Former Riverside Scrap Iron and Metal Property Response Plan Project

Initial Study/ Negative Declaration

Prepared for
Department of Toxic Substances Control

September 19, 2024

appliedplanning inc

Initial Study/Negative Declaration

for the

Former Riverside Scrap Iron & Metal Property

Response Plan Project

DTSC DOCKET NO. HAS-FY21/22-032

Department of Toxic Substances Control

5796 Corporate Avenue

Cypress, California 90630

September 19, 2024

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1.0 PROJECT DESCRIPTION

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1.1 Overview

The Department of Toxic Substances Control (DTSC) is considering approval of the Response Plan, Former Riverside Scrap Iron & Metal Property (GSI Environmental Inc.), last revision July 15, 2024 (Response Plan). The Response Plan proposes remedial actions addressing known and potential soils contamination within the Riverside Scrap Iron & Metal (RSIM) site proper, driveways accessing the RSIM site, and targeted areas of residential properties that abut the RSIM site. Collectively, these various properties comprise the Project Site (Site). For the purposes of CEQA, the Response Plan is the Project evaluated in this Initial Study/Negative Declaration (IS/ND). The Response Plan in total is presented at IS/ND Appendix A.

Per the Response Plan, *Excavation and Off-Site Disposal* (Response Plan Remedial Action Alternative 3), complemented by the Applicant's voluntary *Installation and Testing of Vapor Intrusion Measures at All Future On-Site Buildings with Institutional Controls* (Response Plan Remedial Action Alternative D), have been chosen as the most reasonable remedial actions for the Site (Response Plan, p. 29). In summary, the Recommended Remedial Actions (the recommended Remedy) would: clear the RSIM site of existing surface improvements, excavate and remove contaminated site soils, backfill excavated portions of the site with clean soils, and implement measures that would preclude potential vapor intrusion at future site buildings. For illustrative purposes, an estimate of excavated soils and demolition debris resulting from the Response Plan Recommended Remedial Action Alternative 3 is presented at Table 1.1-1.

Table 1.1-2 summarizes all waste generated by the Project and identifies waste disposal destination(s). Estimated clean fill soil necessary to return the Site to its original grade is also indicated. As indicated at Table 1.1-2, waste export would total 21,500 cubic yards, clean soil import would total 20,020 cubic yards. Export plus import would total 41,520 cubic yards.

Table 1.1-1
Estimated Waste by Category, Weight, and Volume

Location/ Source	RCRA-Level Waste		TSCA (PCB) Waste		Cal-Haz Waste		Non-hazardous Materials			
							Soils		Surface Demolition	
	Tons	Cubic Yards	Tons	Cubic Yards	Tons	Cubic Yards	Tons	Cubic Yards	Tons	Cubic Yards
RSIM Site	2,797	1,865	593	395	3,923	2,615	22,227	14,818	1,500	1,500
Residential Target Areas	--	--	--	--	--	--	460	307	--	--
Totals	2,797	1,865	593	395	3,923	2,615	22,687	15,125	1,500	1,500

Source: GSI Environmental
Notes:
1. Estimates rounded up to nearest whole number.
2. Soil density of 1.5 tons/cubic yd.
3. Demolition debris density of 1 ton/cubic yd.
4. Approximately 2,797 tons of RCRA-level waste to be removed from the Site.
5. Approximately 4,516 tons of CAL-Haz/TSCA waste to be removed from the Site.
6. Approximately 460 tons of contaminated soils to be removed from targeted areas of residential properties.
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.

Table 1.1-2
Waste Export and Clean Soil Import

Waste Export				
Waste Category	**Tons**	**Cubic Yards**	**Destination/Source**	**Approximate Travel Distance (one-way)**
RCRA-Level	2,797	1,865	Kettleman Hills, Kettleman City, California.	230 miles
CAL-Haz	3,923	2,615	US Ecology, Beatty, Nevada	280 miles
TSCA (PCB)	593	395	Kettleman Hills, Kettleman City, California.	230 miles
Non-Hazardous (soils + demolition debris)	(22,687 tons soils, 1,500 tons demolition) 24,187	(15,125 cu. yds. soils, 1,500 cu. yds. demolition) 16,625	Thermal Remediation Services (TRS), Azusa, California.	43 miles
Export Totals	**31,500**	**21,500**	---	---
Soil Import				
Clean Soil	33,030	20,020	---	20 Miles

Source: GSI Environmental.
Notes:
1. All estimates rounded up to nearest whole number.
2. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.

The Response Plan Vapor Intrusion Measures (VIMs) would include the installation of VIMs at any new buildings and the installation of passive Sub-Slab Venting (SSV) at the existing "Barley Mills Building," to be retained within the Site.[1] The Applicant has elected to include these measures regardless of the Response Plan conclusion that measures may not be needed to address the potential for low concentrations of PCE and TCE detected in soil vapor to migrate to indoor air spaces at any future site occupancies.

Section 2.0 of this IS/ND presents the Project environmental impact analysis. For the purposes of the California Environmental Quality Act (CEQA) and this IS/ND, DTSC is the Lead Agency for the Project. It is anticipated that the City of Riverside would act as the Lead Agency for any subsequent development actions at the Site.

1.2 Project Objectives

The Response Plan Objectives are as follows:

- Summarize existing Site conditions, identify potential Site future land uses, identify and summarize prior Site investigations including prior findings regarding Contaminants of Concern (COCs);
- Establish appropriate Remedial Action Objectives (RAOs) for protection of human health and the environment;
- Evaluate alternatives and select remedial actions for the Site that are protective of human health and the environment; and
- Provide a scope of work to implement the selected remedy at the Site.

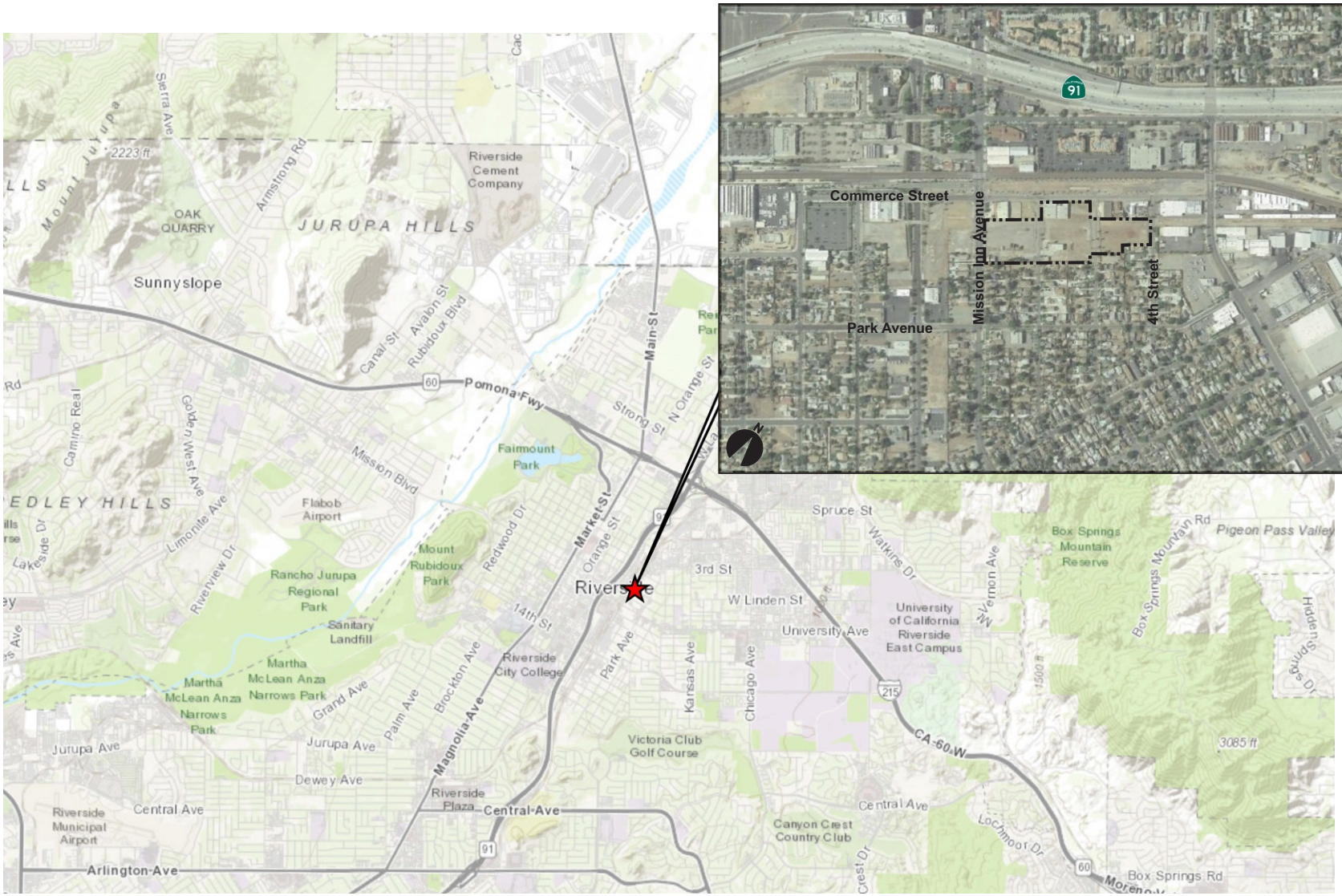
The implemented Response Plan would support anticipated future multi-family residential redevelopment of the Site.

1.3 Project Location

The Project Site is located east of the downtown area of the City of Riverside, approximately 1,000 feet east of the 91 freeway (SR-91). 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 4th Street. The Project Site location is identified at Figure 1.3-1.

The RSIM site comprises approximately 7 (seven) acres extending across multiple parcels. The predominance of the Response Plan activities described herein would occur wholly within the RSIM site boundaries. The Response Plan also addresses contaminants affecting driveways accessing the RSIM site, and limited areas (less than 0.1 acres) of abutting residential properties. The Project Site boundaries are identified at Figure 1.3-2.

[1] The Barley Mills Building is considered a City of Riverside local "Structure of Merit." This structure will be protected in place throughout Site remedial actions, and will eventually be repurposed and incorporated in proposed subsequent Site redevelopment actions.



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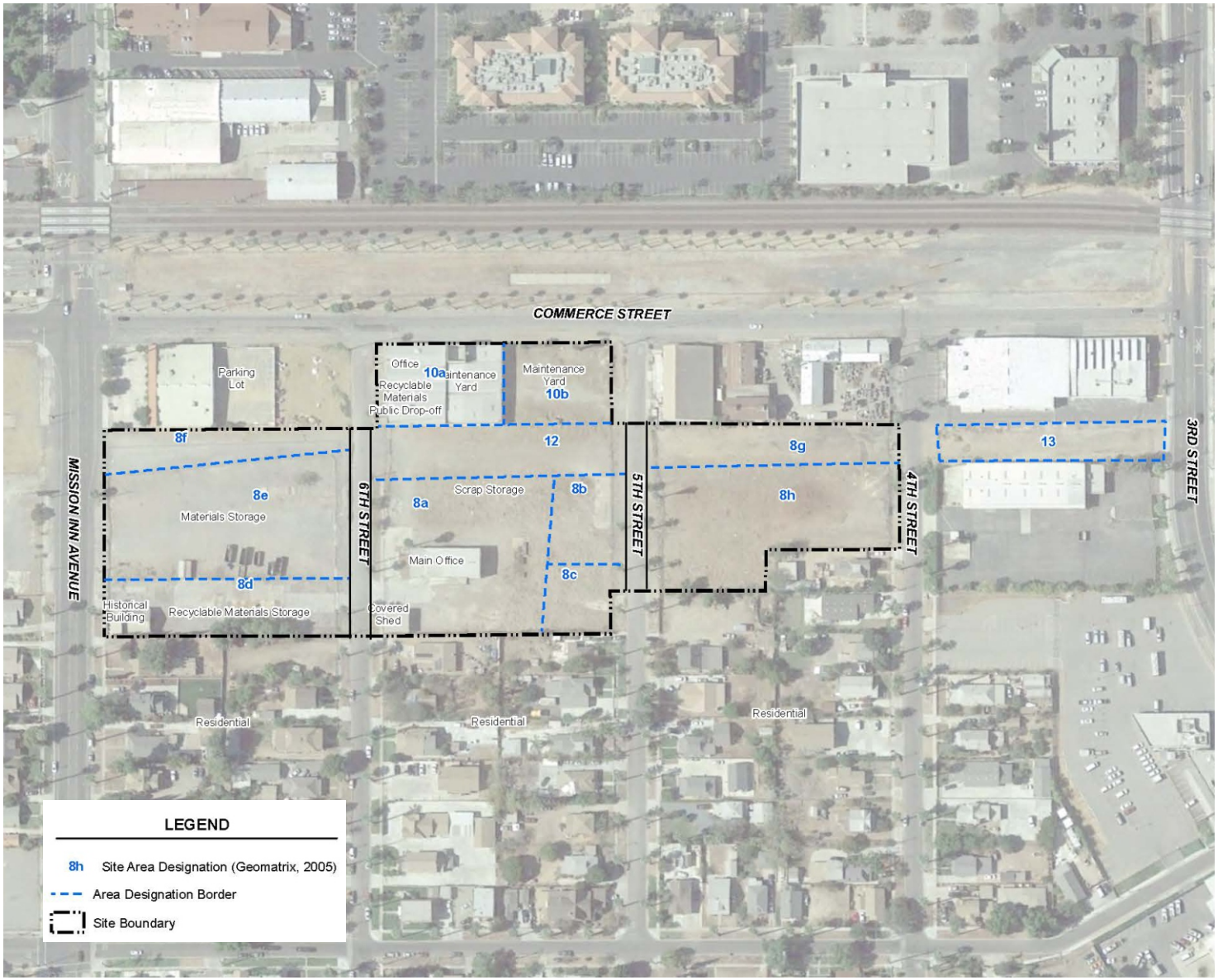
Source: GSI Environmental; Applied Planning, Inc.

applied planning inc

Figure 1.3-1
Project Location



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Source: GSI Environmental

Figure 1.3-2
Project Site Boundaries

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 1.4-1. Existing land uses are illustrated at Figure 1.4-1; existing General Plan Land Use and Zoning designations are presented at Figure 1.4-2. Descriptions of existing land uses and land use designations are presented subsequently.

Table 1.4-1
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

Sources: 2024 Response Plan; City of Riverside General Plan, November 2007; City of Riverside Zoning Map, 9-30-20; Riverside Marketplace Specific Plan, April 1991.

