and contours with clean imported soil. Temporary interim impacts that may affect emergency response services are minimized through Project features and programs that promote safety including but not limited to the Project Health and Safety Plan (HASP) as described at IS/MND Section 1.0 *Project Description*, 1.10.7.1 *Health and Safety Plan*. Potential temporary impacts to public services generally that may be affected by the Project are addressed through mandated compliance with standards and requirements established by the City of Riverside, City of Riverside Police Department, and City of Riverside Fire Department.

The Project does not propose or require new or physically altered facilities of any type or category, the construction of which would cause significant environmental impacts.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*

2.1.16 Recreation

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. No recreational facilities exist within, or proximate to, the Project site.

Analysis as to whether or not Project activities would:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis: The Project proposes site remediation activities that would temporarily disturb the subject site, excavate and remove contaminated material and debris, and then restore the subject site to its approximate previous grade and contours with clean imported soil. The Project does not propose or require uses or facilities that would affect existing neighborhood or regional parks.

Based on the preceding, there is no potential for the Project to 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.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis: The Project proposes site remediation activities that would temporarily disturb the subject site, excavate and remove contaminated material and debris, and then restore the subject site to its approximate previous grade and contours with clean imported soil. The Project does not propose or require construction or expansion of recreational facilities.

Based on the preceding, there is no potential for the Project to include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.*

2.1.17 Transportation and Traffic

Project Activities Likely to Create an Impact:

- Truck traffic conveying contaminated soil and general debris from the Project to designated receiving facilities.
- Truck traffic importing clean soil from local sources to the Projectsite.

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. The existing Project site does not include uses that are substantive traffic generators.

Analysis as to whether or not Project activities would:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle

trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact Analysis: The Project does not propose or require uses that would be substantive long-term traffic generators. Project activities would however, result in temporarily increased truck traffic along local and regional roadway systems. Peak Project traffic generation would occur during export of contaminated soils and general debris from the Project site, and import of clean soil to the Project site.

Material exported from the Project site would include an estimated 28,200 cubic yards (42,300tons) of hazardous and non-hazardous soils and demolition debris. (Section 1.0 *Project Description*, 1.7.5 *Waste Management – General*).

Assuming 16 cubic yards of material per truckload (SCAQMD default truck capacity, *CalEEMod Users Guide*, p. 34), this would equate to approximately 1,794 one-way truck trips from the Project site. Per the Project remediation schedule, export of material from the Project site would occur over a period of 35 days (Section 1.0 *Project Description,* Table 1.8-1 *RAP Activities Schedule*). At a total of 1,794 trips, this would equate to an estimated 52 one-way trips per day.

Subsequent to removal and disposal of contaminated soils and other materials, the RSIM site would be over-covered with clean imported fill sufficient to achieve approximate pre-excavation site elevations and contours. The volume of clean soil imported that would be imported to the Project site is estimated at 35,188 cubic yards (57,005 tons) (Section 1.0 *Project Description*,1.7.5.4 *Post-Excavation Actions*)**.** Assuming 16 cubic yards of material per truckload this would equate to approximately 2,200 one-way trips to the Project site. Per the Project remediation schedule, import of material from the Project site would occur over a period of 35 days (Section 1.0 *Project Description,* Table 1.8-1 *RAP Activities Schedule*). At a total of 2,200 trips, this would equate to an estimated 63 one-way trips per day.

Over the course of material export and import activities, inbound and outbound truck traffic accessing the Project site would be scheduled to occur during off-peak traffic hours (8:00 a.m. – 3:00 p.m.). Conservatively assuming all export/import truck traffic is constrained to this 6-hour time frame, the maximum Project truck traffic during material export activities (52 one-way trips per day) would average approximately 9 one-way (18 two-way) trips per hour; and the maximum Project truck traffic during material import activities (63 one-way trips per day) would average approximately 11 one-way (22 two- way) trips per hour.

Peak hour trips and daily trips generated by the Project would be transient and temporary – lasting approximately 70 working days; any effects of which would be adequately and appropriately addressed through the Project Construction Traffic Management Plan (Section 1.0 *Project Description*, 1.10 *Construction Traffic Management Plan*) and RAP Transportation Plan (RAP Appendix F). These transient and temporary traffic impacts would be less-than-significant.

