Draft Initial Study

WARD: 1

1. Project Number: **PR-2024-001675 (EIR)**

2. Project Title: Riverside Alive

3. Scoping Date: October 23, 2024

4. Lead Agency: City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

5. Contact Person: Paige Montojo, Senior Planner
Phone Number: (951) 826-5773

6. Project Location: 3637 Fifth Street, Riverside CA 92501

Assessor Parcel Numbers (APNs) 213-111-011, 213-111-012, 213-111-014, 213-111-015, 213-111-016

The Project site comprises approximately 10 acres, bounded by Third Street, Fifth Street, Market Street and Orange Street as shown on **Figure 1 – Vicinity Map**, **Figure 2 – Onsite Project Boundary, Figure 3 – USGS Topographic Map**, and **Figure 4 – Proposed Onsite Project Layout.** (Figures commence on page 12.)

7. Project Applicant/Project Sponsor's Name and Address:

City of Riverside
Community & Economic Development Department
3900 Main Street, 3rd Floor, Riverside CA 92522

8. General Plan Designation: Downtown Specific Plan (see **Figure 5 – General Plan Land Use)**

9. Zoning Designation: Downtown Specific Plan (see **Figure 6 – Zoning)**

10. Description of Project:

The City of Riverside is considering the development of a new mixed-use entertainment and hospitality Project, referred to as the Riverside Alive Project (Project). The Project proposes to include a combination of residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities. No specific development application is currently under consideration. The analysis for the Project described below is being conducted on "development envelopes" based on the maximum areas or densities that could be accommodated on the Project site

instead of on specific project details. The intent of the Project Description is to provide the public and decision makers with an idea as to what a future Project could entail, if approved.

Existing Setting and Project Site Conditions

The City of Riverside (City) is in the northwestern portion of Riverside County. The City is bounded on the north by the Cities of Jurupa Valley, Colton, and Grand Terrace and the unincorporated community of Highgrove, to the east by the City of Moreno Valley, to the south by the unincorporated communities of Woodcrest and El Sobrante, and to the west by the Cities of Corona and Norco.

The existing Project site is approximately 10-acres within Downtown Riverside and includes the city-owned Parking Lot 33 (Lot 33), the Riverside Convention Center, and Outdoor Plaza in front of the Riverside Convention Center. The existing Riverside Convention Center offers both indoor and outdoor meeting space. The flexible indoor space of the Convention Center consists of approximately 50,000-square-feet of exhibition/meeting space with additional pre-function area and 40,000 square feet of back-of-house area. The Outdoor Plaza is approximately 48,000 square feet of grass and concrete outdoor gathering space and passive park area.

Lot 33 is a surface parking lot owned and operated by the City of Riverside and provides accessible parking for Convention Center visitors and Downtown visitors while also providing additional parking for Downtown residents, businesses, and employees. Lot 33 is one of four public parking facilities in the Downtown area that provides electric vehicle charging stations (EVCSs). Lot 33 consists of 498 parking stalls, of which 18 are Americans with Disability Act (ADA) accessible stalls and one EVCS stall. Lot 33 can be accessed through two full access driveways, one along Market Street (mainly utilized during event parking) and one along Third Street which is signalized.

Demolition

The proposed Project would include the demolition of the existing surface parking lot (Lot 33) and Outdoor Plaza. The area being demolished would be fenced with windscreen material to obscure views of the site during construction. The Project may reuse crushed concrete and asphaltic concrete materials from demolition during Project construction. The existing Riverside Convention Center building would not be demolished as part of this Project; it would be joined with the proposed building in a minimally invasive way so that the existing building could remain open during construction which would eliminate the need to cancel or reschedule events.

Project Characteristics

The Project proposes a combination of residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities. No specific development application is currently under consideration; however, in order to determine a logical land use mix and buildout of the approximately 10-acre site, conceptual-level buildout details have been compiled. The following description is based on assumptions of the maximum size of the proposed land uses within the Project, but also tempered with some detail in size and intensities for use in the analysis. These maximum "development envelopes" along with some of the reasonable details for the residential and non-residential uses are presented in **Table A** – **Proposed Project Uses**. The proposed layout of all these uses is depicted on **Figure 4** – **Proposed Project Layout**.

Table A – Proposed Project Uses

Land Use Type		Maximum Dwelling Units/Rooms	Maximum Square Footage
Residential Units (168 total)	Condominiums	55	
	Multi-Family Residential	113	
Non-Residential	Hotel	376	
	Office		220,000
	Commercial Retail Uses		
	Restaurant-Focused Retail		12,875
	Grocery Store		20,690
	Fitness Center		28,416
	Parking Facilities	Up to 5 levels	
	Convention Center Expansion		189,000

Residential

The residential component of the proposed Project would include the development of up to 168 residential units. The 168 residential unit total would consist of a mix of for-sale (condominiums) and for-rent housing (multi-family apartments) products. To be as specific as possible for the analysis, it is presumed that 113-units of multi-family residential would be located within one building at the southeast corner of Market Street and Third Street. The multi-family apartment building is expected to be 9 floors and approximately 95-feet tall. (see **Figure 4**, Building A) The multi-family building would also include a ground floor lobby and space for a restaurant. The 55 condominium units are proposed to be located on the top two levels of the full-service hotel building, which is proposed to be located along Third Street. The Hotel building, described below, and the two floors of condominiums would be approximately 95-feet tall. A rooftop pool and deck may also be included to accompany the condominiums.

Hotel

The proposed Project would include two full-service hotel buildings which would provide a total of up to 376 guest rooms and extended stay accommodations. A 208-room full-service hotel would be located within one building along Third Street expected to be approximately 95-feet tall. (see **Figure 4**, Building C) The full-service hotel would include a lobby and restaurant space on the ground floor and five floors of guest rooms. A second, 168-room extended stay hotel would be within a separate building expected to be approximately 95-feet tall located on the interior of the Project site south of the full-service hotel and east of the multi-family residential building (see **Figure 4**, Building B). The 168-extended stay hotel would also include a small, local-serving grocery store and a fitness center on the first two levels.

Office

The proposed Project would also include up to approximately 220,000 square feet of Class A office space in a building up to 14 stories tall/approximately 155-feet tall. The office building would be clad in high-performance glass and is located on the interior of the Project site south of the extended stay hotel building and across from the existing Riverside Convention Center building (see **Figure 4**, Building D).

Commercial Retail Uses

The Project proposes up to 62,000 square feet of commercial retail uses that may include a combination of retail, restaurant, entertainment and personal services. Although detailed site plans and tenants are not available and would be defined during the subsequent entitlement process, the mix of potential uses currently presumed is described below.

Restaurant-Focused Retail

Approximately 12,875 square-feet of restaurant-focused retail space is presumed, which can accommodate several restaurant users to complement the existing dining options in the Downtown area. These restaurant uses would be integrated into the first floor of the proposed buildings for residential, office, and hotel uses. (see **Figure 4**, Buildings A, C, and D)

Grocery Store

An approximately 20,690 square-foot grocery store is presumed on the ground floor of the extended stay hotel building that would be accessible for both the proposed Project's residential uses and visitors and the existing community. (see **Figure 4**, Building B)

Fitness Center

An approximately 28,416 square-foot fitness center is presumed on the second level of the extended stay hotel building (above the proposed grocery store). (see **Figure 4**, Building B)

Subterranean Parking Facility

The Project includes a subterranean parking structure below the proposed residential, office, and hotel buildings that would include up to five levels and be a maximum depth of 53 feet below ground surface (bgs) (see **Figure 4**, Buildings A through D).

Convention Center Expansion

The existing Riverside Convention Center is approximately 108,000-gross-square-foot building that offers approximately 50,000 square-feet of indoor space for exhibit hall, ballroom, and meeting areas, plus additional area for pre-function and concourse space (see **Figure 4**, Building F). The building also includes back-of-house storage space, service corridors, administration area, kitchen facilities, and a loading dock. The proposed Project includes a new 189,000-gross-square-foot expansion that would be joined to the existing 108,000-gross-square-foot building. The new building would add 100,000 square-feet of rentable function space for exhibit, ballroom and meeting areas increasing the total Convention Center function space to approximately 150,000 square feet and the overall gross square footage of the Convention Center to approximately 297,000 square feet.

Vehicular Circulation and Site Access

Regional access to the Project site is provided via State Route 91 (SR-91) and State Route 60 (SR-60). The nearest SR-91 ramps are located at Mission Inn Avenue located approximately 0.3 miles to the southeast. The nearest SR-60 ramps are located at Main Street approximately 0.90 miles north of the Project site. Safety improvements are planned by the City as part of a separate project on Main Street from the proposed Project site to the SR-60, approximately 0.90 miles, to reduce the road from 4-lanes to 2-lanes divided by a traffic median with additional

parking, landscaping, and pedestrian walkways.[1] Construction of these improvements is scheduled to be complete by February 2027.

Local access to the Project site is provided via Main Street, Third Street, Fifth Street, Market Street and Orange Street. These streets are fully improved with sidewalks, curbs and gutters on both sides of the streets.

With the demolition of Lot 33, the two existing driveways at the intersection of Third Street and Main Street and on Market Street would be removed. Vehicular access into the Project site and proposed parking structure is proposed via the driveways that serve the existing Marriot Hotel on Market Street and Fifth Street. There would be three new vehicle loading and drop-off/pick-up areas along Third Street and Market Street in front of the new convention center building, hotel, and multi-family residential building. (see **Figure 4**, Buildings A, C, and E) Existing vehicle loading and drop-off/pick-up areas along Fifth Street would remain in place. The vehicle loading area that serves the existing Convention Center building on Orange Street would remain. No new vehicle loading, and drop-off/pick-up areas are proposed on Orange Street.

Public Transit

The Project area is currently served by the Riverside Transit Agency (RTA). Routes 12, 29 and 204 all travel along Market Street; however, only Routes 12 and 29 have a stop both north and southbound along Market Street. The nearest bus stops along Market Street and Third Street (along the Project frontage), Market Street and Fourth Street and Market Street and Sixth Street. The existing bus shelter near the corner of Market Street and Third Street would be protected in place; this stop may be temporarily relocated or closed during construction of the Project and would be coordinated with Riverside Transit Authority (RTA).

Pedestrian Circulation and Site Access

The Project would provide several pedestrian pathways to facilitate the movement of pedestrians within the site and provide connection to the existing sidewalks along Third Street, Fifth Street, Market Street and Orange Street. These pathways would be lit to ensure security.

Outdoor Plaza

The Project proposes an Outdoor Plaza depicted in green on **Figure 4**, that connects residents and visitors to the existing and proposed uses and would contain flexible outdoor gathering space. The outdoor plaza area may be partially covered or wholly uncovered and is intended to be fully programmable for outdoor events on an intermittent basis. Partially covered structures may include an amphitheater (see **Figure 4**, area G).

Lighting

The proposed Project would include exterior building lights and pedestrian lighting for safety and security purposes within parking facilities, along pathways, and on buildings. All light sources would be shielded so that the light is directed away from streets and adjoining properties. Further, all light fixtures would be required to be consistent with the City of Riverside Municipal Code – Title 19, Zoning Code for illumination. Existing streetlights are located along Third Street, Fifth Street, Market Street and Orange Street within the right-of-way, no changes are anticipated.

Utilities

As the Project is an existing developed site in Downtown Riverside there are existing utilities within and around the site. The site is served by Riverside Public Utilities (RPU) for water and electric, discussed below and Southern California Gas for natural gas. Existing utility facilities on-site may be removed, replaced or relocated to provide

[1] Main Street Safety Improvements are not a part of the proposed Project.

connection to the new buildings proposed by the Project. No new services are expected; rather moving around utility connections are expected and would be determined as specific buildings and facilities undergo specific entitlement and engineering processing in the future. The potential off-site improvements anticipated for this Project are further described below.

Water

Public water service would be provided by RPU via connection to existing pipelines on Third Street with possible connection within other streets. To serve this Project, off-site upgrades would be required to the existing water main within Third Street and it would be upsized to an 18-inch diameter water main (between Orange Street and Market Street).

Wastewater

Wastewater treatment for the Project would be provided by the City Public Works Department at the Riverside Regional Water Quality Control Plant. The proposed Project would connect to an existing 12-inch sewer line located on Market Street. Given the potential demand from the Project, approximately 1,700 feet of the existing 12-inch sewer line may need to be upsized to 15-inch from 11th Street to Mission Inn Avenue.

Stormwater Facilities

The proposed Project would provide new on-site drainage facilities and would be required to reduce pollutants in urban runoff through implementation of best management practices (BMPs) and low-impact development (LID) principles outlined in project-specific Water Quality Management Plans (WQMPs) for future development proposals.

Electricity

RPU provides electrical services to the Project site. All electrical facilities would connect to existing connections along Orange Street or 3rd Street. RPU has sufficient capacity to serve the estimated electrical load of the Project site, but would require electrical network reconfiguration to maintain reliability and resiliency. This would require civil and electrical infrastructure improvements to existing facilities such as pad-mounted switches, transformers, pad-mounted capacitor bank and other related utility distribution equipment on-site or along the Project frontage and would be determined during subsequent entitlement and engineering processing for future development applications.

Natural Gas

Southern California Gas provides natural gas service to the Project site. The City requires building electrification in certain newly constructed buildings (RMC, Ch. 16.26). New building permits filed after January 6, 2023 for buildings three stories or less require electrification and buildings four or more stories are subject to this requirement in January 2026. Building electrification for the proposed Project is anticipated, except in instances where this requirement does not apply.

Construction

Project construction is anticipated to occur in one phase over a 3-year time span. Due to the subterranean parking facilities, the Project may require approximately 500,000 cubic yards of soil excavation and export. The construction fleet may vary due to project needs at the time of construction; however, typical construction equipment and vehicle usage is anticipated may include, but not be limited to excavators, rubber-tired dozers/loaders, cranes, scrapers, motor graders, forklifts, concrete trucks, and other material-delivery vehicles.

Offsite Improvements

Offsite improvements are related to water and sewer facility upgrades, as described above, and shown on **Figure 7 – Offsite Improvements Boundary**.

11. Surrounding land uses and setting:

The area surrounding the Project site is highly developed and urbanized with a variety of land uses, including hotels, commercial, and residential uses. Refer to **Table B – Surrounding Land Uses**, for the land use and zoning designations for the surrounding area.

Table B – Surrounding Land Uses

	Existing Land Use	General Plan Land Use Designation	Zoning Designation
Project Site	Convention Center, Outdoor Plaza, surface parking lot (Lot 33)	Downtown Specific Plan	Downtown Specific Plan - Raincross District
North	Residential Uses	Downtown Specific Plan	Downtown Specific Plan - Raincross District, and Downtown Specific Plan - Residential District
East	Hotel and Commercial Uses	Downtown Specific Plan	Downtown Specific Plan - Raincross District, and Downtown Specific Plan - Residential District
South	Hotel and Commercial Uses	Downtown Specific Plan	Downtown Specific Plan - Raincross District
West	Residential	Downtown Specific Plan	Downtown Specific Plan - Raincross District

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

Agency	Approval
State Water Resources Control Board	National Pollutant Discharge Elimination System Construction General Permit/Stormwater Pollution Prevention Plan

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with Public Resources Code 21080.3.1, the City of Riverside sent out AB 52 consultation notices on April 23, 2024, and received responses from the following tribes: Gabrieleno Band of Mission Indians – Kizh Nation, Pechanga Band of Indians, Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians), Agua Caliente Band of Cahuilla Indians, and Soboba Band of Mission Indians. Tribal consultation will continue and be concluded prior to certification of the EIR.