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Source: Google Earth; Applied Planning, Inc.

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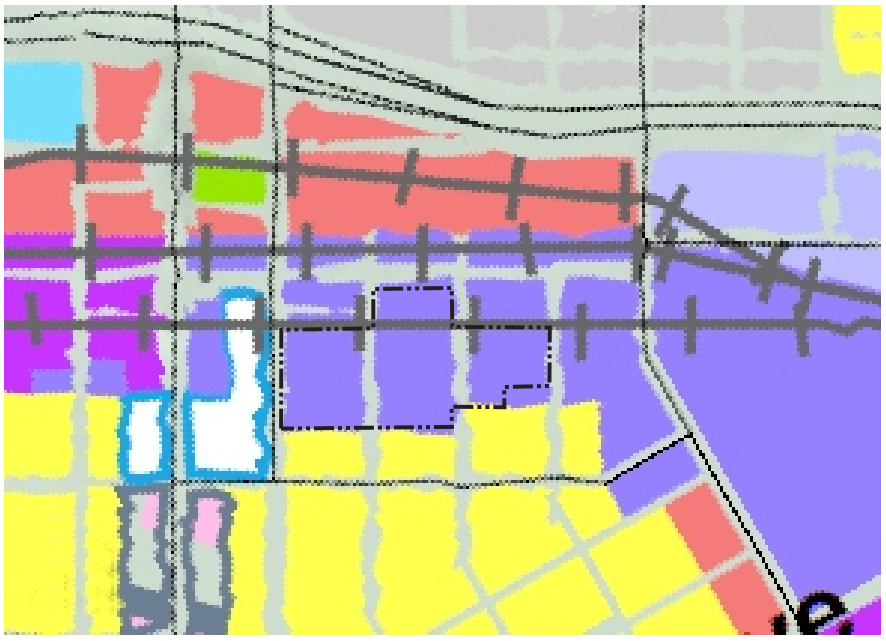
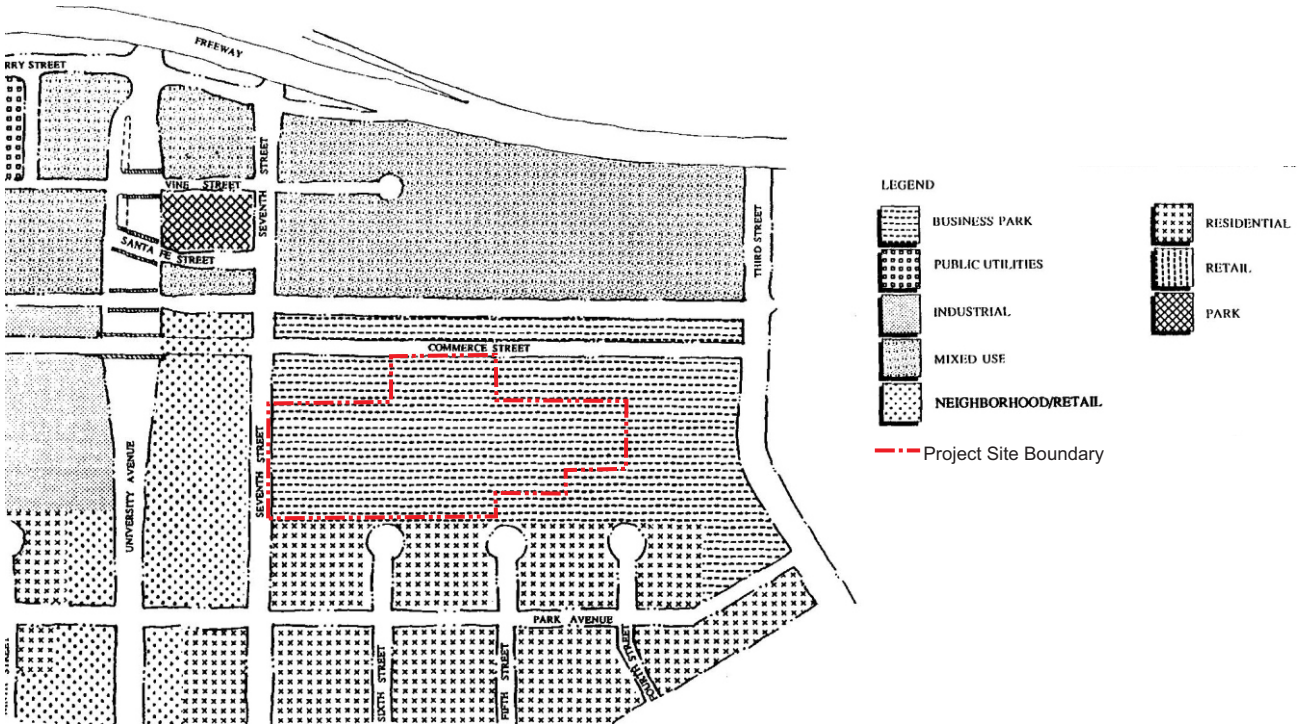
Figure 1.4-1
Existing Land Uses



General Plan Land Use Designations



Zoning Designations

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

applied planning inc

Figure 1.4-2
General Plan Land Use & Zoning Designations

1.4.1 Existing Land Uses

Existing Project Site and vicinity land uses are presented at previous Figure 1.4-1 and are described below.

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 surface debris and currently evidences areas of bare earth and various paved surfaces. Surrounding land uses to the north and west are primarily commercial. Residential housing is primarily located east and south of the Site.

The Project Site also includes targeted areas of residential properties abutting the RSIM site. Specifically, targeted excavation and soil remediation identified in the Response Plan would affect the residential property located at 2981 Mission Inn Avenue; the residential property located at 2968 6th Street; and the residential property located at 2981 6th Street. The Response Plan 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. Response Plan activities and programs would not affect residential structures or surface improvements. Areas that would be affected by proposed off-site excavation activities are discussed subsequently herein (see: *Residential Property Excavations*).

West
West of the Project Site, properties are vacant or developed with commercial land uses.

East
East of the Project Site, properties are developed with residential uses.

North
North of the Project Site are various light industrial/commercial land uses.

South
South of the Project Site, across Mission Inn Avenue, properties are developed with residential uses.

1.4.2 Existing 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.

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).

West

West/southwest 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).

East

East/northeast 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).

North

North 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).

South

South 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 Response Plan maintains the Study Area parcel numbering system for continuity. The RSIM site includes Study Area parcels 8a-8h, 10a, 10b, and 12. Study Area parcel designations for the RSIM site are indicated at previous Figure 1.3-2.

1.5 RSIM Site Background and Current Conditions

The RSIM 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 RSIM Site Investigations

Site characterization activities have been conducted at the Site since 2011. Site-specific investigations are provided in the following documents, and are incorporated herein by reference. Analysis and findings of the listed documents are summarized below. All of the listed documents can be accessed by contacting DTSC. See also: Response Plan Section 3.1, Site Investigation.

- 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)
- 2017 Off-Site Preliminary Environmental Assessment (Hillmann Consulting)
- 2018 PCB Sampling and Analysis, GSI Site Assessment and Report of Findings (2022)
- 2020 Revised Remedial Action Plan (GSI)
- 2021 Phase I Environmental Site Assessment (Hillmann Consulting)
- 2022 Site Assessment Plan and Report of Findings (GSI)
- 2023 Soil Vapor Investigations (GSI)

In addition to the Site investigation documents listed above, a Remedial Action Plan dated January 2, 2020, and a Phase I Environmental Site Assessment dated September 21, 2022 have been completed for the Site.

1.6.1 2011 Phase II Investigation

In 2011, Ami Adini & Associates (AA&A) conducted a subsurface investigation at the Site (AAA, 2011). The investigation included the collection of 56 soil samples at depths of 0.5

to 1-foot bgs and the deployment and collection of passive, GORE-SORBER® soil vapor samples. Shallow soil samples were analyzed for total petroleum hydrocarbons (TPH), PAHs, PCBs, semi-volatile organic compounds (SVOCs), and metals. The passive soil vapor samples were analyzed for volatile TPH and VOCs.

Soil vapor analysis using GORE-SORBER® samplers identified volatile TPH and VOCs in soil vapor 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, including benzo[a]anthracene, benzo[b]fluoranthene, benzo(a)pyrene, dibenz[a,h]anthracene, and indeno (1,2,3-cd) pyrene were detected in several shallow soil samples at concentrations exceeding their respective residential screening levels. These PAHs were detected in soil across the Site; however, elevated PAH concentrations were detected primarily in the maintenance yard, scrap storage, roll-off bin storage, and machine shop areas.

PCB concentrations were detected in 35 samples across the Site. During this investigation, three locations reported PCB concentrations in excess of 50 mg/kg of PCBs (A8b-SB1, A8e-SB4, and A10b-SB4). AA&A reported several metals (antimony, arsenic, beryllium, cadmium, cobalt, copper, lead, mercury, nickel and vanadium) at concentrations above residential screening levels and/or background. Arsenic was detected at concentrations between 12 and 166 milligrams per kilogram (mg/kg) in Areas 8c, 8f, and 8g. All other areas did not identify soil with arsenic above 12 mg/kg, the upper bound background concentration (DTSC, 2008). Lead was detected in shallow soil at concentrations up to 4,260 mg/kg. Concentrations of other metals reported above the residential screening levels are generally co-located with elevated arsenic and lead concentrations at the Site. Soil analytical result tables for metals, PAHs, and PCBs are included at Response Plan Appendix B.

1.6.2 2015 Additional Phase II 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 sampling were to address data gaps (i.e., vertical and lateral extent of COCs in soil and soil vapor) to support preparation of a Response Plan 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 total petroleum hydrocarbons (TPH speciated in gasoline, diesel, and oil ranges), VOCs, metals, PCBs, PAHs, and SVOCs. The borings were completed with soil vapor 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, which are present in concentrations that exceeded residential screening levels, with soil impacts extending deeper at some locations to 2.5 feet bgs. COCs were only identified in excess of residential screening levels in one soil sample location deeper than 2.5 feet (NS20 in Area 8h). Soil in this area appears to have been disturbed historically and surficial soils may have been mixed into underlying soil at this location. Elevated TPH was identified in this area at the location of sample S8 at depths of up to 5 feet bgs. PCB concentrations in excess of 50 mg/kg of PCBs were reported at three locations (NS2, S14, and S6).

The soil vapor sampling results from 2015 identified relatively low concentrations of VOCs; however, trichloroethene (TCE) and tetrachloroethene (PCE) were detected in soil vapor at concentrations exceeding residential screening levels. The maximum concentration of TCE (0.57 micrograms per liter [µg/L]) reported in soil vapor exceeded the residential screening levels for current (0.24 µg/L) and future (0.48 µg/L) land use. PCE was detected at a maximum concentration of 2.0 µg/L, exceeding the residential screening levels for current (0.23 µg/L) and future (0.46 µg/L) land use. The distributions of PCE and TCE in soil vapor are included at Response Plan Appendix C.

The AMEC investigation included a soil sampling program along the southeast property line, which borders four residential properties. The PCB concentrations in most fence line boring soil samples were in excess of residential screening levels, primarily at 0.25 feet bgs. The results of the additional 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). In addition, soil and soil vapor sampling results at 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.

AMEC recommended no additional sampling, except for what may be required to characterize possible impact to the nearby residential properties. Soil analytical results tables for metals, PAHs, and PCBs are included at Response Plan Appendix B. Figures identifying AMEC sampling locations are included at Response Plan Appendix D.

1.6.3 2017 Off-Site Preliminary Environmental Assessment

To address possible impact to the off-Site residential properties, Hillmann prepared a Technical Memorandum (Tech Memo) proposing a scope of work for off-Site and perimeter soil sampling dated November 8, 2016. The proposed scope of work included sampling on the adjoining residential properties located along the southeast property line at 2981 Mission Inn Avenue, 2968 6th Street, 2981 6th Street, and 2980 5th Street. In addition, the Tech Memo proposed testing of the soil just outside the Site perimeter, including near the pathways used by trucks that enter and exit the Site. This work was required by USEPA to determine if impacted material might have spread to greenway areas near the outer gates of the parcels, as these areas intersect with sidewalks and

pathways accessible to the community. The Tech Memo was approved by DTSC by letter dated December 2, 2016.

To define the lateral extent of contamination on the off-Site residential properties, Hillmann proposed to advance eight soil borings on each of the four boundary residential properties, and a separate series of borings in boundary greenway areas. Prior to conducting the investigation, the RSIM property owner secured access to three of the four off-Site residences; the most northeastern property (2980 5th Street) did not grant access for the investigation.

In February 2017, Hillmann advanced a total of 40 soil borings at the locations proposed in the Tech Memo. Borings S1 through S24 were installed on the three residential properties where access had been permitted. These borings were installed along parallel lines to the property line and previous fence line borings. Each residential Site included soil borings installed approximately 3 and 10 feet from the property line, in accessible areas. The Site boundary borings were installed in accessible, non-paved, greenway locations along the property easement with public right-of-way areas near the scrap yard driveways. Borings S25 to S28 were installed along the Mission Inn Avenue edge of the property; borings S29 to 33 were installed in access points along 5th Street and borings S34-S40 were installed along 6th Street access points.

Investigation results from borings on the two southwest residential properties (2981 Mission Inn Avenue and 2968 6th Street) identified two locations at each property with lead concentrations greater than 80 mg/kg with a maximum concentration of 183 mg/kg in sample S1-0.25. Sample S8-0.25, located approximately 10 feet from the Site in line with boring S1, had a reported lead concentration of 95.5 mg/kg. Samples S9-0.25 and S12-0.25 (located at 2968 6th Street) had reported lead concentrations of 153 and 86.1 mg/kg, respectively. In addition, one sample collected approximately 10 feet from the fence line at 2968 6th Street had PAH concentrations in excess of residential screening levels, though none of the samples obtained closer to the fence line had reported concentrations of PAHs above residential screening levels. These results suggest that targeted remedial excavation to 1-foot bgs at these two sites could be reasonably completed with confirmation soil sampling used to ensure that the impacted soil had been adequately removed (Hillmann, 2017a).

Six soil samples collected at the 2981 6th Street residence (located just northeast of the other residences, across 6th Street) reported COCs greater than residential screening levels. Five samples had lead concentrations greater than 80 mg/kg, including the 0.25-foot samples from borings S19, S20, S22, and S23. The highest lead concentration was detected in sample S20-0.25 at 976 mg/kg. This sample also contained PCBs slightly above residential screening levels with 0.25 mg/kg Aroclor 1260 (slightly exceeding the current 0.24 mg/kg residential screening level). Only one of the deeper samples collected at this property had COC concentrations in excess of the residential screening levels; sample S19-1 had a reported lead concentration of 193 mg/kg. The deeper sample from this location, sample S19-2.5, was subsequently analyzed for lead and the reported lead

concentration was 6.54 mg/kg, defining the vertical extent of impacts in this area (Hillmann, 2017a).

