

RIVERSIDE ALIVE

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DRAFT ENVIRONMENTAL IMPACT REPORT SCH NO. 2024100396

PREPARED FOR:



CITY OF
RIVERSIDE

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Draft Environmental Impact Report

SCH# 2024100396

Riverside Alive Project
PR-2024-001675

Lead Agency



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Initial Study
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City of Riverside, California (WEBB-A)
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List of Acronyms

Acronyms

µg/m ³	Micrograms/cubic meter
AAF	Average Annual Flow
AAM	Annual Arithmetic Mean
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
AFY	Acre-feet per year
AIRFA	American Indian Religious Freedom Act
ALMS	Automatic Load Management System
ALS	Advanced Life Support Care
AMSL	Above Mean Sea Level
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AT Plan	Active Transportation Plan
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
Bcf	Billion cubic feet
BMP	Best Management Practices
BP	Before present
BSC	California Building Standards Code
Btu	British thermal units
C	Commercial
CAA	Clean Air Act
Café	Corporate Average Fuel Economy
CalEPA	California Environmental Protection Agency
CalGreen	California Green Building Standards Code
Cal Recycle	California Department of Resources Recycling and Recovery
Caltrans	State Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CAS	Climate Adaptation Strategy
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	California Fire Code
CFCs	Chlorofluorocarbons

Acronyms

CH ₄	Methane
CHRIS	California Historical Resource Information System
CHSC	California Health and Safety Code
CII	Commercial, industrial and institutional
City	City of Riverside
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
COA	Certificate of Appropriateness
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CPUC	California Public Utilities Commission
CSD	Community Service District
CSO	Complete Streets Ordinance
CSWRCB	California State Water Resources Control Board
CRHR	California Register of Historical Resources
CRTR	Cultural Resources Technical Report
CUP	Conditional Use Permit
dB	Decibels
dBA	Decibel A (A-weighted sound level)
dBA/DD	Decibel A per each doubling of the distance
BERD	State Built Environment Resource Directory
Draft EIR	Draft Environmental Impact Report
DIF	Development Impact Fees
DNL	Day-Night Average Sound Level
DOE	Department of Energy
DOF	Department of Finance
DPM	Diesel Particulate Matter
DSP	Downtown Specific Plan
DWR	California Department of Water Resources
EE	Energy Efficient
EIC	Eastern Information Center
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EPA	Environmental Protection Agency
EPCA	The Federal Energy Policy and Conservation Act
EV	Electric Vehicle
EVCS	Electric Vehicle Charging Station
EVSE	Electrical Vehicle Supply Equipment
F	Fahrenheit
FAR	Floor Area Ratio
FEIR	Final Environmental Impact Report
FHWA	Federal Highway Administration
FRA	Federal Railroad Administration
FT	Feet

Acronyms

FTA	Federal Transit Administration
GHG	Greenhouse Gas
GIS	Geographic Information Systems
GMZ	Groundwater Management Zone
GP 2025	City of Riverside General Plan 2025
GPUl	City of Riverside Phase I General Plan Update
GPUl EIR	City of Riverside Phase I General Plan Update Environmental Impact Report
GSP	Groundwater Sustainability Plan
GWh	Gigawatt-hours
GWP	Global Warming Potential
HAPs	Hazardous Air Pollutants
HC	Hydrocarbons
HCP	Habitat Conservation Plans
HMBP	Hazardous Material Business Plan
HP	Historic Preservation Element
HVLP	High velocity-low pressure
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel of Climate Change
IS	Initial Study
IS/NOP	Initial Study Notice of Preparation
ISO	Insurance Service Office
ITE	Institute of Transportation Engineers
Lot 33	Parking Lot 33
kBTUs	Kilo-British thermal units
KWh	Kilowatt-hours
LCFS	Low Carbon Fuel Standard
LDMF	Local Development Mitigation Fee
L_{dn}	Day-Night Average Noise Level
Leq	Equivalent Sound Level
LOS	Levels of Service
LRSP	Local Roadway Safety Plan
LRTS	Long Range Transportation Study
M	Meter
MBPA	California Migratory Bird Protect Act
MBTA	Migratory Bird Treaty Act
MC	Municipal Code
MCA	Medieval Climatic Anomaly
MEP	Maximum Extent Practicable
MERV	Minimum Efficiency Reporting Value
MGD	Million Gallons Per Day
MTCO ₂ E	Metric tons of carbon dioxide equivalent
MM	Mitigation measure
MPH	Miles per hour
MPO	Metropolitan Planning Organization
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MS4	Municipal Separate Storm Sewer Systems

Acronyms

MW	Megawatt
MWD	Metropolitan Water District
MY	Model year
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NAS	National Academy of Sciences
NEPA	National Environmental Protection Act
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic and Safety Administration
NO	Nitric Oxide
NO ₂	Nitrogen Dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	Ozone
OEHHA	Office Environmental Health Hazard Assessment
OPC	California Ocean Protected Council
OPR	Governor's Office of Planning and Research
OS	Open Space
OSHA	Occupational Safety and Health Administration
PACT Plan	Pedestrian Target Safeguarding Plan, Active Transportation Plan, Complete Streets Ordinance and Trails Master Plan
Pb	Lead
PCE	Tetrachloroethylene
PDF	Project Design Features
PG&E	Pacific Gas and Electric
PM	Atmospheric Particulate Matter
PPB	Parts per billion
PPM	Parts per million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
PTS	Pedestrian Target Safeguarding Plan
PV	Photovoltaic
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RBOB	Reformulated gasoline blend stock for oxygenated blending
RCDG	Riverside Citywide Design Guidelines
RCFC & WCD	Riverside County Flood Control and Water Conservation District
RCTC	Riverside County Transportation Commission
RFD	Riverside Fire Department
RHNA	Regional Housing Needs Allocation

Acronyms

RIVCOM	Riverside County Model
RMC	Riverside Municipal Code
ROG	Reactive Organic Gases
ROW	Right-of-way
RPD	Riverside Police Department
RPL	Riverside Public Library
RPS	Renewable Portfolio Standard
RPU	Riverside Public Utilities
RPW	Riverside Public Works
RRWQCB	Riverside Regional Water Quality Control Board
RSA	Regional System of Highways and Arterials
RTA	Riverside Transit Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas and Electric
SE	South Environmental
SF	Square Feet
SH	State Highway
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SKR	Stephens' Kangaroo Rat
SLCP	Short-lived Climate pollutants
SLF	Sacred Lands File
SLM	Sound Level Meter
SO ₂	Sulfur Dioxide
SRA 23	Sauce Receptor Area 23
SRA	State Responsibility Area
SR-60	California State Route 60
SRRE	Source Reduction and Recycling Element
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflows
STC	Sound Transmission Class
SWAT	Special Weapons and Tactics
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
TAC	Technical Advisory Committee
TACs	Toxic air contaminants
TAZ	Traffic Analysis Zone
TCA	1,1,1,-trichloroethane
T-BACT	Best Available Control Technology For Toxics

Acronyms

TCR	Tribal Cultural Resource
TDM	Transportation Demand Management Regulations
TEA-21	The Transportation Equity Act for the 21 st Century
TIA	Traffic Impact Analysis
TMP	Trails Master Plan
TNM	Traffic Noise Model
TPA	Transit Priority Area
TUMF	Transportation Uniform Mitigation Fee (Western Riverside County)
USACE	United States Army Corps of Engineers
USC	United States Code
US DOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plans
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WDR	General Waste Discharge Requirements for Sanitary Sewer Systems
WMD	Water Management District
WMWD	Western Municipal Water District
WSA	Water Supply Assessment
WQMP	Water Quality Management Plan
ZE	Zero Emission
ZEV	Zero Emission Vehicles

1.0 Executive Summary

This Draft EIR is being prepared to analyze the potential environmental effects of the construction and future development of the proposed Riverside Alive Project site including all potential on- and off-site improvements. 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. For the purposes of the Draft EIR and mitigation measures, the term “Project Sponsor” refers to the party proposing development within the Project site via either an entitlement/development application or the City for City-initiated projects. All figures associated with this section start of page 1.0-10.

1.1 Project Location

The City of Riverside (City) is located 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 community of Woodcrest and El Sobrante, and to the west by the Cities of Corona and Norco as reflected on **Figure 1.0-1 – Vicinity Map**. The Project site is located within Section 23, Township 2 South and Range 5 West of the San Bernardino Baseline and Meridian, identified on the Riverside East, California USGS 7.5 Quadrangle Map as identified on **Figure 1.0-2 – USGS Topographical Map**.

The Project site comprises approximately 10 acres, located at the northeast corner of Fifth Street and Market Street, as depicted on **Figure 1.0-3 – On-Site Project Boundary Map**. The Project site consists of assessor parcel numbers (APNs) 213-111-011, 213-111-012, 213-111-014, 213-111-015, and 213-111-016; specifically located at 3637 Fifth Street, Riverside CA, 92501. The Project site is within Downtown Riverside and includes the city-owned Parking Lot 33 (Lot 33), Riverside Convention Center and Outdoor Plaza in front of the Riverside Convention Center. The Project also includes potential off-site impacts that would consist of upsizing an existing water line and a sewer line to adequately serve future Project demands. An existing water main located within Third Street would be upsized to an 18-inch diameter water main (between Orange Street and Market Street). The Project would connect to an existing 12-inch sewer line within Market Street; future Project demand may require an upsize from 11th Street to Mission Inn Avenue. All off-site impacts would be located within roadway right-of-way as reflected on **Figure 1.0-4 – Off-Site Improvement Boundary Map**.

1.2 Environmental Setting

The proposed Project consists of a fully developed site, within an urbanized area and is completely surrounded by existing development. No natural habitats are located on site. Hence, no habitat to support listed or protected species has been identified. The Project site is relatively flat with the highest elevation of approximately 860 feet above mean sea level at the southeast corner and the lowest elevation to the west at approximately 842 feet above mean sea level.

1.3 Existing General Plan Land Use and Zoning Designation

The Project site has a General Plan Land Use Designation and zoning designation of Downtown Specific Plan as reflected on **Figure 1.0-5 – General Plan Land Use Designation** and **Figure 1.0-6 – Zoning Designation**.

1.3.1 Surrounding Land Uses

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 1.0-A – Surrounding Land Uses**, for the existing land use, general plan land use, and zoning designations for the surrounding area.

Table 1.0-A – Surrounding Land Uses

Location	Existing Land Usage	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	Residential	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	Hotel and Commercial	Downtown Specific Plan	Downtown Specific Plan - Raincross District

1.4 Project Characteristics

1.4.1 Existing Site Conditions

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 as shown on **Figure 1.0-3**. 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 indoor pre-function area and 40,000 square feet of back-of-house area. The existing 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.

1.4.2 Proposed Project

Demolition

The proposed Project would include the demolition of the existing surface parking lot (Lot 33) and the existing Outdoor Plaza area. 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 1.0-B – Proposed Project Uses**. The proposed layout of all these uses is depicted on **Figure 1.0-7 – Proposed Project Layout**. The conceptual design of the Project site from the corner of Third Street and Orange Street is shown on **Figure 1.0-8 – Project Site Rendering from Third Street and Orange Street**.

Table 1.0-B – 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		
	<i>Restaurant-Focused Retail</i>		12,875
	<i>Grocery Store</i>		20,690
	<i>Fitness Center</i>		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 (see **Figure 1.0-7**, Building A). The conceptual design of the multi-family building is shown on **Figure 1.0-9 – Multi-Family Residential Concept Rendering**. The multi-family apartment building is expected to be 9 floors and approximately 95 feet tall. (see **Figure 1.0-10 – Project Site Elevation Cross Section 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 1.0-7**, Building C). The conceptual design of the full-service hotel building is shown on **Figure 1.0-11 – Full-Service Hotel Concept Rendering** and the conceptual building elevations are shown on **Figure 1.0-10** and **Figure 1.0-12 – Project Site Elevation Cross Section B**) 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 1.0-7**, Building B). The 168-room extended stay hotel would also include a small, local-serving grocery store and a fitness center on the first two levels. The conceptual design of the extended stay hotel building is shown on **Figure 1.0-13 – Extended Stay Hotel Concept Rendering** and the conceptual building elevation is shown on **Figure 1.0-12**.

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 1.0-7**, Building D). The conceptual design of the office building is shown on **Figure 1.0-14 – Office Building Concept Rendering**. The conceptual office building elevation is shown on **Figure 1.0-15 – Project Site Elevation Cross Section C**.

Commercial Retail Use

The Project proposes up to approximately 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 Buildings A, C, and D as shown on **Figure 1.0-7** and elevation cross-sections shown on **Figures 1.0-10, Figure 1.0-12, and 1.0-15**).

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 Building B on **Figure 1.0-7** and elevation on **Figure 1.0-12**).

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 Building B on **Figure 1.0-7** and elevation on **Figure 1.0-12**)

Subterranean Parking Facility

The Project includes a new 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 1.0-7, Figure 1.0-10, Figure 1.0-12 and Figure 1.0-15**).

Convention Center Expansion

The existing Riverside Convention Center is an 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 Building F on **Figure 1.0-7**). 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 (see Building E on **Figure 1.0-7**). 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. The conceptual design of the new Convention Center building is shown on **Figure 1.0-16 – Convention Center Expansion Concept Rendering**. The conceptual elevation for the new Convention Center expansion is shown on **Figure 1.0-17 – Project Site Elevation Cross Section D and E**.

New Outdoor Plaza

The Project proposes new Outdoor Plaza space depicted in green on **Figure 1.0-7**, that connects residents and visitors to the existing and proposed uses and would contain flexible outdoor gathering space. The new 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 1.0-18 – Project Site Rendering from Fifth Street**).

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 exterior lighting. Existing streetlights are located along Third Street, Fifth Street, Market Street and Orange Street within the right-of-way, no changes are anticipated.

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. See *Section 5.2 – Air Quality* for further details on construction-related assumptions evaluated within this Draft EIR.

1.4.3 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 the South Main Complete Streets Project, a separate project on Main Street from the proposed Project site to the SR-60, approximately 0.90 miles, to convert the road from 4-lanes to 2-lanes divided by a traffic median with additional parking, landscaping, and pedestrian walkways. 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 1.0-7**, 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. The proposed transportation improvements listed below modify existing two-way stop-controlled intersections with right-turn only restrictions:

- Market Street at Eleventh Street Intersection
 - Implement a right-turn-only restriction on Eleventh Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.
- Market Street at Thirteenth Street Intersection
 - Implement a right-turn-only restriction on Thirteenth Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.