14. Sources Referenced in Preparation of this Initial Study:

a. City of Riverside, General Plan 2025

b. City of Riverside, GP 2025 FPEIR

c. City of Riverside Municipal Code Title 16 – Buildings and Construction

d. City of Riverside Municipal Code Title 19 – Zoning

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Appendix A Biological Resource Assessment and MSHCP Consistency Analysis

Appendix B Downtown Specific Plan Consistency Table

Appendix C Water Letter

18. Acronyms

AB Assembly Bill

ADA Americans with Disabilities Act

APN Assessor's Parcel Number

AQMP Air Quality Management Plan

BMP Best Management Practices

CalEEMod California Emissions Estimator Model

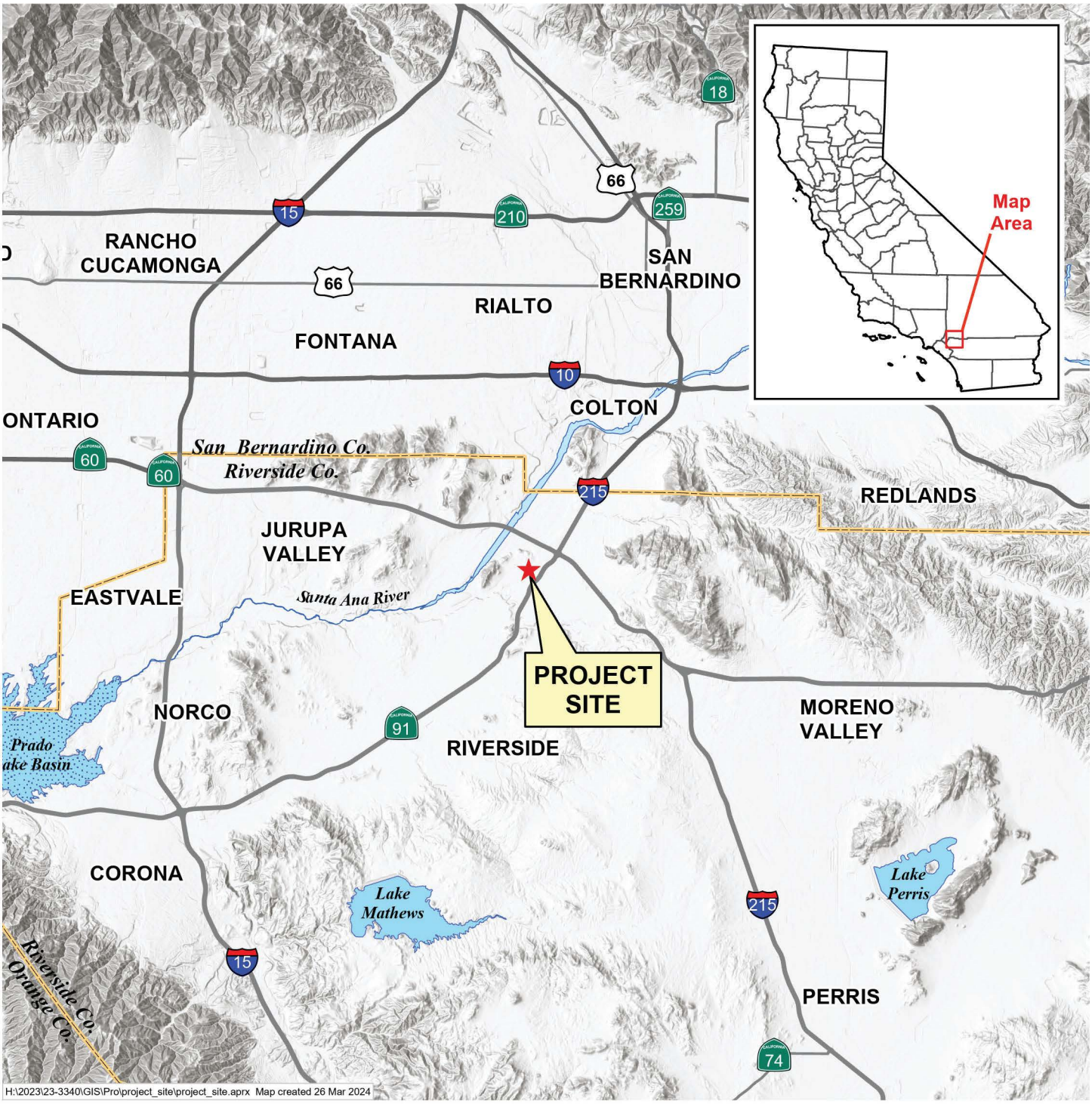
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CNPS	California Native Plant Society
CO	carbon monoxide
CRHR	California Register of Historical Resources
DOT	U.S. Department of Transportation
DTSC	California Department of Toxic Substance Control
DWR	California Department of Water Resources
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
GP	General Plan 2025
GPA	General Plan Amendment
GPD	gallons per day
GSP	Groundwater Sustainability Plan
HCP	Habitat Conservation Plans
HMBP	Hazardous Materials Business Plan
LDMF	Local Development Mitigation Fee
LHMP	Local Hazard Mitigation Plan
LID	Low-Impact Development
LST	Localized Significance Thresholds
MGD	million gallons per day

MRZ	Mineral Resource Zone
MSHCP	Multiple-Species Habitat Conservation Plan
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PM-10	particulate matter less than 10 microns in diameter
PM-2.5	particulate matter less than 2.5 microns in diameter
PRC	Public Resources Code
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RCA	Regional Conservation Authority
RFD	Riverside Fire Department
RPD	Riverside Police Department
RPL	Riverside Public Library
RPU	Riverside Public Utilities
RMC	Riverside Municipal Code
RPW	Riverside Public Works Department
RRWQCP	Riverside Regional Water Quality Control Plant
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
SA-RWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SF	square feet
SFHA	Special Flood Hazard Area
SGMA	Sustainable Groundwater Management Act
SKR	Stephens' Kangaroo Rat
SR	State Route
SRA	State Responsibility Area

SWPPP	Storm Water Pollution Prevention Plan
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
VMT	Vehicle Miles Traveled
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan

FIGURE 1

Vicinity Map



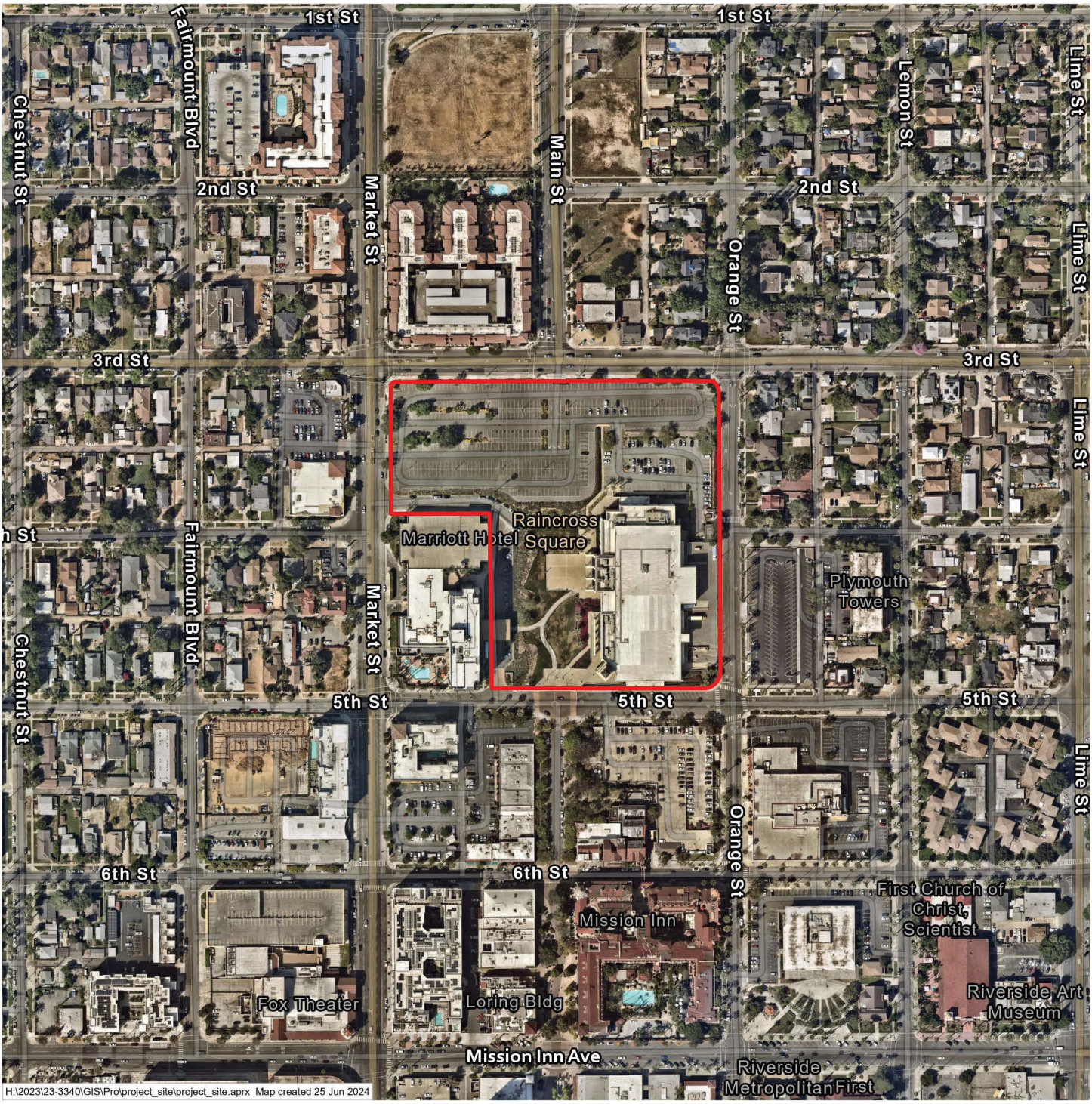
0 10,000 20,000 Feet

Sources: Riverside County GIS, 2020.

ALBERT A. WEBB ASSOCIATES

FIGURE 2

Onsite Project Boundary



LEGEND

Project Boundary

0 175 350 Feet

Sources: Esri Hybrid Reference Layer, 2024; Nearmap, 2024.

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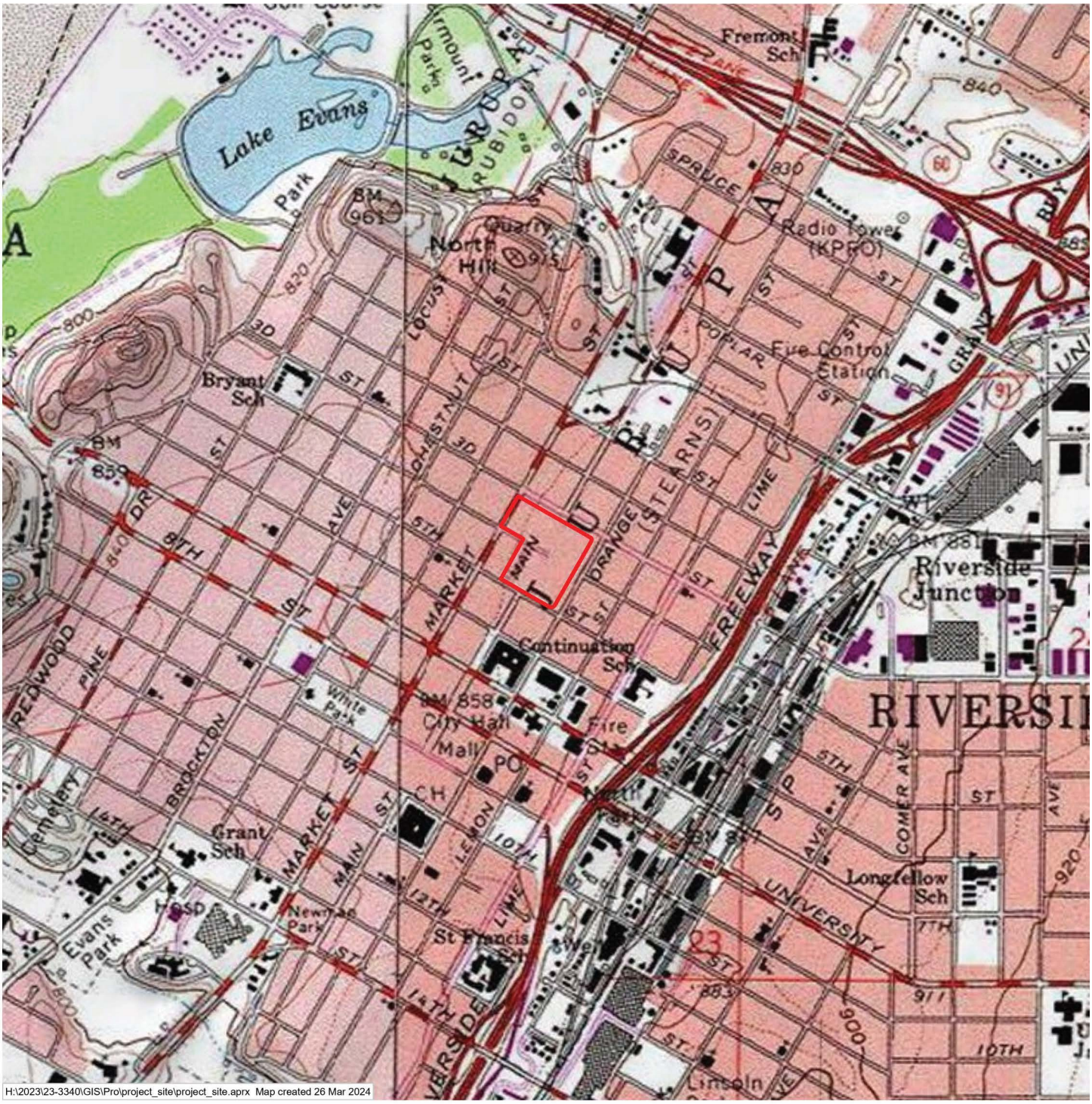
FIGURE 3

USGS Topographic Map



LEGEND

Project Boundary

0 500 1,000 Feet

Sources: USGS Topographic map, Esri, 2024.

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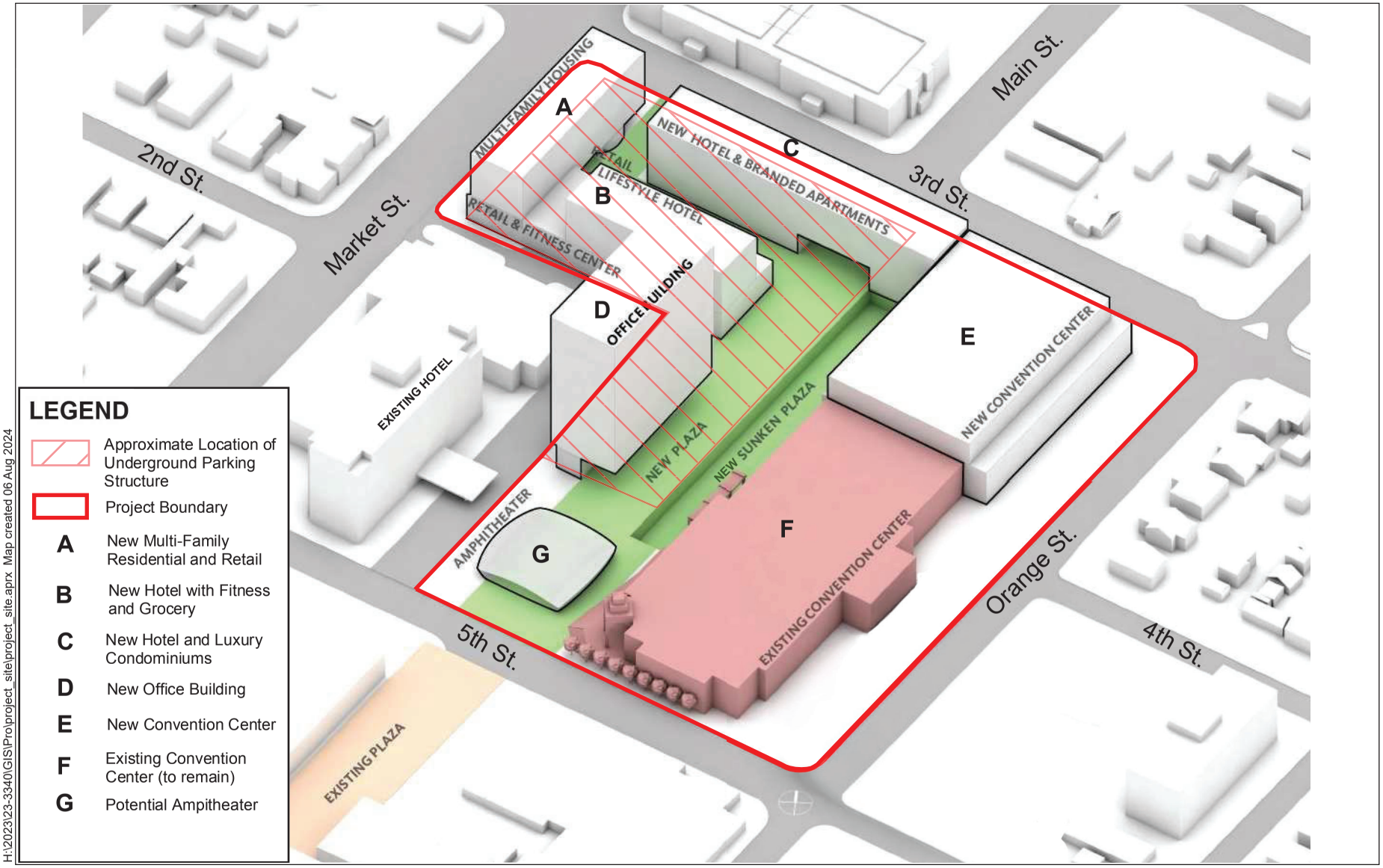

H:\2023\23-3340\GIS\Pro\project_site\project_site.aprx Map created 06 Aug 2024

Source: City

NTS

Figure 4 – Proposed Project Layout

Riverside Alive

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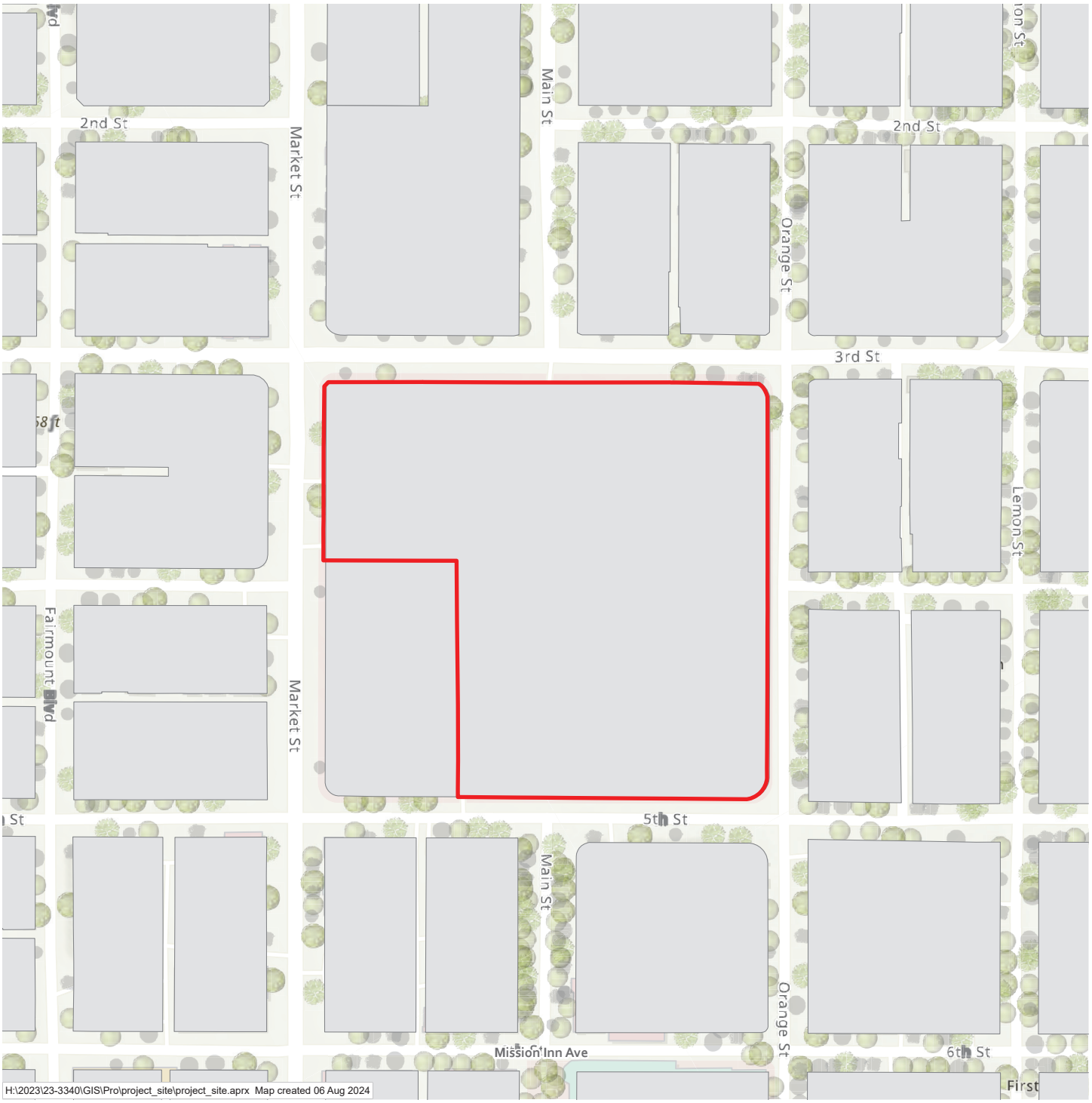
FIGURE 5

General Plan Land Use



LEGEND

Project Boundary

City of Riverside General Plan Land Use

Downtown SP

0 130 260 Feet

Sources: City of Riverside, General Plan Land Use, 2022; Esri Hybrid Reference Layer, 2024.