Further, the General Plan EIR indicates that even under City Buildout Conditions (Year 2025), streets that would be potentially used by Project traffic would operate at acceptable levels of service (LOS) A – C (General Plan EIR, Figure 5.15-4 *Volume to Capacity [V/C] Ration and Level of Services [LOS] [Typical 2025]*). Nominal temporary and transient traffic volumes generated by the Project would not substantively affect area LOS conditions and would be less-than-significant.

Moreover, the *City Riverside Public Works Department Traffic Impact Analysis Preparation Guide* (City of Riverside) January 2016 (Guide), indicates that projects generating 50 peak-hour trips or less are generally exempt from preparation of traffic impact analyses (Guide, Exhibit A). This is an indication that such projects would have little or no potential to result in potentially significant transportation/traffic impacts.

Construction worker traffic would total approximately 10 two-way trips per day, and would not substantively affect area traffic conditions. Transport of construction equipment (approximately 11 pieces) would be single- day events occurring largely at the beginning and conclusion of Project activities, and would not substantively affect traffic conditions.

Based on the preceding, the potential for the Project to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

Impact Analysis: Per the RAP Transportation Plan, Project truck traffic would be directed north/northwesterly to SR-91, and then to designated receiving facilities. Within the City of Riverside, SR- 91 is exempt from Congestion Management Program (CMP) requirements in accordance with CMP Statutes[5] (CMP Table 4-1, *Exempt Facilities in 2011*). As such, the? Project is not subject to SR- 91 CMP analysis. Local streets that would convey Project traffic are not designated CMP facilities and are not subject to CMP analysis.

[5] *Riverside County Congestion Management Program* (Riverside County Transportation Commission) December 14, 2011, p. 4-2 and Table 4-1 *Exempt Facilities in 2011*.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The Project does not propose or require any long-term or permanent alteration of the area roadway system. Nor does the Project propose or require uses or facilities that would substantially increase hazards due to a design feature. Project truck traffic would be routed via the most direct and efficient roadways to receiving facilities, and would avoid residential areas to the extent practical. Any effects of the Project on the area roadway systems and traffic patterns would be temporary and transient.

Proposed truck traffic routing would be subject to review and approval by the City and DTSC prior to issuance of the first development permit.

Potential temporary/transient effects of the Project related to increased hazards and potentially incompatible traffic types are appropriately and adequately addressed through implementation of the Project Construction Traffic Management Plan

Based on the preceding, the potential for the Project to substantially increase hazards due to a design feature or incompatible uses is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Result in inadequate emergency access.

Impact Analysis: The Project does not propose or require uses or facilities that affect emergency access. Potential temporary/transient effects of the Project related to emergency access are appropriately and adequately addressed through implementation of the Project Construction Traffic Management Plan (Section 1.0 *Project Description*, 1.10 *Construction Traffic Management Plan*) and the RAP Transportation Plan (RAP Appendix F).

Based on the preceding, the potential for the Project to result in inadequate emergency access is less- than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. Result in inadequate parking capacity.

Impact Analysis: The Project does not propose or require uses or facilities that would substantively increase parking demands or affect existing parking assets. The Project would however result in temporary/transient parking requirements for Project construction personnel/employees and staging of Project construction equipment. In this regard, an estimated 10 – 15 construction personnel/employees would require temporary parking, and an estimated 4 – 6 pieces of construction equipment may be temporarily staged at the Project site The Project site totals +/- 7 acres and can accommodate these nominal parking demands.

Based on the preceding, the potential for the Project to result in inadequate parking capacity is less-than- significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis: The Project does not propose uses or facilities that would affect adopted policies, plans, or programs supporting alternative transportation. In this regard, temporary improvements and activities resulting from the Project would not affect transit routes, transit facilities, bicycle routes, or any other means of alternative transportation or policies supporting alternative transportation. Potential temporary/transient effects of the Project related to *alternative transportation* and alternative transportation policies are appropriately and adequately addressed through implementation of the Project Construction Traffic Management Plan (Section 1.0 *Project Description*, 1.10 *Construction Traffic Management Plan*) and the RAP Transportation Plan (RAP Appendix F).

Based on the preceding, the potential for the Project to conflict with adopted policies, plans, or programs supporting alternative transportation is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used*: GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.1.18 Tribal Cultural Resources

Project Activities Likely to Create an Impact: Project site excavation and general site disturbance.