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-A).

1.4.4 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.

1.4.5 Infrastructure and 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 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/Sewer

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 Third 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. However, the City Council adopted an Ordinance on July 2, 2024, repealing Chapter 16.26 of the Riverside Municipal Code. As such, natural gas may be utilized in all buildings.

1.4.6 School District

The Riverside Unified School District will serve the Project site. The Project will be responsible for impact fees assessed by the school district.

1.4.7 Off-Site Improvements

Off-site improvements are related to roadway improvements described in *Section 1.4.3* and water and sewer facility upgrades, as described above in *Section 1.4.5*, and shown on **Figure 1.0-4**.

1.4.8 Project Objectives

Per Section 15124 (b) of the State *CEQA Guidelines*, an EIR needs to include a statement of the objectives of a project which will help the City develop a reasonable range of alternatives. The Objectives need to outline the general purpose of the Project and are as follows:

1. Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown.
2. Expand the Convention Center to improve the City's ability to attract larger conferences and group meeting business and be more competitive.
3. Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.
4. Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation for Riverside residents.
5. Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers.
6. Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.
7. Place housing near existing employment center downtown to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.

1.5 Discretionary Actions and Approvals

The Draft EIR serves as an informational document for use by public agencies, the public, and decision makers. This Draft EIR discusses the impacts of development pursuant to the proposed Project and related components and analyzes Project alternatives. This Draft EIR will be used by the City of Riverside and responsible agencies in assessing impacts of the proposed Project. The following approvals and permits are required from the City of Riverside to implement the proposed future development:

- Certification of the EIR – with the determination that the EIR has been prepared in compliance with the requirements of CEQA.

At the time specific development is proposed, the City of Riverside would receive and consider entitlement applications, including, but not limited to:

- Tentative Parcel Map (TPM)/Lot Line Adjustments (LLA)/Subdivision Map
- Site Plan Review
- Conditional Use Permit – for buildings exceeding 100-feet.
- Conditional Use Permit – for establishments with alcohol sales.

Other non-discretionary actions that may be taken by the City at the staff level as part of future development applications, including, but not limited to:

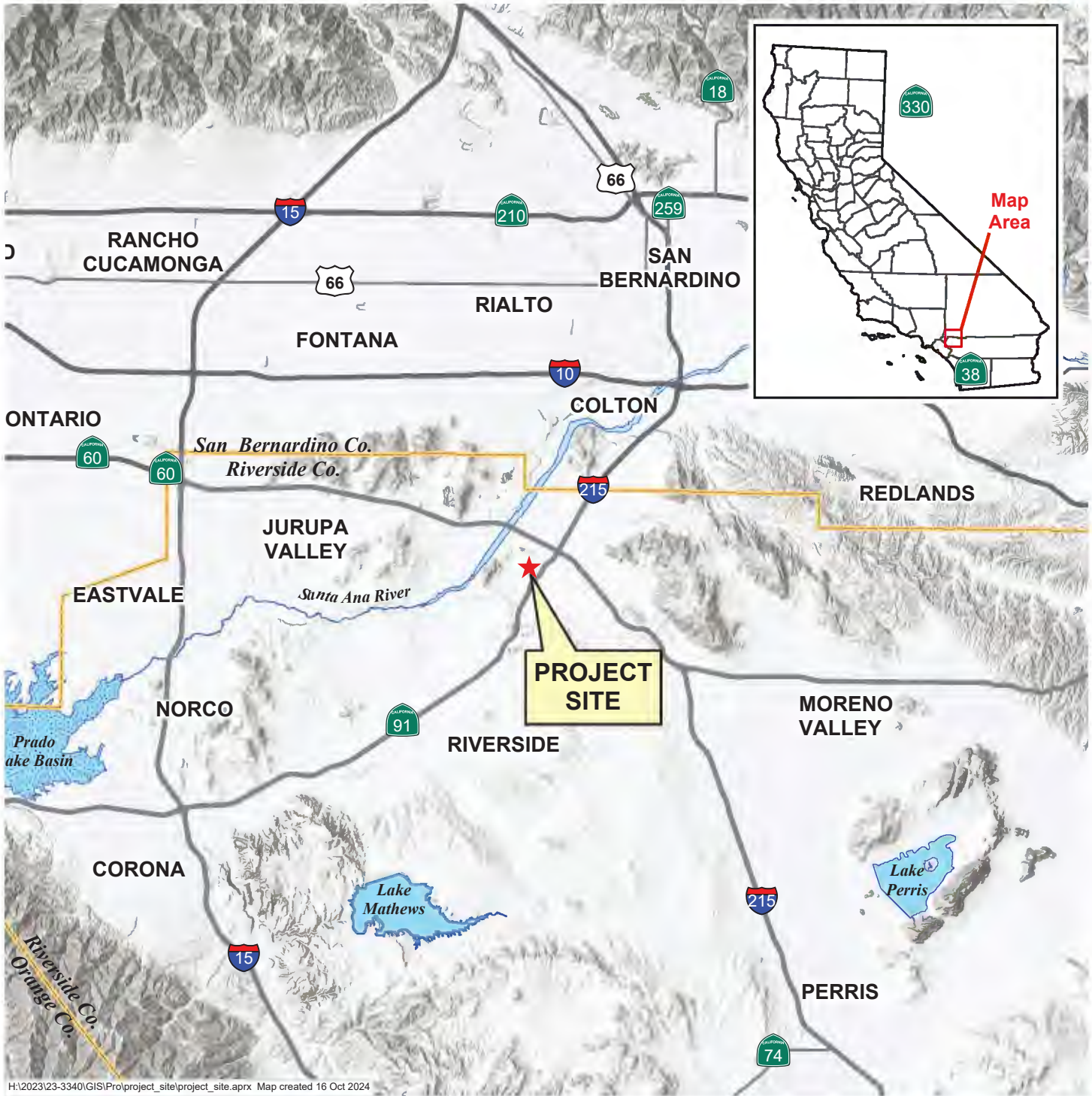
- Review and approval of all infrastructure plans, including street and utility improvements pursuant to the conditions of approval
- Review all on-site plans, including grading and on-site utilities
- Approval of a preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows

Approvals and permits that may be required by future development applications by other agencies include:

- Santa Ana Regional Water Quality Control Board (RWQCB) – A NPDES permit from the RWQCB to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened.
- South Coast Air Quality Management District (SCAQMD) – A permit to install and operate a diesel-powered emergency backup generator.

FIGURE 1.0-1

Vicinity Map



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0 10,000 20,000 Feet

Sources: Riverside County GIS, 2020.


FIGURE 1.0-2

USGS Topographic Map



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LEGEND

 Project Boundary



0 500 1,000
Feet


Sources: USGS Topographic map, Esri,
2024.

FIGURE 1.0-3

On-Site Project Boundary



LEGEND

 Project Boundary



0 175 350 Feet

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

FIGURE 1.0-4 Offsite Improvements Boundary



LEGEND

- Project Boundary
- Offsite Boundary Sewer
- Offsite Boundary Water

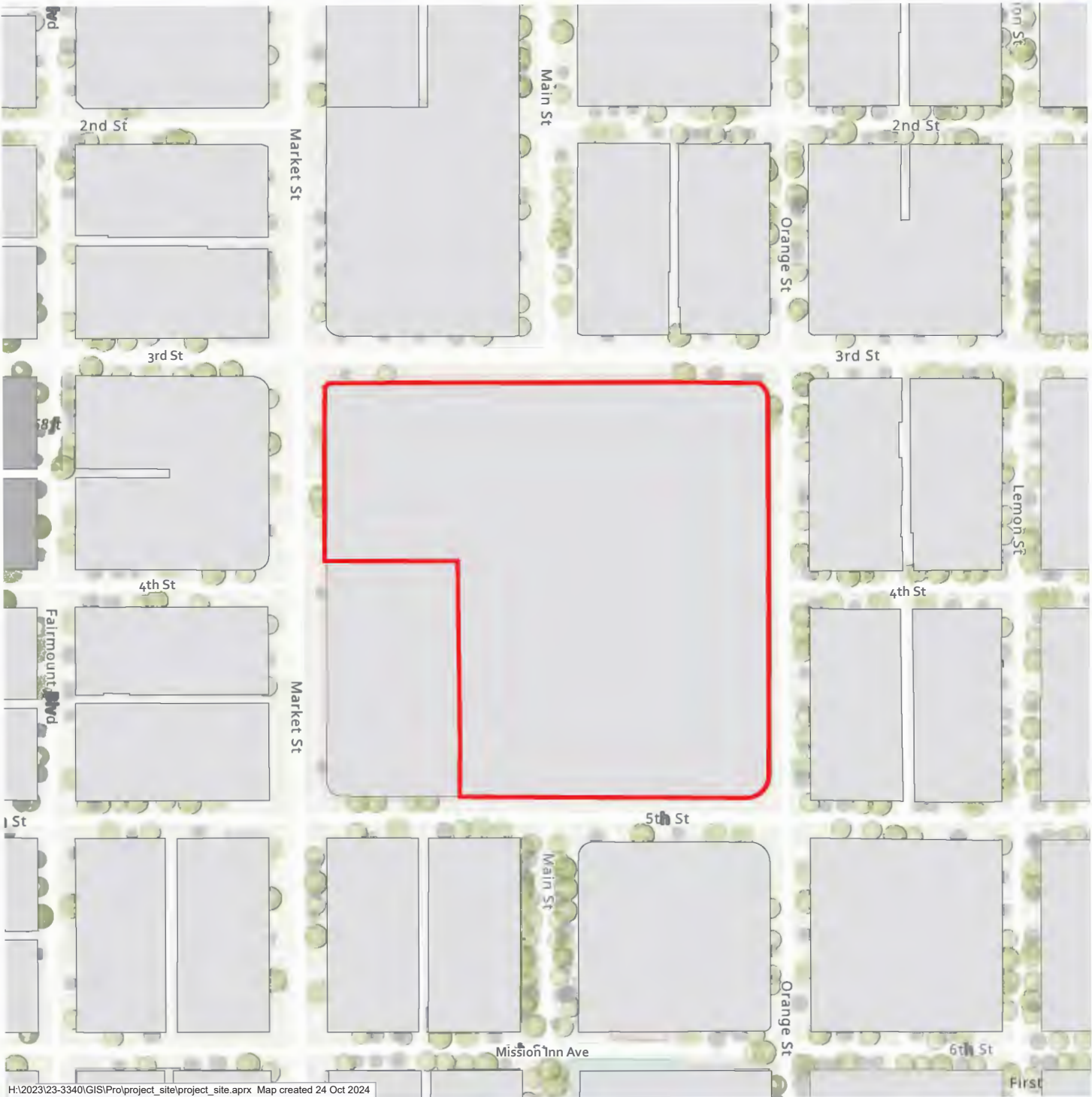


0 235 470 Feet

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

FIGURE 1.0-5

General Plan Land Use



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LEGEND

Project Boundary

City of Riverside General Plan Land Use

Downtown Specific Plan



0 130 260 feet




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

FIGURE 1.0-6

Zoning



LEGEND

-  Project Boundary
- City of Riverside Zoning**
-  Downtown Specific Plan - Raincross District
-  Downtown Specific Plan - Residential

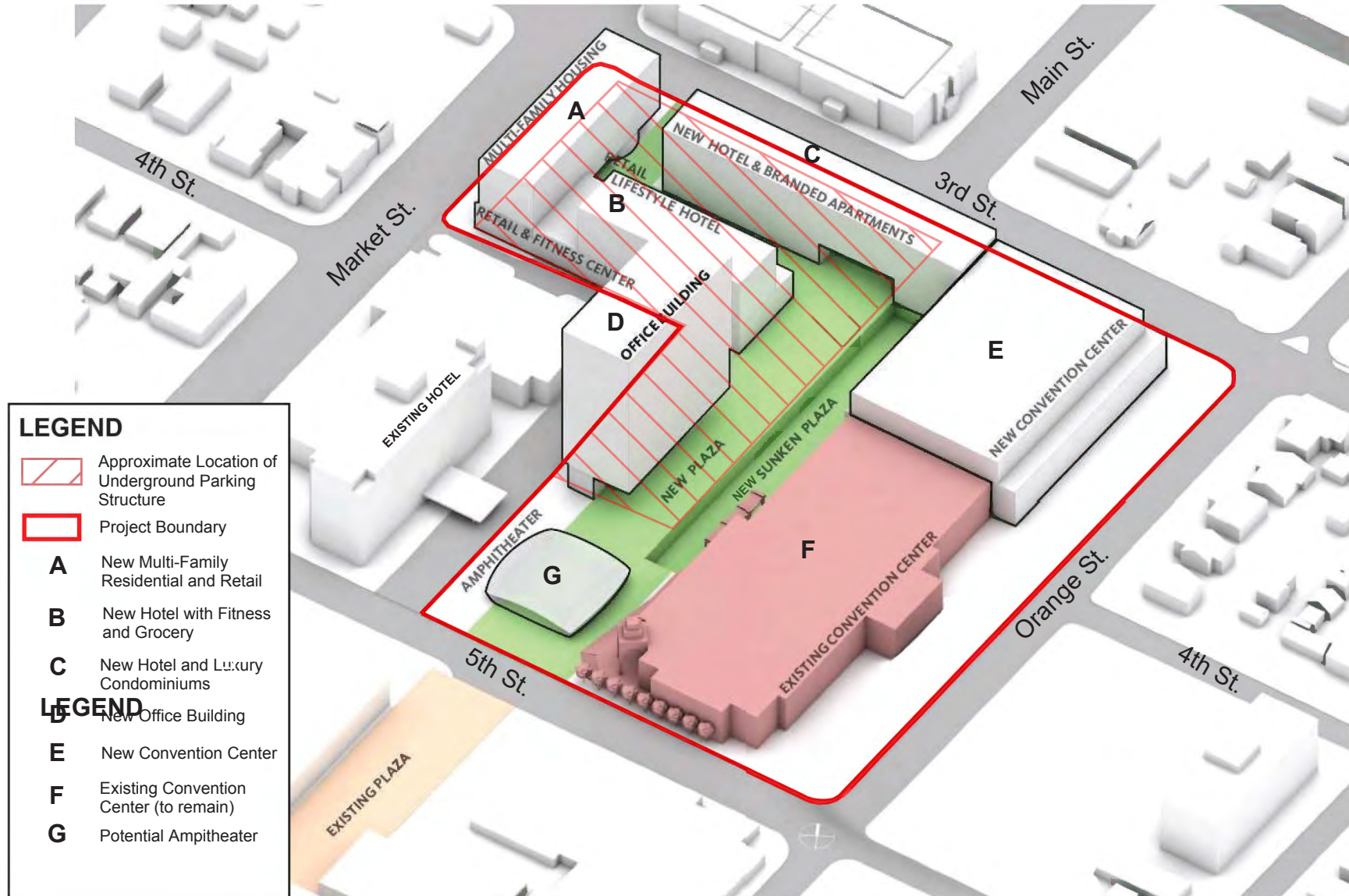


0 100 200 Feet

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

FIGURE 1.0-7

Proposed Project Layout



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Sources: City

FIGURE 1.0-8 Project Site Rendering from Third St. and Orange St.