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Zoning

FIGURE 5

LEGEND

Project Boundary

City of Riverside Zoning

Downtown Specific Plans

0 130 260 Feet

Sources: City of Riverside, Zoning, 2022; Esri Hybrid Reference Layer, 2024.

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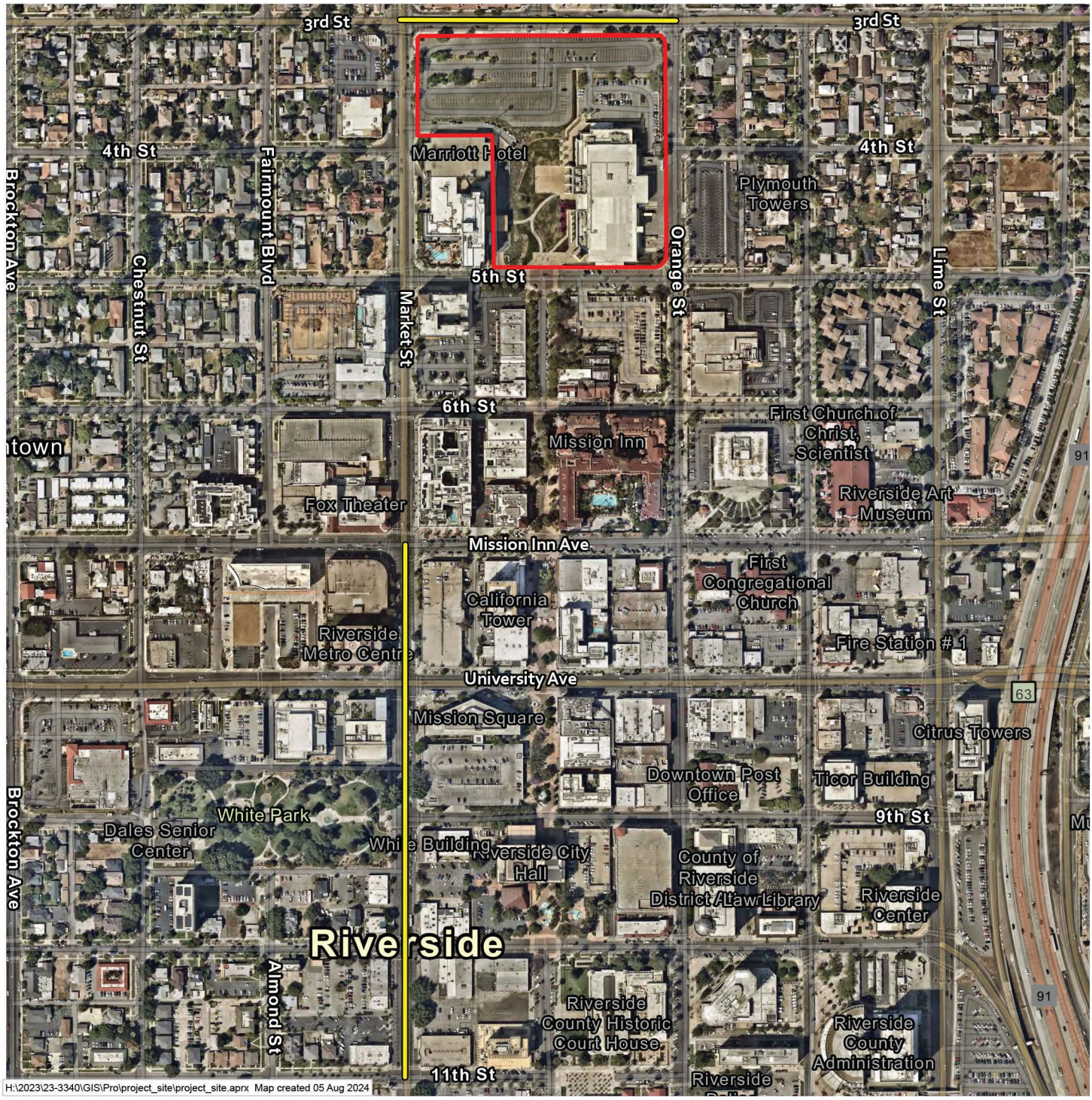
FIGURE 7 Offsite Improvements Boundary



LEGEND

Project Boundary

Offsite Boundary

0 235 470 Feet

Sources: Esri Hybrid Reference Layer, 2024; Nearmap, 2024.

ALBERT A. WEBB ASSOCIATES

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature _____ Date 10/2/2024

Printed Name & Title Paige Montojo, Senior Planner For City of Riverside

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

8) The explanation of each issue should identify:

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐

1a. Response: *(Source: GP; GP PEIR)*

Potentially Significant Impact. Scenic vistas are the view of an area that is visually or aesthetically pleasing. Development projects may potentially impact scenic vistas in two ways: 1) directly diminishing the scenic quality of the vista, or 2) by blocking the view corridors or "vistas" of scenic resources. The proposed Project site is not a scenic resource. Vista points can be found throughout the City both from urban areas toward the hills and from wilderness areas looking on to Riverside. Long-distance views of natural terrain and vegetation can be found throughout the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Park (GP, p. OS-3). Like most of the development in the City, the proposed Project will be developed within the valley floor. Because the building height of the proposed hotel, residential, and commercial buildings could potentially reach 95-155 feet, these proposed uses may impact the City's view corridors. Therefore, the Project may have a substantial adverse effect on a scenic vista. Therefore, the Project may result in a **potentially significant impact** and this topic will be discussed further in the forthcoming EIR.

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

1b. Response: *(Source; GP PEIR; OHP; RCDG)*

Less Than Significant Impact. The Project site does not contain any rock outcroppings but does contain tree species throughout the existing parking and landscaped areas. The Project proposes to remove the existing tree species to accommodate the proposed Project development. The existing tree species located within the right-of-way may also be removed as part of the Project. However, future applicants proposing development within the Project site will be required to incorporate a landscape plant palette consistent with Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines, amended January 2019 (RCDG).

There are no state scenic highways within the City that could potentially be impacted by the proposed Project (GP PEIR, p.5.1-20). However, University Avenue, located 0.20 miles south form the Project site, is designated as a Scenic Parkway (GP PEIR, p. 5.1-19). The Project does not propose changing existing entry points along University Avenue, since improvements to this street are not required or part of the Project. Therefore, implementation of the Project would not increase existing impacts along University Avenue. As mentioned above, the Project would require the removal of existing tree species. Future applicants proposing development within the Project site would replace these trees with new trees and vegetation as approved by the City consistent with special landscape requirements for scenic boulevards. Nonetheless, University Avenue is not designated as a state scenic highway, therefore, impacts to a state scenic highway are not anticipated.

According to the State CEQA Guidelines, a cultural resource is considered "historically significant" and therefore is considered a historical resource, if it is included in a local register of historical resources or is listed in or determined eligible for listing on the California Register of Historical Resources (CRHR) under any one of the criteria. (OHP). Since the existing Convention Center building, surface parking, and the Outdoor Plaza are

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
modern structures, the Project site would not be deemed eligible for listing in the CRHR. Additionally, the Project site is not located along a state scenic highway. Thus, impacts from Project implementation would not substantially damage scenic resources related to trees, rock outcroppings, or state scenic highways. Therefore, impacts would be **less than significant** so this topic will not be further analyzed in the forthcoming EIR.				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?	☒	☐	☐	☐
1c. Response: *(Source: DOF; GP PEIR; Project Description)* **Potentially Significant Impact.** According to *CEQA Statue and Guidelines* §21071, an urbanized area is defined as a city that has a population of at least 100,000. As of January 1, 2024, the City of Riverside's population is approximately 316,690 residents so the City is considered an urbanized area. (DOF). The Project will be required to comply with regulations regarding scenic quality but may result in impacts. Thus, the Project site is in an urbanized area and may conflict with applicable regulations governing scenic quality as well as views from nearby prominent locations such as City Hall and the Historic Mission Inn Hotel. Therefore, the Project may result in a **potentially significant** impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
1d. Response: *(Source: GP PEIR; RMC; Project Description)* **Less than Significant Impact.** The Project site is an existing developed site, and as such, existing streetlights are located along Orange Street, Third Street, Fifth Street and Market Street within the roadway right-of-way. The proposed Project would add additional exterior building lights and exterior lighting for safety and security purposes within the subterranean parking lot, along pedestrian pathways and on buildings. All subsurface light sources would be shielded so that the light is directed away from streets and adjoining properties. Further, all light fixtures would be required to be consistent with City's Riverside Municipal Code (RMC) Title 19 - Zoning Code for illumination. Although the Project would add new sources of potential light and glare (i.e. new lights and windows), the Project would not adversely affect day or nighttime views as the existing Project site and surrounding areas are fully developed and urbanized with existing lighting. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts would be **less than significant** and this topic will not be further analyzed in the forthcoming EIR.				

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

2a. Response: *(Source: CDC; GP)*

No Impact. As previously stated in Response 1(c), above, the Project is located within an urbanized area. The Project site is developed and contains the Riverside Convention Center, outdoor laze, and subsurface parking (Lot 33). The area surrounding the Project site is also fully developed with a variety of land uses such as commercial, office, public facilities, and residential. Additionally, as shown in the City's 2025 General Plan, Figure OS-2 Agricultural Suitability map, the Project site is in an area designated as Urban and Built-Up Land (GP, p. OS-11). According to the California Department of Conservation (CDC) California Important Farmland Finder Map, the Project site is also designated as Urban and Built-Up Land and would not support Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, since the surrounding areas do not support farmland, implementation of the proposed Project would not affect off-site farmland. Thus, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

2b. Response: *(Source: GP)*

No Impact. The site is currently zoned Downtown Specific Plan. As noted in Response 2a., the Project site is an existing development and does not support farmland or agriculture uses. The Project site is not located in an area designated as a Williamson Act Preserve or Contracted Land (GP, p. OS-12). Thus, the Project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
2c. Response: *(Source: COR GP; GP)* **No Impact.** Forest land is defined as land supporting at least 10 percent native tree cover of any species, including hardwoods, under natural conditions that allow for management of one or more forest resource, including timber (COR GP, p. LU-26). As shown on City of Riverside General Plan, Figure OS-2 - Agricultural Suitability, there are no areas within City limits that are designated for forestland or timberland and the City of Riverside has no forestland that can support 10 percent native tree cover nor any timberland. Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
2d. Response: *(Source: CDC; GP)* **No Impact.** As previously mentioned in Response 2(c), above. There is no designated forestland on or adjacent to the Project site. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
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?	☐	☐	☐	☒
2e. Response: *(Source: CDC; GP)* **No Impact**. As previously mentioned in Responses 2(a) through 2(d), above, the lands affected by the Project are not located within an agricultural use area and do not support designated farmland or forestland. Thus, the Project would not result in changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
3a. Response: *(Source: GP PEIR; SCAQMD-A)*				

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

Potentially Significant Impact. The City is located within the South Coast Air Basin. The South Coast Air Quality Management District (SCAQMD) has jurisdiction in the basin (GP PEIR, p. 5.3-3). In order to reduce emissions, the SCAQMD adopted the 2022 Air Quality Management Plan (AQMP), which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and federal air quality standards. The AQMP is a regional and multi-agency effort including the SCAQMD, California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the US Environmental Protection Agency (EPA) (SCAQMD-A).

The AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal 2020), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans including the City's GP. If a project demonstrates compliance with local land use plans and/or population projections from the Connect SoCal 2020, which would have been taken into account by SCAQMD, then the project is consistent with the 2022 AQMP. (SCAQMD-A).

The proposed Project does not include a change of zone or a General Plan Amendment (GPA) since the current land use designation of Downtown Specific Plan allows residential and commercial uses onsite with a conditional use permit. While the Project is not expected to conflict with or obstruct implementation of an applicable air quality plan, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a **potentially significant impact** so an Air Quality Analysis will be prepared and this topic will be further analyzed and addressed in the forthcoming EIR.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐

3b. Response: *(Source: CARB-A; SCAQMD-B)*

Potentially Significant Impact. The portion of the Air Basin within which the proposed Project site is located is designated as a non-attainment area for particulate matter less than 10 microns in diameter (PM-10) under state standards, and for ozone and particulate matter less than 2.5 microns in diameter (PM-2.5) under both state and federal standards (CARB-A). The SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same (SCAQMD-B). Hence, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable.

Air quality impacts can be described in short-term and long-term perspectives. Short-term impacts occur during site preparation and Project construction, whereas long-term impacts are associated with Project operation. The Project's short-term and long-term emissions will be evaluated using the latest industry standard air quality modeling software and analyzed for compliance with SCAQMD regional significance thresholds.

The proposed Project may result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the Project may result in a **potentially significant** impact so an Air Quality Analysis will be prepared and this topic will be further analyzed and addressed in the forthcoming EIR.

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

3c. Response: *(Source: CARB-B; SCAQMD-C)*

Potentially Significant Impact. Air Quality impacts to sensitive receptors can be analyzed via Localized Significance Thresholds (LST) analysis, which is recommended, but not required, by SCAQMD. LSTs are applicable to nitrogen oxides (NO_X), carbon monoxide (CO), particulate matter less than 10 microns (PM-10), as well as particulate matter less than 2.5 microns (PM-2.5) and represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard on sensitive receptors (SCAQMD-C, pp. 1-1 – 1-2). Sensitive receptors include residential uses, school playgrounds, childcare facilities, athletic facilities, hospitals, retirement homes, and convalescent homes. (CARB-B, p. 2-1). Demolition and development of the Project site may have the potential to expose nearby sensitive receptors to substantial pollutant concentrations. Therefore, the Project may result in a **potentially significant** impact so an Air Quality Analysis will be prepared and this topic will be further analyzed and addressed in the forthcoming EIR.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3d. Response: *(Source: CARB-B)*

Less Than Significant Impact. The California Air Resources Board developed an Air Quality and Land Use Handbook to outline common sources of odor complaints. The sources of odors include sewage treatment plants, landfills, recycling facilities, and petroleum refineries (CARB-B, p. 2-2). Odor impacts during Project operation will be minimal because the land uses proposed on the Project site are not included on CARB's list of facilities that are known to be prone to generate odors. Potential sources of operational odors generated by the Project would include disposal of miscellaneous refuse. Consistent with City requirements, all Project generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Thus, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

4a. Response: *(Source: SE; GP)*

Less Than Significant Impact with Mitigation Incorporated. The proposed Project will be located on a fully developed site, amongst an urbanized area completely surrounded by existing development. The Project site is designated as Residential/Urban/Exotic which means that the Project site is not expected to support sensitive

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

habitat (GP, p. OS-20). The Project site is within the Multiple Species Habitat Conservation Plan (MSHCP) and specifically within the Cities of Riverside and Norco Area Plan. (SE, p 6). A *Biological Resources Assessment and MSHCP Consistency Analysis* (BRA) was prepared by South Environmental (South) dated May 2024, included as Appendix A to this Initial Study, to document the existing biological resources at the Project site and within a 500-foot buffer (Study Area). As part of the BRA, a pedestrian-based biological survey and a literature review were conducted and the results are summarized below.

A pedestrian-based biological survey of the Study Area was conducted on March 27, 2024. At the time of the survey, the Study Area included developments and ornamental landscaping. The Project site and Study Area are within a dense urban environment within the City. (SE, p. 8). There are no jurisdictional features (i,e. streams, drainages, ponds, lakes) within either the Study Area or the Project site. (SE, p. 14).

The results of the literature review and pedestrian-based biological survey indicate that the Study Area, including the Project site, includes one vegetation community type: Developed/Ornamental Landscaped. The developed areas include buildings, driveways, parking lots, and sidewalks. Ornamental landscaping is mixed with the developed areas. All of the observed landscaping plants within the Study Area are located in *Table 1. List of Plants Observed on the Study Area* of the BRA. The plants species observed consisted of succulents, trees, shrubs, perennials, annuals, and palms and are made up of two native and 40 non-native plants. (SE, p. 10). The trees on the site are not special-status species or conservation species recognized in the MSHCP; therefore, no protected trees occur in the Study Area or the Project site. (SE, p. 14). No sensitive natural communities occur on the Study Area or Project site. (SE, p. 14). Additionally, no special-status plant species were observed during the pedestrian-based biological survey, nor do they have the potential to occur in the Project site due to a lack of native habitat. The Project site is entirely developed and lacks native habitats that are required for special-status plant species to occur. (SE, p. 13).