The adjacent property located at 2980 5th Street could not be sampled because access was not granted. Prior to implementation of remedial actions outlined in this Response Plan, an additional attempt will be made to gain access to this property for soil sampling. Soil analytical result tables for metals, PAHs, and PCBs are included at Response Plan Appendix B and sample locations are identified at Response Plan Appendix E.

1.6.4 2018 Additional On-Site PCB Sampling and Analysis

Procedures for conducting soil sampling for PCBs at the Site under TSCA were summarized in the Revised Technical Memorandum Workplan for Delineation of Resource Conservation and Recovery Act (RCRA) Level PCB-Impacted Soil prepared by Hillman in October 2017 (PCB Work Plan; Hillmann, 2017b). GSI was subsequently retained in November 2017 by RSIM to implement the PCB Work Plan. In early December 2017, GSI, USEPA, and DTSC corresponded to confirm the TSCA procedures for delineation and removal of PCB-impacted soil.

Six historical sample locations with PCB concentrations exceeding 50 mg/kg were identified in the PCB Work Plan for further characterization in accordance with TSCA requirements (Response Plan Figure 3). Additional soil sampling and analysis was conducted by GSI in 2018 to define the extent of PCB impacts in soil in these areas (Response Plan Figures 4A, 4B). Soil samples were collected on a 1.5-meter grid pattern at stepped-out locations from the six identified locations, with samples from each location collected at depths 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. Soil delineation “step out” sampling events were conducted accordingly on the following dates:

- January 23, 2018;
- May 18, 2018;
- July 27, 2018;
- August 3, 2018;
- September 27, 2018; and
- December 20, 2018.

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.

The soil samples collected were analyzed for soil moisture using USEPA Method 9045D, and PCBs using USEPA Method 8082A and the Soxhlet extraction method USEPA

Method 3540C. Concentrations in soil samples were reported on a dry-weight basis as mg/kg, as indicated in the PCB Facility Approval Streamlining Toolbox (FAST; USEPA, 2017). Soil analytical results are included in Response Plan Appendix E.

After the December 20, 2018 sampling event, all six PCB-impacted areas were delineated laterally and vertically with the exception of one sample location (KK26), where concentrations of PCBs exceeded 50 mg/kg (Response Plan Figure 4A). On February 5, 2019, USEPA and DTSC concurred that the Site was characterized for PCBs and that no further sampling was necessary to complete preparation of the Response Plan, 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 at that location. Results of PCB-delineation sampling are included at Response Plan Appendix F and indicated at Response Plan Figures 4A, 4B.

1.6.5 2020 Revised Remedial Action Plan

A Remedial Action Plan (Response Plan) was completed for the Site on January 2, 2020. This document summarizes the nature and extent of contamination for the Site and provides a feasibility study that identifies remedial alternatives including: 1) No Further Action; 2) Containment through Surface Capping; or 3) Excavation and Off-Site Disposal. Alternative 3, Excavation and Off-Site Disposal, was selected as the remedy, and the Response Plan identified Site-wide excavation depths and targeted excavations based on COC concentrations that were compared to applicable residential screening levels. A Remedial Action Implementation Plan was included in the Response Plan.

1.6.6 2021 Phase I ESA

A Phase I Environmental Assessment (ESA) was completed for the Site on September 21, 2021 (Hillman, 2021). Recognized environmental conditions (RECs) identified for the Site included those listed at Table 1.6-1. Corresponding recommended REC responses are also identified.

Table 1.6-1
RSIM Site Recognized Environmental Conditions and Recommended REC Responses

Recognized Environmental Conditions	
REC No. 1	Riverside Scrap Iron and Metal-2993 6th Street, was listed in numerous regulatory databases for site contamination resulting for the historic use as a scrap metal yard. This site is currently subject to a voluntary cleanup agreement with the DTSC to conduct further investigations and remediation. The contaminants of concern were indicated to include arsenic, lead, PCBs, poly-nuclear aromatic hydrocarbons, tetrachlorethylene and total petroleum hydrocarbons.
REC No. 2	The known contamination left in place after three (3) Underground Storage Tank (UST) closures at 2993 6th Street, is considered to be a REC in connection with the Property.
REC No. 3	Hillmann observed several rails and wood ties within the fom1er railroad right-of-way supporting the possibility that railroad ties may be present just below the surface soil. Railroad ties are known to be treated with oil-based and tar-based chemicals such as creosote, and railroad spurs are commonly treated with pesticides for weed control. The buried railroad line/spur is considered to be a REC in connection with the Property.

Table 1.6-1
RSIM Site Recognized Environmental Conditions and Recommended REC Responses

Recommended REC Response Action(s)	
REC Nos. 1-3	Complete site cleanup per the Remedial Action Plan prepared by GSI for the DTSC and pursue closure from applicable regulatory agencies.
Historical Recognized Environmental Conditions	
HREC No. 1	Various UST closures at the Property have left contamination in place including a 10,000-gallon diesel UST at 3033 5th Street, analysis of soils beneath the tank indicated 62 mg/kg Total Petroleum Hydrocarbons Diesel (TPHd) kept in place, which is below residential cleanup levels, and is therefore considered to be a HREC in connection with the Property. The closure of a reported 1,000-gallon UST at the southeast comer of the warehouse at 3596 Commerce Street with a known release, reported cleanup with regulatory closure is also considered to be a HREC in connection with the Property.
Recommended HREC Response Action(s)	
HREC No. 1	No response action recommended at this time.
Controlled Recognized Environmental Conditions	
-	No CRECs were identified.
Significant Data Gaps	
-	No SDGs were identified.

Source: 2024 Response Plan.

The Phase I ESA RECs Nos. 1 and 2 both reference potential impact from low concentrations of petroleum hydrocarbons originating from former fuel USTs at the Site that were removed in the year 2000 in the vicinity of Area 8b (see IS/ND Figure 1.3-2, Project Site Boundaries). In August 2015, soil samples collected from depths of 2.5, 5, 15, and 20 feet below grade at a location approximately 10 feet south of the former UST excavation, were analyzed for VOCs, including gasoline-range organics, and no compounds were identified above the laboratory reporting limit in any sample collected. Additionally, gasoline-range organics were not identified in approximately 90 soil samples collected from depths between 2.5 and 20 feet at 46 locations across the Site (AMEC, 2015; Figure 2 and Table 4). Implementation of the proposed remedial action plan would address shallow soil impacts above residential land use criteria.

1.7 2022 Site Assessment Plan and Report of Findings

The Site Assessment and Report of Findings (GSI, 2022) is required under the CLRRA agreement between Iron Lofts and DTSC that was entered into for redevelopment of the Site. Iron Lofts purchased the property after the 2020 Response Plan was submitted to DTSC. The Site Assessment and Report of Findings is a summary of the Site and Site investigations (listed in the Sections above) and presents information related to the nature and extent and contamination at the Site. Based on the historical data available for the Site, the Site Assessment and Report of Findings recommended the preparation of a Response Plan that will evaluate the alternatives for response actions necessary to "reduce COC concentrations to concentrations considered protective of human health for residential use."

1.8 2023 Soil Vapor Investigation Reports

Soil vapor sampling was completed at locations throughout the Site in November 2022 and May 2023 to evaluate PCE and TCE in soil vapor and provide the additional assessment data required to support the planned multifamily redevelopment planning, design, and regulatory oversight, and for the evaluation of unrestricted Site use. The Soil Vapor Investigation Report and Addendum to the Soil Vapor Investigation Report have been included as Response Plan Appendix G.

Analytical results for soil vapor samples are evaluated by comparison to risk-based screening levels for residential and commercial/industrial Site use. Screening levels (SLs) for soil vapor are developed by applying an attenuation factor to screening levels for indoor air:

$$\text{Soil Vapor Screening Level } (SL_{sv}) = \frac{SL_{ia}}{AF}$$

Where:

SLsv	=	Soil vapor screening level (µg/m^3)
SLia	=	Indoor air screening level (µg/m^3)
AF	=	Attenuation factor (unitless)

Soil vapor SLs were calculated using the default attenuation factor published by DTSC for residential and commercial use (0.03; DTSC & State Water Resources Control Board [SWRCB], 2023); these soil vapor SLs are referred to in this report as the "DTSC SLs." Soil vapor data are evaluated by comparison to the DTSC SLs for an initial screening of soil vapor data.

As shown at Response Plan Appendix G, Perchloroethylene (PCE) Tetrachloroethylene (TCE), 1,2-dichloroethene (1,2-DCA), and chloroform were the only Volatile Organic Compounds (VOCs) detected in at least one soil vapor sample at a concentration exceeding its DTSC SL, and the results for these VOCs are summarized below:

- PCE was detected in all soil vapor samples collected at concentrations ranging from 63 to 850 µg/m3. The highest PCE concentrations in soil vapor were observed in the soil vapor samples collected at 30 feet bgs at the southwestern and northeastern property boundary of the southern parcel (850 µg/m3 at VP-1-30 REP, 810 µg/m3 at VP-1-30, 640 µg/m3 at VP-9-30, and 840 µg/m3 at VP-19-30) and southeastern property boundary of the central parcel (780 µg/m3 at VP-20-30). All soil vapor samples exceed the DTSC SL of 15 µg/m3.

- TCE was detected in 22 of 23 total soil vapor samples at concentrations ranging from 6 to 2,100 µg/m3. The highest TCE concentrations in soil vapor were also observed in the soil vapor samples with the highest PCE concentrations. Specifically, TCE was detected at the highest concentrations in the soil vapor samples collected at 30 feet bgs at the southwestern and northeastern property boundary of the southern parcel (2,000 µg/m3 at VP-1-30 REP and 1,900 µg/m3 at VP-1-30, 1,600 µg/m3 at VP-9-30, and 1,700 µg/m3 at VP-19-30) and southeastern property boundary of the central parcel (2,100 µg/m3 at VP- 20-30).

All soil vapor samples with detections of TCE except for one (6 µg/m3 at VP-9-5) exceed the DTSC SL of 16 µg/m3.

- 1,2-DCA was detected in one soil vapor samples at a concentration of 17 µg/m3, which exceeds the DTSC SL of 3.7 µg/m3. The low concentration of 1,2-DCA was not reproduced in any other soil vapor samples collected in 2022 and 2023. The detection of 1,2-DCA may be associated with a consumer product, since 1,2-DCA is associated with soft plastics (Doucette et al., 2009).

- Chloroform was detected in four soil vapor samples at concentrations ranging from 19 to 24 µg/m3, all of which exceed the DTSC SL of 4.0 µg/m3. Chloroform is commonly detected in soil vapor samples since chloroform is a disinfection byproduct and present in municipal water (Agency for Toxic Substances and Disease Registry [ATSDR], 1997).

During the November 2022 sampling event, 47 primary soil vapor samples were collected from 21 locations installed at depths ranging between 5 and 30 feet. During the May 2023 sampling event, 23 primary soil vapor samples were collected from 8 of the locations previously identified with higher concentrations of PCE and/or TCE relative to the other probes at the Site. PCE and TCE were the primary VOCs detected in soil vapor samples during both sampling events. PCE was detected in every soil vapor sample, but at relatively low concentrations (up to 850 µg/m3). TCE was detected less frequently, but at slightly higher concentrations (up to 2,100 µg/m3).

In general, PCE and TCE concentrations during the November 2022 sampling event increased with depth at all soil vapor sample locations (i.e., higher concentrations were detected in deeper soil vapor samples) with the exception of two locations (VP-4 and VP-5). The highest PCE and TCE concentrations in soil vapor were observed from soil vapor samples collected at 30 feet bgs at the southwestern and northeastern property boundary of the southern parcel and southeastern property boundary of the central parcel. The results of the May 2023 sampling event were consistent with the November 2022 sampling event.

The results of the November 2022 sampling event were compared to the results of the May 2023 sampling event to evaluate the temporal variability of PCE and TCE in soil vapor at the Site. Results presented in the Addendum to the Soil Vapor Investigation Report do not indicate any significant temporal variation in PCE or TCE concentrations between the November 2022 and May 2023 data.

Only low concentrations of PCE and TCE were detected in soil vapor samples collected and analyzed during the November 2022 and May 2023 sampling events. Although the possibility of small on-Site releases of PCE and TCE cannot be ruled out, the soil vapor results are consistent with an off-Site source of PCE and TCE.

Site use as a scrap metal yard for over 45 years has resulted in an impact of COCs to the shallow subsurface. Soil sampling has identified PCBs, metals (arsenic and lead), and PAHs in shallow soil at concentrations above USEPA and DTSC-recommended residential screening levels. In addition, VOCs have been detected in Site soil vapor at concentrations above residential screening levels. However, the concentrations detected are relatively low and although the possibility of small on-Site releases of PCE and TCE cannot be ruled out, the soil vapor results are consistent with an off-Site source of PCE and TCE. Minor releases of VOCs, most notably PCE and TCE, associated with historical Site use, also may be a source of VOCs in on-Site soil vapor. Based on historical Site investigation results, groundwater does not appear to have been impacted by COCs in shallow soil at the Site.

1.9 Existing Site COCs

COCs (PCBs, metals, and/or PAHs) in soil are present within the top approximately 1 foot of soil across the Site, with a few detections at depths of 2.5 or 5 feet. Historical sample locations with concentrations of COCs that exceed screening levels are identified at Response Plan Table 7 and Figure 7. Although the specific source(s) of contamination at the Site have not been identified, the historical Site use as a scrap yard is considered the likely source of impact.

PCBs identified at the Site primarily include Aroclors 1242, 1248, 1254, and 1260. These Aroclors are commonly found in hydraulic fluid and polyvinyl acetate (paints and adhesives). Table 1.9-1 summarizes some potential sources for each of the Aroclors identified at the Site, some of which may be associated with historical Site operations.