Description of Baseline Environmental Conditions: The RSIM site has historically been used for scrap metal storage and stockpiling. Targeted areas of residential properties within the Project are not improved or typical residential landscaping features. The Project site is not a known source or location of sensitive or protected cultural resources. Nor is there considered to be a substantive potential for presence of sensitive or protected cultural resources.

Analysis as to whether or not Project activities would:

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Impact Analysis: Within the Project site, there are no known Tribal Cultural Resources (TCRs) that are 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). Nor is it anticipated that the Project would adversely affect off-site TCRs.

Tribal Resources Consultation (Consultation) with requesting Tribes has been initiated as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*. Pursuant to the Consultation process, if potentially significant impacts to TCRs are identified, DTSC and affected Tribe(s) will mutually agree to measures that would avoid or mitigate these impacts. Alternatively, affected parties acting good faith and after reasonable effort, may conclude that a mutual agreement cannot be reached.

Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a tribal cultural resource as defined at Public Resources Code 21074 is considered less- than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis: Please refer to remarks at Checklist item 17. a.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used: *GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23. City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; *AB 52, Gatto. Native Americans: California Environmental Quality Act*.

2.1.19 Utilities and Service Systems

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Project site includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. The existing Project site is served by all utilities systems.

Analysis as to whether or not Project activities would:

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

Impact Analysis: The Project proposes site remediation activities that would temporarily disturb the subject site, excavate and remove contaminated material and debris, and then restore the subject site to its approximate previous grade and contours with clean imported soil. The Project does propose or require uses that would generate wastewater. On this basis, there is no potential for the Project to generate wastewater that would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis: The Project proposes site remediation activities that would temporarily disturb the subject site, excavate and remove contaminated material and debris, and then restore the subject site to its approximate previous grade and contours with clean imported soil. The Project does not propose or require uses or facilities that would increase demands on water service, water treatment, wastewater conveyance or waste water treatment facilities.

On this basis, there is no potential for the Project to require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects*.

Impact Analysis: The Project proposes site remediation activities that would temporarily disturb the subject site, excavate and remove contaminated material and debris, and then restore the subject site to its approximate previous grade and contours with clean imported soil. The Project does not propose or require any substantive permanent alteration of stormwater drainage

facilities.

Temporary impacts to the serving stormwater management system would be addressed though mandated implementation of a City and DTSC-approved Project Storm Water Pollution Prevention Plan (SWPPP). Pursuant to the approved SWPPP, "[c]ontractor shall supply, install, and maintain all SWPPP erosion control items including but not limited to: silt fences, straw wattle, sand bags, drain inlet filters, etc. Contractor shall provide all necessary SWPPP reports and monitoring before, during, and after each rain event during the rough grading scope of work. Stormwater discharges shall conform to California Regional Water Quality Control Board (RWQCB) regulations and water quality standards and National Pollution Discharge Elimination System (NPDES) permitting requirements (Section 1.0 *Project Description*, *1.7.2 Pre-field Activities*)**.**

Based on the preceding, the potential for the Project to require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects is less-than-significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: Please refer to remarks at Checklist item 18. a.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis: Please refer to remarks at Checklist item 18. b.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis: Contaminated materials removed from the Project site would be transported to designated receiving facilities. The proposed receiving facility for the RCRA level waste is Waste Management's Kettleman Hills Class I Facility in Kettleman City, California. The proposed receiving facility for CAL-Haz wastes is US Ecology in Beatty Nevada. The proposed receiving facility for the remaining non-hazardous waste is Thermal Remediation services in Azusa, California. Prior to transportation of materials, whether hazardous or non-hazardous, proposed receiving facilities would be contacted to ensure their acceptance of materials (Section 1.0 *Project Description*, 1.7.4 *Waste Management - Targeted Excavations*, 1.7.5 *Waste Management - General*).

Based on the preceding, the potential for the Project to generate waste that would exceed the capacity of receiving landfills is less-than-significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The soil removed from the RSIM Site as part of this removal action will be transported to one of the treatment facilities listed below by end-dump transfer trucks. The final treatment facility will be selected based on the results of waste profile analysis and existing PCB data. When more than one COC is present in soil, the decision of which disposal facility to transport the soil to shall be based on the contaminant of concern with the most conservative option.