Wildlife that has been previously recorded in the Study Area includes Lincoln Sparrow, Black-headed grosbeak, Audubon's Warbler, striped skunk, common raccoon, and fox squirrel. However, during the pedestrian-based biological survey no wildlife was observed. (SE, p. 13). Additionally, no special-status animals were observed during the pedestrian-based biological survey, nor do they have the potential to occur in the Project site due to a lack of native habitat. The Project site is entirely developed and lacks native habitats that are required for special-status animal species to occur. (SE, p. 13).

Applicants of future implementing projects on the Project site would remove all vegetation (trees, shrubs, herbaceous plants) from the Project site, that could provide potential nesting habitat for birds and raptors protected by the Migratory Bird Treaty Act (MBTA), California Migratory Bird Protect Act (MBPA) and the Fish and Game Code. By removing said vegetation, direct and indirect impacts to, if present, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. Additionally, if present, impacts to nearby nests may also occur during construction activities due to noise or vibration. To avoid impacts mitigation measure **MM BIO-1**, summarized below, would be required for applicants of future implementing projects within the Project site.

> **MM BIO-1**: **Nesting Birds.** Prior to issuance of grading of the Project site, should tree and/or vegetation removals be required during the nesting/breeding season (between February 1st and August 31st), a pre-removal nesting bird survey shall be required for the Project site and a 500-foot buffer (Study Area), or a buffer size determined by the qualified biologist. If construction is proposed a qualified biologist shall conduct a nesting bird survey(s) no more than three (3) days

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
/48 hours prior to initiation of grading to document the presence or absence of nesting birds within Project site and a 500-foot buffer (Study Area), or a buffer size determined by the qualified biologist. The survey(s) shall focus on identifying any raptors and/or bird nests that are directly or indirectly affected by construction activities. If active nests are documented, species specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the City of Riverside for review and approval prior to initiation of grading in the nest-setback zone. The qualified biologist shall have prior experience conducting nesting bird surveys for construction projects and shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final monitoring report of the findings, prepared by a qualified biologist, shall be submitted to the City of Riverside documenting compliance with the CDFG Code. Any nest permanently vacated for the season shall not warrant protection pursuant to the CDFG Code.				
Thus, the Project site does not contain candidate, sensitive, special status species or habitat to support said species because the Project site is currently developed. Additionally, applicants of future implementing projects within the Project site would be required to adhere to **MM BIO-1**, which would not result in substantial adverse effects, 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, impacts would be **less than significant with mitigation incorporated** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
4b. Response: *(Source: SE)* **No Impact.** The Project site is an existing developed site and does not contain riparian habitat or other sensitive natural communities (SE, p. 11). Thus, the proposed Project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife (CDFW)or US Fish and Wildlife Service (USFWS). Therefore, **no impacts** are anticipated so this topic will not be further analyzed in the forthcoming EIR.				
c. Have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
4c. Response: *(Source: SE)* **No Impact.** The Project is an existing developed site located within an urbanized area. The Study Area, including the Project site, does not contain streams, wetlands, drainages, ponds, lakes (SE, pp. 11, 14). There are no federally				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) on-site or within proximity to the Project site. Further, the Project site does not contain any wetlands or jurisdictional resources regulated by the US Army Corps of Engineers (USACE), CDFW or Regional Water Quality Control Board (RWQCB). Thus, the proposed Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
4d. Response: *(Source: SE)* **No Impact.** As discussed in Response 4(a) above, the Study Area, including the Project site is fully developed and surrounded by existing dense urban development that lacks connection to native plant communities or habitats. (SE, pp. 14-15.) The Project site does not represent a regional wildlife movement corridor and provides no cover, food, and no natural unrestricted water courses that would facilitate regional wildlife movement onsite and is not located in a MSHCP designated core, extension of existing core, non-contiguous habitat block, constrained linkage or linkage area intended to protect lands for wildlife movement. Thus, the proposed Project would not 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. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
4e. Response: *(Source: SE; RMC)* **Less Than Significant.** The 2025 General Plan includes policies to ensure that future development would not conflict with any local policies or ordinances protecting biological resources. Objectives and policies that relate to biological resources include the following: **Objective OS-5:** Protect biotic communities and critical habitats for endangered species throughout the General Plan Area. ▪ **Policy OS-5.2:** Continue to participate in the MSHCP Program and ensure all projects comply with applicable requirements. ▪ **Policy OS-5.3:** Continue to participate in the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan including collection of mitigation fees. Future applicants proposing development within the Project site would be required to pay the SKR fees in accordance with County of Riverside Ordinance 663.10 (COR 663.10) and City of Riverside MSHCP Local Development Mitigation Fees (LDMF), established by MC Section 16.72.040. Further, because the Project site is fully developed it does not have the potential to contain any SKR habitat. (SE, Appendix B) Through payment of applicable fees, the Project will not conflict with any of the 2025 General Plan policies listed above. Thus, implementation of the proposed Project would not conflict with any local policies or ordinances protecting				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
biological resources. Therefore, impacts would be **less than significant** so this topic will not be further analyzed in the forthcoming EIR.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

4f. Response: *(Source: RCA-A, RCA-B, SE, TLMA)*

Less Than Significant with Mitigation Incorporated. The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is a comprehensive multi-jurisdictional effort that includes western Riverside County and eighteen (18) cities including the City of Riverside. (TLMA, pp. 1-1, 2-49). Rather than addressing sensitive species on an individual basis, the MSHCP focuses on conservation of 146 species, including those listed at the federal and state levels and those that could become listed in the future. (TLMA, pp. 1-16 - 1-17). The MSHCP proposed a reserve system of approximate 500,000 acres, of which 347,000 acres are currently within public ownership and 153,000 acres will need to be assembled from lands currently in private ownership. (TLMA, pp. 3-11). The MHSCP allows the County and other permittees (including the City of Riverside) to issue take permits for listed species so that applicants do not need to receive endangered species incidental take authorization from the USFWS and CDFW. (RCA-A) On June 17th, 2003, the County of Riverside Board of Supervisors adopted the MSHCP, certified the Environmental Impact Report/Environmental Impact Statement, and authorized the Chairman to sign the Implementing Agreement with the respective wildlife agencies. (TLMA). The Incidental Take Permit was issued by the wildlife agencies on June 22nd, 2004. The City of Riverside is a Permittee under the MSHCP. Regions of the MSHCP have been organized into Area Plans that generally coincide with logical political boundaries, including city limits or long-standing unincorporated communities. The Project site is located within the Cities of Riverside/Norco Area Plan. The Cities of Riverside/Norco Area Plan has a target conservation acreage of 3,465 to 3,615 acres. (TLMA, p. 3-470) The project site is located within the MSHCP and the Stephens Kangaroo Rat (SKR) Fee Area as outlined in the SKR Habitat Conservation Plan. Project compliance with the SKR HCP consists of paying the SKR fee.

The MSHCP requires project consistency with Sections 6.1.1 (Property Owner Initiated Habitat Evaluation and Acquisition Negotiation Strategy), 6.1.2 (Protection of Species within Riparian/Riverine Areas and Vernal Pools), 6.1.3 (Protection of Narrow Endemic Plant Species), 6.1.4 (Urban Wildlands Interface), 6.3.2 (Additional Survey Needs and Procedures), 6.4 (Fuels Management), Appendix C (Standard Best Management Practices), and 7.5.3 (Construction Guidelines). As a Permittee to the MSHCP, the City is required to ensure that all projects are consistent with these Sections of the MSHCP.

Consistency with MSHCP Section 6.1.1

Section 6.1.1, *Property Owner Initiated Habitat Evaluation and Acquisition Negotiation Strategy (HANS),* of the MSHCP applies to property which may be needed for inclusion in the MSHCP Conservation Area or subjected to other MSHCP Criteria and shall be implemented by the County and those Cities that have agreed to implement the HANS process. The HANS process ensures that an early determination will be made of what properties are needed for the MSHCP Conservation Area, that the owners of property needed for the MSHCP Conservation Area are compensated, and that owners of land not needed for the MSHCP Conservation Area shall receive Take Authorization for Covered Species Adequately Conserved through the Permits issued to the County and Cities pursuant to the MSHCP. The Project site is not located in an MSHCP Conservation Area or subjected to other MSHCP Criteria. (SE, p. 16). Since the Project site does not require to be included in an MSHCP Conservation Area or Criteria Cell, then a HANS determination is not required. Thus, the proposed Project is consistent with Section 6.1.1 of the MSHCP.

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

Consistency with MSHCP Section 6.1.2

Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools,* of the MSHCP requires that projects develop avoidance alternatives, if feasible, that would allow for full or partial avoidance of riparian/riverine areas. Section 6.1.2 of the MSHCP defines Riparian/Riverine areas as "lands which contain Habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens, which occur close to, or which depend upon soil moisture from a nearby fresh water source; or areas with freshwater flow during all or a portion of the year." The Project site is not located nearby jurisdictional features- streams, wetlands, drainage, ponds, or lakes. (SE, p 14). The proposed Project site has already been developed and does not support riparian, riverine, fairy shrimp and vernal pool habitats and no species associated with these habitat types are present on the site. (SE, Appendix B). As such, no focused surveys are required nor a MSHCP Determination of Biologically Equivalent or Superior Preservation (DBESP) report. Thus, the proposed Project is consistent with Section 6.1.2 of the MSHCP.

Consistency with MSHCP Section 6.1.3

Section 6.1.3, *Protection of Narrow Endemic Plant Species*, of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site does not occur within an MSHCP predetermined Survey Area for narrow endemic plant species. (RCA-B). Since the Project site is not within the NEPSSA then the Project would not impact Narrow Endemic Plant Species. Thus, the Project is consistent with Section 6.1.3 of the MSHCP.

Consistency with MSHCP Section 6.1.4

Section 6.1.4, *Guidelines Pertaining to the Urban/Wildlife Interface,* outlines the minimization of indirect effects associated with locating development in proximity to a MSHCP Conservation Area. The Project site is not located adjacent to an existing or proposed MSHCP Conservation Area. SE, p. 16). Thus, the Project is consistent with Section 6.1.4 of the MSHCP.

Consistency with MSHCP Section 6.3.2

Section 6.3.2, *Additional Survey Needs and Procedures,* requires additional surveys for certain species if a project is located within criteria areas shown on *Figure 6-2 (Criteria Area Species Survey Area)*, *Figure 6-3 (Amphibian Species Survey Areas with Critical Area)*, *Figure 6-4 (Burrowing Owl Survey Areas with Criteria Area)* and *Figure 6-5 (Mammal Species Survey Areas with Criteria Area)* of the MSHCP. The Project site does not occur within the Amphibian Species Survey Area, Mammal Species Survey Area, Narrow Endemic Plant Survey Area, Burrowing Owl Area, Criteria Area Species, or Invertebrate Survey Area. The Project Site is not located within an Amphibian Species Survey Area, Mammal Species Survey Area, Narrow Endemic Plant Survey Area, Burrowing Owl Area, Criteria Area Species, or Invertebrate Survey Area. (RCA-B). Thus, no focused surveys are required so the Project is consistent with Section 6.3.2 of the MSHCP.

Consistency with MSHCP Section 6.4

Section 6.4, *Fuels Management,* of the MSHCP provides guidelines to address brush management activities around new development within, or adjacent to, MSHCP Conservation Areas. The Project Site is not located adjacent to an existing or proposed MSHCP Conservation Area. (SE, p. 16). So, this section is not applicable to the proposed Project. Therefore, the Project is consistent with MSHCP Section 6.4.

MSHCP Appendix C and Section 7.5.3

The MSHCP's Appendix C, *Standard Best Management Practices* and Section 7.5.3, *Construction Guidelines*, lists standard best management practices and guidelines to be implemented during project construction that will

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

minimize potential impacts to sensitive habitats in the vicinity of a project. The guidelines relate to water pollution and erosion control, equipment storage, fueling, and staging, dust control, exotic plant control and timing of construction. Although the Project does not propose development, applicants of future development would be required to implement mitigation measure **MM BIO-1** to address potential construction impacts to nesting birds. Thus, with mitigation the proposed Project is consistent with Appendix C and Section 7.5.3 of the MSHCP.

Hence, with implementation of mitigation measure **MM BIO-1**, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, impacts are **less than significant with mitigation incorporated** so this topic will not be further analyzed in the forthcoming EIR.

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

5a. Response: *(Source: DSP, PRC, Project Description)*

Potentially Significant Impact. Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. By statute, CEQA is primarily concerned with two classes of cultural resources: "historical resources," which are defined in Public Resources Code (PRC) Section 21084.1 and CEQA Guidelines Section 15064.5; and "unique archaeological resources," which are defined in PRC Section 21083.2. This section addresses the proposed project's potential impacts in relation to historical and archaeological resources. Project impacts to tribal cultural resources are evaluated in *Section 18, Tribal Cultural Resources,* of this Initial Study.

As mentioned in the Project Description above, the Project includes the demolition of the existing surface parking lot (Lot 33) and the Outdoor Plaza and construction of a mixed-use entertainment development in its place. Additionally, the Project includes the Convention Center expansion that will include minor modification to adjoin the existing Convention Center structure with the proposed building.

The Project site is located in the Downtown Specific Plan, specifically within the Raincross District. The Raincross District is the cultural, historic, and social center of both Riverside and the region beyond. The quality of Downtown Riverside's historic buildings and the relationship between these buildings creates an historic urban fabric unparalleled in the region. (DSP, p. 6-10). Various national historic landmarks and historic districts are located within the Raincross District. While the Project is not expected to result in direct impacts to historical resources pursuant to § 15064.5, nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a **potentially significant impact** related to historic resources so this topic will be further analyzed and addressed in the forthcoming EIR.

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

5b. Response: *(Source: Project Description)*

Potentially Significant Impact. As stated in Response 5(a), above the Project proposes to demolish the existing surface parking lot (Lot 33) and the Outdoor Plaza and construct a mixed-use entertainment development in its place. The proposed mixed-use entertainment development includes a subterranean parking facility that could include up to five levels and extend to a maximum depth of 53-feet below ground surface the Project involves

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ground disturbing activities. Therefore, construction of the Project could result in accidental discovery of archaeological resources below the surface. Thus, the Project may have the potential to cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5. Therefore, the Project may result in a **potentially significant impact** so this topic will be further analyzed and addressed in the forthcoming EIR.				
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

5c. Response: *(Source: Project Description)*

Less than Significant Impact with Mitigation Incorporated. As mentioned in Response 5(b), above the Project proposes demolition of an existing parking lot and the Outdoor Plaza and construction of a mixed-use entertainment development. Since the proposed mixed-use entertainment development includes a subterranean parking facility at a maximum depth of 53-feet below ground surface the Project involves ground disturbing activities. While the Project site is currently developed and no known cemeteries are located on the Project site excavation as a result of the Project site may result in inadvertent findings.

Pursuant to California Health and Safety Code regulations Sections 57051 and 7054, and California Public Resources Code Section 5097.98, in the unlikely event that suspected human remains are uncovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the proper authorities and standard procedures for the respectful handling of human remains will be adhered to. Future applicants proposing development within the Project site would be required to comply with regulatory requirements for treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 as well as California Public Resource Code (PRC) Section 5097. These regulations prohibit the interference with any human remains or "cause severe irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site or sacred shrine." If human remains are found during construction, all work must halt and a qualified archaeologist must contact the city and shall ensure reasonable protection measures are taken to protect the discovery from disturbance. Implementation of mitigation measures **MM CR-1** will further ensure impacts to human remain are less than significant.

> **MM CR-1**: **Human Remains**. If human remains are discovered during ground disturbing activities, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98).

Through compliance with existing regulations and implementation of mitigation measure **CR-1**, impacts with regard to disturbing human remains, including those interred outside of dedicated cemeteries will be less than significant. Therefore, impacts are **less than significant with mitigation incorporated** so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

6a. Response: *(Source: Project Description)*

Potentially Significant Impact. As previously mentioned, the Project includes demolition of existing surface parking lot (Lot 33) and the Outdoor Plaza, and the construction of the Project site with mixed-use entertainment development that includes residential, hotel, and commercial uses. Implementation of the Project would incorporate a residential use which would result in an increase in population density. An increase in population may have the potential to increase energy consumed by the Project site. Thus, implementation of the proposed Project may have the potential to result in significant impacts. To determine the severity of Project-related impacts regarding wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation an Energy Analysis will need to be prepared. Therefore, the Project may result in a **potentially significant impact** so this topic will be further analyzed and addressed in the forthcoming EIR.

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

6b. Response: *(Source: Project Description)*

Potentially Significant Impact. The Project's compliance with state and local plans for renewable energy or energy efficiency cannot be determined without an analysis of the Project's energy consumption, which is not yet available. Thus, pending this analysis, the Project may conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Project may result in a **potentially significant impact** so this topic will be further analyzed and addressed in the forthcoming EIR.