Table 1.9-1
Site Aroclors and Potential Sources

Aroclor	Potential Source
1242	Carbonless copy paper
	Gas transmission turbines
	Heat transfer
1248	Epoxy resins - Increased resistance to oxidation and chemical attack; better adhesive properties
1254	Capacitors
	Chlorinated rubber - Enhanced resistance, flame retardant, electrical insulation properties
	Cutting oils
	Ethylene vinyl acetate – Pressure-sensitive adhesives
	Inks
	Pesticide extenders
	Sealants and caulking compounds
	Styrene-butadiene co-polymers
	Synthetic resins
1260	Polyester resins - Stronger fiberglass; reinforced resins and economical fire retardants
	Varnish - Improved water and alkali resistance
Multiple Aroclors	**Potential Source**
1242, 1248	Rubbers
1242, 1248, 1254, 1260	Hydraulic fluid
1242, 1248, 1254, 1260	Polyvinyl acetate - Improved quick-track and fiber-tear properties

Table 1.9-1
Site Aroclors and Potential Sources

1242, 1254	Wax extenders
1242, 1254, 1260	Transformers
1248, 1254	Vacuum pumps
1254, 1260	Dedusting agents

Source: 2024 Response Plan

1.10 Site Soil Vapors

Soil vapor sampling completed across the Site in 2015, 2022 and 2023 indicates that PCE and TCE concentrations generally increase to the total depth explored of 30 feet (i.e., higher concentrations were detected in deeper soil vapor samples). Only low concentrations of VOCs were detected in soil vapor samples collected at the Site, and no VOCs were detected in soil vapor samples collected at depths of 5 to 15 feet bgs at concentrations exceeding 1,000 µg/m3.

The highest PCE and TCE concentrations in soil vapor were observed from soil vapor samples collected at 30 feet bgs at the southwestern and northeastern property boundary of the southern parcel and southeastern property boundary of the central parcel. For soil vapor samples collected in 2022 and 2023, only low concentrations of PCE and TCE were observed in shallow soil vapor samples, with higher concentrations observed in soil vapor samples collected at 22 to 30 feet bgs. Maximum observed Site PCE and TCE concentrations are summarized at Table 1.10-1.

Table 1.10-1
Maximum Observed Site PCE and TCE Concentrations by Depth (µg/m3)

	PCE	TCE
Maximum Detected Concentrations (All depths)	850	2,100
Soil Vapor Samples collected at 5 feet bgs	280	190
Soil Vapor Samples collected at 13 to 15 feet bgs	460	770
Soil Vapor Samples collected at 22 to 30 feet bgs	850	2,100

Source: 2024 Response Plan.

The above results indicate that the primary source of PCE and TCE to soil vapor is associated with an off-Site release of PCE and TCE, and that PCE and TCE concentrations decrease in shallow soil vapor compared to deeper soil vapor. In these regards, the Response Plan stares:

- Thorough soil and soil vapor sampling investigations were completed and a source of PCE or TCE to soil vapor was not identified on the Site.
- Concentrations increase with depth at all resampled soil vapor sample locations (i.e., higher concentrations were detected in deeper soil vapor samples).
- The highest PCE and TCE concentrations in soil vapor were observed from soil vapor samples collected at 30 feet bgs at the southwestern and northeastern property boundary of the southern parcel and southeastern property boundary of the central parcel.

Analysis of three rounds of soil vapor investigation does not identify a source of PCE and TCE at the Site. Additionally, no evidence of significant temporal variability in concentrations of PCE or TCE is identified in the samples analyzed from 2015 to 2023. Low concentrations of PCE and TCE detected in soil vapor samples and increasing concentrations with depth are not indicative of an on-Site release. It is possible that the low concentrations are attributed to minor releases associated with historical on-Site operations and/or an off-Site release that is migrating in deeper soil vapor or groundwater to the Site.

Based on the consistent and relatively low concentrations of VOCs in Site soil vapor over the approximately 8-year soil vapor sampling period, and the increasing concentrations with depth, no further action is recommended to support planned residential redevelopment or to further delineate the vertical extent of PCE and TCE in soil vapor.

1.11 Response Plan Summary and Remedial Action Implementation

The Response Plan evaluates *Remedial Action Alternatives – Soil*, and *Remedial Action Alternatives – Soil Vapor* (listed below) that could potentially achieve the above-stated objectives and provide for successful remediation of the Site COCs.

Remedial Action Alternatives – Soil

- Alternative 1 – No Further Action
- Alternative 2 – Containment through Surface Capping
- Alternative 3 – Excavation and Off-Site Disposal

Remedial Action Alternatives – Soil Vapor

- Alternative A - Vapor Intrusion Mitigation Measures at All On-Site Buildings
- Alternative B - Excavation of Soil with VOCs in Soil Vapor and Off-Site Disposal
- Alternative C - Soil Vapor Extraction (SVE)
- Alternative D - Vapor Intrusion Mitigation Measures at All On-Site Buildings with Institutional Controls

Per the Response Plan, *Excavation and Off-Site Disposal* (Soil Remediation Action Alternative 3), complemented by *Installation and Testing of Vapor Intrusion Measures* [VIMs] *at All Future On-Site Buildings with Institutional Controls* (Soil Vapor Remediation Action Alternative D), have been chosen as the most reasonable remedial actions for the Site (Response Plan, p. 29, et. al). In summary, the Recommended Remedial Actions (the recommended Remedy) would: clear the RSIM site of existing surface improvements, excavate and remove contaminated site soils, backfill excavated portions of the site with clean soils, and implement measures that would preclude potential vapor intrusion at future site buildings. Remedial actions that would be implemented under the selected *Excavation and Off-Site Disposal Alternative*; and the *Installation and Testing of Vapor Intrusion Measures at All Future On-Site Buildings with Institutional Controls Alternative* are summarized below.

Response Plan Remedial Action - Soil: Alternative 3 – Excavation and Off-Site Disposal
Implementation of Alternative 3 includes excavation and removal of the on-Site impacted surficial soil to a depth of approximately 1.0 to 2.5 feet bgs, followed by soil confirmation sampling.

A small portion of the total volume 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.

1.11.1 Excavation Plan
The Excavation Plan calls for targeted removal in the vicinity of on-Site sample locations that contain impacted soil with either PCBs or lead concentrations that exceed or may exceed hazardous waste levels (Response Plan Tables 4 and 5). The Excavation Plan is designed to address these higher concentration areas first, followed by Site-wide excavation of the remainder of Site with lower concentrations of COCs in soil. The Overall Excavation Plan for the RSIM site is presented at IS/ND Figure 1.11-1.

Excavation from the targeted PCB and lead areas will be conducted using a backhoe excavator and the soil will be placed on and covered with plastic sheeting. The excavated areas will initially extend to approximately 1.0 foot. Confirmation soil samples will be obtained from the side walls and base of the lead target excavation areas to verify that the remaining in-place soil is below the target concentrations, and based on confirmation data, the excavations will be expanded as necessary. The targeted PCB-impacted locations have undergone in-place pre-remedial confirmation sampling in accordance with TSCA guidelines.

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 Standard Guide for Sampling Waste Piles (Reapproved in 2006), as applicable. Waste profiling activities for excavated soils will be documented and will consider prior Site sampling data.

NOT TO SCALE

Source: GSI Environmental

applied planning inc

Figure 1.11-1
Proposed Site Excavation

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. These soils will be excavated in accordance with TSCA regulations. These excavations are defined based on the 2018 pre-remedial PCB delineation data summarized at Response Plan Table 1 and identified at Response Plan Figures 4A and 4B. Soil will be excavated using a backhoe excavator and loaded directly into a truck for off-Site disposal. Excavated soils will be disposed of as RCRA waste. Approximately 485 cubic yards of PCB-impacted soil above 50 mg/kg would be removed.

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 and may be treated on-Site by a DTSC-permitted transportable treatment unit (TTU) prior to off-Site transportation and disposal. These areas are defined based on the information presented at Response Plan Table 5 and indicated at Response Plan 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 WET) and several other samples have high lead or concentrations that meet the criteria for California hazardous waste based on TTLC test results (>1,000 mg/kg lead) and/or STLC guidelines based on WET results (5 mg/L).

Approximately 2,260 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 Risk-Based Screening Levels (RBSLs)

Based on historical data included at Response Plan Appendix B.1, B.2, and B.3, 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.

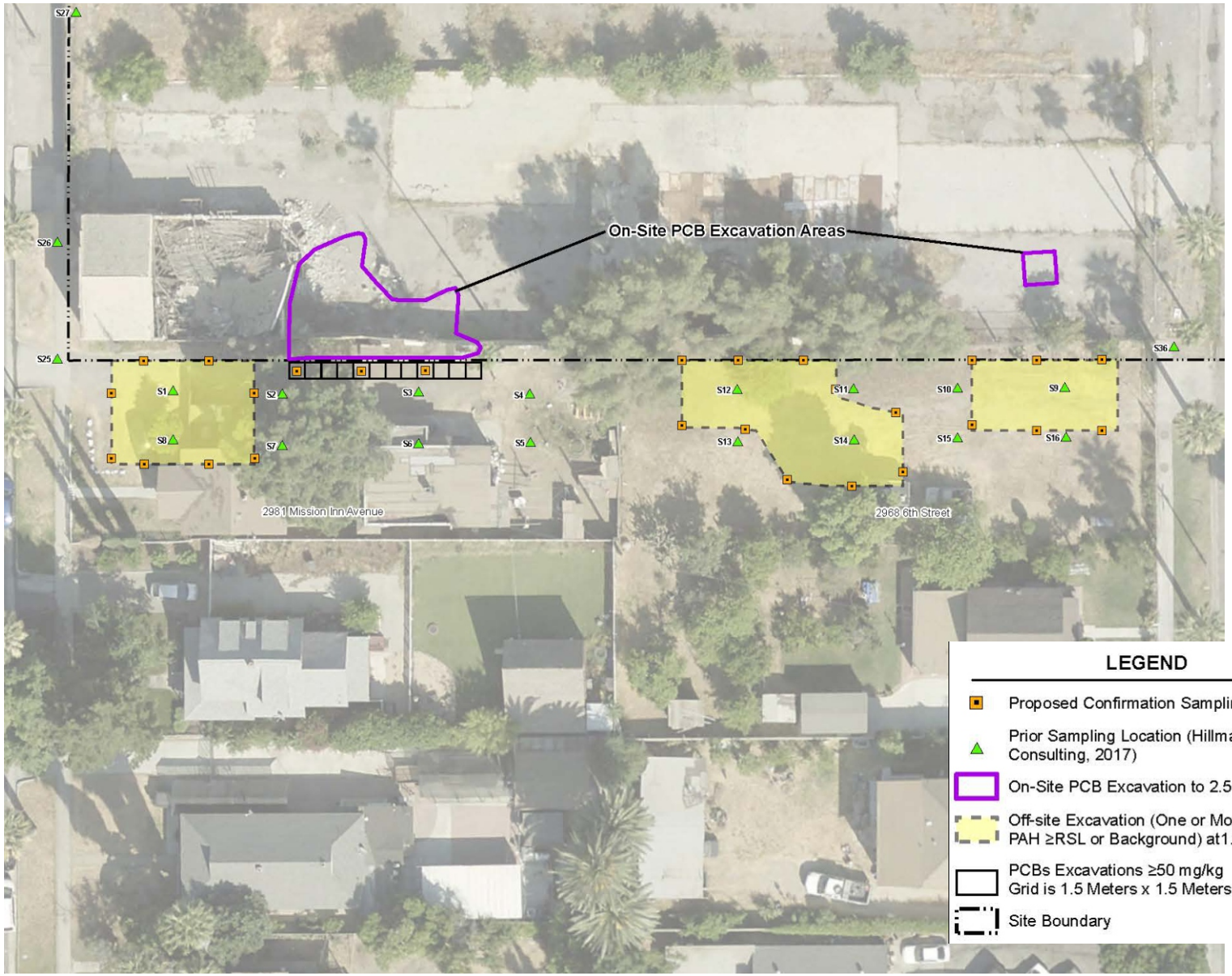
Residential Property Excavations

The off-Site excavations on the residential properties will include targeted excavations intended to eliminate the impacted soil in these areas. This includes the immediate area around borings S1 and S8 (at 2981 Mission Inn Avenue), S9 and S12 (at 2968 6th Street), and S19, S20, S22, S23, and S24 (at 2981 6th Street). Areas of off-site excavation are presented at IS/ND Figures 1.11-2, 1.11-3. 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.

NOT TO SCALE

Source: GSI Environmental

Figure 1.11-2
Offsite Affected Areas - North



NOT TO SCALE

Source: GSI Environmental

applied planning inc

Figure 1.11-3
Offsite Affected Areas - South

The off-Site residential excavations will be completed to 1-foot bgs over the area identified at Figures 1.11-2, 1.11-3. Approximately 307 cubic yards of soil would be removed. Confirmation soil sampling will be used to ensure effective removal of impacted soils. If confirmation soil sampling indicates that COCs levels remain above remedial goals, deeper targeted excavation will be conducted, and additional confirmation samples will be collected. This process shall be repeated until remedial goals are achieved.

Response Plan Remedial Action - Soil Vapor: Alternative D - Vapor Intrusion Measures at All On-Site Buildings with Institutional Controls

This Alternative would include the installation of VIMs at any new buildings and the installation of passive Sub-Slab Venting (SSV) at the existing "Barley Mills Building" that will be retained within the Site. The Applicant has elected to include these measures regardless of the Response Plan conclusion that measures may not be needed to address the potential for low concentrations of PCE and TCE detected in soil vapor to migrate to indoor air spaces at any future site occupancies. It is recommended that future development actions include a land use covenant (LUC) to ensure the Site use does not change, building design(s) remain the same, and VIMs and SSV systems are not modified. The LUC would encompass the entire Site, and the LUC prohibitions and requirements would be presented in and managed through an operation, maintenance, and monitoring plan for the VIMS and SSV systems (VIMS/SSV OM&M Plan).

The VIMS/SSV OM&M Plan would include:

- A description of VIMS and SSV components at the new buildings and the retained Barley Mills Building;
- General requirements and controls (and financial support) to maintain the long-term integrity of VIMS and SSV;
- Methodologies for the collection of post-construction verification monitoring to evaluate the operational effectiveness of VIMS and SSV;
- Technical approach for evaluating verification sampling data; and
- Protocols for annual monitoring and/or inspections to ensure VIMS operations.

1.11.2 Permitting

It is anticipated that the following permits would be required for excavation operations:

- A grading permit from the City of Riverside; and

- South Coast Air Quality Management District (SCAQMD) Rule 1466 permit due to the concentrations of COCs in the soil.

All excavation and soil handling shall be conducted by a qualified Hazardous Waste Operations and Emergency Response (HAZWOPER)-trained contractor using conventional earthwork equipment. The contractor will prepare a Site-specific Health and

Safety Plan (HASP). The HASP shall address identification of hazards, hazard mitigation, safe work practices and emergency response procedures.