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Sources: City

FIGURE 1.0-9

Multi-Family Residential Concept Rendering



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Sources: City

FIGURE 1.0-11

Full-Service Hotel Concept Rendering

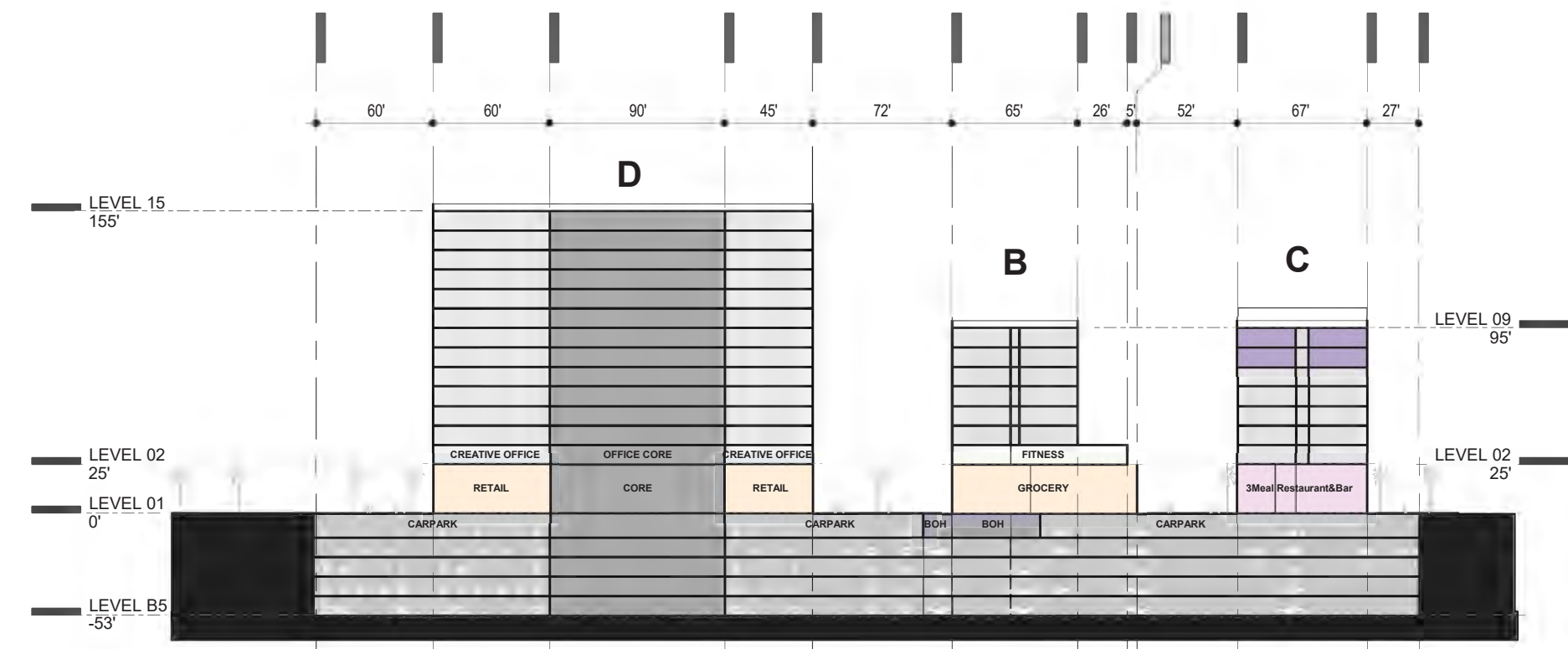


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Sources: City

FIGURE 1.0-12

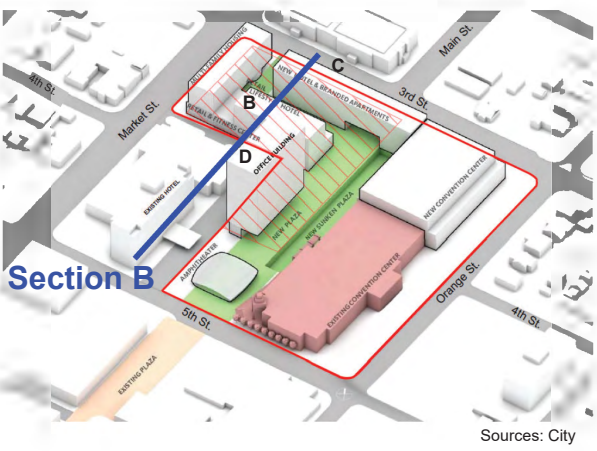
Project Site Elevation Cross Section B



LEGEND

- Approximate Location of Underground Parking Structure
- Project Boundary
- Building B** New Hotel with Fitness and Grocery
- Building C** New Hotel and Condominiums
- Building D** New Office Building

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Sources: City

FIGURE 1.0-13

Extended Stay Hotel Concept Rendering



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Sources: City

FIGURE 1.0-14

Office Building Concept Rendering

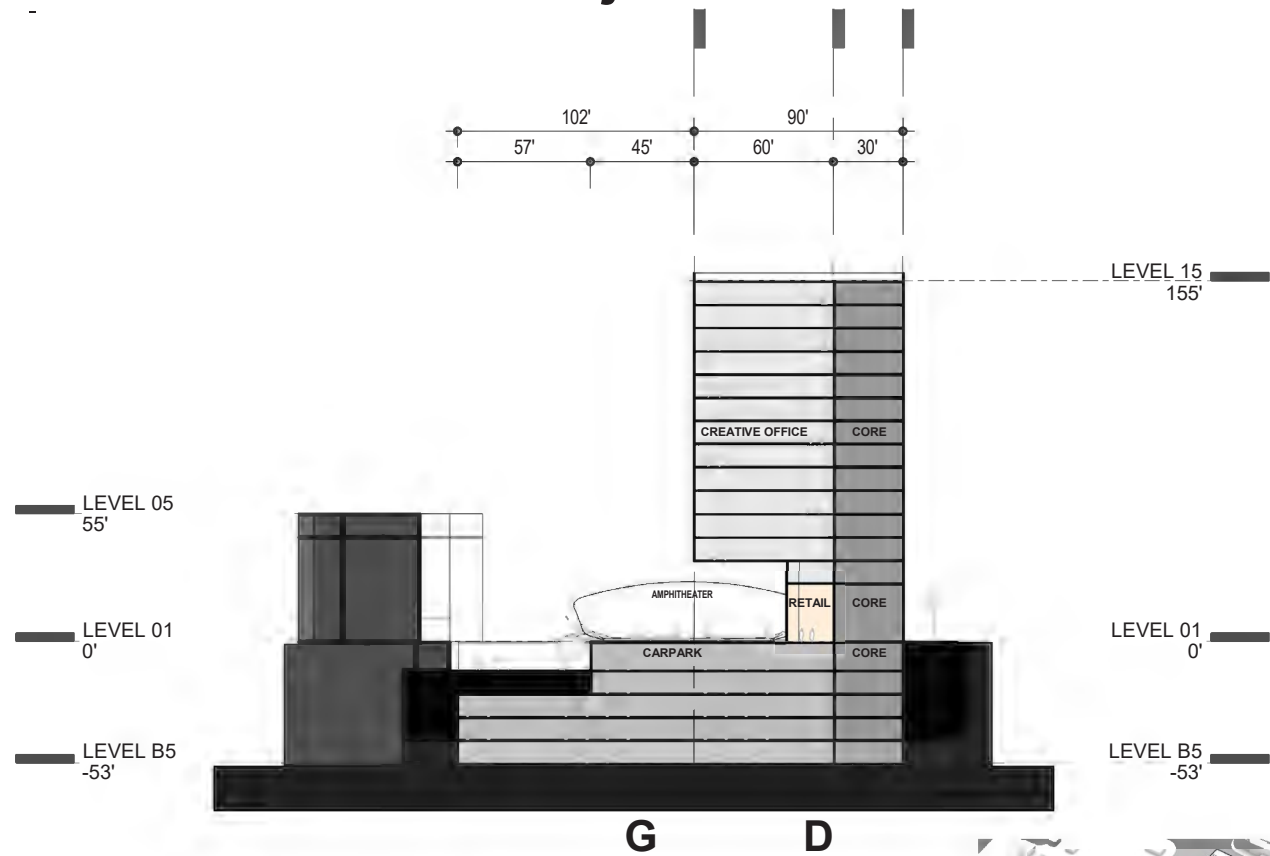


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Sources: City

FIGURE 1.0-15

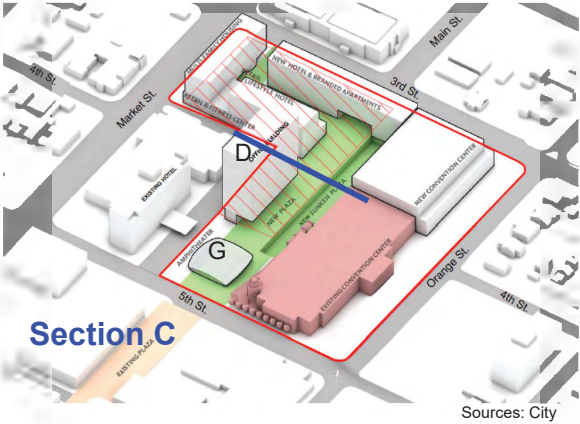
Project Site Elevation Cross Section C



LEGEND

- Approximate Location of Underground Parking Structure
- Project Boundary
- Building D** New Office Building
- Building G** Potential Amphitheater

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Sources: City

FIGURE 1.0-16

Convention Center Expansion Concept Rendering

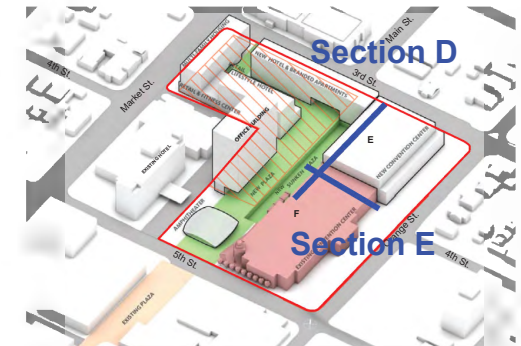
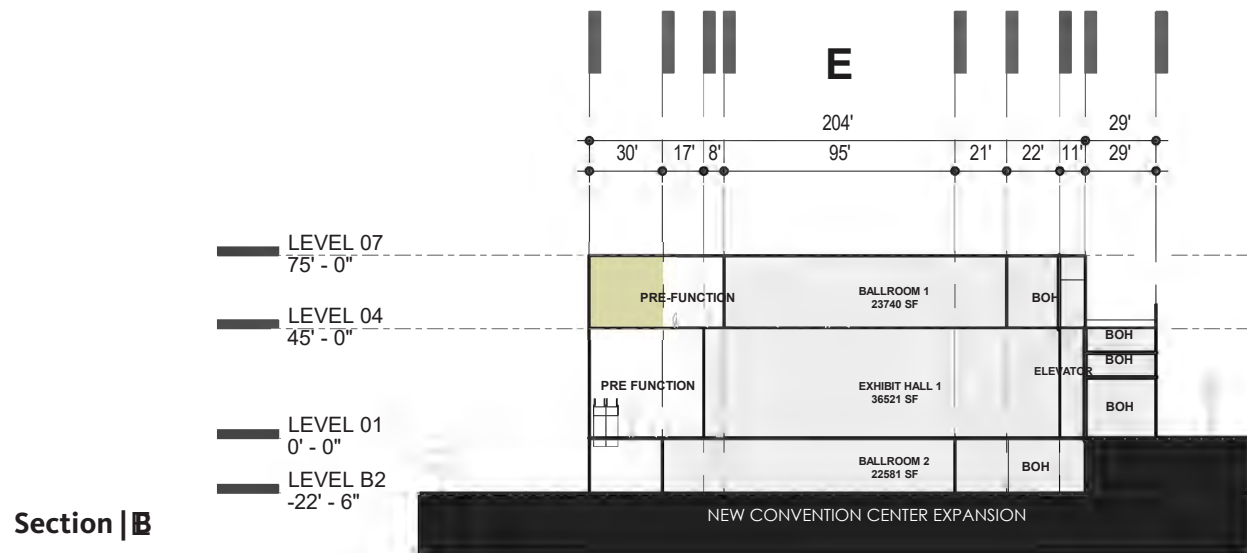
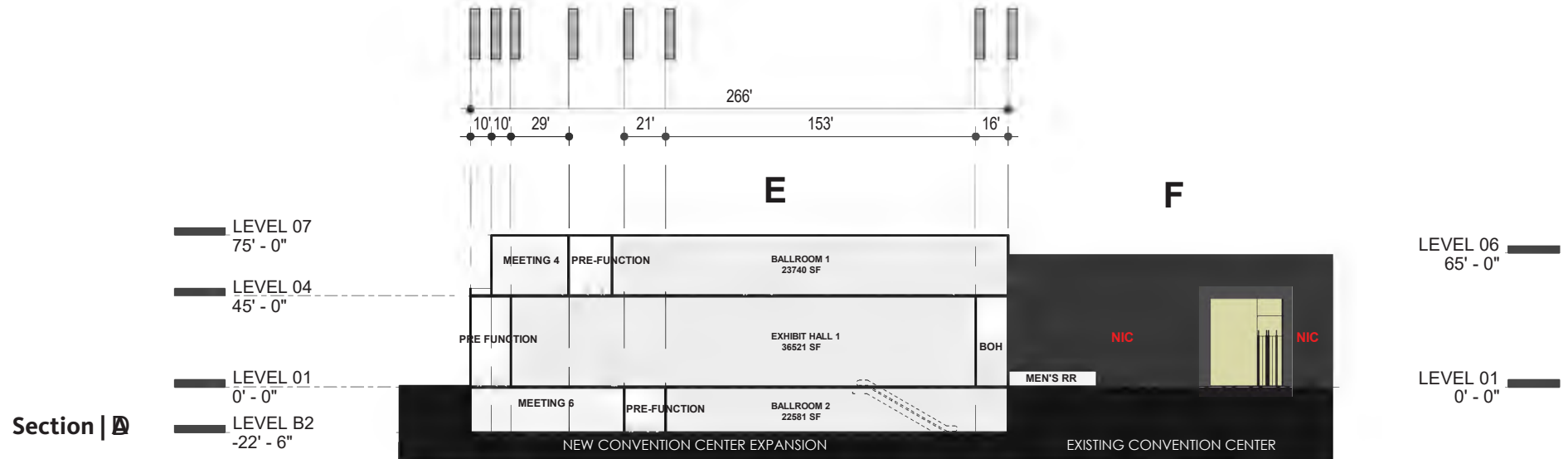


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Sources: City

FIGURE 1.0-17

Convention Center Expansion Elevation Cross Section D and E



Legend

- Approximate Location of Underground Parking Structure
- Project Boundary
- Building E New Convention Center
- Building F Existing Convention Center

FIGURE 1.0-18

Project Site Rendering from Fifth Street



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Sources: City

1.6 Areas of Controversy and Issues to be Resolved

An Initial Study (IS) was prepared by the City of Riverside Planning Department to assess the Project's potential to result in significant environmental impacts. A Notice of Preparation (NOP), which included the Initial Study, was circulated to 49 responsible agencies and interested parties. A notice advising of the availability of the NOP was posted by the Riverside County Clerk from October 9, 2024. The NOP was posted at the California State Clearinghouse on October 9, 2024.