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

7i. Response: *(Source: GP; GPUI FEIR;RMC; PSE-TR)*

Less Than Significant Impact. As outlined in the 2025 General Plan *Public Safety Element Technical Background Report* there are no known active faults that traverse the City and there are no Alquist-Priolo Fault Zones mapped within the City. As shown in *Figure CP-1: Regional Fault Zones*, the Project is located within a Seismic Hazard Zone III and is surrounded by three are active faults in the region; the San Andres fault, the San Jacinto fault and the Elsinore fault. The closest point of the San Andres fault zone is located approximately 11-miles east from the Downtown Area. The closest point of the San Jacinto fault is located approximately 7-miles east from the Downtown Area. The closest point of the Elsinore fault is located approximately 13-miles southwest

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

from the Downtown Area. (PSE-TR, p. 4). Pursuant to Policy PS-1.1 of the 2025 General Plan ensures that all new residential and mixed-use development in the City abides by the most recently adopted City and state seismic and geotechnical requirements. As such, any future development facilitated by the Project would require a geotechnical investigation and compliance with the California Building Code (CBC), which would address the risk of fault rupture. Therefore, development facilitated by the Project would be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Riverside Municipal Code (RMC) Section 16.08.185 for any property identified as being subject to the potential of liquefaction or within a seismic hazard zone disclosing the site-specific risk of fault rupture at a future development site. (GPUI FEIR, p. 3.15-12). Applicants of future development shall be required to prepare and comply with all the recommendations outlined in the geotechnical investigation report. Additionally, the Project would be required to comply with all CBC regulations. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of known earthquake fault. Therefore, impacts are **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

ii. Strong seismic ground shaking?	☐	☐	☒	☐

7ii. Response: *(Source: GP; GPUI FEIR;RMC; PSE-TR)*

Less Than Significant Impact. As discussed above in Response 7(a)(i), the Project site is located approximately 7 to 13 miles away from fault zones. Southern California is a seismically active region furthermore, three active faults were identified within the region. The previously identified faults (the San Andres fault, the San Jacinto fault and the Elsinore fault) were estimated with having the potential to produce earthquakes between 8.3-6.0 magnitude. Due to the proximity to the faults and the potential earthquake magnitude that these faults could produce, the Project site may be exposed to seismic ground shaking. (PSE-TR, p. 4). Thus, applicants of future development will be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Policy PS-1.1 of the 2025 General Plan and the RMC Section16.08.185. (GPUI FEIR, p. 3.15-12). Future development shall be required to comply with all the recommendations outlined in the geotechnical investigation report and all applicable RMC standards. Additionally, the Project would be required to comply with all CBC regulations. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, impacts are **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

7iii. Response: *(Source: GP;GP PEIR; GPUI FEIR;RMC; PSE-TR)*

Less Than Significant Impact. Liquefaction is a process whereby strong seismic ground shaking causes sediment layers that are saturated with groundwater to lose solidity and behave as a liquid. Factors influencing a site's potential for liquefaction include area seismicity, on-site soil type and consistency, and groundwater level. When a load such as a structure is placed on ground that is subject to liquefaction, ground failure can result in the structure sinking and soil being displaced. Ground failure can take on many forms, including flow failures, lateral spreading, lowering of the ground surface, ground settlement, loss of bearing strength, ground fissures, and sand boils. (GPUI FEIR, p. 3.15-13). Based on the Phase 1 General Plan Update *Public Safety Element Technical Background Report Figure CPC-2: Liquefaction Zone,* the Project site is located in an area designated with a low potential for liquefaction (PSE -TR, p. 7). Within a low liquefaction zone, groundwater depths are greater than 30 feet (GP PEIR, p. 5.6-6) According to the City of Riverside 2025 General Plan EIR *Figure 5.6-4, Soils* the Project site is composed of Buren soils. Low liquefaction. Nevertheless, applicants of future development will be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Policy PS-1.1 of the 2025 General Plan and the RMC Section16.08.185. (GPUI FEIR, p. 3.15-12). The recommendations outlined in the geotechnical

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
investigation report and all applicable RMC standards and CBC regulations would be incorporated in the future site design. Thus, the Project is not anticipated to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, through adherence with the CBC regulations and the recommendations from the Geotechnical Investigations impacts are **less than significant** so this topic will not be further analyzed and addressed further in the forthcoming EIR.				
iv. Landslides?	☐	☐	☐	☒
7iv. Response: *(Source: GPUI FEIR)* **No Impact.** Landslides occur when the stability of a slope changes from a stable to an unstable condition. The stability of a slope is affected by the following primary factors: inclination, material type, moisture content, orientation of layering, and vegetative cover. (GPUI FEIR, p. 3.15-15). However, the Project site is located in an urbanized area with generally flat topography and is not located near any slopes. Thus, the Project site is not located in an area prone to landslides. Because the site is relatively flat and not close to significant slopes, the potential for earthquake-induced landslides to occur at the site is considered very low. Thus, the Project is not anticipated to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
7b. Response: *(Source: GPUI FEIR; RMC)* **Less Than Significant Impact.** As previously discussed in Response 7(a)(iv) above, the Project site is flat. However, erosion and loss of topsoil could occur as a result of Project construction. As such, the applicants of future development on the Project site will be required to comply with the State and federal requirements regarding the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The applicants of future development on the Project site will also be required to comply with the National Pollutant Discharge Elimination System (NPDES) regulations. Additionally, with the erosion control standards for which all development activity must comply (Title 18), the Grading Code (Title 17) requires the implementation of measures designed to minimize soil erosion (RMC). Thus, through compliance with state and federal requirements as well as with Titles 18 and 17 the Project would not result in substantial soil erosion or loss of topsoil. Therefore, impacts would be a **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
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?	☐	☐	☒	☐
7c. Response: *(Source: GP; GPUI FEIR; RMC; PSE-TR)* **Less Than Significant Impact.** The Project site is located in an urbanized area and the general topography of the subject site is flat. The Project site is currently developed as the Riverside Convention Center, the Outdoor Plaza and Lot 33. As stated in Response 7(a)(iv) above, the Project site is not located in an area prone to landslides. As stated in Response 7(a)(iii) above, the Project site is located in an area with low liquefaction potential. The City is situated north of the Peninsular Ranges and south of the Transverse Range, with the San Bernardino Mountains to the north and the San Jacinto Mountains to the east. Elevations in the City range from approximately				

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

700 feet above mean sea level near the Santa Ana River to almost 1,400 feet above mean sea level west of La Sierra Avenue. Land within the City is mostly flat and generally underlain with subsurface deposits dating from the Mesozoic period, consisting of granite, adamellite, Mesozoic granitic rock, granodiorite, and Mesozoic basic intrusive rock. (GPUI FEIR, p. 3.15-6).

Lateral spreading is the lateral displacement of surficial blocks of sediment because of liquefaction in a subsurface layer. Lateral Spreading can occur on sites with gently sloping (1 percent or more) ground, as found on the Project site. Soil type and groundwater depth vary across the City, but it is assumed that the risk of lateral spreading is highest near the Santa Ana River and along arroyos and watercourses, areas where the risk for liquefaction is higher than it is in the rest of the City. (GPUI FEIR, p. 3.15-16). Congruent with the Project site's liquefaction potential lateral spreading is considered low.

As discussed above, the Project site is located in an urbanized area that is not prone to landslides, lateral spreading, flow failure, and loss of bearings. Nonetheless, applicants of future development shall prepare a geotechnical investigation prior to issuance of permits pursuant to Policy PS-1.1 of the 2025 General Plan and the RMC Section16.08.185. (GPUI FEIR, p. 3.15-12). The recommendations outlined in the geotechnical investigation report would be incorporated in future development. These recommendations typically include general standards of care related to site preparation, unsuitable soil removal, over-excavation, backfill placement, compaction, and structural design.

Because the Project site is not located on a geologic unit or soil that is unstable, or that would become unstable, and applicants of future development shall prepare and adhere to recommendations of a geotechnical investigation report, implementation of the Project would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

7d. Response: *(Source: GP PEIR; GPUI FEIR; RMC; PSE-TR)*

Less Than Significant Impact. The City is underlain by soils with a high shrink-swell potential in various locations. (GPUI FEIR, p. 3.15-14). The soil type underlying the Project site is Buren fine sandy loam which has a moderate shrink-swell potential (GP PEIR, pp. 5.6-8-5.6-9). Furthermore, the Project site is not identified as having high shrink-swell potential per the 2025 General Plan *Figure 5.6-5 Soils With High Shrink-Swell Potential* (GP PEIR, p. 5.6-13) As part of the construction permitting process, reflected in the Municipal Code Section 18.090.050, a geotechnical investigation shall be prepared. Future development's design and construction shall comply with the recommendations outlined in the Geotechnical Reports. Thus, through compliance with the recommendations of the Geotechnical Investigation report, applicable provisions of the City's Subdivision Code Title 18, and the CBC with regard to expansive soils, the Project would not create substantial direct or indirect risks to life or property. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	☐	☐	☐	☒

7e. Response: *(Source: Project Description)*

No Impact. As previously mentioned in Response 7(c), the Project site has been previously developed located within an urbanized area. Thus, future development at the Project site will connect to and be served by existing sewer infrastructure. The Project does not propose the use of a septic system. Thus, 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 is not applicable to the proposed Project. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR**.**

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

7f. Response: *(Source: Project Description)*

Potential Significant Impact. The Project site has been previously developed however, the Project does propose the demolition of the existing surface parking lot (Lot 33) and Outdoor Plaza and construction of a mixed-use entertainment development in its place. The proposed mixed use entertainment development includes a subterranean parking facility at a maximum depth of 53-feet below ground surface the Project involves ground disturbing activities. Therefore, construction of the Project could result in accidental discovery of archaeological resources below the surface. Thus, the Project may have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, the Project may result in a **potentially significant impact** so this topic will be further analyzed and addressed in the forthcoming EIR.

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

8a. Response: *(Source: Project Description)*

Potentially Significant Impact. The Project includes demolition of existing surface parking lot (Lot 33) and the Outdoor Plaza, to facilitate construction of the mixed-use entertainment Project. Implementation of the Project would incorporate residential use which would result in an increase in population density. This increased density may have the potential to increase greenhouse gas emissions above SCAQMD thresholds. As such, a Greenhouse Gas Analysis will be prepared. The Greenhouse Gas Analysis will address the GHG generated from the proposed construction and operation activities using the CalEEMod software. Thus, the Project may have the potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the Project may result in a **potentially significant** impact so this topic will be further analyzed and addressed in the forthcoming EIR.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

8b. Response: *(Source: Project Description)*

Potentially Significant Impact. As discussed in Response 8(a) above, the Project may have the potential to increase GHG emissions to levels that may impact the environment. The preparation of the Greenhouse Gas Analysis will determine the Project's operational GHG emissions and whether those emissions exceed applicable GHG plans, policies, or regulations. Thus, the proposed Project may have the potential to conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases Therefore, the Project may result in a **potentially significant** impact so topic will be further analyzed and addressed in the forthcoming EIR.

9. HAZARDS & HAZARDOUS MATERIALS Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

9a. Response: *(Source: CCR; CFR; GPUI FEIR; HMBP; RMC)*

Less Than Significant Impact. The routine transport, use, and disposal of hazardous materials can result in potential hazards to the public through accidental release. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities.

Demolition and Construction

The Project entails demolition of the existing Lot 33 and the Outdoor Plaza and construction of mixed-use entertainment development in its place. Construction and demolition of the Project site would involve the transport of fuels, lubricants, and various other liquids for operation of construction equipment. These materials will be transported to the Project site by equipment service trucks. In addition, workers will commute to the Project via private vehicles and will operate construction vehicles and equipment on public streets. Hence, the potential exists for direct impacts to human health and the environment from accidental spills of small amounts of hazardous materials during Project construction through the transport, use, and disposal of construction-related hazardous materials such as fuels, lubricants, and solvents. However, several federal and state agencies prescribe strict regulations for the safe transportation of hazardous materials. Hazardous material transport, storage and response to upsets or accidents are primarily subject to federal regulation by the United States DOT Office of Hazardous Materials Safety in accordance with Title 49 Part 171-180 of the CFR. Title 49 Part 171-180 regulates the safe transportation of hazardous materials and appropriate documentation for all hazardous waste that is transported is required. OSHA protects workers from being killed or seriously harmed at work, specifically 29 CFR §§1910 and 1926 address the handling of toxic materials. Cal OSHA, under 8 CCR §§337-340, specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings. Management of Hazardous Waste, under CCR Title 22 Division 4.5, establishes permits for the storage and disposal of hazardous material that cannot be disposed of in landfills. The California Hazardous Waste Control Law, under Chapter 6.95 of the Health and Safety Code, describes strict regulations for the safe transportation and storage of hazardous materials. Compliance with all applicable laws and regulations will reduce potential impacts associated with routine transport, use, or disposal of hazardous materials.

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

The transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion. Further, it is possible that licensed vendors may bring some hazardous materials to and from the Project site as a result of the proposed Project. However, appropriate documentation for all hazardous waste that is transported in connection with specific Project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the CHSC. In addition, future users would be required to comply with all applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to the United States Department of Transportation (DOT) Office of Hazardous Materials Safety Title 49 of the CFR, and implemented by Title 13 of the CCR which prescribes strict regulations for the safe transportation of hazardous materials. Compliance with the applicable federal and state laws related to the transportation of hazardous materials, would reduce the likelihood and severity of accidents during transit.

Operation

Residential uses have a limited use of potentially hazardous materials during their operations (typical materials include household cleaners and household waste). As such, generation of hazardous materials for residential units would be low. Non-residential uses allowable as identified by RMC Title 19, *Table 19.150.020.A-Permitted Uses*, pose a minor potential for household hazardous products to be stored or transported to the site during operation. However, any hazardous materials utilized during operation would not be manufactured at the Project site. All uses would be required comply with the regulations, standards, and guidelines established by the Environmental Protection Agency (EPA), the State and City of Riverside related to storage, use, and disposal of hazardous materials. Additionally, both Federal and State governments require all businesses that handle more than a specified number of hazardous materials to submit a business plan to regulating agency. Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted; and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. (GPUI FEIR, pp. 3.15-17 – 3.15-18).

Additionally, the City's Municipal Code Chapter 9.48 – Unified Hazardous Materials Program, requires any business that utilizes, stores, and or handles a hazardous materials to submit a Hazardous Material Business Plan (HMBP) (RMC). Should any implementing use utilize, store, and or handle a hazardous material as part of operations, they will be required to submit a HMBP.

Thus, because the Project would be required to comply with all applicable federal and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials, it would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

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?	☐	☐	☒	☐

9b. Response: *(Source: CCR; CFR; GPUI FEIR; RMC)*

Less than Significant Impact. All tenants of the proposed buildings are not yet known at this time. As such, there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be stored and transported during construction and operation but, these

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
hazardous materials would not be manufactured at the Project site and would only be stored short-term before transport. And transportation of such materials would be required to comply with Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the CHSC in addition to all applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to the United States Department of Transportation (DOT) Office of Hazardous Materials Safety Title 49 of the CFR, and implemented by Title 13 of the CCR as stated above. Should there be a need for short-term storage of hazardous materials, these materials are required to be stored in designated areas designed to prevent accidental release to the environment. The California Fire Code (CFC) requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Compliance with all applicable federal and state laws related to the storage of hazardous materials would maximize containment and provide for prompt and effective clean-up if an accidental release occurs. As mentioned in Response 9(a) above, Project construction and demolition of the Project site would involve the transport of fuels, lubricants, and various other liquids for operation of construction equipment. Thus, Project construction activities would occur in accordance with all applicable local standards adopted by the City of Riverside, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code. (GPUI FEIR, p.3.15-17 -3.15-18). Adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials and with the safety procedures mandated by applicable federal, state, and local laws and regulations. Project conformance with existing local, state, and federal regulations pertaining to the release of hazardous materials would ensure that potential to 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 would be low. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
9c. Response: *(Source: GE)* **Less Than Significant Impact.** The schools nearest the Project site are: Longfellow Elementary located approximately 0.89 miles southwest of the Project site, and Bryant Elementary School located 0.50 miles northeast of the Project site. As such, there are no existing or proposed schools within one-quarter mile of the Project site. Thus, given the distance to the nearest school and compliance with existing federal and state regulations, the Project site would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 the public or the environment?	☐	☐	☐	☒

9d. Response: *(Source: DTSC)*

No Impact. The Project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.25 (DTSC). The nearest hazardous material site is Alark Hard Chrome and is categorized as an active Federal Superfund Site located at 2777 Main St approximately 0.45 miles from the Project site. The soil at the site was contaminated as a result of spills, drips, and possible discharge of plating bath solutions. Thus, the Project would not result in a significant hazard to the public or the environment. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

9e. Response: *(Source: ALUC-A; GE)*

Less Than Significant Impact. The Project site is not located within any airport influence area. The nearest airport is Flabob Airport located approximately 1.8 miles from the Project site. According to *Figure Map FL-1, Map of Flabob Airport* of the Riverside County Airport Land Use Commission Compatibility Plans, the Project site lies outside of the land use compatibility zone boundaries of the Flabob Airport. (ALUC-A, p. 3-21). Because the Project site is located outside an airport land use plan area, then the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

9f. Response: *(Source: GP; LHMP, RMC, PSE-TR)*

Less Than Significant Impact. The Project site is located off of Market Street, Fifth Street, Third Street and Orange Street. Market Street has been identified by the *Public Safety Element Figure CP-8: Evacuation Routes* as a Minor/Principal Arterial road for evacuation. (PSE -TR, p. 38). The proposed Project will be required to comply with the City's Local Hazard Mitigation Plan adopted July 30, 2018[2] (LHMP). This plan provides the planned response to extraordinary emergency situations associated with natural disasters, national security emergencies, and technological incidents affecting the City. Construction activities will be generally confined within the Project site. Any construction activities that may temporarily restrict vehicular traffic will be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures in accordance with the City's LHMP.