Permitting and compliance requirements addressing Site remedial activities are summarized below. The selected remedial contractor shall be responsible for compliance monitoring and meeting the requirements described below.

SCAQMD Rules 401, 403, and 1466

To control fugitive dust emissions from earth-moving activities at sites containing soil with toxic air contaminants, which include Site COCs, and in compliance with requirements contained in SCAQMD Rules 403 and 1466, Site remedial activities shall comply with the following:

- Notification to SCAQMD of planned earth-moving activities in compliance with Rule 1466;
- Documentation of Rule 1466 procedures implemented using SCAQMD Rule 1466 record keeping logs.
- Application of water to control dust generation at the working face and other points of dust/odor generation;
- Stockpile control – covers, wetting;
- Cease work conditions – wind speed, odor, or particulate monitoring thresholds;
- Truck loading and covering procedures; and
- Housekeeping (street cleaning as necessary).

To further control dust emissions and to comply with SCAQMD Rules 401, 403, and 1466 requirements, and where feasible, rumble strips consisting of metal plates with raised rails should be utilized to remove bulk material from tires and vehicle undercarriages. Rumble strips should be placed at the Site egress point(s) accessing public road(s). Contractor bid selection documents shall include a requirement that contractors demonstrate their ability to implement remedial activities in compliance with applicable SCAQMD regulations, including Rule 1466.

Surface Runoff Control

Surface runoff and storm water discharges shall be controlled by implementing an approved Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall provide a plan for controlling potential run off during Site-disturbing activities. Best management practices (BMPs) shall be implemented as outlined in the SWPPP during Response Plan activities.

Waste Transportation and Disposal Documentation, and Transporter Requirements

Regulations regarding documentation necessary for the transportation and disposal of hazardous waste are included under 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste*, and transporter requirements are included under 40 CFR Part 263, *Standards Applicable to Transporters of Hazardous Waste*. The Project would be required to comply with 40 CFR Part 262 and 40 CFR Part 263.

1.11.3 Site Preparation and Utility Clearance

Prior to remediation activities, the selected contractors would conduct initial site preparation and utility clearance mobilization activities. These activities act to avoid utility disruptions and temporary traffic delays or interruptions that could occur during Site remediation. Site preparation and utility clearance mobilization activities typically 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.

1.11.4 Field Variances

Because field conditions can vary, it may be necessary to implement minor modifications to the recommended procedures presented in this Response Plan. Field personnel shall notify the property owner(s), USEPA, and DTSC when deviations from the Response Plan are necessary, and a verbal or written concurrence, as appropriate, will be obtained before implementing the modification, if substantive. If encountered, field conditions dictate the need for a significant modification to the procedures outlined in this Response Plan, such as the discovery of an unexpected area of contamination requiring remedial action or a major unidentified utility, the USEPA and DTSC shall be notified for consultation and concurrence with any proposed modifications before proceeding. The property owner(s) and DTSC shall respond to all requests for review and/or concurrence in a timely manner to minimize potential impacts to the project schedule. Modifications to the approved Response Plan shall be documented in the field variances section of the Response Completion Report (RCR) required at the conclusion of remedial activities.

1.11.5 Waste Profiling and Classification

Soil waste not immediately loaded and removed from the Site would be stockpiled, sampled, and analyzed for proper waste profiling, transportation and off-Site disposal.

Representative waste characterization samples from each soil stockpile shall be collected in accordance with Chapter 9 of USEPA publication SW-846, Test Methods for Evaluation Solid Waste, Physical/Chemical Methods (SW-846) and prior to waste disposal under manifest. Waste characterization samples shall be submitted to a State-certified laboratory and analyzed as listed below. Additional constituents shall be analyzed if/as required by the receiving facility(ies):

- Metals using USEPA Method 6010/7471;
- PCBs using USEPA Method 8082;
- PAHs using USEPA Method 8270 or 8310;
- VOCs using USEPA Method 8260B; and

- Petroleum hydrocarbons using USEPA Method 8015.

Excavated waste soil shall 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.

1.11.6 Investigation Derived Waste

The types of investigation derived waste (IDW) that may be generated during field activities include but are not limited to disposable personal protective equipment (nitrile gloves and booties), rags, and equipment decontamination wastewater. These types of waste shall be contained and disposed of in accordance with 40 C.F.R. § 761.61(a)(5)(v).

Labels shall be placed on drums or other containers storing PCB-related and other IDW that are pending laboratory analysis for disposal. Accumulation start dates will be identified on all drums or other containers used to hold IDW. Labels will be replaced when worn or illegible. Generation of hazardous IDW is not anticipated, however, if hazardous IDW is generated, it will be separated from non-hazardous IDW, if possible, to minimize the volume of hazardous IDW that must be properly managed.

1.11.7 Health and Safety

Contractor(s) shall develop their own Site-specific Health and Safety Plan (HASP) for work conducted at the Site as required pursuant to the regulations in 29 CFR Part 1910.120 and California Code of Regulations (CCR), Title 8, Section 5192. The HASP shall be prepared for the work described in the Response Plan and include the details regarding physical and chemical hazards that could be encountered at the Site. The HASP shall address the safety and health hazards of each activity in the removal design, including the requirements and procedures for worker protection. The implementation of the HASP is the responsibility of the designated Site Health and Safety Officer. The HASP shall also include a map showing directions between the Site and the local hospital or emergency center.

1.12 Confirmation Sampling

1.12.1 Soil Sampling

Pre-excavation in-place confirmation samples were collected for the >50 mg/kg PCB-impacted areas. In accordance with 40 CFR 761.61(a)(5)(i)(B)(2), bulk PCB remediation waste that exceeds 50 mg/kg total PCBs shall be disposed of at a hazardous waste landfill permitted by EPA under section 3004 of RCRA or a State authorized disposal facility under RCRA Section 3006. For soils containing PCBs that are detected above the action level but below 50 mg/kg, the bulk remediation waste may be disposed of in accordance with 40 CFR 761.61(a)(5)(v)(A), which includes a municipal solid waste landfill that is permitted, licensed, or registered by a State, among other options.

PCB-impacted areas that exceed 50 mg/kg have been delineated in-place with one exception; the area to the south of sample location (KK26) where concentrations of PCBs exceed 50 mg/kg.

Additional confirmation sampling was postponed at this location to complete the original Response Plan. DTSC and USEPA concurred that confirmation soil sampling could be conducted after targeted PCB removal in the area south of KK26 to document that remedial excavation goals for PCBs are met during the planned excavation event. Note that targeted lead excavation areas were not delineated "in-place" and will have confirmation sampling performed to document achievement of the remedial goal for lead.

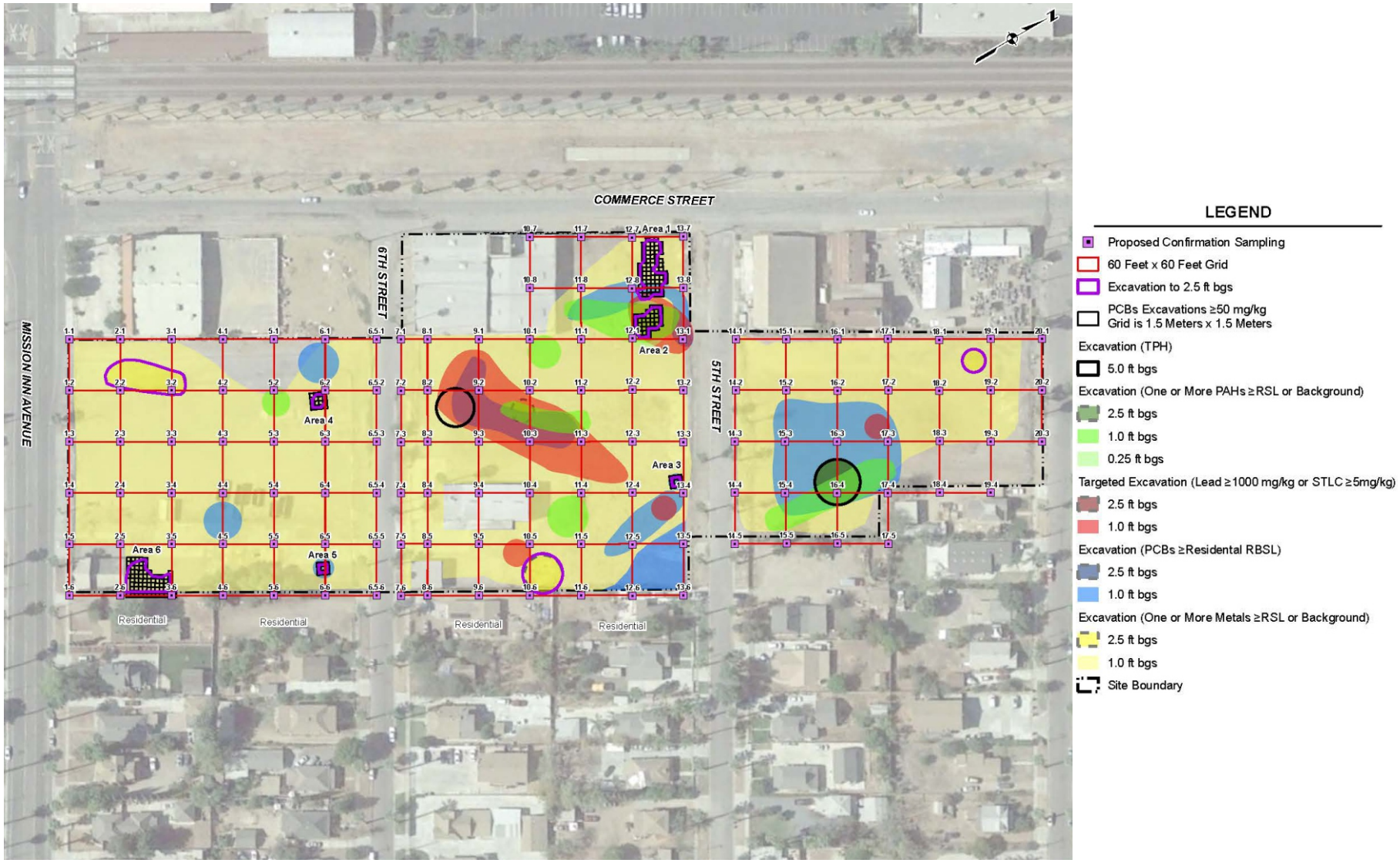
Confirmation soil samples will be collected from the base of the excavation in a grid pattern with samples collected every 60 feet. The sample locations where COCs have historically exceeded RSLs and their closest associated confirmation sample node are included at Response Plan Table 7. Sidewall samples will be collected along the perimeter of the Site excavation, co-located near the planned bottom sample. In addition, four sidewall samples will be collected from deeper excavations.

Excavation will be performed on the off-Site properties to remove surface soil with COCs above remedial goals as identified at Response Plan Table 3. Progress and confirmation soil samples will be collected at locations identified at previous IS/ND Figures 1.11-2, 1.11-3 to confirm that the lateral and vertical extent of soil with COCs above remedial goals has been removed. Additional sampling will be performed at the 2981 Mission Inn Avenue property adjacent to an on-Site soil removal area to confirm PCB-impacted soil on-Site along the property boundary has been removed. Off-Site residential excavations will have confirmation samples collected approximately every 10 feet along bottoms and/or sidewalls to confirm remedial objectives are met for the residential properties.

All confirmation sampling will be documented in the Response Completion Report (RCR). The locations of the proposed confirmation soil samples for on-Site excavations are identified at IS/ND Figure 1.11-4.

Confirmation soil samples will be collected using manual or direct-push sampling methods in appropriate sampling containers for the requested analyses. Confirmation samples will be analyzed for Title 22 (CAM-17) metals, polychlorinated biphenyls (PCBs), and Polycyclic aromatic hydrocarbons (PAHs) across the Site and for Total Petroleum Hydrocarbons (TPH) in TPH removal areas. Any sampling of PCBs, whether for purposes of confirmation sampling or waste profiling, shall include the Soxhlet Extraction Method (EPA Method 3541 [SW-846]).

In areas where 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.



NOT TO SCALE

Source: GSI Environmental

applied planning inc

Figure 1.11-4
On-Site Soil Sampling Confirmation Locations

1.12.2 Human Health Risk Assessment

Following completion of confirmation soil sampling, a Human Health Risk Assessment (HHRA) included in the Response Action Completion Report shall be prepared. The approved HHRA shall confirm attainment of remedial objectives and evaluate whether additional post-Response Plan implementation measures are necessary to support the proposed future residential redevelopment of the Site.

1.13 Public Participation

An administrative record for the Site is maintained by the State Water Resources Control Board (SWRCB) and DTSC, and is publicly accessible via SWRCB's Geotracker website and DTSC's Envirostor website. The administrative record includes Site history information, environmental data, investigation and remediation reports, and regulatory orders and correspondence for public access, review and/or comment. The Response Plan and all related technical documents will be placed on the DTSC Envirostor website.

A Community Survey (in both English and Spanish) was mailed to local residents within 0.25-mile of the Site, and stakeholders on December 11, 2022. The Community Survey noted that a Community Update would be distributed in the future to provide a summary of proposed activities and an opportunity to review and comment on the draft Response Plan.

The Community Update will be distributed in a factsheet format to interested local residents within 0.25-mile of the Site, and all persons and agencies requesting information regarding the Response Plan. A 30-day public notice and comment period shall be provided. Information shall be provided in English and Spanish. Once the 30-day public comment period ends, DTSC shall respond in writing to all public comments. A Response to Comments (RTC) document shall be mailed to all commenting individuals and agencies. DTSC staff will also be available to respond to phone calls and email communications regarding the Response Plan and all related materials. The Response Plan will be revised, as necessary, to address any comments received.

1.14 Schedule

Anticipated schedule for implementation of the Response Plan is presented at Table 1.14-1.

Table 1.14-1
Project Implementation Schedule

Date to Complete	Task
7/15/24-10/23/24	Response Plan Approval; Public Participation (notice preparation, comment period, and review of comments); Public Notice and Fact Sheet; Contractor Solicitation, Bidding, and Selection; Response Plan Implementation Planning; Permitting
10/24/24-12/18/24	Site Preparation, Mobilization, and Implementation of Response Plan
12/19/24-2/19/25	Compile Response Completion Report (RCR) for submittal to DTSC.

Source: 2024 Response Plan

1.15 General Development Features and Operational Performance Standards

In addition to the specific remediation requirements criteria identified in the Response Plan and summarized in the preceding Sections, the following General Development Features and Performance Standards are incorporated and reflected in the Project.