In accordance with Section 15082(c)(1) and Section 15083 of the *CEQA Guidelines*, a public virtual scoping meeting was held on October 23, 2024 between 6:00 p.m. – 7:00 p.m. via ZOOM. There were no attendees nor comments during the scoping meeting.

Copies of the NOP (including the Initial Study) and NOP distribution list are located in Appendix A. Copies of comments regarding the NOP received by the City of Riverside Planning Department are also included in Appendix A.

By the close of the 30-day public review period on November 8, 2024, four responses to the IS/NOP were received. Comments in response to the IS/NOP were received from the following:

- Riverside Transit Agency
- Department of Toxic Substances Control
- Native American Heritage Commission
- Californians Allied for a Responsible Economy

In accordance with Section 15123(b)(2) of the State *CEQA Guidelines*, areas of controversy known to the Lead Agency including issues raised by agencies and the public shall be identified in the EIR. Section 15123(b)(3) of the State *CEQA Guidelines* requires that an EIR identify issues to be resolved. The thresholds used to determine whether or not effects are significant are included in the "Thresholds of Significance" section for each topic discussion in this Draft EIR.

1.7 Summary of Environmental Impacts

The following table, **Table 1.0-C – Draft EIR Impact Summary Matrix**, provides a summary of impacts related to the proposed Project. The table identifies significant environmental impacts resulting from the Project pursuant to the State *CEQA Guidelines* Section 15123(b)(1).

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
IMPACT Category: Aesthetics				
Have a substantial adverse effect on a scenic vista?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
In a non-urbanized area, would the proposed Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? In an urbanized area, would the proposed Project conflict with applicable zoning and other regulations governing scenic quality?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
IMPACT Category: Air Quality				
Would the Project conflict with or obstruct implementation of the applicable air quality plan?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project 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? <i>The Project would result in significant Project and Cumulative impacts to Air Quality.</i>	MM AQ 1: Residential Commute Trip Reduction. Upon a residential dwelling unit being rented or sold, the Project Sponsor or its designee shall notify and offer to the prospective tenant, as soon as it may be done, disclosure materials describing available public transit, ridesharing and non-motorized commuting opportunities available in the vicinity of the Project. Such information shall be transmitted no later than the finalization of a rental contract, lease, or purchase agreement. A draft of this disclosure shall be submitted to the City of Riverside Planning Division for review prior to the	Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	issuance of the certificate of occupancy.			
	MM AQ 2: Non-Residential Commute Trip Reduction. Prior to occupancy, the Project Sponsor or its designee shall notify and offer to the prospective tenant, as soon as it may be done, disclosure materials describing available public transit, ridesharing and non-motorized commuting opportunities available in the vicinity of the Project site. Such information shall be transmitted no later than the finalization of a lease or purchase agreement. A draft of this disclosure shall be submitted to the City of Riverside Planning Division for review prior to the issuance of the certificate of occupancy.	Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
	MM AQ 3: Carpool/Vanpool. Prior to occupancy, the Project Sponsor or its designee shall provide designated carpool/vanpool parking in desirable locations on the Project site to encourage employees to rideshare. Plans shall be provided to the City Building and Safety Division prior to issuance of building permits.	Prior to issuance of building permits/Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
	MM AQ 4: Electric Vehicle Charging. Prior to occupancy, the Project Sponsor or its designee shall facilitate future installation of electric vehicle supply equipment in accordance with Section 5.106.5.3.2, Multiple Charging Space Requirements, of the California Green Building Standards Code Part 11 by providing excess electric vehicle (EV) charging spaces than required by the CalGreen Code in effect at the time of building permit issuance. Construction	Prior to issuance of building permits/Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	plans and specifications shall be provided to the City Building and Safety Division prior to issuance of building permits.			
	MM AQ 5: Non-Residential Bicycle Facilities. Prior to occupancy, the Project Sponsor or its designee shall provide and maintain secure bicycle parking (in excess of existing code at the time of building permit), bike lockers, and personal lockers to encourage employees to bicycle to work. Shower facilities shall be provided on plans, where feasible, and as determined in coordination with the City of Riverside Planning Division prior to issuance of a building permit.	Prior to issuance of building permits/Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
	MM AQ 6: Telecommute. The Project Sponsor or its designee shall install broadband infrastructure or other communication technologies in office uses that encourage telecommuting and working from home. The Project Sponsor or its designee shall submit documentation to the City Building and Safety Division prior to occupancy.	Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
	MM AQ 7: Unbundle Residential Parking Costs. The Project Sponsor or its designee shall provide information to the residential property owner and/or property management firm about the benefits of providing unbundled, or separate, residential parking costs from property costs for rental or condo units, which allows those who wish to purchase parking spaces to do so at an additional	Prior to occupancy	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	cost. Unbundled parking costs may decrease vehicle ownership and, therefore, result in a reduction in VMT and GHG emissions. The Project Sponsor or its designee shall submit documentation to the City Planning Division prior to occupancy.			
	MM AQ 8: Energy Efficient Appliances. here appliances are installed by Project Sponsor or its designee, Energy Star-rated appliances (or other equivalent technology) for clothes washers, dish washers, refrigerators, ceiling fans, and commercial food service equipment shall be installed. Said Energy Star-rated appliances shall be noted on the plans prior to the issuance of any building permit and verified upon final inspection.	Prior to issuance of building permits/ verified during final inspection	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
	MM AQ 9: Solar Energy Systems. The Project Sponsor or its designee shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the Project site to be installed in the future, with a specified electrical generation capacity, such as equal to the building's projected energy needs. The City Building and Safety Division shall verify sizing and location before issuance of building permits.	Prior to issuance of building permits	Project Sponsor	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
Would the project expose sensitive receptors to substantial pollutant concentration?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
IMPACT Category: Biological Resources (Mitigation Measure brought in from Initial Study)				
Would the Project 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?	MM BIO-1: Nesting Birds. 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 /72 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	No more than 3 days prior to initiation of grading	Project Sponsor / Biologist	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	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.			
Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	See MM BIO-1 above	See MM BIO-1 above	See MM BIO-1 above	Less Than Significant
IMPACT Category: Cultural Resources (Mitigation Measure MM CR 6 brought in from Initial Study)				
Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5?	MM CR 1: Consultation. Upon submittal of entitlement application and prior to the issuance of the grading permit the Project Sponsor and the City shall contact Consulting Tribes (Soboba Band of Luiseño Indians, Pechanga Band of Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians) to provide an	Upon submittal of entitlement application/ Prior to issuance of grading permit	Project Sponsor/ City Planning Department	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>electronic copy of the plans for review. Additional consultation shall occur between the City, Project Sponsor, and Consulting Tribes to discuss any proposed site design changes and review any new impacts to Tribal Cultural Resources and/or potential avoidance/preservation of the Tribal Cultural Resources on the Project site. The City and the Project Sponsor shall make all attempts to avoid and/or preserve in place as many Tribal Cultural Resources as possible that are located on the Project site if the site design and/or proposed grades should be revised.</p>			
	<p>MM CR 2: Archaeological Monitoring. Since no specific development plans have been prepared to date, the future Project Sponsor(s) will retain a qualified archaeologist to review final grading and construction plans along with geotechnical testing results to determine the depth at which native soils exist that would require archaeological monitoring. The areas to be monitored shall be provided to the Planning Department and Consulting Tribes for review prior to the issuance of a grading permit. At least 30 days prior to issuance of a grading permit for private development or before any site grading, excavation and/or initial ground disturbing activities take place, the Project Sponsor shall retain a Secretary of Interior Standards qualified archaeological monitor, with regional experience, to monitor all initial ground-disturbing activities in an effort to identify</p>	Prior to issuance of grading permit	Project Sponsor/ Archaeologist	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>any unknown archaeological resources.</p> <ol style="list-style-type: none"> 1. The Project Archaeologist, in consultation with Consulting Tribes the Project Sponsor and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and tribal monitoring activities that will occur on the Project site. Details in the plan shall include: <ol style="list-style-type: none"> a. Grading and development scheduling; b. The development of a schedule in coordination with the Project Sponsor and the Project Archaeologist for designated Tribal Monitors from the Consulting Tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project Archaeologists; c. The protocols and stipulations that the Project Sponsor, Consulting Tribes, and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered archaeological resources and Tribal Cultural Resource 			

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>deposits that shall be subject to a resource evaluation; and</p> <p>d. Avoidance, treatment and final disposition of any archaeological or Tribal Cultural Resources, sacred sites, and human remains if discovered on the Project site.</p>			
	<p>MM CR 3: Tribal Monitor. Prior to issuance of grading permit, the Project Sponsor shall engage each of the Consulting Tribe(s), choosing to monitor, regarding Tribal Monitoring. The Project Sponsor shall provide evidence to the City that they have reached an agreement with each of the Consulting Tribe(s) regarding the following:</p> <ol style="list-style-type: none"> 1. The treatment of known cultural resources; 2. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and 3. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities <p>The Project Sponsor shall provide sufficient evidence that they have made a reasonable effort to reach an agreement with the Consulting Tribes in regard to items 1-3, as listed above.</p>	Prior to issuance of grading permit	Project Sponsor	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>MM CR 4: Treatment and Disposition of Tribal Cultural Resources. In the event that Tribal Cultural Resources are inadvertently discovered during the course of grading for this Project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> 1. All work shall be halted in the area of the discovery and may be redirected to an alternate area of the Project site, based on the direction of the Project Archaeologist and Tribal Monitor(s). Work may recommence once culturally appropriate treatment has been agreed upon by the City, Project Sponsor, and Consulting Tribes. 2. Notification to City and Consulting Tribes: Within 24 hours of discovery, the City and the Consulting Tribe(s) shall be notified via email and phone by the Project Archaeologist. The Project Sponsor shall provide the City evidence of notification to Consulting Tribes. Consulting Tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 3. Inadvertent Finds Assessment: <ol style="list-style-type: none"> a. All ground disturbance activities within 100 feet of the discovered Tribal Cultural Resources shall be halted until a meeting is convened between the Project Sponsor, the Project Archaeologist, the Tribal Representative(s), and the 	In the event of discovery	Project Sponsor/ Archaeologist	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>Planning Division to discuss the significance of the find.</p> <p>b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the Planning Division, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the Tribal Cultural Resources.</p> <p>c. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.</p> <p>d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the Consulting Tribes. This may include avoidance of the cultural resources through project design, in-place preservation of Tribal Cultural</p>			

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>Resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.</p> <p>e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribes, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p> <p>4. Temporary Curation and Storage: During the course of construction, all discovered Tribal Cultural Resources that cannot be avoided and are not subject to relocation shall be temporarily curated in a secure location on site. The removal of any artifacts from the Project site will need to be approved by the Consulting Tribes and thoroughly inventoried with Tribal Monitor oversight of the process. Historical archaeological resources, which are not of Native American cultural patrimony may be stored at the offices of the Project Archaeologist.</p> <p>5. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all Tribal Cultural</p>			

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>Resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to Tribal Cultural Resources. The Project Sponsor shall relinquish the artifacts through one or more of the following methods, in order of preference, and provide the City of Riverside Community and Economic Development Department with evidence of same:</p> <ul style="list-style-type: none"> a. Preservation in Place of the Tribal Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources. b. Accommodate the process for on-site reburial of the discovered items with the Consulting Tribes. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all cataloguing and basic recordation, that has been approved by the Consulting Tribes has been completed. c. A curation agreement with an appropriate qualified repository within Riverside County that 			