[2] In 2022 the City of Riverside began to update their Local Hazard Mitigation Plan at this time City has not adopted the 2023 Local Hazard Mitigation Plan. However, future development would be required to comply with the City's latest Local Hazard Mitigation Plan.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
All local roadways would remain open during Project construction and operation. Hence, the Project would not result in closures of local roadways that may have an effect on emergency response or evacuation plans in the vicinity of the Project site. Further, construction activities occurring within the Project site would comply with all conditions, including grading permit conditions regarding fire access, and would not restrict access for emergency vehicles responding to incidents on the site or in the surrounding area. During operation, the Project site will be accessible via the driveways that serve the existing Marriot Hotel on Market Street and Fifth Street. Additionally, the design of Project access and internal circulation routes, as well as the size and location of fire suppression facilities (e.g., hydrants and sprinklers), would be subject to City standards and conditions of approval. The City Fire Department would also review the proposed development plans prior to Project approval to ensure that adequate emergency access and on-site circulation are provided. Thus, implementation of the proposed Project would not impair or physically interfere with an emergency response plan or evacuation plan. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐
9g. Response: *(Source: CALFIRE; GP)* **Less Than Significant Impact.** As further discussed in *Section 20, Wildfire,* the Project site is not identified as being in a very high fire hazard severity zone according to the Fire Hazard Severity Zones in the State Responsibility Area Map produced by the California Department of Forestry and Fire Protection (CALFIRE). Additionally, the Project site is not located within the City's moderate, high, or very high hazard rating area (GP, p. PS-30). As such, the Project site will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
10. HYDROLOGY AND WATER QUALITY Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
10a. Response: *(Source: DSP, RIV-WQMP, RMC)* **Less Than Significant Impact.** The Santa Ana Regional Water Quality Control Board (SARWQCB) sets water quality standards for all ground and surface waters within the region including the City of Riverside. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). ***Construction*** Potential threats to surface and ground water quality may occur with construction activities associated with future implementing projects - short-term grading and construction activities include discharges of construction-related sediment and hazardous materials (e.g., fuels). To ensure that construction activities do not impair water quality of downstream receiving waters when the total land disturbance area is greater than 1 acre, future applicants proposing development within the Project site will be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) permit for construction activities (i.e., Construction General Permit) which requires preparation of an effective Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Practitioner (QSP) and implemented onsite by a certified Qualified SWPPP Developer (QSD),				

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

with annual reporting and monitoring requirements and enforcement by the RWQCB. The SWPPP addresses on-site areas of land disturbance by listing Best Management Practices (BMPs) for erosion and sediment control to minimize to the extent practicable the release of construction-related stormwater and non-stormwater discharges into off-site areas and storm drains. Said BMPs are expected to include silt fencing, gravel bags, stockpile covers, stabilized entrance/exit, secondary containment around hazardous materials, temporary sediment basins, and housekeeping measures to keep construction materials from leaving the boundaries of the project due to rain or wind. Additionally, the SWPPP would contain a visual monitoring program, a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment (CWA Section 303(d) requires states to identify "impaired" water bodies as those which do not meet water quality standards and states are required to compile this information in a list and submit the list to the US Environmental Protection Agency (EPA) for review and approval). Therefore, through future applicant's compliance with the NPDES permit and implementation of standard required BMPs, Project impacts to surface and ground water quality would be less than significant.

Operations

Potential pollutants discharged to storm drains and downstream water bodies resulting from long-term occupancy and operations of the proposed project include litter, trash, and debris; oil, grease, metals, vehicle hydrocarbons; and sediments, nutrients, pesticides, and fertilizers from landscaped areas. The Project site is tributary to Santa Ana River Reach 3. This receiving water's list of impairments includes copper, indicator bacteria, and lead. Designated beneficial uses include agricultural supply, groundwater recharge, water contact recreation, noncontact water recreation, warm freshwater habitat, wildlife habitat, and for preservation of rare and endangered species (located approximately just over one mile downstream).

The proposed Project will include impervious and pervious surfaces in the form of commercial and residential buildings and an Outdoor Plaza located within the same footprint of the Project site that currently contains impervious surfaces (parking lot) and pervious surfaces (an Outdoor Plaza). Like the current development, the proposed Project would be required to adhere to DSP development standards that include a landscape courtyard, with a minimum are of 600 continuous square feet with a minimum dimension of 20 feet that is landscaped with greenery, statuary, water features, seating, or combination of the four. (DSP, p. 6-7). So, the potential to substantially increase surfaces that would lead to surface runoff would be low. Nevertheless, future applicants proposing development within the Project site, pursuant to SARWQCB's Water Quality Management Plan Guidance document, would be required to prepare a project-specific water quality management plan (WQMP) which is a plan for post-construction BMPs to prevent and manage stormwater quality for the life of a project during use. The Water Quality Management Plan Guidance document indicates that new development or redevelopment projects shall control stormwater runoff and the preparation of a water quality management plan is required for new development (adding 10,000 or more square feet of impervious surfaces) and significant redevelopment (adding 5,000 or more square feet of impervious surfaces) to control stormwater runoff to prevent any deterioration of water quality. (RIV-WQMP, p. 5). The Water Quality Management Plan Guidance document also indicates that implementation of Low Impact Development (LID) to site designs to infiltrate, evapotranspirate, harvest and use, or treat runoff from impervious surfaces is a sustainable approach to land development. LID focuses on stormwater management, wastewater treatment, circulation and site design. (RIV-WQMP, pp 25. -28). Per RMC Chapter 14.12.316, new development or redevelopment projects shall control stormwater runoff to prevent any deterioration of water quality that would impair subsequent or competing uses of the water. This section further indicates that the City Engineer shall identify the BMPs that may be implemented to prevent such deterioration and shall identify the manner of implementation. Finally, each future implementing development would be required to go through the City's development review process to ensure each project adheres to the above regulations as per existing conditions. Compliance with said regulations would ensure that development within the Project site does not violate any water quality standards or discharge requirements, or

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
otherwise substantially degrade water quality. Further, the Project's implementation would not alter these existing policies or requirements in any way. Through compliance with existing regulations that address operational-phase discharges, Project impacts to surface and ground waters will be **less than significant.** This topic will not be analyzed in the EIR.				
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
10b. Response: *(Source: RPU-UWMP)* **Less than Significant Impact.** The Project site does not use on-site groundwater or support groundwater wells on-site. The Project site is located in the Riverside South Basin groundwater basin and would be served by the Riverside Public Utilities (RPU) for domestic water supply. According to RPU's 2020 Urban Water Management Plan, RPU's water supply from 2016 to 2020 included groundwater from the Riverside South Basin and it is projected to overdraft (RPU-UWMP, p. 6-7). The Riverside South Basin is adjudicated, and the Western San Bernardino Adjudication Judgement established entitlements and groundwater obligations for the San Bernardino Valley Municipal Water District (Valley District) and Western Municipal Water District (WMWD) (RPU-UWMP, pp. 6-2- 6-3). The Western San Bernardino Adjudication Judgement also obligates Valley District and WMWD to replenish Riverside South's groundwater if water levels are over drafted above allowance (RPU-UWMP, p. 6-2). Natural infiltration capacity is not currently present as the Project site because it is currently developed, largely with impervious surfaces. As discussed in Response 10(a) above, the proposed Project will increase the pervious areas of the Project site. However, implementation of the proposed Project would not impede groundwater recharge because it does not currently provide for groundwater recharge of stormwater at the site. Therefore, the Project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, impacts are **less than significant** so this topic will not be further analyzed or addressed in the forthcoming EIR.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	☐	☐	☒	☐
10ci Response: *(Source: Project Description)* **Less than Significant Impact.** The Project site is in an urbanized area that has been fully developed. Features such as a stream or river are not located near or at the Project site. In its existing condition, the Project site is covered in mostly impervious surfaces and an outdoor landscaped plaza as shown on **Figure 4**.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
As such the proposed Project would not result in a substantial change in drainage patterns of the Project site that would cause substantial erosion or siltation, nor substantially increase the rate or amount of surface runoff in a manner that would result erosion or siltation on or offsite. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	☐	☐	☒	☐
10cii Response: *(Source: Project Description)* **Less Than Significant Impact.** As discussed in Response 10(a) and 10(ci) above, the potential for the Project to substantially increase surfaces that would lead to surface runoff would be low and implementing projects would be required to capture all on-site flows with drainage facilities pursuant to City's standards and would be addressed in the future implementing Water Quality Management Plan required by the City's National Pollutant Discharge Elimination System (NPDES) requirements. Additionally, the internal storm drain facilities will be sized to capture the onsite storm water runoff volumes from the Project. Because regulations are already in place to address the additional surface water generated which require no hydromodification from the Project, as well as since the site is located within a fully developed condition, any additional storm water from the site will be incorporated into the existing underground storm drain system which is sized to accommodate the Project already, the Project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site. Thus, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
10ciii Response: *(Source: Project Description)* **Less Than Significant Impact.** As indicated in Response 10(a), 10(ci), and 10(cii) above, the Project will not result in an excess of surface runoff, since future implementing developments would be required to treat and capture all on-site runoff pursuant to NPDES requirements. Overall, the future implementing developments within the Project will incorporate an internal underground drainage system that would connect to existing storm drains within the public right-of-way along Market Street, Fifth Street, Orange Street, or Third Street. Any sources of pollution that would be generated from the Project will be treated via underground water quality treatment facilities or bioswales or other means as approved by the City once site-specific Water Quality Management Plans are prepared in the future. However, because regulations are already in place to treat the sources of potential pollution from the site, and since there is already existing storm drain infrastructure located at the frontage of the site for the new internal storm drain lines to connect to, the Project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Thus, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Impede or redirect flood flows?	☐	☐	☒	☐

10civ Response: *(Source: FEMA, RMC)*

Less Than Significant Impact. According to the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) (Panel No. 06065C0726G, effective Aug. 28, 2008), the Project site is located in "Zone X – Other Flood Areas." These are defined as "areas of 0.2 percent annual chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood." The City of Riverside Municipal Code Section 16.18 does not include Zone X (as shown on said FIRM map) as a Special Flood Hazard Area (SFHA), and it is therefore not subject to the City's requirements pertaining to SFHAs. The property is not required to pay flood insurance within this flood zone designation.

Future implementing development within the Project site will incorporate an internal drainage system that would connect to existing storm drains within the public right-of-way along Market Street, Fifth Street, Orange Street, or Third Street. Also, the Project will not alter the course of a stream or river. Thus, the Project is not expected to impede or redirect flood flows because of such actions. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

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

10d. Response: *(Source: FEMA; GP, RMC)*

Less Than Significant Impact. The Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) (Panel No. 06065C0726G, effective Aug. 28, 2008), shows the Project site is located in "Zone X – Other Flood Areas." This is defined as "areas of 0.2 percent annual chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood." The City of Riverside Municipal Code Section 16.18 does not include Zone X (as shown on said FIRM map) as a Special Flood Hazard Area (SFHA), and it is therefore not subject to the City's requirements pertaining to SFHAs. The property is not required to pay flood insurance within this flood zone designation.

The Project will not substantially change the overall drainage pattern of the Project site. In the event of inundation, the Project would not risk a pollutant release any more than the risk from surrounding properties.

The Project is not located within an identified seiche zone. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Because of the distance from the proposed Project site to surrounding large water bodies and reservoirs, inundation due to seiche is unlikely.

The Project is not located within an identified tsunami zone. Tsunamis are a type of earthquake-induced flooding that is produced by large-scale sudden disturbances of the sea floor and can result in an increased wave height and a destructive wave surge into low-lying coastal areas. Because tsunamis occur in coastal areas and the project is located approximately 40 miles east of the Pacific Ocean, inundation due to tsunami is unlikely.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
As such, the Project would not be exposed to the release of pollutants due to project inundation from flood, tsunami, or seiche. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
10e. Response: *(Source: SARBP, RPU-UWMP)* **Less Than Significant Impact.** The local water quality control plan (Basin Plan) outlines the regulatory programs of the RWQCB, which address ground and surface water quality. (SARBP) Said programs include requirements from various NPDES permits including the Construction General Permit and municipal separate storm sewer system (MS4) permit for post-construction BMPs at new and re-development sites. Because the future applicants proposing development within the Project site would prepare and implement a SWPPP during construction and provide the required post-construction storm water quality treatment, no conflicts or obstructions with the Basin Plan are anticipated. Under California's Sustainable Groundwater Management Act of 2014 (SGMA), adjudicated basins, like the Riverside South Basin, have specific provisions that differ from other groundwater basins. Adjudicated basins do not need to develop a Groundwater Sustainability Plan (GSP) under SGMA, but they must still manage groundwater sustainably according to their adjudication decrees, the Western San Bernardino Adjudication Judgement, and provide annual reports to the California Department of Water Resources (DWR). The Project's land uses are consistent with the existing land uses and are unlikely to result in activities that would conflict with the forthcoming GSP. Thus, the Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
11. LAND USE AND PLANNING Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
11a. Response: *(Source: Project Description)* **No Impact.** The Project site is currently developed with the Convention Center, Outdoor Plaza and surface parking Lot 33. The Project site is surrounded by residential uses to the north; commercial and hotel uses to the east; commercial uses to the south; and parking and residential uses to the west. Further, the Project does not propose any new roadways that could physically divide the existing community. Thus, the Project would not divide an established community. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

11b. Response: *(Source: DSP; GP)*

Less Than Significant Impact. The Project would not conflict with any land use plan, policy, or regulation primarily because the Project is consistent with the City's zoning and General Plan land use designations. The Project site is in the Downtown area of the City and is within the Downtown Specific Plan (DSP). Specifically, the Project site is located within the Raincross District of the DSP. The DSP is consistent with the 2025 General Plan and Zoning Code. (DSP, p. 3-5). Where land use regulations and/or development standards of the Zoning Code are inconsistent with DSP, the standards and regulations of the DSP shall prevail. (DSP, p. 3-5). Because the DSP is consistent with both the 2025 General Plan and Zoning Code, the analysis below only analyzed the proposed Project's consistency with the DSP.

The DSP identified seven goals and their associated policies to aid the framework to realize the DSP vision. These goals include Land Use Goals (Goal LU-1), Housing Goals (Goal H-1), Economic Development Goals (ED-1), Urban Design Goals (Goal UD-1), Historic Preservation Goals (Goal HP-1), Circulation Goals (Goal C-1), and Parking Goals (Goal P-1). (DSP, pp. 3-5 - 3-11). Appendix B contains the DSP Consistency Table, which includes all goals and policies and consistency with the proposed Project.

As shown in Appendix B, the proposed Project is consistent with the DSP, which is consistent with the 2025 General Plan and the Municipal Code. Therefore, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**, and this topic will not be further analyzed in the EIR.

12. MINERAL RESOURCES Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the residents of the state?	☐	☐	☐	☒

12a. Response: *(Source: GP PEIR)*

No Impact. Portions of the City are located in Mineral Resource Zone (MRZ)-2 and MRZ-4. MRZ-2 is defined as Mineral Resource Zone where adequate information indicates that significant mineral deposits are present or there is a high likelihood for their presence and development should be controlled. MRZ-4 is defined as a Mineral Resource Zone where there is insufficient data to assign any other MRZ designation. (GP PEIR, p. 5.10-4).

The Project site is in MRZ-4. As such, there is no sufficient data to determine the existence of mineral resources on-site. Additionally, the Project site is developed and is fully paved. Moreover, the Project does not involve extraction of mineral resources. No mineral resources have been identified on the Project site and there is no historical use of the site or surrounding area for mineral extraction purposes. The Project site is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the 2025 General Plan, or other land use plan.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
For the reasons stated above, the Project is not anticipated 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. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
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?	☐	☐	☐	☒
12b. Response: *(Source: GP PEIR)* **No Impact.** As mentioned in Response 12(a), above, the Project site is in an area with no known mineral resources of local or state importance. Since the Project does not propose mineral extraction at the currently developed site, implementation of proposed Project would not result in the loss of available resources. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
13. NOISE Would the project 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?	☒	☐	☐	☐
13a. Response: *(Source: GP)* **Potentially Significant Impact.** The proposed Project will include demolition of the existing surface parking lot (Lot 33) and the Outdoor Plaza to develop the proposed Project. An increase in construction and operational noise levels associated with construction and traffic related noise levels due to proposed residential and commercial uses may occur. This may result in the Project generating 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. Therefore, the Project may result in a **potentially significant** impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
13b. Response: *(Source: Project Description)* **Potentially Significant Impact.** Groundborne vibration and groundborne noise levels are not typically associated with operational activities from residential and commercial uses. However, demolition, excavation and construction activities associated may result in vibration depending on the equipment and methods employed. Thus, the Project may generate excessive groundborne vibration or groundborne noise levels. Therefore, the Project may result in a **potentially significant** impact so this topic will be further analyzed and addressed in the forthcoming EIR.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	☐	☐	☒	☐

13c. Response: *(Source: ALUC-A)*

Less than Significant Impact. As mentioned in Response 9(c) above, the Project site is not located within any airport influence area. The nearest airport is Flabob Airport located approximately 1.8 miles from the Project site. According to *Figure Map FL-1, Map of Flabob Airport* of the Riverside County Airport Land Use Commission Compatibility Plans, the Project site lies outside of the land use compatibility zone boundaries of the Flabob Airport. (ALUC-A, p. 3-21). Because the Project site is located outside the land use plan area for Flabob Airport, the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

14. POPULATION AND HOUSING Would the project:				
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)?	☐	☐	☒	☐

14a. Response: *(Source: DOF;DSP; GP PEIR; HE-TBR)*

Less Than Significant Impact. The Project site is developed and contains the Riverside Convention Center, Outdoor Plaza, and surface parking (Lot 33). The Project proposes a maximum of 168 residential units and a maximum of 376 rooms through hotel development, as well as other commercial uses. The City of Riverside Phase I General Plan Update Housing Element Technical Background report found that the City's household size increased from 3.26 to 3.43 people per dwelling unit from 2011 to 2019. (HE-TBR, p. 11) However, it should be noted the 2024 Department of Finance's (DOF) the City's household generation factor is 3.06 people per dwelling unit (DOF). As a conservative approach, a range was calculated using the 2024 DOF factor of 3.06 people per dwelling unit and the City of Riverside Phase I General Plan Update Housing Element Technical Background factor of 3.43 people per dwelling unit; thus, the Project may introduce between approximately 514[3] to 576[4] additional residents to the City of Riverside. The Project's uses are consistent with the Downtown Specific Plan (DSP) designation, which allows for high-density residential and mixed-use development within the Raincross District. The DSP allows a maximum dwelling unit density of 60 units per acre and can be increased with the approval of conditional use permit (DSP, p. 6-10). The Project's residential density results in approximately 16 dwelling units per acre, which is well below the maximum allowable density. As such, the Project does not induce unplanned growth. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, impacts would be **less than significant** and this topic will not be further analyzed and addressed in the forthcoming EIR.

3. Based on household generation factor of 3.06 people per dwelling unit and the proposed Project maximum 168 total residential units, the Project may generate 514 additional residents (3.06 x 168 = 514).