- Construction equipment shall be maintained in good working condition. Particular attention shall 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 shall be positioned to allow for adequate work room and the area kept free of trip and slip hazards. Care shall 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 shall be worn.

1.16 Construction Traffic Management Plan

The Project Applicant would be responsible for the preparation and submittal of a construction area traffic management plan (Plan) to be reviewed and approved by the City. Typical elements and information incorporated in the Plan would include, but would not be limited to:

- Name of on-site construction superintendent and contact phone number.

- Identification of Construction Contract Responsibilities - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).

- Identification and Description of Truck Routes - to include the number of trucks and their staging location(s) (if any).

- Identification and Description of Material Storage Locations (if any).

- Location and Description of Construction Trailer (if any).

- Identification and Description of Traffic Controls - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.

- Identification and Description of Parking - Estimate the number of workers and identify parking areas for their vehicles.

- Identification and Description of Maintenance Measures - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of grading/encroachment permits. The Plan and its requirements would also be provided to all contractors as one required component of building plan/contract document packages.

1.17 Transportation Plan

Transportation of and disposal of waste materials resulting from the Response Plan activities would be required to conform to requirements outlined at 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste*, and transporter requirements presented at under 40 CFR Part 263, *Standards Applicable to Transporters of Hazardous Waste*. To these ends, the Transportation Plan summarized herein is incorporated in the Project. At the request of DTSC, a stand-alone version of this Transportation Plan will be compiled for use during the implementation of the Response Plan.

1.17.1 Transportation Routes And Destinations

Soils removed from the RSIM Site as part of this removal action will be transported to one of the treatment facilities listed below. The receiving treatment facility will be selected based on the results of waste profile analysis. Potential receiving treatment facilities are listed below. 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 COC with the most conservative option.

- RCRA Level Waste: Waste Management's Kettleman Hills Class I Facility in Kettleman City, California.

- CAL-Haz Waste: US Ecology in Beatty, Nevada.

- Non-hazardous Waste: 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. All waste materials shall be transported and disposed of in accordance with 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste*, and transporter requirements presented at under 40 CFR Part 263, *Standards Applicable to Transporters of Hazardous Waste*.

1.17.2 Transporter Requirements

The transport company hired by the contractor will be required to provide proof of valid certification for the transport of hazardous soil/materials and documentation that the trucks will not release soil during transport prior to loading the hazardous waste soil into the trucks. The transport company will be insured and licensed to transport either non-hazardous or hazardous waste and will be properly registered, operated, and placarded

in compliance with local, state, and federal requirements.

Transporter Training
All transportation company personnel must be properly trained in hazardous waste operations in accordance with 29 CFR 1910.120 and CCR Title 8 Section 5192.

Contingency Plan
The transportation company is required to prepare a contingency plan that deals with emergency situations during the transportation of soil (e.g., accidental spill, mechanical breakdown, or fire), changes in volumes of excavated soil, and/or waste profile characteristics change. The Contingency Plan will identify key personnel responsible for health and safety and response operations. The Contingency Plan should be prepared in accordance with DTSC's guidance for preparing transportation plans for site remediation (DTSC, May 1994).

1.17.3 Soil Staging and Loading
Instructions for staging and loading the soil onto trucks are included in this section.

Staging
It will be necessary to temporarily store the excavated soil on-site until off-site transportation and disposal are available.

1) The staging process will be conducted in a manner to minimize the generation of dust (e.g., low backhoe drop heights, low profile piles, etc.).
2) Water spray or mist, as appropriate, will be applied during soil loading operations.
3) A permit to use a nearby fire hydrant for water will be procured to fill onsite water trucks.
4) At the staging areas, excavated soil will be placed on an impermeable barrier base (e.g., plastic sheeting) and covered with tarps or other proper materials (e.g., plastic sheeting) when work is not being conducted.
5) If significant rainfall is anticipated, the staging areas will be bermed to contain any run-off.
6) As the Site requires site-wide excavation, staging areas will be moved as necessary.

Loading
The following are instructions for loading the soil. 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.

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.

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.

Truck Routing and Site Access

The following are instructions for transportation when the truck enters, parks, prepares to leave, and exits the Site. The preliminary on-Site truck route is subject to change based on final contractor input.

1) Trucks will enter the Site from the contractor-designated entrance and exit locations. 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 Avenue 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.

Truck Routing – Off Site

The following are instructions for transportation 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 truck driver will be provided with the cellular phone number for the contractor's Site manager. It will be the responsibility of the truck 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 truck 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.

1.18 Health and Safety

General Requirements

The Contractor will prepare a site-specific health and safety plan including identification of requirements associated with transport.

1) Prior to the commencement of each day's activities, a tailgate health and safety meeting will be held.
2) All Site workers will be required to be familiar with the health and safety plan and attend the daily tailgate meetings or health and safety briefings.
3) Truck drivers only need to be familiar with the health and safety plan and not required to be present at the daily tailgate meeting.
4) Everyone working at the Site will be required to sign the site-specific health and safety plan to demonstrate that they are familiar with the health and safety plan and that they participated in, or were briefed on, the daily tailgate meeting.
5) The contractor's Site manager will maintain the signature sheet.

Site Records

The contractor will be responsible for maintaining a Site logbook during the removal action activities. The contractor will additionally be required to keep a Site Logbook containing records of all waste manifests generated for the Site. Site Logbook general requirements are outlined below.

1) Site Logbook

   A Site logbook will fulfill the criteria listed below:
   a) Logbooks will be bound with consecutively numbered pages.
   b) Each page will be dated and the time of entry noted.
   c) Entries should be complete and accurate enough to permit reconstruction of field activities.
   d) Entries should be legible.
   e) Entries should be written in black or blue ink and signed by the individual making the entries.
   f) Language will be factual, objective, and free of personal opinions.

g) If an error is made, corrections will be made by crossing a line through the error and entering the correct information and entry corrections will be dated and initialed.

The Site Logbook will include the following information:

a) Observations.
b) On-site personnel.
c) Equipment arrival and departure times.
d) Information for each trip including date, time, weight/volume of material, type of material, trucking company, drivers name, and vehicle used.

2) Uniform Hazardous Waste Manifests and Non-Hazardous Waste Manifests (waste manifests) Hazardous or non-hazardous waste manifests, as applicable, will be used to track the movement of soil sent offsite from the point of generation to the point of ultimate disposition. Before transporting soil offsite, an authorized representative will sign the waste manifest. Copies of the waste manifests, signed by the receiving facilities, will be included in a final report. The manifest will include the information listed below.

a) Name and address of the generator, transporter, and the destination facility.
b) U.S. DOT description of the waste being transported and any associated hazards.
c) Waste quantity.
d) Name and phone number of a contact in case of an emergency.
e) EPA Hazardous Waste Generator Number.
f) Other information required either by EPA and/or DTSC.

Please refer also to detailed health and safety guidelines and requirements presented in *Site-Specific Health and Safety Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street, Riverside, California 92507* (GSI Environmental) August 15, 2023 (IS/ND Appendix B).

1.19 Air Quality Best Available Control Measures

In order to minimize construction-source emissions, the Project would implement SCAQMD Rule 403 Best Available Control Measures (BACMs). To these ends, the following language or equivalent shall be incorporated into Project plans and specifications as implementation of Rule 403:

(1) 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.

(2) The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three 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.

(3) The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.

The Project would also be required to comply with SCAQMD Rules 1166 and 1466, summarized below.

Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities:

1. The excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs).
2. The excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs.
3. The handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site.
4. The treatment of VOC-contaminated soil at a facility.

See also: http://www.aqmd.gov/home/rules-compliance/compliance/rule-1166-site-specific-and-various-locations-soil-mitigation-plan.

Rule 1466 applies to any owner or operator conducting earth-moving activities of soil with applicable toxic air contaminant(s) as defined in paragraph (c)(16) of the rule that have been identified as contaminant(s) of concern at a site. The rule focuses on the toxic air contaminants listed in Table I of the rule. The provisions in Rule 1466 include ambient PM_{10} monitoring, dust control measures, notification, signage, and recordkeeping requirements. Rule 1466 allows for alternative signage that is approved by the Executive Officer. The rule does not apply to earth-moving activities of soil with applicable toxic air contaminant(s) of less than 50 cubic yards. See also: https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466.

1.20 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.

1.20.1 Lead Agency Discretionary Actions and Permits

- Adoption of this Negative Declaration.

- Approval of Former Riverside Scrap Iron & Metal Property Response Plan, last revision July 15, 2024, DTSC DOCKET NO. HAS-FY21/22-032.

1.20.2 Other Consultation and Permits

Anticipated consultation and permits necessary to implement the Response Plan 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.

- Various permitting by/through the South Coast Air Quality Management District (SCAQMD) including permitting pursuant to SCAQMD Rules 401, 403, and 1466.

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

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

1.21 Use of this IS/ND

This IS/ND addresses the potential environmental effects of the implementation of the proposed Former Riverside Scrap Iron & Metal Property Response Plan (last revision July 15, 2024) DTSC DOCKET NO. HAS-FY21/22-032 (Response Plan, 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 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/ND 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/ND 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/ND, 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/ND 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.

2.0 ENVIRONMENTAL IMPACT ANALYSIS

2.0 Environmental Impact Analysis

2.1 Aesthetics

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Project Site comprises the former Riverside Scrap Iron and Metal (RSIM) site and targeted portions of residential properties abutting the RSIM site. The Project Site totals approximately 7 (seven) acres extending across multiple parcels. The predominance of the Response Plan activities would affect, and would be located within, the approximately 7-acre RSIM site. The Response Plan also addresses contaminants affecting limited areas (less than 0.1 acres) of abutting residential properties located south of the RSIM site. “Site Areas” referenced in the discussions below (e.g., Areas 8a, 8b, etc.) correspond to Areas identified at IS/ND Figure 1.3-2.

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 surface debris and currently evidences areas of bare earth and various paved surfaces. Surrounding land uses to the north and west are primarily commercial. Residential housing is primarily located east and south of the Site.

West
West of the Project Site, properties are vacant or developed with commercial land uses.

East
East of the Project Site, properties are developed with residential uses.

North
North of the Project Site are various light industrial/commercial land uses.

South
South of the Project Site, across Mission Inn Avenue, properties are developed with 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 Response Plan 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's west/southwest 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 Response Plan 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. In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.

Impact Analysis: Site disturbance and implementation of any site screening/buffering elements pursuant to the Response Plan 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 surroundings. Please refer also to remarks at Checklist Items 2.1. 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: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

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

Impact Analysis: There is currently no land in the City of Riverside that qualifies as forest land or timberland. As such, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland.

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

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

Impact Analysis: There is currently no land in the City of Riverside that qualifies as forest land or timberland. As such, the Project would not result in the loss or conversion of forest land.

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

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

Impact Analysis: The Project does not propose or require other changes to the environment which could result in the conversion of farmland or forest land to other uses beyond those previously identified under the preceding discussions.

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

References Used: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507 (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.3 Air Quality

Project Activities Likely to Create an Impact:

- Construction equipment air pollutant emissions.
- Demolition and Site Clearing.
- Fugitive dust and particulates generated by Response Plan 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: Please refer to IS/ND 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 2.3-2, 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. 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 below substantiates that Project air pollutant emissions would not exceed applicable SCAQMD significance thresholds. Project-source air pollutant emissions would therefore not result in a cumulatively considerable net increase in criteria pollutants for which the project region is non-attainment.

Air Pollutant Emissions Modeling
For the purposes of this analysis, Response Plan actions and programs are considered to be and 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, v2022.1) 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.
- Demolition and Site Clearing.
- Fugitive dust and particulates generated by Response Plan 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.[1]

Estimated construction workers and construction equipment is presented below.[2]

RESPONSE PLAN EQUIPMENT LIST/PERSONNEL

High Volume Day:
1 ea. Deere 300-P Excavator
2 ea. 2,000 Gallon Water Truck
2 ea. Deere 644 Loader
2 ea. 5 cy Dump Truck
77 ea. End Dump Semi Trucks (offsite dirt hauling)
4 ea. Crew Trucks (F250 or =)
3 Operators
6 Technicians/Laborers

Normal Day:
1 ea. Deere 300-P Excavator
1 ea. 2,000 Gallon Water Truck
1 ea. Deere 644 Loader
1 ea. 5 cy Dump Truck
40 ea. End Dump Semi Trucks (offsite dirt hauling)
2 ea. Crew Trucks (F250 or =)
2 Operators
4 Technicians/Laborers

Modeled maximum daily Project construction-source air quality emissions reflecting the above-listed activities and equipment use are presented at Table 2.3-1. Modeled emissions reflect implementation of SCAQMD Rule 403 Best Available Control Measures as reflected in the Project Description.

Table 2.3-1
Maximum Daily Construction-Source Air Pollutant Emissions (pounds per day)

Year	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2023	2.03	40.50	16.30	0.20	9.30	3.02
2024	1.84	24.98	13.28	0.16	6.83	2.25
Maximum Daily Emissions	**2.03**	**40.50**	**16.30**	**0.20**	**9.30**	**3.02**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: 2023 Response Plan AQ/GHG Modeling (Urban Crossroads, Inc.) August 24, 2023, IS/ND Appendix C; Applied Planning, Inc.
Note: Values reported at Table 2.3-1 are highlighted in the CalEEMod modeling output presented at IS/ND Appendix C.

[1] Total removed waste and soils: 31,500 tons; 35,125 cubic yards. Worker daily trips during Demolition/Excavation/Soil Stockpiling: 13 Average Daily Trips (ADT); Haul trips per day during Soil Loading/Export (Including Demolition Export): 77 ADT; Worker daily trips + haul trips during Soil Import/Stockpiling: workers 13 ADT; haul trips 72 ADT= 85 total ADT.

[2] Applicant-provided information.

As indicated at Table 2.3-1, maximum daily Project construction-source emissions would not exceed applicable SCAQMD regional thresholds, and would therefore not contribute considerably to non-attainment conditions affecting the Basin. As noted in the Project Description, the Project would implement enhanced SCAQMD Rule 403 BACMs (to include 3 x daily watering) acting to avoid/minimize construction source emissions.

Regional Air Quality Impact Summary
Project maximum daily construction-source emissions would not exceed applicable SCAQMD thresholds and would therefore be less-than-significant. On this basis, Project maximum daily construction-source emissions would not result in cumulatively considerable net increase in emissions that could contribute to non-attainment conditions affecting the Basin.