RCRA Hazardous Waste Facilities
US Ecology Nevada
Highway 95, 11 Miles South of Beatty, Beatty, Nevada 89003
Phone Number – (775) 553-2203
EPA ID No. NVT3300100000

Non-RCRA and RCRA Hazardous Facilities

Clean Harbors, Buttonwillow Landfill
2500 West Lokern Road, Buttonwillow, CA 93206
Phone Number – (661) 257-3655
EPA ID No. CAD980675276

Waste Management, Chemical Waste Management (Kettleman Hills)
35251 Old Skyline Road, Kettleman City, CA 93239
Phone Number – (559) 309-7688
EPA ID No. CAT000646117

Republic Services La Paz County Landfill
26999 Highway 95, Parker, AZ 85344
Phone Number – (928) 669-8886
EPA ID No. AZC950823111

Non-Haz Waste Facilities
Waste Management, Azusa Land Reclamation
1211 W Gladstone Street, Azusa, CA 91702
Phone Number – (866) 909-4458
EPA ID No. N/A

Mecca Resource Facility
62-200 Gene Welmas Drive, Mecca, CA 92254
Phone Number – (760) 507-2062
EPA ID No. N/A

Chandler's Corporation, Maitri Road Recycling Facility
24980 Maitri Road, Corona, CA 92883
Phone Number – (310) 784-2904
EPA ID No. N/A

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ☐ No Impact

References Used: *GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23*.

2.1.20 Wildfire

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	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	□	□	x	□
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?	□	□	x	□
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?	□	□	□	x
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?	□	□	x	□

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting wildfire resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

State Responsibility Areas are boundaries adopted by the Board of Forestry and Fire Protection and are areas where the California Department of Forestry and Fire (CAL FIRE) has a financial responsibility for fire suppression and prevention. Review of the California State Responsibility Area Viewer and the Riverside County Fire Hazard Severity Zone Maps for State Responsibility Area and Local Responsibility Area indicate the Proposed Project Site is not located in a Very High Hazard Severity Zone (VHFHSZ). The closest State Responsibility Area doesn't appear to be within 5-8 mile of the Proposed Project Site (CAL FIRE 2009), The closest area classified as a VHFHSZ is located 3-5 miles south of the Proposed Project Site (CAL FIRE 2009).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of wildfires resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to wildfire resources in or near the Proposed Project Site, no environmental studies relating to wildfire resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

Please refer to the analysis provided in Section 9(f) of this Initial Study.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:

The Proposed Project Site is not located in an area with environmental conditions conducive to wildland fires. The project site is in an area lacking dry vegetation such as marshes and wetlands. However, operation of construction equipment on the during remedial action has the limited potential to spark a fire. However, remedial activities would implement BMPs which address fire prevention methods such as:

- restricting vehicles from driving or parking on dry vegetation during fire sensitive times of the year; and
- wetting dry construction areas before commencing activities, and wetting throughout the day, as appropriate.

Conclusion:

Although construction equipment has a minimal potential• to spark a fire during corrective measures, implementation of BMPS would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the corrective measures are considered less than significant.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:

Implementation of remedial action would not require the installation or maintenance of associated infrastructure (e.g., fuel breaks, emergency water sources, power lines, other utilities) that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. Corrective measures would require construction of temporary access roads of compacted clean soil or imported clean gravel to facilitate access to work areas. However, the temporary access roads would overall reduce wildfire risk during the implementation of remedial action by incorporating soil or gravel.

Conclusion:

The proposed remedial action plan would not install any infrastructure that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. No impact would occur.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

Landslides tend to occur where slopes are steeper with higher relief. The Proposed Project Site is flat with very little relief. The proposed remedial action plan would not significantly change the existing slope of the Proposed Project Site.

Conclusion:

The proposed remedial action plan would not create steep slopes or disturb any landslide-prone areas. In addition, proposed corrective measures would not expose people or structures to risk from uncontrolled storm water runoff. These impacts are considered less than significant.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

References Used: California Department of Forestry and Fire (CAL FIRE), 2019. Riverside County Fire Hazard Severity Zone Maps for State Responsibility Area. https://osfm.fire.ca.gov/media/5922/riverside.pdf (Accessed October 30, 2019).

2.1.21 Mandatory Findings of Significance

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project has ☒ does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. The project does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

c. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Determination of Appropriate Environmental Document:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

☒ The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A Mitigate Negative Declaration will be prepared.

The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that

remain to be addressed.