4. Based on household generation factor of 3.33 people per dwelling unit and the proposed Project maximum 168 total residential units, the Project may generate 576 additional residents (3.43 x 168 = 576).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

14b. Response: *(Source: Project Description)*

No Impact. The Project site is developed and contains the Riverside Convention Center, Outdoor Plaza, and surface parking (Lot 33). Hence, no housing units would be displaced because of Project construction. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, **no impacts** are anticipated and this topic will not be further analyzed and addressed in the forthcoming EIR.

15. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☒	☐	☐	☐

15a. Response: *(Source: GE; PSE-TR)*

Potentially Significant Impact. The City of Riverside Fire Department (RFD) has 14 fire stations throughout the City of Riverside (PSE-TR, p. 16). The Project site is located approximately 0.32 miles north of the City of Riverside Fire Department Downtown Station No. 1 located at 3401 University Avenue and approximately 1.64 miles west of the Eastside Station No. 4 at 1496 W Linden Street #1436 (GE). -the Project proposes to introduce residential and non-residential uses to the Project site. Based on the maximum residential area proposed of 168 units, the maximum anticipated number of new residents would be 576.[5] The Project's proposed development may result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, the Project may result in **potentially significant impacts** so this topic will be further analyzed and addressed in the forthcoming EIR.

b. Police protection?	☒	☐	☐	☐

15b. Response: *(Source: GE;GP; GPUI FEIR)*

Potentially Significant Impact. Police protection services for the Project area are provided by the Riverside Police Department (RPD) through four (4) RPD stations (GPUI FEIR, p. 3.10-4). The nearest police station to the Project site is located approximately half a mile to the north at 4102 Orange Street (GE). As mentioned in Response 15(a) above the Project proposes to introduce residential and non-residential uses to the Project site. Based on the maximum residential area proposed of 168 units the anticipated number of new residents would be 576[6]. Based on the maximum non-residential area proposed and the distinct uses, the number of employees may

[5] The Housing Element household generation factor of 3.33 which equates to a maximum of 560 resident was utilized as a conservative approach.

[6] The Housing Element household generation factor of 3.33 which equates to a maximum of 560 resident was utilized as a conservative approach.

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

be approximately 1,746[7]. Thus, the Project is anticipated to generate a total of approximately 2,322 people onsite. Thus, the Project may result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, the Project may result in **potentially significant impacts** so this topic will be further analyzed and addressed in the forthcoming EIR.

c. Schools?	☐	☐	☒	☐

15c. Response: *(Source: RUSD-A; RUSD-B)*

Less than Significant Impact. The proposed Project is located within the Riverside Unified School District (RUSD-A). As mentioned in Response 15(a) the Project proposes to introduce residential uses to the Project site which would result in a population increase of approximately 168 residential units. An increase in populations would result in an increase the numbers of school-aged children within RUSD. The combined student generation rate for multi-family units within RUSD as set forth in the *School Fee Justification Study 2022***,** is 0.239 students per dwelling unit. Calculations for student generation rates are shown in **Table C – Student Generation**. Based on the 168 residential units proposed the Project would generate approximately 41 new school-aged children. Based on generation rates identified in the *School Fee Justification Study 2022,* the Project is expected to generate approximately 163 students under non-residential uses and a combined total of approximately 204 students.

Table C – Student Generation

Land Use	Maximum Square Foot (SF)/Units	Student Generation Factor	Total Students[1]
Residential	168 units	0.239 per unit	41
Hotel[2]	254,918[3] SF	0.1205 per 1,000 SF	31
Office[4]	220,000 SF	0.5097 per 1,000 SF	113
Commercial Retails Uses[5]	61,981 SF	0.2979 per 1,000 SF	19
Convention Center Expansion	189,000 SF	N/A	N/A
		Total	204

Source: RUSD-B Table 16

Notes:

1. Rounded to the nearest whole number
2. Hospitality (Lodging) student generation factors were utilized
3. SF derived from conceptual maximum development envelope diagram (170,000 SF Hotel + 84,918 SF Extended Stay Hotel)
4. Commercial Offices (Standard) student generation factors were utilized
5. The Project proposes the following uses in Table A; restaurant focused retail, grocery store and fitness center under. For the purposes of this discussion a neighborhood shopping center category student generation factor was chosen to capture all proposed uses.

Since future development would result in approximately 204 additional students, future development would be required to pay development impacts fees pursuant to RMC Chapter 16.556 - school development fee. The school

[7] Number of employees were calculated using the Riverside County General Plan Appendix E, Table E-5 - Commercial Employment Factors and the proposed Project land use and associated square footage. (https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-Plan-2017-appendices-Appendix-E-2-April-2017.pdf)

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

development fee is established by the RUSD prior to the issuance of building permits. As per AB 2926 and SB 50, the school development fee is charged to developers to mitigate the impact of development on school facilities which may result from increased enrollment and is deemed to provide full and complete school facilities mitigation for impacts to school facilities. (RUSD-B, pp. 10, 19).

Additionally, the Project is consistent with the land uses envisioned in the DSP, zoning and General Plan land use designations. RUSD projections should have included the Project's land uses in their projections to plan for students and services within this area of the City.

Therefore, through compliance with City policy and payment of development impact fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

d. Parks?	☐	☐	☒	☐

15d. Response: *(Source: GE; GP; GPUI FEIR;RMC)*

Less than Significant Impact. The City has 68 public parks and open space areas encompassing more than 2,940.61 acres of City owned parkland (GPUI FEIR, p. 3.11-1). The City of Riverside has adopted a standard for developed park acreage of three (3) acres per 1,000 residents. The standard is further broken down to favor neighborhood parks, with two (2) acres of neighborhood park provided per 1,000, and one (1) acre of community park land per 1,000 persons, for a 2:1 ratio. Currently the City does not meet this standard. Based on adopted classifications and standards, neighborhood parks should be located within a one-half-mile (0.5) radius of every residence and community parks within a two-mile (2) radius. (GP, p. PR-15). The Project is located within 0.32-miles northeast of White Park which is categorized as "Special Use Facility," within 0.74 miles southwest of Fairmount Park which is categorized as a Regional Park and within 1.14 miles north east of Bobby Bonds Park which is categorized as a Community Park. (GE) The Project proposes to introduce new residential uses to the Project site. Utilizing the City's park land ratio and calculating the anticipated residents, the Project would create a demand for approximately 1.55 acres of parkland. As mentioned in the Project Description, the Project proposes an Outdoor Plaza that may be partially covered or wholly uncovered and is intended to be fully programmable for outdoor events on an intermittent basis. The Outdoor Plaza would contain flexible outdoor gathering spaces, such as an amphitheater. The Project is consistent with the land uses envisioned in the DSP, zoning and General Plan land use designations. Thus, the City's recreational budget projections should have included the Project's land uses in their projections to plan for parkland ration within this area of the City. Moreover, once specific projects are proposed, project-specific fees would be generated and paid into Local Park Development Fees per RMC Chapter 16.60 – Local Park Development Fees for their fair share contribution. Local park fees are collected by the City as part of the development review process and are used for the purpose of supporting the City's recreational budget for past and present facilities to serve the community. Thus, through integration of the Outdoor Plaza amenities and payment of Local Park Development Fees for future implementing projects, there would not be a substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Other public facilities?	☐	☐	☒	☐

15e. Response: *(Source: GPUI FEIR)*

Less than Significant Impact. The City of Riverside Public Library (RPL) consists of one Main Library and seven branch libraries. Four university and college libraries also serve the City (GPUI FIER, p. 3.10-7). The Project site is located approximately 0.28 miles southwest to the City's Main Library located at 3900 Mission Inn Avenue. The City's new main Library expanded in 2021 covering 42,000 square feet and providing more than 60,000 items. (GPUI FEIR, p. 3.10-8). While the Project proposes an increase in population the incremental increase in the use of libraries but is not expected to substantially increase the demand of these services such that construction of new or expanded facilities would be required. While there are no development impact fees that would fund the RPL system, the Project would be required to comply with GP 2025 Education Element Objective ED-5 and Policy ED-5.1, which states that the City is required help to provide ample and convenient library facilities. Compliance with these policies would ensure that the Project would not affect the City's ability to provide adequate libraries. Further, City Council may approve funds as necessary for library services. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

16. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

16a. Response: *(Source: Project Description, RMC)*

Less than Significant Impact. The Project proposes to introduce new residential and commercial uses to the area. With residential development, the Outdoor Plaza will be included as part of the Project to serve residents. However, the Project may result in an increase in the use of existing neighborhood and regional parks or other recreational facilities but it is not anticipated that substantial physical deterioration of the facility would occur or be accelerated. The City requires a park development fee to enable the acquisition and/or development and/or improvement of neighborhood and community parks to provide both passive and active recreational opportunities to the residents of the City. RMC Section 16.60 outlines the park development fees and in lieu dedication or improvements imposed on construction or replacement of nonresidential units and new dwelling units. Applicants of future development within the Project site would be required to pay said fee. With payment of the park development fee, impacts to parks would not result in physical or accelerated deterioration. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

16b. Response: *(Source: Project Description, RMC)*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Less than Significant Impact. The Project proposes a mixed-use entertainment development to the area. The Project proposes outdoor spaces and an Outdoor Plaza. The Project would bring approximately 576[8] residents to the area. There are multiple parks surrounding the Project site. Fairmount Park is approximately 0.74 miles from the Project site and is designated as a Regional Park. White Park is approximately 0.32 miles from the Project site and is designated as a Special Use Park. The Project does not include recreational facilities or require the construction of recreational facilities which might have an adverse physical effect on the environment Additionally, as describe in Response 16(a) above, future applicants would be required to pay park development fees pursuant to RMC 16.60. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
17. TRANSPORTATION Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
17a. Response: *(Source: GP, Project Description)* **Potentially Significant Impact.** The Project proposes a mixed-use entertainment development to the area which may increase traffic volumes on the surrounding roadways. While the Project is not expected to result in conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a **potentially significant** impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
17b. Response: *(Source: Project Description)* **Potentially Significant Impact.** The Project proposes a mixed-use entertainment development which may increase traffic volumes on the surrounding roadways. While the Project is not expected to result in conflicts with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a **potentially significant** impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
17c. Response: *(Source: GP; Project Description)* **Less than Significant Impact.** No sharp curves or other hazardous traffic conditions currently exist within the Project site or within the Project vicinity. As described in the Project Description above, the Project site and Project vicinity are currently fully developed. The nearby roadways that currently provide access to the Project site, Market Street, Third Street, Fifth Street, and Orange Street, are built out to their ultimate width per the City's				

[8] The Housing Element household generation factor of 3.33 which equates to a maximum of 560 resident was utilized as a conservative approach.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2025 General Plan. These same roadways will continue to provide access to the proposed Project and no improvements to these roadways are proposed or required. No internal drive aisles are proposed since the Project site includes an Outdoor Plaza and automobile parking would be provided via the proposed subterranean parking structure. Moreover, future applicants proposing development within the Project site would be required to submit final site designs that conform to City's design and safety standards. Said final site designs would be subject to review and approval by the City. Sight distance at each Project access point would be reviewed to ensure conformance with City sight distance standards at the time of preparation of final grading, landscape, and street improvement plans. As a result, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
d. Result in inadequate emergency access?	☐	☐	☒	☐
17d. Response: *(Source: PSE-TR; Project Description)* **Less Than Significant Impact.** According to the *Public Safety Element Technical Background Report,* Market Street, a north south roadway, is an arterial street that has been identified as a potential evacuation route (PSE-TR, p. 38). It is anticipated that all local roadways would remain open during Project construction and operation. Hence, the Project would not result in closures of local roadways that may influence emergency access in the vicinity of the Project site. Further, future applicants proposing development within the Project site would be required to comply with all conditions, including grading permit conditions regarding fire access, and would not restrict access for emergency vehicles responding to incidents on the site or in the surrounding area. Additionally, applicants of future implementing projects within the Project site would be required to prepare development site design plans that include Project access and internal circulation routes, as well as the size and location of fire suppression facilities (e.g., hydrants and sprinklers). These development site design plans would be subject to City standards and conditions of approval. The City Fire Department would also review the future implementing projects proposed development plans prior to Project approval to ensure that adequate emergency access and on-site circulation are provided. Thus, implementation of the proposed Project would not result in inadequate emergency access. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.				
18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☒	☐	☐	☐
18a. Response: (*Source: Project Description)* **Potentially Significant Impact.** The proposed Project may have the potential to affect tribal cultural resources. The Project proposes to demolish the existing surface parking lot (Lot 33) and Outdoor Plaza and proposes to construct a subterranean parking facility along with various commercial and residential uses. There is potential				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to unearth tribal cultural resources during construction activities that may cause a substantial adverse change in the significance of a tribal cultural resource, as 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 that is 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). Therefore, the Project may result in a **potentially significant impact** so this topic will be further analyzed and addressed in the forthcoming EIR.				
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐
18b. Response: *(Source: Project Description)* **Potentially Significant Impact.** As of July 1, 2015, AB52, signed into law in 2014, amends CEQA and establishes new requirements for tribal consultation. The law applies to all projects that have a notice of preparation or notice of negative declaration/mitigated negative declaration. It also broadly defines a new resource category of "tribal cultural resource" and establishes a more robust process for meaningful consultation between the lead agency and Native American Tribes that includes: prescribed notification and response timelines, consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures, and documentation of all consultation efforts to support CEQA findings. The City as lead agency, is required to coordinate with Native American Tribes through the AB52 consultation process. As these processes have yet to be concluded, knowledge and significance of potential tribal cultural resources, if any, has yet to be determined. Thus, the Project may cause a substantial adverse change in the significance of a tribal cultural resource determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Therefore, the Project may result in a **potentially significant impact** so this topic will be further analyzed and addressed in the forthcoming EIR.				
19. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
19a. Response: *(Source: RMC; Project Description)* **Potentially Significant Impact.** The Project site is currently developed and is currently served by the existing utilities within and around the site. The Riverside Public Utilities (RPU) provides water and electric services and the Southern California Gas provides natural gas services for the Project site, and Charter and AT&T provide				

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

telecommunications services. No utility upgrades on site are needed to serve the Project, since all of these utilities are already providing service to the site. One segment of existing offsite sewer main line located in Market Street will most likely need to be upsized to 15 inches and one segment of water line in Third Street along the Project frontage that will need to be upsized to 18 inches. The exact timing of this upgrade is not known at this time, and will be further evaluated in the forthcoming EIR.

Therefore, the Project may result in a **potentially significant** impact related to water and wastewater services so only this utility will be further analyzed and addressed in the forthcoming EIR. All other services related to water, storm drain, electrical, natural gas and telecommunications will not be addressed in the forthcoming EIR.

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

19b. Response: *(Source: GP PEIR; Project Description; WSA Letter)*

Less than Significant Impact. The Project site is located within the Riverside Public Utilities (RPU) Service Area (GP PEIR, p. 5.16-8). Water service would be provided by RPU via connections on Third Street. In order to serve this Project, upgrades to the existing water main will be upsized to an 18-inch diameter water main located between Orange Street and Market Street.

Assembly Bill 610 (AB610) effective January 1, 2002, requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, a Water Supply Assessment (WSA) must be prepared in conjunction with the land use approval process associated with a project and is required for any "project" that is subject to CEQA and meets certain criteria relative to size. Proposed development of more than 500 dwelling units require a water supply assessment by the water supplier. Since the proposed Project will facilitate the development of more than 500 dwelling units, or proposed hotel with more than 500 rooms, or a project that would demand an amount of water equivalent to , or greater, than the amount of water required by a 500 dwelling unit project, then a WSA is required. According to the *Future Water Demand Estimates for the Riverside Alive Project* letter (WSA Letter) prepared for the Project by RPU and is included as Appendix C, the net increase in water demand from the proposed Project does not meet nor exceed any of the requirements listed in Water Code section 10912(a); thus, a WSA is not required for the proposed Project. As such, the City's existing water supplies would be sufficient to support the development of the proposed Project. Therefore, impacts would be **less than significant** and this topic will not be further analyzed and addressed in the forthcoming EIR.

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?	☐	☐	☒	☐

19c. Response: *(Source: GP PEIR; Project Description; SSMP)*

Less than Significant Impact. Wastewater treatment for the Project would be provided by the City Public Works Department at the Riverside Regional Water Quality Control Plant (RRWQCP). The land uses associated with the Project are consistent with the zoning code, General Plan land use designations and the DSP. Per the Sewer System Management Plan, the RRWQCP has capacity to treat approximately 46 million gallons per day (mgd). (SSMP, p. 1) Currently, the RRWQCP receives an average daily flow of 26 mgd; therefore, the RRWQCP has a

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
remaining capacity of 20 mgd. The generation of wastewater from buildout of the Project site consistent with the DSP was accounted for in the master planning of the RRWQCP. Thus, RRWQCP has adequate capacity to serve the Project's increased demand in addition to RRWQCP's existing commitments. Therefore, the impacts would be **less than significant** and this topic will not be further analyzed and addressed in the forthcoming EIR.				
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

19d. Response: *(Source: CAL-A, CAL-B, CAL-C; GP PEIR; Project Description)*

Less Than Significant. The proposed Project includes the demolition of the existing surface parking lot and Outdoor Plaza. Anything with salvage value will be segregated and recycled. The Project may reuse crushed concrete and asphaltic concrete materials from demolition in Project construction; therefore, some solid waste from demolition will be diverted from landfills.

Construction of the Project would result in the generation of construction-related solid waste. The Project area is currently served by three landfills: Badlands Landfill, Lamb Canyon, and El Sobrante Landfill. Badlands accepts up to 5,000 tons of solid waste per day and is not anticipated to close until 2059. Lamb Canyon accepts up to 5,000 tons of solid waste per day and is not anticipated to close in 2032. El Sobrante accepts 16,054 tons of solid waste per day and is not anticipated to close in 2051. (CAL-A, CAL-B, CAL-C). The Project's contribution from construction to the disposal facilities would not exceed the capacity of any of the three landfills and is therefore negligible.