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 (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$). 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 Site to the south. Applicable SRA 23 mass emission rate thresholds presented at Table 2.3-2 are conservatively based on 1 acre/day disturbance and the minimum 25-meter source – receptor distance. Table 2.3-2 summarizes the Project's maximum potential localized construction-source emissions impacts. Modeling reflects implementation of SCAQMD Rule 403 BACMs noted at previous MM AQ-1.

Table 2.3-2
Maximum Construction-Source Localized Emissions (pounds per day)

Activity/Emissions Source	Pollutant Emissions (Pounds per day)			
	CO	NO_X	PM_{10}	$PM_{2.5}$
Demolition/Site Preparation	**14.47**	**11.28**	**2.30**	**0.73**
SCAQMD Localized Threshold	118	602	4	**3**
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	**13.16**	**11.11**	**0.46**	**0.42**
SCAQMD Localized Threshold	118	602	4	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Sources: 2023 Response Plan AQ/GHG Modeling (Urban Crossroads, Inc.) August 24, 2023, IS/ND Appendix C; Applied Planning, Inc.
Notes:
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.

As indicated at Table 2.3-2, maximum daily Project construction-source emissions would not exceed applicable SCAQMD LSTs, and would therefore be less-than-significant.

Localized Air Quality Impact Summary

Project maximum daily construction-source localized emissions would not exceed applicable SCAQMD LSTs would therefore be less-than-significant.

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

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis: 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. The preceding discussion of Localized Air Quality Impacts substantiates that criteria pollutant emissions levels at sensitive receptors nearest the Project Site would not exceed SCAQMD LSTs, and would therefore be less-than-significant. On this basis, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations would be less-than-significant. Please refer also to the discussion above at item b.

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

d. Result in other emissions adversely 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

e. Result in human exposure to Naturally Occurring Asbestos.

Impact Analysis: The Project Site is not a known source of naturally occurring asbestos. The Response Plan does not indicate that naturally occurring asbestos is a Contaminant of Concern (COC) 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 Checklist Item 2.9., *Hazards and Hazardous Materials* discussions addressing potential exposure to asbestos that may result from Project demolition activities.

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

References Used: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; 2023 Response Plan AQ/GHG Modeling (Urban Crossroads, Inc.) August 24, 2023.

2.4 Biological Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The 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 Response Plan 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. The Project does not propose or require facilities or uses 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 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 2.4. 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 mean*s.

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 2.4. 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 2.4. a., b., c.

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

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

Impact Analysis: There are no 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 2.4. 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*.

Impact Analysis: 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 2.4. a., b., c., d., e.

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.5 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.

Analysis as to whether or not Project activities would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Impact Analysis: A focused draft cultural resources assessment has been prepared In anticipation of proposed future redevelopment of the Site. Any redevelopment of the Site would be subject to review and approval by the City of Riverside, and would be undertaken only upon successful completion of the Response Plan remedial activities described herein.

The draft assessment: *Cultural Resources Assessment Report: Barley Mills Building, 3596 Commerce Street & 3051 Mission Inn Avenue; Riverside CA, Site of Riverside Soda Works, 2933 Mission Inn Avenue; Riverside CA* (Draft) (George Taylor Louden AIA, inc. Modern Historical Architecture Preservation) March 15, 2024, identifies the "Barley Mills Building" in the northern portion of the Site as a City of Riverside local Structure of Merit. Location of the Barley Mills Building is indicated at previous Figure 1.4-1. The Barley Mills Building structure would be protected in place throughout all Site remedial actions and would not be affected by the Response Plan activities. The draft cultural resources assessment does not identify any other historical resources of potential significance within the Site.[3]

[3] The draft cultural resources assessment is available under separate cover and can be obtained from the City of Riverside or by contacting DTSC.

The Project does not 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). Subsequent to approval of the Response Plan, 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. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis: The 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. Based on the preceding, the potential for the Project to disturb any human remains is less-than-significant.

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *Cultural Resources Assessment Report: Barley Mills Building, 3596 Commerce Street &*

3051 Mission Inn Avenue; Riverside CA, Site of Riverside Soda Works, 2933 Mission Inn Avenue; Riverside CA (Draft) (George Taylor Louden AIA, inc. Modern Historical Architecture Preservation) March 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.6 Energy

Project Activities Likely to Create an Impact:

- Construction equipment operations.
- 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.

All of the above would result in temporary and transient increased energy demands - primarily increased consumption of diesel and gasoline.

Description of Baseline Environmental Conditions: Baseline environmental conditions providing general context for the Project energy demands are presented below. The following discussions are summarized from**:** *Final 2020 Integrated Energy Policy Report Update* (CEC) March 2021. See also: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update.

Electricity

The California Energy Commission (CEC) provides forecasts for electricity and natural gas demand every two years as part of the Integrated Energy Policy Report (IEPR) process. The forecasts include 3 energy demand cases (high, low, and middle) designed to capture a reasonable range of demand outcomes over the next 10 years. The high energy demand case incorporates relatively high economic/demographic growth, relatively low electricity and natural gas rates, and relatively low committed efficiency program, self-generation, and climate change impacts. The low energy demand case includes lower economic/demographic growth, higher assumed rates, and higher committed efficiency program and self-generation impacts. The mid case uses input assumptions at levels between the high and low cases. The forecasts include estimates of the effects of new legislation and trends in electric consumption such as the use of zero-emission automobiles. IEPR data indicates relatively stable consumption rates from 2005 through 2018, with an increase in consumption beginning in 2020.

City of Riverside Public Utilities is the electrical utility provider for the City. City of Riverside Public Utilities also provides information on energy efficiency/energy conservation, rotating outages, public safety, and emergency/hazard response plans to ensure non-interference with electrical utility lines.

Transportation Energy
California is home to 30 million registered cars, trucks, buses, and other motorized on-road vehicles. The state's history has been, in part, a history of the automobile and the associated impacts on personal mobility, land-use planning, and air quality. In recognition of these challenges, California has enacted a suite of policies and goals to shift the transportation sector toward cleaner, sustainable fuels and more efficient technology vehicles. IEPR data indicates very stable consumption rates for jet fuel and diesel through 2030. Gasoline consumption is forecasted to decline through 2030.

Natural Gas
Natural gas provides energy to heat homes, cook food, and generate electricity. Currently in California, natural gas serves more than 10.5 million homes, about 445,000 businesses, about 37,000 factories and industrial consumers, and more than 640 electric generating units. The greatest consumers of natural gas in decreasing order are electric power generation, residential, industrial, mining, commercial, and other. In California since 1990, natural gas demand has remained relatively flat in all but the electric power sector which has steadily increased.

IEPR data generally shows a decreasing reliance on natural gas through 2024. The CEC indicates increased reliance on natural gas for power generation between 2024 and 2026 due to expiration of long-term power supply contracts (purchase agreements) with coal facilities outside California.

Southern California Gas Company (The Gas Company) provides natural gas to the City. The Gas Company also provides customers with appliance services, an energy efficiency and rebate program, and information on emergency preparedness and air quality.

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: Project activities that would result in energy consumption include:

- Construction equipment operations.
- 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.

The above activities would result in temporary and transient increased consumption of petroleum fuels (diesel and gasoline products). Project construction activities and equipment would not result in substantial consumption of electricity or natural gas.

Project construction equipment is required to be maintained in good working condition acting to promote efficient use of energy and avoid wasteful, inefficient, or unnecessary consumption of energy resources. Moreover, energy consumed by the Project would be comparable to, or less than, energy consumed by other site remediation projects of similar type, scale, and intensity. On this basis, the potential for the Project to result in the inefficient, wasteful, or unnecessary consumption of energy is considered less-than-significant.

Conclusion:
☐ 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: State and local plans for renewable energy or energy efficiency are concerned with developments or activities that would require or result in long-term energy consumption (e.g., buildings or other permanent or semi-permanent development features). The Project proposes only short-term site remediation activities. The Project does not propose or require new buildings or similar features that would result in long-term demand for energy resources, renewable or otherwise. The Project does not otherwise propose or require uses or facilities that would potentially obstruct a state or local plan for renewable energy or energy efficiency. On this basis, the potential for the Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency is considered less-than-significant.

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

References Used: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *Final 2020 Integrated Energy Policy Report Update* (CEC) March 2021; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.7 Geology and Soils

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 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. 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 (Response Plan, p. 4). Project Site disturbance and excavation activities pursuant to the Response Plan 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/ND Section 1.0 *Project Description*, 1.11.2 *Permitting*. 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 (Response Plan, 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 be required to comply with applicable City codes and regulations addressing soil suitability.

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 2.7. 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

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

Impact Analysis:

Paleontological Resources
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 paleontological resources are encountered during site disturbance activities, all work must be halted in the vicinity of the discovery until a registered and qualified paleontological 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 Lead Agency, in consultation with the paleontological 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. This would ensure that potential impacts to paleontological resources resulting from the Project would remain at levels that would be less-than-significant.

Geological Features

With regard to unique geological features, the City has not established criteria for determining what comprises a unique geological feature. Other relevant agency criteria however indicates that a geological feature could be generally considered unique if it:

- Is the best example of its kind locally or regionally;
- Embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally;
- Provides a key piece of geologic information important in geology or geologic history;
- Is a “type locality” of a geological feature;
- Is a geologic formation that is exclusive locally or regionally;
- Contains a mineral that is not known to occur elsewhere in the County; or
- Is used repeatedly as a teaching tool.

The Project Site is underlain by silty sand and sandy silt with occasional thin layers of clay (Response Plan, p. 4). These soil types are common throughout Southern California and do not comprise unique geological features as described above. The Project does not propose uses or activities that would indirectly contribute to or result in potentially adverse impacts to a unique geological feature. Based on the preceding, the potential for the Project to directly or indirectly destroy a unique geological feature is considered less-than-significant.

Conclusion:

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.8 Greenhouse Gas Emissions

Project Activities Likely to Create an Impact:

- Construction equipment air pollutant emissions.
- 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 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 2.8-1.

Table 2.8-1
Project GHG Emissions (Metric Tons/Year)

	Emissions (metric tons per year)				
	CO_2	CH_4	N_2O	R	Total CO_2e
2023	131.34	0.00	0.02	0.10	136.46
2024	333.76	0.01	0.04	0.24	346.49
Total CO_2e (All Sources)	482.95				
SCAQMD Threshold	3,000				
Threshold Exceeded?	No				

Source: 2023 Response Plan AQ/GHG Modeling (Urban Crossroads, Inc.) August 24, 2023, IS/ND Appendix C.

As indicated at Table 2.8-1, 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: *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; 2023 Response Plan AQ/GHG Modeling (Urban Crossroads, Inc.) August 24, 2023.

2.9 Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Project Site disturbance and excavation would generate criteria air pollutants, and could release potential Contaminants of Concern (COC) identified in the Response Plan.
- Demolition activities could result in the 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: Shallow soil at the Site is impacted with polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and metals (primarily lead and arsenic) at concentrations exceeding regulatory screening levels for residential use and/or regional background concentrations. In addition, VOCs have been detected in Site soil vapor at concentrations above residential screening levels (Response Plan, p. 1). Additionally, RSIM 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: Remediation activities conducted under the Response Plan would involve excavation and removal of COC-impacted soils and disposal of general demolition debris, with subsequent import of clean fill soils to the Site. Waste export and clean soils import estimates are summarized at Tables 2.9-1, 2.9-2.

Prior to transportation of materials, whether hazardous or non-hazardous, proposed receiving facilities would be contacted to ensure their acceptance of materials. The Project Transportation Plan (IS/ND Section 1.17, *Transportation Plan*) 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 Response Plan 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* and the Draft Health and Safety Plan[4] presented at IS/ND Appendix B.

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.

With incorporation of requirements and control measures outlined in the Response Plan 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 Response Plan, 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.

Table 2.9-1
Estimated Waste by Category, Weight, and Volume

Location/ Source	RCRA-Level Waste		TSCA (PCB) Waste		Cal-Haz Waste		Non-hazardous Materials			
							Soils		Surface Demolition	
	Tons	Cubic Yards	Tons	Cubic Yards	Tons	Cubic Yards	Tons	Cubic Yards	Tons	Cubic Yards
RSIM Site	2,797	1,865	593	395	3,923	2,615	22,227	14,818	1,500	1,500
Residential Target Areas	--	--	--	--	--	--	460	307	--	--
Totals	2,797	1,865	593	395	3,923	2,615	22,687	15,125	1,500	1,500

Source: GSI Environmental
Notes:
1. Estimates rounded up to nearest whole number.
2. Soil density of 1.5 tons/cubic yd.
3. Demolition debris density of 1 ton/cubic yd.
4. Approximately 2,797 tons of RCRA-level waste to be removed from the Site.
5. Approximately 4,516 tons of CAL-Haz/TSCA waste to be removed from the Site.
6. Approximately 460 tons of contaminated soils to be removed from targeted areas of residential properties.
7. Total removed waste and soils: 31,500 tons; 35,125 cubic yards.
8. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.
9. Per the Project schedule, site remediation activities would be completed with 90 days of their commencement.

[4] *Site-Specific Health and Safety Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street, Riverside, California 92507* (GSI Environmental) August 15, 2023.

Table 2.9-2
Waste Export and Clean Soil Import

Waste Export				
Waste Category	**Tons**	**Cubic Yards**	**Destination/Source**	**Approximate Travel Distance (one-way)**
RCRA-Level	2,797	1,865	Kettleman Hills, Kettleman City, California	230 miles
CAL-Haz	3,923	2,615	US Ecology, Beatty, Nevada	280 miles
TSCA (PCB)	593	395	Kettleman Hills, Kettleman City, California	230 miles
Non-Hazardous (soils + demolition debris)	(22,687 tons soils, 1,500 tons demolition) 24,187	(15,125 cu. yds. soils, 1,500 cu. yds. demolition) 16,625	Thermal Remediation Services (TRS), Azusa, California	43 miles
Export Totals	**31,500**	**21,500**	---	---
Soil Import				
Clean Soil	33,000	20,020	---	20 Miles (CalEEMod default)

Source: GSI Environmental
Notes:
1. All estimates rounded up to nearest whole number.
2. All estimates reflect potential maximum impact scenarios and are for purposes of environmental modeling only.

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 2.9 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 southeast 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 not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Project would remediate the contaminants on-site to prevent human health and ecological impacts. Requirements and control measures outlined in the Response Plan 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. The Project does not propose or require actions or uses that would potentially affect off-site properties included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on the preceding, the potential for the Project to result in or create a significant hazard to public or the environment due to listing as a hazardous materials sites compiled pursuant to Government Code Section 65962.5 is considered less-than-significant.