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation.			
	MM CR 5: Phase IV Report. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City and Consulting Tribes documenting monitoring activities conducted by the Project Archaeologist and Tribal Monitors within 60 days of completion of ground disturbing activities. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the Project Archaeologist and Tribal Monitors. All reports produced will be submitted to the City of Riverside, the applicable California Historical Resources Information System (CHRIS)	At the completion of ground-disturbing activities	Project Sponsor/ Archaeologist	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	Information Center, and Consulting Tribes.			
	<p>MM CR 6: Human Remains. If human remains are discovered, 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). (GP Objective 23.3, CEQA). <i>This mitigation measure was identified as MM CR-1 in the Initial Study. This mitigation measure has been renumbered to MM CR 6 for purposes of inclusion in the Project’s Mitigation Monitoring and Reporting Program.</i></p>	In the event of discovery	Project Sponsor/ Archaeologist	Less Than Significant
	<p>MM CR 7: Non-Disclosure. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be asked to withhold public disclosure</p>	In the event of discovery	Project Sponsor/ Archaeologist	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.			
	<p>MM CR 8: Cultural Sensitivity Awareness.</p> <p>The Secretary of Interior qualified Project Archaeologist and Tribal Monitor(s) shall attend the pre-grading meeting with the Project Sponsor's contractors to provide a briefing regarding the potential inadvertent cultural discoveries prior to the start of construction activities. This shall include the description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. Neither Project Archaeologist nor Consulting Tribe shall be allowed to bring any samples of the cultural and archeological artifacts to this meeting. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p>	Prior to grading activities	Project Sponsor/ Archaeologist	Less Than Significant
Would the Project disturb any human remains, including those interred outside of formal cemeteries?	See MM CR 6 above	See MM CR 6 above	See MM CR 6 above	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<p>MM CR 9: Paleontological Resources Impact Mitigation Program and Paleontological (PRIMP).</p> <p>Construction activities that extend below the depth of artificial fill and below pavement may impact significant paleontological resources throughout the Project area, but especially in the area of the proposed subterranean parking structure. Therefore, prior to the issuance of grading permits for private development or any site grading, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified professional paleontologist as defined by paleontology industry standards and/or the Society of Vertebrate Paleontology guidelines. The PRIMP will include a Worker's Environmental Awareness Program training which can be done concurrently with MM CR 8 to all field personnel to describe the types of paleontological resources that may be found and the procedures to follow if any are encountered; the monitoring plan will indicate where construction monitoring should occur and the frequency of required monitoring (e.g., full-time, spot-checks, etc.); the monitoring plan will also provide details about fossil collection, analysis, and preparation for permanent curation at an approved repository; and lastly, the monitoring plan will describe the different reporting standards to be used, such as monitoring with negative findings versus monitoring resulting in fossil discoveries.</p>	Prior to issuance of grading permit	Project Sponsor/ Paleontologist	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
IMPACT Category: Energy				
Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation??	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency??	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
IMPACT Category: Greenhouse Gas Emissions				
Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? <i>The Project would result in significant Project and Cumulative impacts to Greenhouse Gas Emissions.</i>	See MM AQ 1 through MM AQ 9 above	See MM AQ 1 through MM AQ 9 above	See MM AQ 1 through MM AQ 9 above	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval.
Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
IMPACT Category: Noise				
Would the Project result in 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?	MM NOI 1: Placement Criteria for Mechanical Equipment. To ensure that noise from mechanical equipment associated with future implementing development projects on the Project site is consistent with City noise standards, prior to the issuance of the earlier of a building permit or use permit, the City shall verify that the design of the mechanical equipment meets the following criteria: (i) no more than ten (10) pieces of mechanical equipment shall be located within any 100-square	Prior to issuance of building permit	Project Sponsor	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>foot area; (ii) the noise; (ii) the noise level of each piece of equipment shall not exceed 59 dBA at three (3) feet; (iii) all mechanical equipment shall be placed a minimum of 25 feet away from any property line. The mechanical equipment installed shall not exceed a noise level of 59 dBA at 3 feet; and (iv) all mechanical equipment shall be shielded by a solid parapet wall with a minimum height equal to the height of the equipment. In the event one or more of the above criteria is not met, the Project Sponsor shall retain a noise specialist, meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5, to prepare an acoustical analysis to confirm that mechanical noise from the implementing development project not meeting the criteria set forth in this mitigation measure shall not exceed the City's noise standards. Any recommendations identified in the acoustical analysis that are necessary to meet City standards shall be incorporated into the implementing development project.</p>			
	<p>MM NOI 2: Residential Interior and Exterior Noise. Prior to issuance of a building permit for any residential building or unit, the Project Sponsor shall retain a noise specialist, meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5, to prepare an acoustical analysis to confirm that the noise insulation proposed in the final design is sufficient to achieve interior noise levels at or below 45 CNEL</p>	Prior to issuance of building permit	Project Sponsor	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	and exterior noise levels at or below 65 CNEL. Interior noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the residences, to the extent such measures are necessary, to ensure that interior noise levels are at or below 45 CNEL. Measures may include, but not be limited to, upgraded building façade elements (windows, doors, and /or exterior wall assemblies) with Sound Transmission Class (STC) rating of 35 or higher. If the interior limit can be achieved only with the windows closed, then the building design shall include mechanical ventilation that meets California Building Code requirements. Exterior noise attenuation measures, which shall be unit/structure specific, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 dBA CNEL.			
	MM NOI 3: Non-Residential Exterior Noise. Prior to issuance of a building permit or use permit for any non-residential structure or non-residential use that includes any outdoor gathering or dining areas, the Project Sponsor shall retain a noise specialist, meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5, to prepare an acoustical analysis to confirm that the noise insulation proposed in the final design is sufficient to achieve exterior noise levels at or below 65 CNEL in any outdoor gathering or dining areas. Noise attenuation measures	Prior to issuance of building permit	Project Sponsor	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	identified in said acoustical analysis shall be incorporated into the design of the non-residential area, to the extent such measures are necessary, to ensure that exterior noise levels are at or below 65 CNEL. Exterior noise attenuation measures, which shall be specific to the ultimate location of the outdoor area, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 dBA CNEL.			
Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
IMPACT Category: 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 fire protection?	MM PS 1: Fire Protection Services. During the entitlement processes when an implementing project is proposed, the Project Sponsor shall confer with RFD to determine if physical improvements, increased personnel or other types of expansion are necessary at Station 4 or Station 6 in order for the RFD to adequately serve the implementing project. The City will allocate funds collected from the Project Sponsor as part of the DIF fees expected to be in effect once implementing projects are proposed, and, if not, the Project Sponsor shall enter into a Cost Contribution Agreement with RFD to expand facilities, purchase additional equipment and/or fund adequate staffing.	During the entitlement process	Project Sponsor / City Planning Department	Less Than Significant

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
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 police protection?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
IMPACT Category: Transportation				
Would the Project conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
IMPACT Category: 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: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code Section 5020.1(k)?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	No Impact <i>Mitigation not required</i>

Table 1.0-C – Draft EIR Impact Summary Matrix

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
<p>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:</p> <p>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 Resource Code Section 5024.1; in applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?</p>	See MM CR 1 through MM CR 8 above	See MM CR 1 through MM CR 8 above	See MM CR 1 through MM CR 8 above	Less Than Significant
IMPACT Category: Utilities and Service Systems				
<p>Would the Project 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 effect?</p>	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	<p>Less Than Significant</p> <p><i>Mitigation not required</i></p>

1.8 Summary of Project Alternatives

The Project objectives allow for the analysis of reasonable alternatives to the proposed Project. A range of reasonable alternatives, both on- and off-site, that would feasibly attain most of the basic Project objectives, while avoiding or substantially lessening the significant effects of the Project, must be analyzed per State *CEQA Guidelines* Section 15126.6, which identifies the parameters within which consideration and discussion of alternatives to a proposed project should occur. Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The rationale for selecting the alternatives to be evaluated and a discussion of the “no project” alternative are also required, pursuant to Section 15126.6. This Draft EIR evaluates the following Alternatives: 1) No Project Status Quo Alternative, 2) 30-Percent Reduced Project Density/Intensity Alternative, 3) Convention Center Expansion with Hotel and Residential Uses Only (No Office or Retail) Alternative.

Table 1.0-D – Comparison of Alternatives Matrix, gives a summary of all Project alternatives considered in detail in the Draft EIR and identifies the areas of potential environmental effects per CEQA and ranks each alternative as less, same, or greater than the proposed Project with respect to each area.

Table 1.0-D – Comparison of Alternatives Matrix

Environmental Issue	Alternative 1: No Project Status Quo	Alternative 2: 30-Percent Reduced Project Density/Intensity	Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only (No Office or Retail)
Air Quality <i>Project and Cumulative</i>	Less – Alternative 1 would not require the demolition of the Outdoor Plaza or Lot 33. Additionally, since there would be no change from existing operations, no new long-term emissions would result from increased traffic or building-related energy use. Therefore, impacts related to air quality would be less than that of the proposed Project and less than significant.	Similar – Construction-related air quality impacts would be similar to the proposed Project. However, Alternative 2 would reduce long-term air quality impacts, since impacts from mobile sources correlate to the proposed building size. Alternative 2 anticipates a 30 percent reduction of mobile sources than the proposed Project. However, a 30 percent reduction would not avoid impacts resulting from VOC emissions exceeding the SCAQMD daily threshold. Therefore, under Alternative 2, air quality impacts would be similar to the proposed Project and would remain significant and unavoidable.	Less – Construction-related air quality impacts would be similar to the proposed Project. However, under Alternative 3 long-term air quality impacts resulting from mobile sources would be reduced by approximately 52 percent of the proposed Project and would be less than the SCAQMD thresholds. Air quality emissions would also be reduced as a result of the reduced building sizes in this Alternative. Therefore, under Alternative 3 air quality impacts would be less than the proposed Project and less than significant.

Table 1.0-D – Comparison of Alternatives Matrix

Environmental Issue	Alternative 1: No Project Status Quo	Alternative 2: 30-Percent Reduced Project Density/Intensity	Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only (No Office or Retail)
Greenhouse Gas Emissions <i>Project and Cumulative</i>	Less – Alternative 1 would not require the demolition of the Outdoor Plaza or Lot 33. Additionally, since there would be no change from existing operations, no new long-term emissions would result from increased traffic or building-related energy use. Therefore, impacts related to GHG emissions would be less than that of the proposed Project and less than significant.	Similar – Construction-related greenhouse gas emissions would be similar to the proposed Project. Under Alternative 2, a 30 percent reduction of mobile sources, building space, solid waste, and indoor water demand is anticipated. However, a 30 percent reduction in GHG emissions would still result in an exceedance of the 3,000 MTCO ₂ E/yr threshold. Therefore, this Alternative would have similar impacts as the Project and impacts regarding GHG emissions would remain significant and unavoidable.	Similar – Construction-related greenhouse gas emissions would be similar to the proposed Project. Alternative 3 would still result in residential development, hotel uses and convention center expansion which would still generate GHG emissions. Although Alternative 3 would result in a 52 percent reduction in mobile sources and reduced building sizes, it would still result in GHG emissions that exceed standards. Therefore, this Alternative would have similar impacts as the Project and impacts regarding GHG emissions would remain significant and unavoidable.
Environmentally Superior to Proposed Project?	No	Yes, but to a lesser degree	Yes, but to a lesser degree
Meets Most of the Project Objectives?	No <i>(0 of 7 Objectives Met)</i>	Yes, but to a lesser degree <i>(7 of 7 Objectives Met)</i>	Yes, but to a lesser degree <i>(6 of 7 Objectives Met)</i>

1.9 Environmentally Superior Alternative

State *CEQA Guidelines*, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, Alternative 1 (No Project/Status Quo) is the environmentally superior alternative because the Project site would remain in its existing condition with no change in operations and therefore no impacts to air quality or greenhouse gases. Since no new development would occur, Alternative 1 would eliminate the significant and unavoidable impacts to air quality and greenhouse gas emissions. However, none of the Project Objectives would be realized. The State CEQA Guidelines also require the identification of another environmentally superior alternative if the No Project alternative is selected as the environmentally superior alternative.

Alternative 3, the No Office or Retail uses would be considered the environmentally superior alternative.

Alternative 3 would result in less impacts related to air quality and greenhouse gas emissions because it has fewer vehicle trips compared to the proposed Project. This reduction in trips results from eliminating the office and retail uses proposed by the Project. Alternative 3 reduces air quality impacts to a less than significant level. Alternative 3 also meets six of the seven Project Objectives even though two of the objectives are met to a lesser degree than the proposed Project. Hence, Alternative 3 is the environmentally superior alternative.

2.0 Introduction

2.1 Purpose and Scope

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the California Environmental Quality Act (CEQA) to assess the potential environmental effects of the Riverside Alive Project (Project); which will introduce mixed uses to the subject property.

The basic purposes of CEQA (*CEQA Guidelines*, Section 15002) are to:

- inform governmental decision makers and the public about the potential significant environmental effects of proposed activities;
- identify the ways that environmental damage can be avoided or significantly reduced;
- prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

2.2 Authorization

This Draft EIR has been prepared by the City of Riverside (City) as “Lead Agency” in accordance with the California Environmental Quality Act (CEQA) (Pub. Res. Code Section 21000 et. seq), the Guidelines for the Implementation of the California Environmental Quality Act (State *CEQA Guidelines*) (Sections 15000–15387 of the California Code of Regulations), and the City’s *CEQA Guidelines*. The proposed Project considered in this Draft EIR is a “project,” as defined by Section 15378 of the State *CEQA Guidelines*, which states that an EIR must be prepared for any project that may have a significant impact on the environment. The City, as Lead Agency, has determined that the Project may have a significant adverse impact on the environment; therefore, preparation of an EIR was required.

2.3 Lead and Responsible Agencies

CEQA defines a “lead agency” as the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. Other agencies, e.g., South Coast Air Quality Management District (SCAQMD), which also have some authority or responsibility to issue permits for projects, are designated as “responsible agencies.” Both the lead agency and responsible agencies must consider the information contained in the EIR prior to acting upon or approving a project. The City of Riverside is the lead agency for the Project. The City’s address is:

City of Riverside – Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
Contact: Paige Montojo, Senior Planner

Discretionary actions to be considered by the City of Riverside as Lead Agency are described in *Section 3.0 - Project Description* of this Draft EIR.

Other agencies that may require approvals or permits for the Project include, but may not be limited to the following:

- Federal Agencies
 - None
- State Agencies
 - None
- Regional Agencies
 - South Coast Air Quality Management District
 - Santa Ana Regional Water Quality Control Board
- County Agencies
 - None

2.4 Project Applicant/Project Sponsor

The Project Applicant/Project Sponsor is:

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

2.5 CEQA Procedures

The EIR process typically consists of three parts: 1) the Notice of Preparation (NOP) including an Initial Study (IS) if applicable, 2) Draft Environmental Impact Report (Draft EIR), and 3) Final Environmental Impact Report (Final EIR). Pursuant to Section 15063 of the State *CEQA Guidelines*, the City prepared an Initial Study for the Project in order to determine if the Project may have a significant effect on the environment. Based upon the analysis contained within the Initial Study, the City concluded that the Project may cause potentially significant impacts and that an EIR should be prepared.