The Project proposes a mixed-use development which in its operational state would result in commercial and residential solid waste generation. The yearly in-take capacities for Badlands, Lamb Canyon, and El Sobrante Landfill are 1,825,000 tons/yr, 1,825,000 tons/yr, 5,859,710 tons/yr[9] respectively. The Project's operational solid waste contribution would represent a nominal amount of the yearly in-take capacities and therefore impacts to any of the three landfills during operation will be negligible. Athens provides solid waste collection services to the existing site and provides sustainable waste and recycling services in addition to having an extensive network of processing facilities that would manage the Project site's waste stream to include solid waste, recyclables, green waste, food waste, construction and demolition waste, and electronic waste.

Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills. Non-recyclable solid waste generated during long-term operation of the Project would be disposed of at the El Sobrante, Badlands Landfill, and/or the Lamb Canyon Landfills. All of these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume (CAL-A, CAL-B, CAL-C). Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.

Federal, state, and local statutes and regulations regarding solid waste reductions are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to

[9] Daily disposal capacity multiplied by 365 days per year.

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

develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and state programs. Additionally, the proposed Project would be required to comply with applicable practices enacted by the City under AB 341 and any other applicable local, state, and federal solid waste management regulations.

Thus, the proposed Project's estimated solid waste generation during demolition, construction, and operation will not generate solid waste in excess of State or local standards, or in excess of infrastructure capacity because estimated waste will constitute an extremely small proportion of the daily available disposal capacity of any of the landfills. Further, the proposed Project will be required to comply with all existing regulations. Therefore, impacts would be **less than significant** so this topic will not be further analyzed in the EIR.

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

19e. Response: *(Source: GP PEIR; Project Description)*

Less Than Significant. The Project would generate solid waste during construction and operation activities, thus requiring consideration of waste reduction and recycling measures. The 1989 California Integrated Waste Management Act (AB 939) requires that specific waste diversion goals be achieved for all California cities and counties, including an overall reduction in solid waste produced by 50 percent by the year 2000. In addition, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the proposed design. Additionally, AB 341 (2011) established a state goal to reduce, recycle, or compost no less than 75 percent of waste generated by the year 2020. The City is currently achieving a 60 percent diversion rate, well above AB 939 requirements. (GP PEIR, p. 5.16-18) CALGreen also requires all developments to divert 65 percent of non-hazardous construction and demolition debris for all projects and 100 percent of excavated soil and land clearing debris for all nonresidential projects. Hence, the proposed Project will be required to comply with the City's waste disposal requirements as well as CALGreen. Thus, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the impacts would be **less than significant** so this topic will not be further analyzed in the EIR.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

20a. Response: *(Source: CALFIRE; GP)*

Less Than Significant Impact. The Project site is not located in a State Responsibility Area (SRA) or in an area that is identified as being in a very high fire hazard severity zone according to the Fire Hazard Severity Zones in the SRA Map produced by the California Department of Forestry and Fire Protection (CALFIRE). Further, the City of Riverside has not designated the site as a very high, high, or moderate wildfire rating (GP, p. PS-30). As discussed in response to 9(f) above, the Project will not impair an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be **less than significant** so this topic will not be further analyzed and addressed in the forthcoming EIR.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	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?	☐	☐	☒	☐

20b. Response: *(Source: Initial Study Checklist)*

Less Than Significant Impact. As discussed in Responses 7(a)(iv) and 20(a), above, the Project site is not located within a SRA very high fire, high or moderate hazard severity zone and the Project site is generally flat with no steep slopes located on or adjacent to the affected lands that would exacerbate wildfire risk (i.e., from upslope winds). No other natural features are present on-site that would exacerbate wildfire risks. Thus, the Project would not, 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. Therefore, impacts would **be less than significant** and this topic will not be further analyzed and addressed in the forthcoming EIR.

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?	☐	☐	☐	☒

20c. Response: *(Source: Initial Study Checklist)*

No Impact. As discussed in Response 20(b), above, the Project site is generally flat with no steep slopes located on or adjacent to the landsite and the site is not located in or adjacent to a very high fire, high or moderate hazard severity zone. The Project site is fully served by existing roads and utilities. As such, the Project will not need to construct any new roads, fuel breaks, power lines or other utilities. Thus, the Project would not require the installation or maintenance of new associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.

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?	☐	☐	☐	☒

20d. Response: *(Source: Initial Study Checklist)*

No Impact. As discussed in Response 20(b), above, the Project site and surrounding lands are relatively flat and the Project site is not located in or adjacent to a very high fire, high or moderate hazard severity zone. As such, the risk of downslope or downstream flooding or landslide hazards is considered to be low to nonexistent. Thus, the Project would not expose people or structures to significant risks including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, **no impacts** are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐

21a. Response: *(Source: Initial Study Checklist)*

Potentially Significant Impact. The Project site is currently developed and is surrounded by existing development. As discussed in *Section 4 – Biological Resources* of this Initial Study, the Project site is fully developed and is not located within an area designated for nor does it contain suitable habitat for an endangered species, candidate, sensitive, or special-status species. Nonetheless, the Project would be required to comply with Mitigation Measure **MM BIO-1**, which requires a pre-construction bird survey during nesting season. Through compliance with **MM BIO-1** as described in *Section 4 – Biological Resources* of this Initial Study, the proposed Project would have less than significant impacts with mitigation incorporated on biological resources.

As discussed in *Section 5 – Cultural Resources* of this Initial Study, the Project site is located within the Downtown Specific Plan specifically within the Raincross District. Since the Raincross District is the cultural, historic, and social center of both Riverside and the region beyond, the quality of Downtown Riverside's historic buildings and the relationship between these buildings creates an historic urban fabric unparalleled in the region. While the Project is not expected to result in direct impacts to historical resources pursuant to § 15064.5, nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a potentially significant impacts related to historic resources so this topic will be further analyzed and addressed in the forthcoming EIR. Last, as discussed in *Section 18 – Tribal Cultural Resources* of this Initial Study, the Project is subject to AB52 which will be further analyzed and discussed in the forthcoming EIR.

Therefore, the Project may result in **potentially significant** impacts related to California history or prehistory.

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

21b. Response: *(Source: Initial Study Checklist)*

Potentially Significant Impact. The following topics will not be addressed in the forthcoming EIR, as they do not have the potential to result in significant impacts and will not result in cumulatively considerable impacts.

Agriculture: The Project site does not contain Prime Farmland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and does not contain Williamson Act contracts.

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

Furthermore, the City of Riverside does not contain any lands designated for forestland or timberland. Additionally, the Project site is zoned as DSP – Downtown Specific Plan, as such the Project will not convert existing agricultural or forest land to non-agricultural or non-forest use. Thus, the Project will not create cumulatively considerable impacts.

Biological Resources: The Project site is an existing developed site that does not contain suitable habitat or existing habitat. Implementation of mitigation measure **MM BIO-1** ensures Project would not result substantial impacts to biological resources. Thus, the Project will not create cumulatively considerable impacts.

Geological Resources: The Project will not result in direct or indirect substantial adverse effects, including the risk of loss, injury, or death related to geological resources. It was determined that future development will be required to prepare a Geotechnical Investigation prior to issuance of permits. Therefore, the Project would be required to comply with all recommendations outlined in geotechnical investigation report, RMC standards and CBC regulations. Thus, the Project will not create cumulative considerable impacts in relation to geological resources. It should be noted that Project proposes a subterranean parking facility thus due to proposed depth disturbance paleontological resources may be impacted. Thus, cumulative considerable impacts in relation to paleontological resources will be further analyzed and addressed in the forthcoming EIR.

Hazards and Hazardous Materials: Project construction activities would occur in accordance with all applicable local standards adopted by the City of Riverside, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code. Stormwater runoff from the site, under both construction and post-construction development conditions, would be avoided through compliance with National Pollutant Discharge Elimination System (NPDES) regulations administered by the Santa Ana Regional Water Quality Control Board (RWQCB). Thus, the Project will not create cumulatively considerable impacts.

Hydrology: The Project will not violate any water quality standards, waste discharge requirements, degrade ground water quality or result in substantial erosion or flooding. Stormwater runoff from the site, under both construction and post-construction development conditions, would be avoided through compliance with National Pollutant Discharge Elimination System (NPDES) regulations administered by the Santa Ana Regional Water Quality Control Board (RWQCB). Further, the drainage facilities would be required to be sized to capture the onsite water volumes. Future implementing development within the Project site proposed Project will incorporate an internal drainage system that would still connect to existing storm drains within the public right-of-way along Market Street, Fifth Street, Orange Street, or Third Street. Thus, the Project will not create cumulatively considerable impacts.

Land Use: The Project does not propose any changes to the existing general plan land use designation, general plan land use and urban design element or zoning designation. Additionally, the Project site has been previously developed and surrounding by development; therefore, the Project will not create cumulatively considerable impacts.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Mineral Resources: The Project site is located in MRZ-4, therefore there isn't sufficient data to determine mineral resources on-site, therefore, development of the proposed Project will not have a cumulatively considerable impact on mineral resources. Population/Housing: The Project site is located within the Downtown Specific Plan which allows for high-density residential and mixed-use development. Thus, the Project would not induce substantial unplanned growth in the area. The Project site does not currently contain residential uses and thus the Project would not displace people or housing. Therefore, the Project will not create cumulatively considerable impacts. Public Services: The Project site has been previously developed and has previously received public services from the City. While the proposed Project would increase the population the future developments would be required to pay development impact fees for schools, parks, and other facilities like libraries per the City's municipal code standards and general plan policies. Through payment of fees, the Project would result in less than significant impacts to these services. Thus, the Project will not create cumulatively considerable impacts to these services. Recreation: The proposed Project would be required to pay park development fees pursuant to City's municipal code Section 16.60 at the time of development. Through payment of said fees, the Project would result in less than significant impacts to parks. Thus, the Project will not cause cumulatively considerable impacts. Wildfire: There is no significant risk of wildfire and wildfire impacts due to the Project's location. Since the Project site has been previously developed and is located within an urbanized area, the Project site is not located on lands classified with very high fire hazard severity zone. Additionally, the Project would be required to adhere to City and CBC buildings codes and California Fire Code standards. The proposed Project will not cause cumulatively considerable impacts. The potential cumulative impacts related to the **potentially significant impacts** of the proposed Project will be addressed in the forthcoming EIR.				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

21c. Response: *(Source: Initial Study Checklist)*

Potentially Significant Impact. The Project may potentially contribute to an exceedance of SCAQMD thresholds for air quality and greenhouse gases, which may pose a threat to human health. Likewise, noise impacts associated with construction and operation of the proposed Project may impact human health and comfort. Project-specific air quality and noise will be prepared to assess these impacts. Therefore, the Project may have a **potentially significant impact** so this topic will be considered in the forthcoming EIR.

REFERENCES

ALUC-A	County of Riverside, Riverside County Airport Land Use Commission, *Riverside County Airport Land Use Compatibility Plan,* October 14, 2004. (Available at https://rcaluc.org/riverside-county-airport-land-use-compatibility-plan, accessed May13, 2024 .)
CAL-A	Cal Recycle, *SWIS Facility/Site Activity Details Badlands Sanitary Landfill (33-AA-0006*) December 18, 2020. (Available at https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367, accessed May 21, 2024.)
CAL-B	Cal Recycle, *SWIS Facility/Site Activity Details El Sobrante Landfill (33-AA-0217)* April 1, 2018. (Available at https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402, accessed May 21, 2024.)
CAL-C	Cal Recycle, *SWIS Facility/Site Activity Details Lamb Canyon Sanitary Landfill (33-AA-0007)* January 8, 2015. (Available at https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368, accessed May 21, 2024.)
CALFIRE	California Department of Forestry and Fire Protection, *Fire Hazard Severity Zones (FHSZ) Viewer (Interactive map)*, Effective April 1, 2024. (Available at https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed, May 13, 2024.)
CARB-A	California Air Resources Board, *Area Designations Maps/State and National*, revised October 2022. (Available at https://www.arb.ca.gov/desig/adm/adm.htm, accessed May 13, 2024.)
CARB-B	California Air Resources Board, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, dated May 6, 2005. (Available at http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4, accessed May 13, 2024.)
CDC	California Department of Conservation, *California Important Farmland Finder,* 2016. (Available at https://maps.conservation.ca.gov/DLRP/CIFF/, accessed May 13, 2024.)
COR GP	County of Riverside, *Riverside County General Plan,* (Available at https://planning.rctlma.org/General-Plan-Zoning/General-Plan, accessed May 14, 2024.)
DOF	State of California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2024*, May 2024. (Available at https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/, accessed May 14, 2024.)
DTSC	Department of Toxic Substances Control, EnviroStor. (Available at https://www.envirostor.dtsc.ca.gov/public/map/?global_id=33970009, accessed May 17, 2024.)
DSP	City of Riverside, *Downtown Specific Plan*, Adopted December 10, 2002. (Available at https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/spec-plans/2024/Downtown_SP.pdf, accessed May 16, 2024.)
FEMA	United Sate of Homeland Security, Federal Emergency Management Agency, *FEMA Flood Map Service Center,* August 28, 2008. (Available at https://msc.fema.gov/portal/home, accessed May 14, 2024.)
GE	Google, Inc. Google Earth Pro. Accessed May 21, 2024.

GP	City of Riverside, *General Plan 2025,* November 2007. (Available at https://riversideca.gov/cedd/planning/city-plans/general-plan-0, accessed May 16, 2024.)
GP PEIR	City of Riverside, *Recirculated Draft Program Environmental Impact Report City of General Plan 2025 Program SCH# 2004021108.* July 2007. (Available at https://riversideca.gov/cedd/planning/city-plans/general-plan-0, accessed May 10, 2024.)
GPUI FEIR	City of Riverside, Phase I General Plan Update Final Environmental Impact Report (SCH No. 2021040089), certified October 5, 2021. (Available athttps://riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach, accessed May 16, 2024.)
HE-TBR	City of Riverside, *Housing Element Technical Background Report,* adopted October 5, 2021.(Available at https://riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach, accessed August 5, 2024.)
HMBP	City of Riverside, *Hazardous Materials Business Plans.* 2016. (Available at https://riversideca.gov/fire/divisions/prevention/hazardous-materials-business-plans, accessed May 17, 2024.)
LHMP	City of Riverside, 2018 *Local Hazards Mitigation Plan* adopted July 30, 2018 (Available at https://riversideca.gov/fire/divisions/office-emergency-management/lhmp, accessed May 17, 2024.)
OHP	Office of Historic Preservation, *California Register of Historical Resources, 2023. (*Available at https://ohp.parks.ca.gov/?page_id=21238, accessed May 14, 2024.)
PSE-TR	City of Riverside, *Public Safety Element Technical Background Report,* adopted October 5, 2021.(Available at https://riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach, accessed May 16, 2024.)
RCA-A	Regional Conservation Authority. *FAQs*, 2024. (Available at https://www.wrc-rca.org/faqs/, accessed on May 24, 2024.),
RCA-B	Regional Conservation Authority. RCA MSHCP Information Map, Version 2.0. (Available at https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=2b9d4520bd5f4d35add35fb58808c1b7, accessed May 24, 2024.)
RCDG	City of Riverside, *Riverside Citywide Design Guidelines, Appendix C: Water Efficient Landscape and Irrigation Design Guidelines*, Amended January 15, 2019. (Available at https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/Citywide_Design_and_Sign_Guidelines_web%20version_Amended%2001-15-19_1.pdf, accessed May 14, 2024.)
RIV-WQMP	Santa Ana Regional Water Quality Control Board, Santa Ana Regional Water Quality Control Board. Water Quality Management Plan, a Guidance Document for the Santa Ana Region of Riverside County. October 2012. (Available at https://content.rcflood.org/downloads/NPDES/Documents/SA_WQMP/SantaAnaWQMPGuidance.pdf, accessed May 15, 2024.)
RMC	City of Riverside, *Riverside Municipal Code*, Online content updated on January 9, 2024. (available at https://library.municode.com/ca/riverside/codes/code_of_ordinances, accessed May 15, 2024.)
RPU-UWMP	Riverside Public Utilities, *2020 Urban Water Management Plan*, adopted July 1, 2021. (Available at https://riversideca.gov/utilities/about-rpu/urban-water-management-plan, accessed May 21, 2024.)

RUSD-A	Riverside Unified School District, *District Boundary Maps*, 2017-2018. (Available at https://www.riversideunified.org/departments/operations_division/planning___development/district_boundary_maps, accessed May 16, 2024.)
RUSD-B	Riverside United School District, *School Fee Justification Study*, May 19, 2022. (Available at https://www.riversideunified.org/common/pages/DisplayFile.aspx?itemId=21524100 accessed May 20, 2024.)
SARBP	State of California Water Boards, *Water Quality Control Plan- Santa Ana River Basin (8),* January 24, 1995, Updated June 2019. (Available at , https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/, accessed May 16, 2024.)
SCAQMD-A	South Coast Air Quality Management District, *2022 Air Quality Plan, Adopted December 2, 2022*. (Available at https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16, access May 10, 2024.)
SCAQMD-B	South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. (Available at http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, accessed May 10, 2024.)
SCAQMD-C	South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised July 2008. (Available at http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed May 10, 2024.)
SE	South Environmental LLC, *Biological Resources Assessment and MSHCP Consistency Analysis*, *for the Riverside Alive Project*. May 2024. (Appendix A)
SSMP	City of Riverside, *Sewer System Management Plan,* Originated July 2009 revised June 2022. (Available at https://riversideca.gov/publicworks/sites/riversideca.gov.publicworks/files/City%20of%20Riverside%20SSMP%20rev%202022%20%281%29.pdf, accessed August 5, 2024.)
TLMA	County of Riverside Transportation and Land Management Agency, *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP*). Approved June 17, 2003. (available at www.wrc-rca.org/Permit_Docs/MSHCP/MSHCP-Volume%201.pdf, accessed on May 24, 2024.)