The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

Certification: I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Preparer's Signature		2/6/20 Date
ASLAM SHAREEF Preparer's Name	Hazardous Substances Engineer Preparer's Title	(714) 484-5472 Phone #
Branch or Unit Chief Signature		2.6.20 Date
SHAHIR HADDAD Branch or Unit Chief Name	Sup. Hazardous Substances Engineer I Branch or Unit Chief Title	(714) 484-5368 Phone #

ATTACHMENT A

2.2 References

- GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.
- *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.
- *Air Quality Modeling for Draft Remedial Action Plan, Riverside Scrap Iron & Metal* (Urban Crossroads) December 4, 2017.
- *City of Riverside Economic Prosperity Action Plan and Climate Action Plan* (City of Riverside) January 2016.
- Riverside Marketplace Specific Plan and Environmental Impact Report (The SWA Group, The Arroyo Group, Parsons Brinckerhoff) April 1991.
- City of Riverside Municipal Code.
- *AB 52, Gatto. Native Americans: California Environmental Quality Act*.

3.0 MITIGATION MONITORING PLAN

To ensure that the mitigation measures contained in this MND are properly implemented, a monitoring plan has been developed pursuant to State law. This Mitigation Monitoring Plan (MMP) identifies measures incorporated in the Project which reduce its potential environmental effects; the entities responsible for implementation and monitoring of mitigation measures; and the appropriate timing for implementation of mitigation measures. As described at *CEQA Guidelines* Section 15097, this MMP employs reporting on, and monitoring of, Project mitigation measures.

The objectives of the MMP are to:

1. Assign responsibility for, and ensure proper implementation of mitigation measures;

2. Assign responsibility for, and provide for monitoring and reporting of compliance with mitigation measures;

3. Provide the mechanism to identify areas of noncompliance and need for enforcement action before irreversible environmental damage occurs.

3.1 Mitigation Monitoring and Reporting

Mitigation monitoring and reporting procedures incorporated in the Project are presented in the following Section. Specific mitigation measures incorporated in the Project, mitigation timing, and implementation and reporting/monitoring responsibilities are presented in Table 3.1-1.

3.2 Mitigation Monitoring and Responsibilities

As the Lead Agency, DTSC is responsible for ensuring full compliance with the mitigation measures adopted for the proposed Project. DTSC will monitor and report on all mitigation activities. Mitigation measures will be implemented at different stages of development throughout the Project area. In this regard, the responsibilities for implementation have been assigned to the Applicant, Contractor, or a combination thereof.

If during the course of Project implementation, any of the mitigation measures identified herein cannot be successfully implemented, DTSC shall be immediately informed, and the City will then inform any affected responsible agencies. DTSC, in conjunction with any affected responsible agencies, will then determine if modification to the Project is required and/or whether alternative mitigation is appropriate

Table 3.1-1
Project Mitigation Monitoring Plan

General Note: *To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by DTSC prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.*

Mitigation Measures	Mitigation Timing	Implementation Entity	Monitoring/ Reporting Entity	Monitoring/Reporting Frequency
Air Quality				
AQ-1 Use of off-road construction equipment rated at > 150 HP shall comply with EPA/CARB Tier 3 emissions standards, and shall be tuned and maintained in accordance with the manufacturer's specifications.	Throughout site disturbing activities.	Applicant.	DTSC/ City of Riverside.	Throughout site disturbing activities.
AQ-2 The following measures are incorporated to ensure monitored implementation and compliance with applicable SCAQMD Rule 403 provisions: • *All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.* • *Contractor(s) shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.* • *Contractor(s) shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.*	Throughout site disturbing activities.	Applicant.	DTSC/ City of Riverside.	Throughout site disturbing activities.

3.3 References

City of Riverside General Plan 2025 [General Plan],

Riverside Marketplace Specific

City of Riverside General Plan and Supporting Documents EIR (Albert A. Webb Associates) November 2007 (General Plan EIR)

Air Quality Modeling for Draft Remedial Action Plan, Riverside Scrap Iron & Metal (Urban Crossroads) December 4, 2017.

AMEC Foster Wheeler (AMEC), 2015, Additional Phase II Environmental Site Assessment Report, December 9.

Ami Adini & Associates (AA&A), 2011, Phase II Environmental Site Assessment. August 8.

GSI, 2019, Revised Draft Remedial Action Plan, Riverside Scrap Iron & Metal, 2993 Sixth Street, Riverside, California, July 23.

Hillmann, 2017a, Off-Site Preliminary Environmental Assessment, February 27.