This document covers the Draft EIR stage of the EIR process. As the "Lead Agency" for the purposes of CEQA compliance, the City of Riverside has the principal responsibility for processing and approving the Project. As set forth in Section 15021 of the State *CEQA Guidelines*, as "Lead Agency", the City of Riverside also has the duty to avoid or minimize significant environmental damage where feasible. Furthermore, Section 15021(d) states that, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian." Other public agencies (i.e., Responsible and Trustee Agencies) that may use this EIR in their decision-making or permit processing, will consider the information in this EIR along with other information that may be presented during the CEQA process. In accordance with CEQA, the public agencies will be required to make findings for each environmental impact of the Project that cannot be mitigated to a less than significant level. If the Lead Agency determines the benefits of the proposed Project outweigh unavoidable significant environmental effects,

the agency will be required to adopt a Statement of Overriding Considerations stating the reasons supporting their action notwithstanding the Project's significant environmental effects.

After the public review is over for the Draft EIR, then the City will prepare the Final EIR which will include responding to any written comments received during the 45-day public review period on the Draft EIR. The Final EIR will be a separate document.

2.5.1 NOP Comment Letters

Pursuant to Section 15082 of the State *CEQA Guidelines*, the Initial Study (IS), and a Notice of Preparation (NOP) for this Draft EIR were distributed to the State Clearinghouse, responsible agencies, and other interested parties via overnight or mail delivery and recipients were requested to provide responses within the 30-day public review period. The public review period for the IS/NOP began on October 9, 2024 and ended on November 8, 2024. Additionally, a notice advising on the availability of the NOP was posted by the Riverside County Clerk on October 9, 2024.

Table 2.0-A – Written Comments Received During the NOP Comment Period below summarizes the written comments received and the issues raised. None of the comments received had the effect of changing the issue areas to be discussed in the Draft EIR. Copies of the comment letters, IS/NOP, and NOP distribution list are included in Appendix A.

Table 2.0-A – Written Comments Received During the NOP Comment Period

Commenter / Date of Letter	Summary of Comment	Location in Draft EIR (or IS) in which Comment is Addressed
Riverside Transit Agency (RTA) October 17, 2024	Acknowledges an existing active bus stop along the Project frontage at Market Street and Third Street. Recommends internal pedestrian pathways throughout the site to provide safe pedestrian connectivity to existing public transportation.	<ul style="list-style-type: none"> Section 5.8 – Traffic and Transportation
Department of Toxic Substances Control (DTSC) October 21, 2024	Recommends testing and documentation of all imported soil and fill materials for any contaminants. If buildings or other structures are to be demolished surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caul and disposed of properly.	<ul style="list-style-type: none"> Initial Study Section 9 – Hazards and Hazardous Materials
Native American Heritage Commission (NAHC) November 5, 2024	NAHC provided a standard comment letter outlining the requirements for historic resources and compliance with Assembly Bill 52 and Senate Bill 18 requiring consultation with California Native American tribes that are traditionally and culturally affiliated with	<ul style="list-style-type: none"> Section 5.3 – Cultural/Paleontological Resources Section 5.9 – Tribal Cultural Resources

Table 2.0-A – Written Comments Received During the NOP Comment Period

Commenter / Date of Letter	Summary of Comment	Location in Draft EIR (or IS) in which Comment is Addressed
	the geographic area of the proposed Project. This comment also includes examples of mitigation measures (if feasible and needed), and the NAHC's recommendations for cultural resources assessments.	
Californians Allied for a Responsible Economy (CARE CA) November 8, 2024	CARE CA provided a general comment letter recommending a full analysis of environmental impacts, feasible mitigation measures, and reasonable alternatives to the Project regarding Air Quality and Public Health, and Greenhouse Gas Emissions.	<ul style="list-style-type: none"> ▪ Section 5.2 – Air Quality ▪ Section 5.4 – Energy ▪ Section 5.5 – Greenhouse Gas Emissions

Because the Project is considered to be of statewide, regional, or area wide significance, per Section 15206(b) (2)(E) of the State *CEQA Guidelines*, a scoping meeting was held October 23, 2024 via ZOOM, an online platform. No comments were received on the IS/NOP during the scoping meeting.

2.6 Documents Incorporated by Reference

Section 15150 of the State *CEQA Guidelines* permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized throughout this Draft EIR, where that information is relevant to the analysis of potential impacts of the Project. All documents incorporated by reference are available for review at, or can be obtained through, the City of Riverside Planning Department.

2.6.1 City of Riverside General Plan 2025

The *City of Riverside General Plan 2025* (GP 2025) was adopted in 2007. The GP is a long-range plan designed to control and regulate growth in the City and to maintain the quality of the human and natural environment through 2025. The GP is the City's planning "constitution," or a blueprint for development, and is the single-most important policy document in guiding land use and development decisions within the City (GP 2025 EIR, p. 2-5). To that end, the GP contains goals and policies that serve as the planning framework for the City in addition to providing direction for City operations and programs and serves as a guide to public and private decision-making. The GP 2025 includes the following required elements: [Land Use and Urban Design](#) , [Circulation and Community Mobility](#) , [Housing](#) , [Arts and Culture](#), [Education](#), [Public Safety](#), [Noise](#), [Open Space and Conservation](#), [Air Quality](#), [Public Facilities and Infrastructure](#), [Parks and Recreation](#). The GP 2025 is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>.

2.6.2 Program Environmental Impact Report for City of Riverside General Plan 2025

The *City of Riverside General Plan 2025 Program Environmental Impact Report State Clearinghouse No. 2004021108* (GP 2025 EIR) was certified in 2007 and provided a first-tier analysis of the potential environmental effects of the adoption and implementation of the proposed General Plan, adoption and implementation of the comprehensive update of the Zoning Code and Subdivision Code, amendment to the Noise Code, adoption and implementation of the Magnolia Avenue Specific Plan, as well as the adoption and implementation of the *Citywide Design and Sign Guidelines* available online at <https://riversideca.gov/cedd/planning/zoning-code-and-regulations>. The GP 2025 Program EIR is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>.

2.6.3 General Plan Update Phase I for Updated Housing and Public Safety Elements and Environmental Justice Policies

A comprehensive update of the General Plan kicked off in Fall 2024 to guide the development of the City through the year 2050. This update will be conducted in phases. The *Phase I General Plan Update* (GPUI) has already taken place which included an updated 6th Cycle Housing Element (2021-2029), updated Public Safety Element, and Environmental Justice Policies and was approved in October 2021. The GPUI is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>.

2.6.4 Environmental Impact Report for City of Riverside General Plan Update Phase I

The *City of Riverside Phase I General Plan Update Environmental Impact Report State Clearinghouse No. 2021040089* (GPUI EIR) was certified by the Riverside City Council on October 5, 2021. The GPUI EIR is a programmatic EIR that does not identify specific development projects that could occur as a result of approval of the Housing and Public Safety Element Updates and the new Environmental Justices policies. (GPUI EIR, p. 1-5.)

The Housing and Public Safety Elements are citywide planning documents associated with GP 2025. One of the components of the Housing Element Update evaluated in the GPUI EIR is a rezoning program that involves amending the Zoning Code and Specific Plans to change the zone of multiple sites identified for future housing and mixed-use development, referred to as Opportunity Sites. Environmental Justice Policies are an additional component of the project evaluated in the GPUI EIR.

GPUI EIR assessed a total of 460 parcels totaling 581 acres for rezoning, Specific Plan and General Plan Land Use amendments to accommodate the City's 6th Cycle Regional Housing Needs Assessment (RHNA) obligation of at least 18,458 new residential units over an 8-year planning period (2021-2029). The Final EIR evaluated identified sites for a variety of zoning and Land Use changes that generally increased allowed development capacities to promote the development of new residential and mixed use projects, resulting in a potential net increase of 31,175 dwelling units.

The GPUI EIR did not evaluate specific development densities or intensities for individual sites; rather, for sites proposed for Mixed Use Zones and General Plan designations. The GPUI EIR assumed that 33 percent of sites would develop with nonresidential uses, 33 percent would develop with residential uses, and 34 percent would develop with a mix of residential and nonresidential uses. Of the 34 percent that would develop with a mix of uses, it was further assumed that the resulting development would

comprise 80 percent residential uses and 20 percent nonresidential uses by floor area. Residential floor area was then converted to an estimated number of dwelling units by assuming an average unit size of 1,050 square feet. The GPUJ EIR is available online at <https://www.riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach>.

2.6.5 Downtown Specific Plan

The Downtown Specific Plan (DSP) was adopted in 2002, and last amended in 2021. The DSP area consists of approximately 640 acres located in the north portion of the City of Riverside. The Specific Plan area is bounded by State Route 60 to the northeast, State Route 91 to the southeast, the Brockton Avenue corridor to the northwest, and the Tequesquite Arroyo to the southwest. The purpose of the DSP is to facilitate and encourage development and improvements that help realize the community's vision for Downtown. The Specific Plan is important to the City and its residents because it reinforces Downtown Riverside as the cultural, arts, retailing and entertainment center for the Inland Empire. The DSP provides detailed development standards, design standards and guidelines, and land use regulations developed for this area. These important Specific Plan features are consistent with the goals and policies set forth in City of Riverside's General Plan. The DSP is a tool to create public improvement projects, promote development, evaluate development proposals and facilitate historic preservation. The DSP is available online at https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/spec-plans/2024/Downtown_SP.pdf.

2.6.6 City of Riverside Municipal Code

The City's Municipal Code complements GP 2025. The Municipal Code, which contains among other ordinances, the City's Zoning Code (Title 19), is a mechanism to implement and enforce the goals, objectives, policies, and programs articulated in GP 2025. Many of the potential environmental concerns considered in the GP 2025 EIR are adequately addressed through the application of regulations contained in the Municipal Code. The Municipal Code is available online at <http://www.riversideca.gov/municode/>.

3.0 Project Description

This Draft EIR is being prepared to analyze the potential environmental effects of the construction and future development of the proposed Riverside Alive Project site including all potential on- and off-site improvements. 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. For the purposes of the Draft EIR and mitigation measures, the term “Project Sponsor” refers to the party proposing development within the Project site via either an entitlement/development application or the City for City-initiated projects. All figures associated with this section start of page 3.0-10.

3.1 Project Location

The City of Riverside (City) is located 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 community of Woodcrest and El Sobrante, and to the west by the Cities of Corona and Norco as reflected on **Figure 3.0-1 – Vicinity Map**. The Project site is located within Section 23, Township 2 South and Range 5 West of the San Bernardino Baseline and Meridian, identified on the Riverside East, California USGS 7.5 Quadrangle Map as identified on **Figure 3.0-2 – USGS Topographical Map**.

The Project site comprises approximately 10 acres, located at the northeast corner of Fifth Street and Market Street, as depicted on **Figure 3.0-3 – On-Site Project Boundary Map**. The Project site consists of assessor parcel numbers (APNs) 213-111-011, 213-111-012, 213-111-014, 213-111-015, and 213-111-016; specifically located at 3637 Fifth Street, Riverside CA, 92501. The Project site is within Downtown Riverside and includes the city-owned Parking Lot 33 (Lot 33), Riverside Convention Center and Outdoor Plaza in front of the Riverside Convention Center. The Project also includes potential off-site impacts that would consist of upsizing an existing water line and a sewer line to adequately serve future Project demands. An existing water main located within Third Street would be upsized to an 18-inch diameter water main (between Orange Street and Market Street). The Project would connect to an existing 12-inch sewer line within Market Street; future Project demand may require an upsize from 11th Street to Mission Inn Avenue. All off-site impacts would be located within roadway right-of-way as reflected on **Figure 3.0-4 – Off-Site Improvement Boundary Map**.

3.2 Environmental Setting

The proposed Project consists of a developed site, within an urbanized area and is completely surrounded by existing development. No natural habitats are located on site. Hence, no habitat to support listed or protected species has been identified. The Project site is relatively flat with the highest elevation of approximately 860 feet above mean sea level at the southeast corner and the lowest elevation to the west at approximately 842 feet above mean sea level.

3.3 Existing General Plan Land Use and Zoning Designation

The Project site has a General Plan Land Use Designation and zoning designation of Downtown Specific Plan as reflected on **Figure 3.0-5 – General Plan Land Use Designation** and **Figure 3.0-6 – Zoning Designation**.

3.3.1 Surrounding Land Uses

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 3.0-A – Surrounding Land Uses**, for the existing land use, general plan land use, and zoning designations for the surrounding area.

Table 3.0-A – Surrounding Land Uses

Location	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	Residential 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	Hotel and Commercial Uses	Downtown Specific Plan	Downtown Specific Plan - Raincross District

3.4 Project Characteristics

3.4.1 Existing Site Conditions

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 as shown on **Figure 3.0-3**. 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 indoor pre-function area and 40,000 square feet of back-of-house area. The existing 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.

3.4.2 Proposed Project

Demolition

The proposed Project would include the demolition of the existing surface parking lot (Lot 33) and the existing Outdoor Plaza area. 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 3.0-B – Proposed Project Uses**. The proposed layout of all these uses is depicted on **Figure 3.0-7 – Proposed Project Layout**. The conceptual design of the Project site from the corner of Third Street and Orange Street is shown on **Figure 3.0-8 – Project Site Rendering from Third Street and Orange Street**.

Table 3.0-B – 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		
	<i>Restaurant-Focused Retail</i>		12,875
	<i>Grocery Store</i>		20,690
	<i>Fitness Center</i>		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 (see **Figure 3.0-7**, Building A). The conceptual design of the multi-family building is shown on **Figure 3.0-9 – Multi-Family Residential Concept Rendering**. The multi-family apartment building is expected to be 9 floors and approximately 95 feet tall. (see **Figure 3.0-10 – Project Site Elevation Cross Section 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 3.0-7**, Building C). The conceptual design of the full-service hotel building is shown on **Figure 3.0-11 – Full-Service Hotel Concept Rendering** and the conceptual building elevations are shown on **Figure 3.0-10** and **Figure 3.0-12 – Project Site Elevation Cross Section B**) 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 3.0-7**, Building B). The 168-room extended stay hotel would also include a small, local-serving grocery store and a fitness center on the first two levels. The conceptual design of the extended stay hotel building is shown on **Figure 3.0-13 – Extended Stay Hotel Concept Rendering** and the conceptual building elevation is shown on **Figure 3.0-12**.

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 3.0-7**, Building D). The conceptual design of the office building is shown on **Figure 3.0-14 – Office Building Concept Rendering**. The conceptual office building elevation is shown on **Figure 3.0-15 – Project Site Elevation Cross Section C**.

Commercial Retail Uses

The Project proposes up to approximately 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 Buildings A, C, and D as shown on **Figure 3.0-7** and elevation cross-sections shown on **Figures 3.0-10, Figure 3.0-12, and 3.0-15**).