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

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

Impact Analysis: The Project Site is not located within two miles of an airport. The Riverside Municipal Airport, located approximately 4.5 miles southeast of the Project Site, is the airport nearest the site. Due to physical separation between the Project Site and the closest airport facilities, as well as land use regulations which preclude or restrict development within airport approach/departure zones, potential air safety impacts are considered less-than-significant.

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

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

Impact Analysis: Implementation of measures and procedures identified at IS/ND Section 1.16 *Construction Traffic Management Plan***,** and 1.17 *Transportation Plan* 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

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Impact Analysis: The Project Site is not located within or proximate to a designated "Fire Hazard" area. The Project does not propose or require uses or facilities that would otherwise expose people or structures to a significant risk of loss, injury or death involving wildland fires. Moreover, the Project Site and surrounding areas are provided fire protection services by the City of Riverside Fire Department, further reducing fire hazard risks.

Based on the preceding, the potential for the Project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires is considered less-than-significant.

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

References Used: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.10 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 (seven) 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. 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 Response Plan 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. 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*, 1.11.2 *Permitting*). 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 decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

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) (Response Plan, p.2).

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 or 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:
(i) 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 (two) miles west of the Project Site. The Project does not propose or require uses or facilities that would substantively affect off-site drainage courses, water courses, the amount of impermeable surfaces, or the amount of runoff from the site. The Project Site is not in a designated flood hazard area.

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

(ii) 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 above Item c (i).

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

(iii) 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 above Items c (i, ii).

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

(iv) 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. Please refer also to remarks at above Items c (i, ii, iii).

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

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

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 is not subject to flood hazards. Based on the preceding, the Project would have no impacts with regards to flood hazard, tsunami, seiche zones, or risk release of pollutants due to project inundation.

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

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

Impact Analysis: Please refer to remarks above at Item b.

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.11 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 (seven) 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 2.11-1. Please refer also to IS/ND Section 1.0, *Project Description,* 1.4, *Existing Land Uses and City of Riverside General Plan Land Use and Zoning Designations***.**

Table 2.11-1
Existing Land Uses and Land Use Designations

	Existing Land Use	General Plan Designation	Zoning Designation
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; MDR	MSP-Business Park; Residential
North	Light Industrial; Commercial	B/OP	MSP-Business Park
South	Residential	MDR	MSP-Residential

Source: City of Riverside General Plan 2025; Riverside Marketplace Specific Plan and Environmental Impact Report; City of Riverside Zoning Map; Google Earth Aerial Photo.

Analysis as to whether or not Project activities would:

a. Physically divide an established community.

Impact Analysis: No residences or other housing exist within the Project Site. No residents would be displaced by the Project, nor would the physical arrangement of any neighboring residential communities be modified or divided by the Project. Additionally, as substantiated herein, the project would not result in any significant and unavoidable

impacts that could potentially divide or disrupt an established community. Based on the preceding, the potential for the Project to physically divide an established community is considered less-than-significant.

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

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

Impact Analysis: The Project Site includes the RSIM site and targeted areas of residential properties abutting the RSIM site. The City of Riverside General Plan Land Use designation for 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 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 Response Plan are allowed under the site's current General Plan Land Use and Zoning designations. Moreover, the implemented Response Plan would allow for full use and development of the Project Site as allowed under the General Plan. The Project does not 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 Response Plan 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

References Used: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *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.

2.12 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 2.12. a.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated

☒ Less Than Significant Impact
☐ No Impact

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.13 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 the rail corridor located north/northwest of the Project Site.

The General Plan EIR indicates that Year 2003 ambient noise conditions at the Project Site approximated 60 – 65 dBA CNEL[5] (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. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

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*

[5] 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.

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 noise levels in excess of City of Riverside standards. The Project is not subject to the standards of other agencies.

Based on the preceding, the potential for the Project to generate substantial temporary or permanent increases in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be less-than-significant.

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

b. Generation of excessive groundborne vibration or groundborne noise.

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 2.13. 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])[6] could be distinctly perceptible.[7] For the purposes of this analysis, received vibration levels exceeding 0.10 PPV (0.071 RMS) would be considered potentially significant.

[6] 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.

[7] *Caltrans Transportation and Construction Vibration Guidance Manual* (Caltrans) September 2013, p. 38.

Groundborne vibration levels resulting from construction activities occurring within the Project Site were estimated by employing 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 south 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 noted above. At greater distances, these vibration levels would be further reduced. Additionally, any perceived vibration levels would be temporary and transient limited to 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, the 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. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

Impact Analysis: The Project Site is not located in the vicinity of a private airstrip or airport land use plan. the Project Site is not located within two miles of a public airport or public use airport. The Riverside Municipal Airport, located approximately 4.5 miles southeast of the Project Site, is the airport nearest the site. Due to physical separation between the Project Site and the closest airport facilities, there is no potential for the Project to be adversely affected by aircraft or airport-source noise.

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; City of Riverside Municipal Code.

2.14 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. No housing exists within the RSIM site. Targeted areas of abutting residential properties could be generally affected by Project activities as described elsewhere herein, but with no substantive effect on housing assets.

Analysis as to whether or not Project activities would:

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

Impact Analysis: The Project does not propose or require new homes or businesses. The Project does not propose or require infrastructure that could potentially induce substantial growth. The Project proposes only remediation and site restoration activities that would temporarily disturb the Site.

On this basis, there is no potential for the Project to induce substantial population growth in an 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 people or housing, necessitating the construction of replacement housing elsewhere.

Impact Analysis: No housing exists within the RSIM site. Targeted areas of abutting residential properties would be affected by Project activities, but with no substantive effect on housing assets or persons. In this regard, as substantiated herein, the Project would not result in any effects that would substantially and adversely affect any area residential properties. The Project does not otherwise propose or require uses or facilities that would potentially displace substantial numbers of existing housing or persons.

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

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024.

2.15 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 abutting residential properties. 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 due to Project construction traffic are minimized through the Project Construction Traffic Management Plan (IS/ND Section 1.16, *Construction Traffic Management 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 government 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*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024.

2.16 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*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024.

2.17 Transportation

Project Activities Likely to Create an Impact:

- 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 includes the RSIM site and targeted areas of residential properties abutting the RSIM site to the south. The Project Site does not include uses that are substantive traffic generators.

Analysis as to whether or not Project activities would:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

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. Maximum estimated average daily trips (ADT) generated by the Project is summarized at Table 2.17-1.

2.17-1
Maximum Daily Trips

Activity/Stage	Worker Trips Per Day	Hauling Trips Per Day	Total ADT
Demolition/Excavation/Soil Stockpiling	13	0	**13**
Soil Loading/Export (Including Demolition Export)	0	77	**77**
Soil Import/Stockpiling	13	72	**85**

Source: Urban Crossroads, Inc.
Notes: Estimated trips reflect Project construction schedule, number of workers, and types/use of construction equipment. Per the Project schedule, site remediation activities should be complete within 90 days of their commencement.

Trips generated by the Project would be transient and temporary, any effects of which would be adequately and appropriately addressed through measures identified at IS/ND Section 1.16, *Construction Traffic Management Plan*, and Section 1.17, *Transportation Plan*.

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.

State Route 91 (SR-91) would provide regional access to the Project Site. SR-91 interchanges with Mission Avenue approximately one-quarter mile west of the Project Site. Within the City of Riverside, SR-91 is exempt from Congestion Management Program (CMP) requirements in accordance with CMP Statutes[8] (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.

The Project does not propose or require facilities or operations that would otherwise conflict with a program, plan, ordinance, or policy addressing the circulation system.

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

Based on the preceding, the potential for the Project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less-than-significant.

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

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Impact Analysis: *CEQA Guidelines* Section 15064.3, *Determining the Significance of Transportation Impacts*, states that for many projects, a qualitative analysis of construction traffic may be appropriate. Since construction traffic is temporary and workers are either travelling to the project jobsite or another jobsite elsewhere, the impact on vehicle miles traveled (VMT) is considered less-than-significant.

In addition, as summarized at previous Table 2.17-1, the maximum Project ADT during site remediation activities would total 85 ADT. The Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* indicates that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.

Based on the preceding, the potential for the Project to conflict with or be inconsistent with, *CEQA Guidelines* Section 15064.3, subdivision (b) would be less-than-significant.

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* (IS/ND Section 1.16) and *Transportation Plan* (IS/ND Section 1.17).

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 (IS/ND, Section 1.16 *Construction Traffic Management Plan*) and Project Transportation Plan (IS/ND, Section 1.17, *Transportation Plan*).

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

References Used*: Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007.

2.18 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 the 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 in 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 2.18. a.

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

References Used: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007; *AB 52, Gatto. Native Americans: California Environmental Quality Act*.

2.19 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 abutting residential properties. The Project Site is served by all utilities and service systems.

Analysis as to whether or not Project activities would:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation 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 propose or require uses that would require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities. On this basis, there is no potential for the Project to require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

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

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

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 permanent facilities that would consume water. Limited, temporary, and intermittent water use would however be required for dust suppression and to clean and maintain construction equipment during site disturbing activities. Such water consumption would not materially affect water supplies available to existing and future uses. On this basis, there is no potential for the Project to result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

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

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

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 that would generate wastewater that could materially affect existing or future wastewater treatment capacities. On this basis, there is no potential for the Project to result in a determination by the serving wastewater treatment provider that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

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

d. Be served by a landfill with sufficient permitted capacity to accommodate the project's 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. All waste materials shall be transported and disposed of in accordance with 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste*, and transporter requirements presented at under 40 CFR Part 263, *Standards Applicable to Transporters of Hazardous Waste*. Compliance with these regulations acts to ensure that the potential for Project waste to exceed permitted capacity of accepting facilities is maintained at levels that would be less-than-significant.

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

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

Impact Analysis: Soils removed from the RSIM Site pursuant to the Response Plan will be transported to one of the designated facilities listed below. These facilities are designed and operated to accept and treat soils and contaminants consistent with federal, state, and local statutes and regulations related to solid waste. The final treatment facility will be selected based on the results of waste profile analysis and supporting 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 COC with the most conservative option. On this basis, the potential for the Project to conflict with federal, state, and local statutes and regulations related to solid waste would be less-than-significant.

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: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024.

2.20 Wildfire

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: 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 CAL FIRE, *Fire Hazard Severity Zone Maps* indicate the Project Site is not located within a State Responsibility Area, or within or near a Very High Fire Hazard Severity Zone (VHFHSZ). The nearest area classified as a VHFHSZ is located approximately 3 (three) miles east of the Project Site and is

separated from the Site by intervening urban development and the I-215 freeway. See also *Fire Hazard Severity Zones in State Responsibility Area*: https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zones-map/.

Analysis as to whether or not project activities would (if located in or near state responsibility areas or lands classified as very high fire hazard severity zones):

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

Impact Analysis: The Project is not located in a state responsibility area or in or near lands classified as very high fire hazard severity zones. This Project Site is provided access by existing improved roadways. The Project does not propose or require uses or facilities that would otherwise expose people or structures to a significant risk of loss, injury or death involving wildfire. There are no adopted emergency response plans or emergency evacuation plans that would be adversely affected by the Project.

The Project Construction Traffic Management Plan (IS/ND Section 1.16, *Construction Traffic Management Plan*) and Project Transportation Plan (IS/ND Section 1.17, *Transportation Plan*) 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.

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 Project Site is not located within a designated "High Fire Hazard" area. Nor is the Project Site or vicinity properties classified as very high fire hazard severity zones. There are no prevailing conditions (slope, winds, and other factors) that would exacerbate wildfire risks and thereby expose the Project Site to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Project would implement BMPs addressing fire prevention generally including:

- 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.

Based on the preceding, there is no potential to expose Project occupants or other persons to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to location within or proximate to a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones.

Conclusion:
☐ 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: The Project Site is not located within a designated "High Fire Hazard" area. Nor is the Project Site or vicinity properties classified as very high fire hazard severity zones. The Project Site abuts and is provided direct access to improved and City-maintained roadways. Access to the Project would be provided consistent with City of Riverside Fire Department requirements. All utilities and services are currently available to the Project Site. Potential Project impacts associated with localized infrastructure improvements and connections to utilities and services is addressed under relevant topical issues within this IS/ND.

The Project proposes only temporary site disturbances necessary to achieve remediation standards. The Project does not propose or 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. Based on the preceding, the Project has no potential to require the installation or maintenance of associated infrastructure within a State or Federal Responsibility Area, or within lands that are classified as very high fire hazard severity zones that may result in temporary or ongoing impacts to the environment. Please refer also to related discussions presented at Checklist Items 2.20, a – c.

Conclusion:
☐ 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:
The Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Landslides tend to occur where slopes are steeper with higher relief. The Project Site is essentially level. The Response Plan would not materially alter the Project Site terrain such that the potential for landslide would occur. The mandated Project SWPPP would ensure appropriate control of stormwater discharges from the Project Site. Based on the preceding the Project has no potential to 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.

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

References Used: *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024; CAL FIRE *Fire Hazard Severity Zone Maps*: https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zones-map/.

2.21 Mandatory Findings of Significance

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

a. The Project 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 the evidence in this Initial Study, DTSC makes the following findings:

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

☐The 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 **Mitigated Negative Declaration** will be prepared.

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

☐The 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.

3.0 REFERENCES

3.0 References

- *Response Plan, Former Riverside Scrap Iron & Metal Property, 2993 6th Street Riverside, California 92507* (GSI Environmental) last revision July 15, 2024
- City of Riverside General Plan 2025 [General Plan]
- Riverside Marketplace Specific Plan
- *City of Riverside General Plan and Supporting Documents EIR* (Albert A. Webb Associates) November 2007 (General Plan EIR)
- 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)
- 2017 Off-Site Preliminary Environmental Assessment (Hillmann Consulting)
- 2018 PCB Sampling and Analysis, GSI Site Assessment and Report of Findings (2022)
- 2020 Revised Remedial Action Plan (GSI)
- 2021 Phase I Environmental Site Assessment (Hillmann Consulting)
- 2022 Site Assessment Plan and Report of Findings (GSI)
- 2023 Soil Vapor Investigations (GSI)
- 2023 Response Plan AQ/GHG Modeling (Urban Crossroads, Inc.) August 24, 2023
- *Cultural Resources Assessment Report: Barley Mills Building, 3596 Commerce Street & 3051 Mission Inn Avenue; Riverside CA, Site of Riverside Soda Works, 2933 Mission Inn Avenue; Riverside CA* (Draft) (George Taylor Louden AIA, inc. Modern Historical Architecture Preservation) March 15, 2024