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 Building B on **Figure 3.0-7** and elevation on **Figure 3.0-12**).

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 Building B on **Figure 3.0-7** and elevation on **Figure 3.0-12**)

Subterranean Parking Facility

The Project includes a new 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 3.0-7, Figure 3.0-10, Figure 3.0-12 and Figure 3.0-15**).

Convention Center Expansion

The existing Riverside Convention Center is an 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 Building F on **Figure 3.0-7**). 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 (see Building E on **Figure 3.0-7**). 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. The conceptual design of the new Convention Center building is shown on **Figure 3.0-16 – Convention Center Expansion Concept Rendering**. The conceptual elevation for the new Convention Center expansion is shown on **Figure 3.0-17 – Project Site Elevation Cross Section D and E**.

New Outdoor Plaza

The Project proposes new Outdoor Plaza space depicted in green on **Figure 3.0-7**, that connects residents and visitors to the existing and proposed uses and would contain flexible outdoor gathering space. The new 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 3.0-18 – Project Site Rendering from Fifth Street**).

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

exterior lighting. Existing streetlights are located along Third Street, Fifth Street, Market Street and Orange Street within the right-of-way, no changes are anticipated.

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. See *Section 5.2 – Air Quality* for further details on construction-related assumptions evaluated within this Draft EIR.

3.4.3 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 the South Main Complete Streets project, a separate project on Main Street from the proposed Project site to the SR-60, approximately 0.90 miles, to convert the road from 4-lanes to 2-lanes divided by a traffic median with additional parking, landscaping, and pedestrian walkways. 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 3.0-7**, 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. The proposed transportation improvements listed below modify existing two-way stop-controlled intersections with right-turn only restrictions:

- Market Street at Eleventh Street Intersection
 - Implement a right-turn-only restriction on Eleventh Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.
- Market Street at Thirteenth Street Intersection
 - Implement a right-turn-only restriction on Thirteenth Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.

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-A).

3.4.4 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.

3.4.5 Infrastructure and 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 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/Sewer

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 Third 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. However, the City Council adopted an Ordinance on July 2, 2024, repealing Chapter 16.26 of the Riverside Municipal Code. As such, natural gas may be utilized in all buildings.

3.4.6 School District

The Riverside Unified School District will serve the Project site. The Project will be responsible for impact fees assessed by the school district.

3.4.7 Off-Site Improvements

Off-site improvements are related to roadway improvements described in *Section 3.4.3* and water and sewer facility upgrades, as described above in *Section 3.4.5*, and shown on **Figure 3.0-4**.

3.4.8 Project Objectives

Per Section 15124 (b) of the State *CEQA Guidelines*, an EIR needs to include a statement of the objectives of a project which will help the City develop a reasonable range of alternatives. The Objectives need to outline the general purpose of the Project and are as follows:

1. Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown.
2. Expand the Convention Center to improve the City's ability to attract larger conferences and group meeting business and be more competitive.
3. Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.
4. Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation for Riverside residents.
5. Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers.
6. Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.

7. Place housing near existing employment center downtown to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.

3.5 Discretionary Actions and Approvals

The Draft EIR serves as an informational document for use by public agencies, the public, and decision makers. This Draft EIR discusses the impacts of development pursuant to the proposed Project and related components and analyzes Project alternatives. This Draft EIR will be used by the City of Riverside and responsible agencies in assessing impacts of the proposed Project. The following approvals and permits are required from the City of Riverside to implement the proposed Project:

- Certification of the EIR – with the determination that the EIR has been prepared in compliance with the requirements of CEQA.

At the time specific development is proposed, the City of Riverside would receive and consider entitlement applications, including, but not limited to:

- Tentative Parcel Map (TPM)/Lot Line Adjustments (LLA)/Subdivision Map
- Site Plan Review
- Conditional Use Permit – for buildings exceeding 100-feet
- Conditional Use Permit – for establishments with alcohol sales

Other non-discretionary actions that may be taken by the City at the staff level as part of future development applications, including, but not limited to:

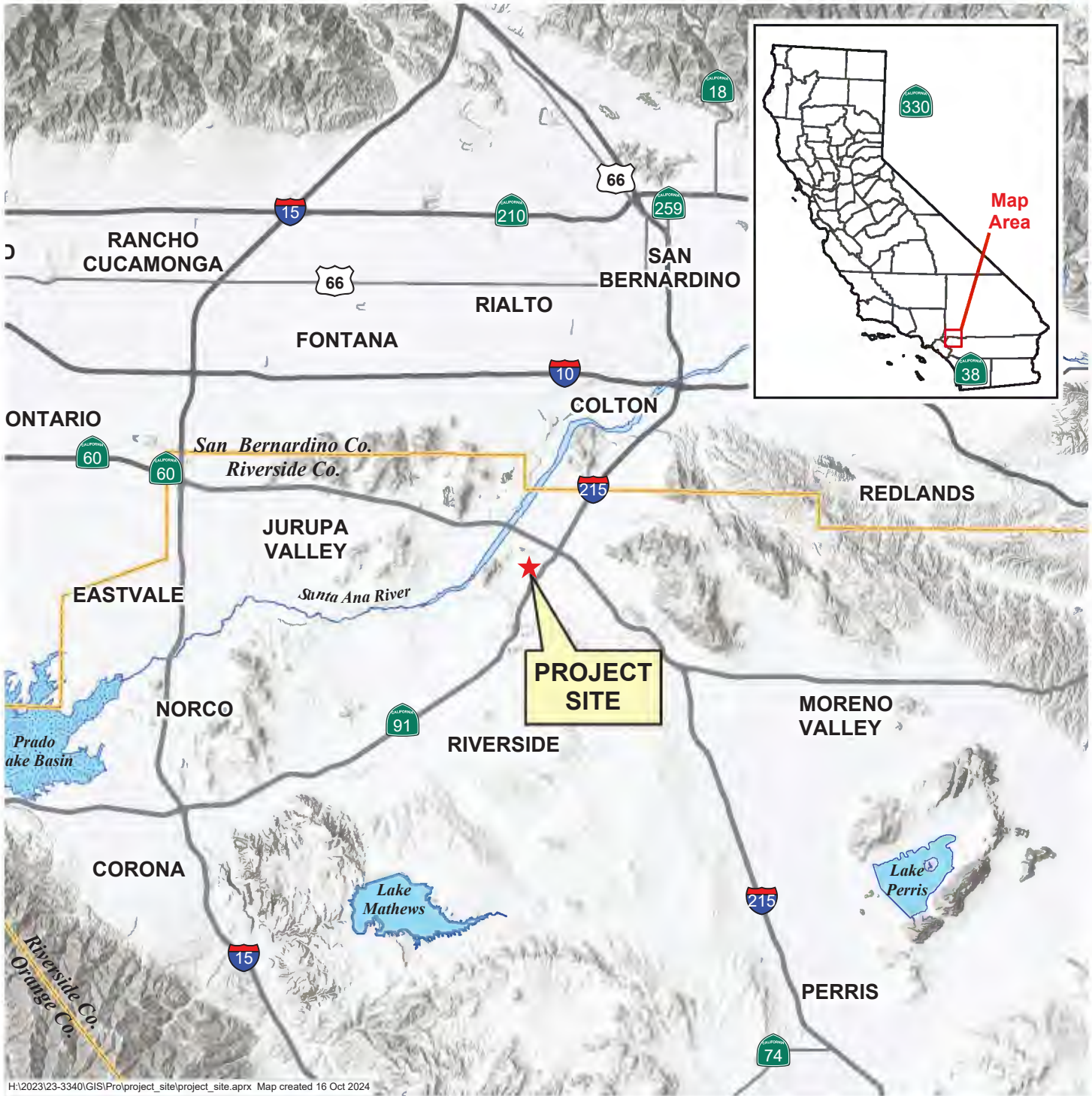
- Review and approval of all infrastructure plans, including street and utility improvements pursuant to the conditions of approval
- Review all on-site plans, including grading and on-site utilities
- Approval of a preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows

Approvals and permits that may be required by future development applications by other agencies include:

- Santa Ana Regional Water Quality Control Board (RWQCB) – A NPDES permit from the RWQCB to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened.
- South Coast Air Quality Management District (SCAQMD) – A permit to install and operate a diesel-powered emergency backup generator.

FIGURE 3.0-1

Vicinity Map



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0 10,000 20,000 Feet

Sources: Riverside County GIS, 2020.


FIGURE 3.0-2

USGS Topographic Map



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LEGEND

 Project Boundary



0 500 1,000
Feet

Sources: USGS Topographic map, Esri,
2024.

FIGURE 3.0-3

On-Site Project Boundary



LEGEND

Project Boundary



0 175 350 Feet

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

FIGURE 3.0-4 Offsite Improvements Boundary



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LEGEND

- Project Boundary
- Offsite Boundary Sewer
- Offsite Boundary Water

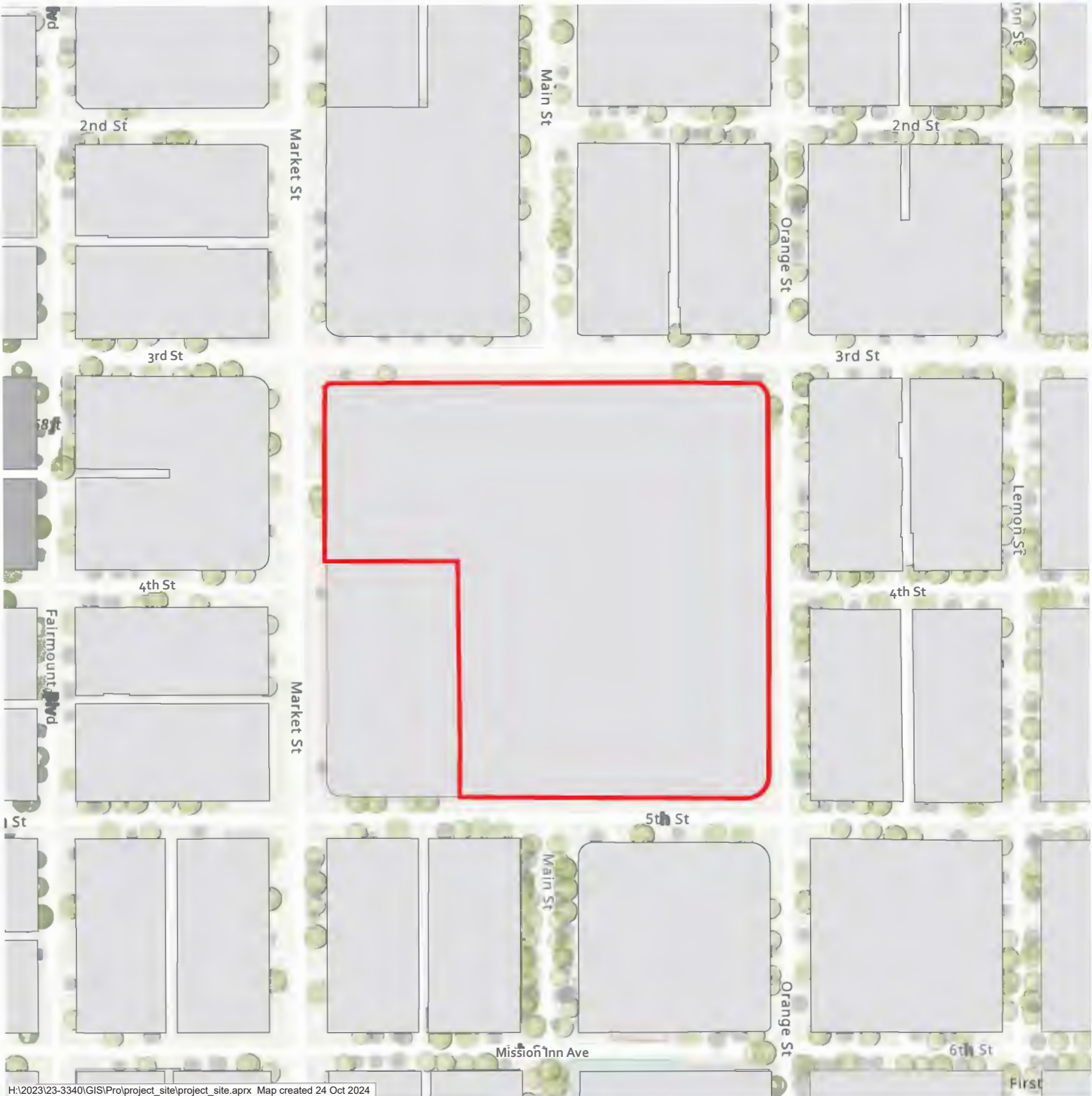


0 235 470 Feet

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

FIGURE 3.0-5

General Plan Land Use



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LEGEND

Project Boundary

City of Riverside General Plan Land Use

Downtown Specific Plan

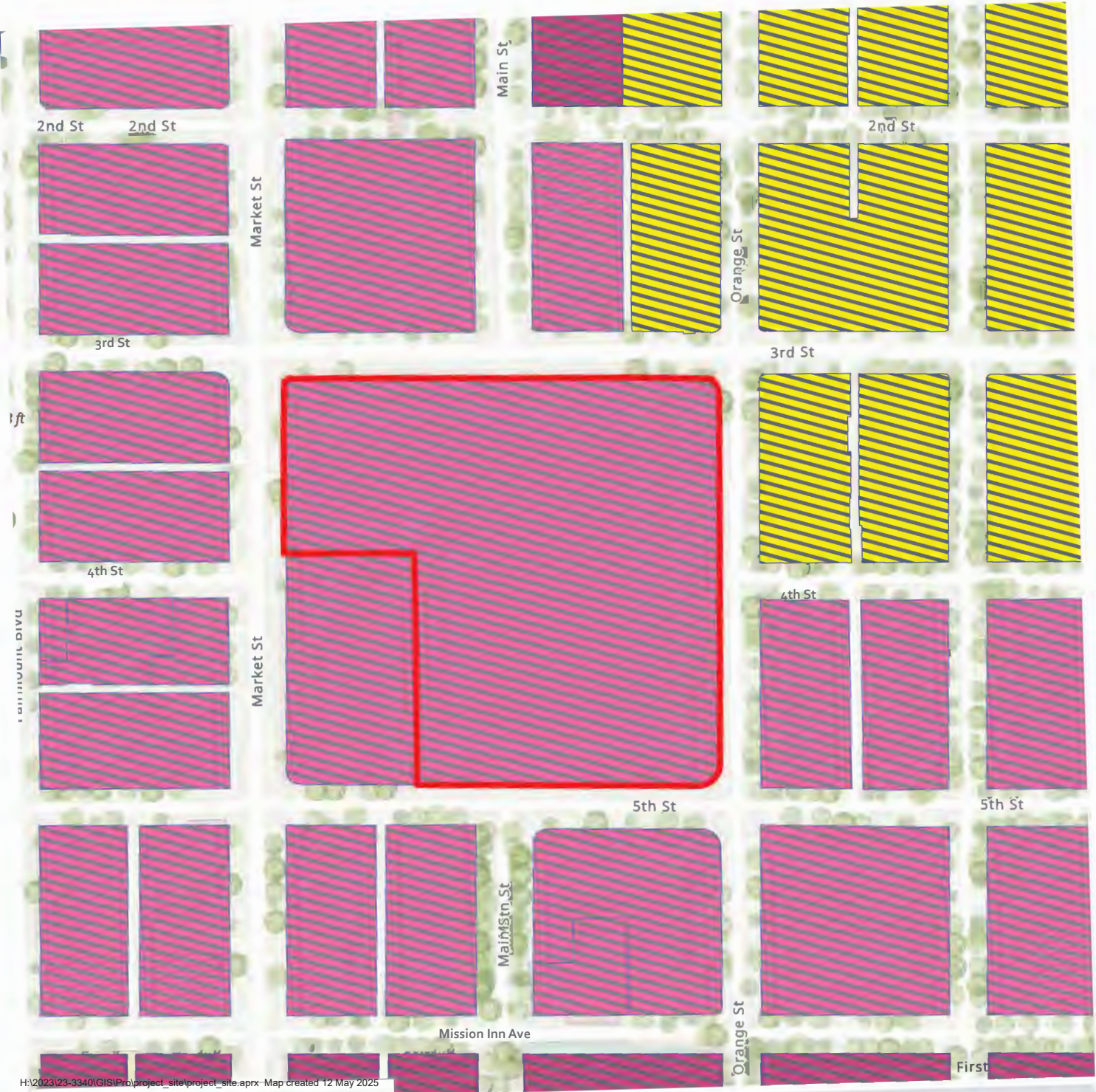


0 130 260 feet

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

FIGURE 3.0-6

Zoning



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LEGEND

- Project Boundary
- City of Riverside Zoning**
- Downtown Specific Plan - Raincross District
- Downtown Specific Plan - Residential

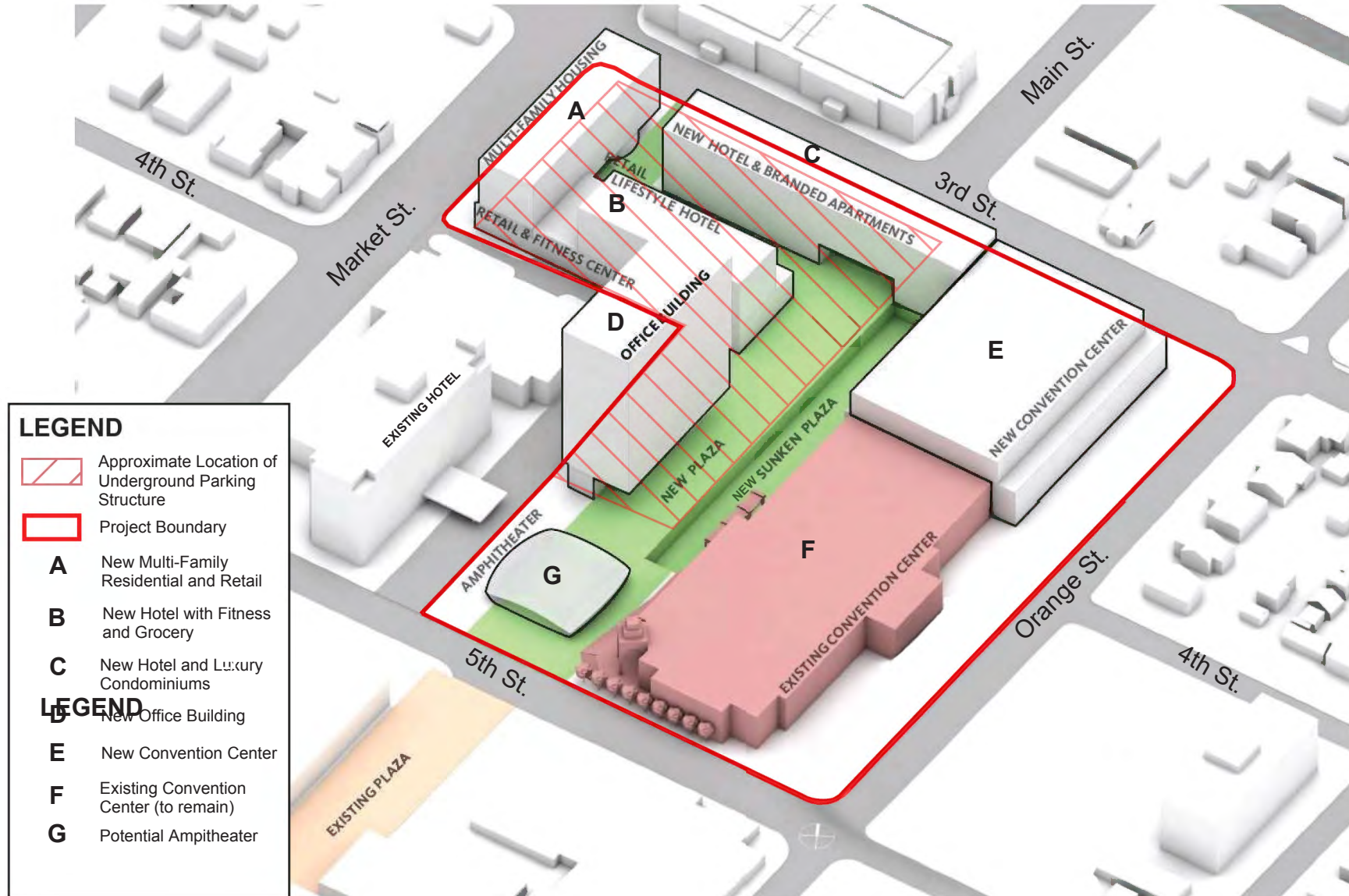


0 100 200 Feet

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

FIGURE 3.0-7

Proposed Project Layout



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Sources: City

FIGURE 3.0-8 Project Site Rendering from Third St. and Orange St.



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Sources: City

FIGURE 3.0-9

Multi-Family Residential Concept Rendering

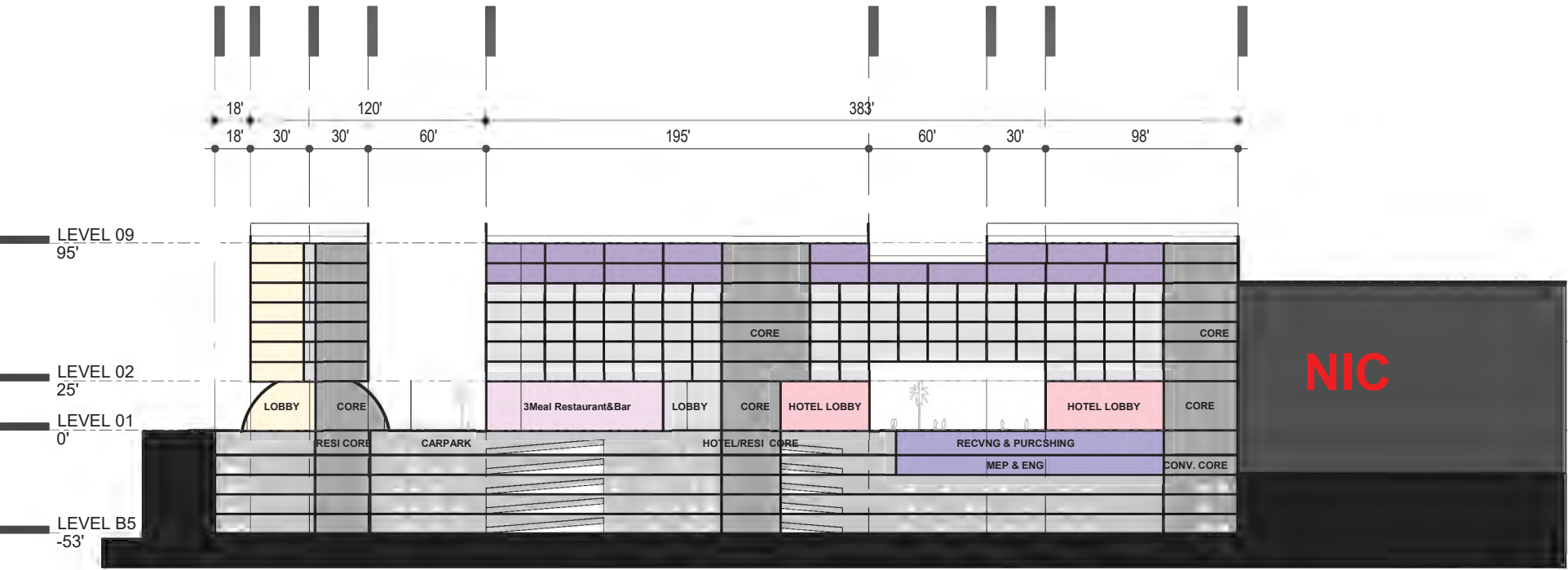


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Sources: City

FIGURE 3.0-10


Project Site Elevation Cross Section A




A

C

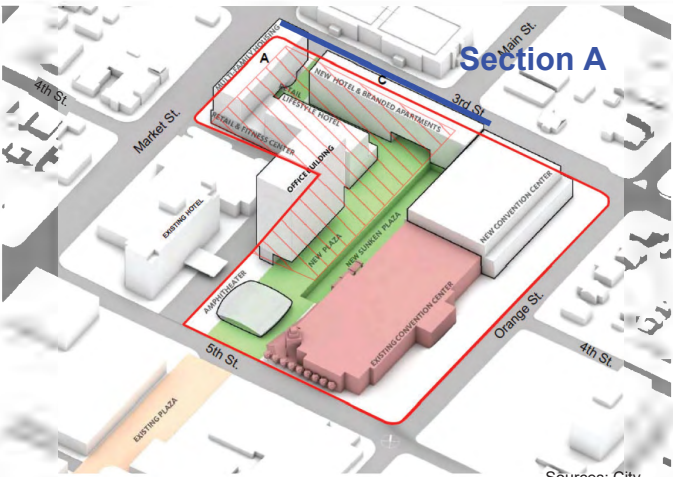
LEGEND

 Approximate Location of Underground Parking Structure

 Project Boundary

Building A New Multi-Family Residential and Retail

Building C New Hotel and Condominiums



Sources: City

H:\2023\23-3340\GIS\Pro\project_site\project_site.aprx Map created 16 Oct 2024

FIGURE 3.0-11

Full-Service Hotel Concept Rendering

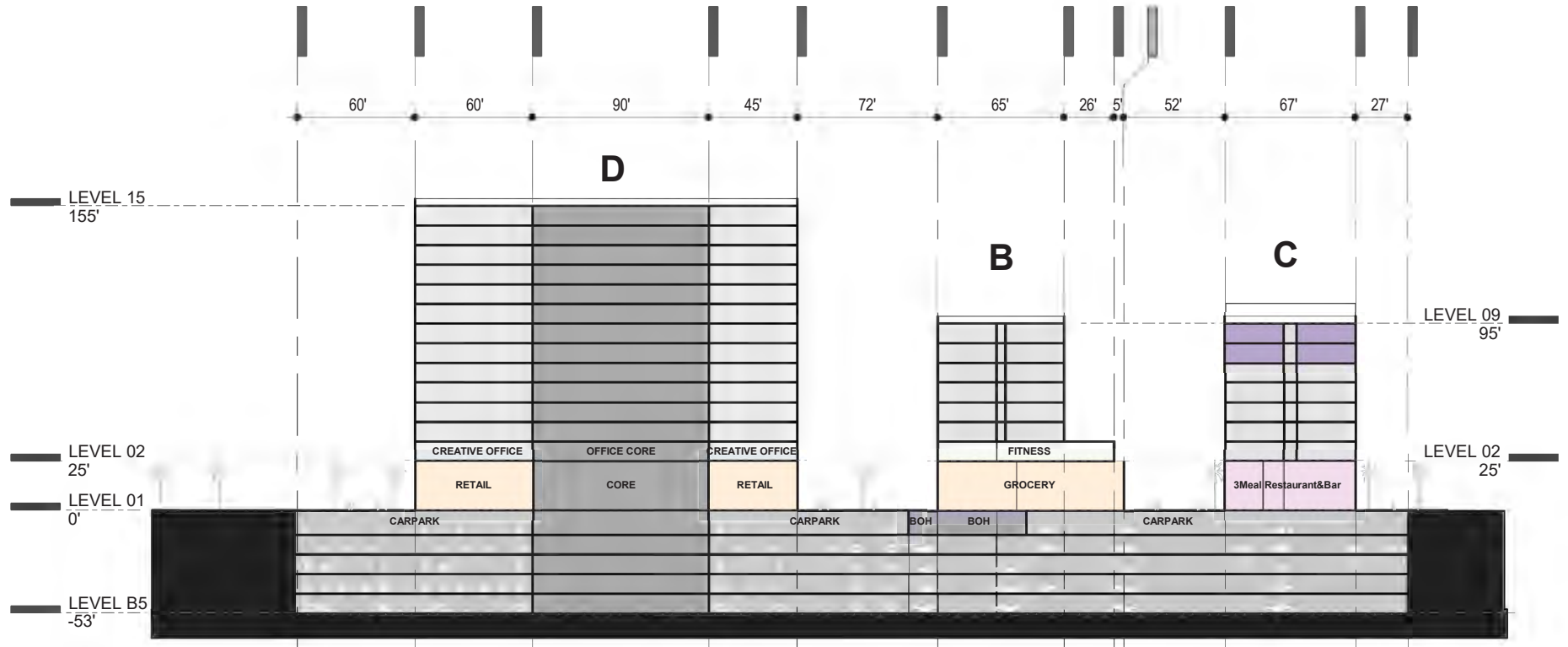


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Sources: City

FIGURE 3.0-12

Project Site Elevation Cross Section B



LEGEND

Approximate Location of Underground Parking Structure

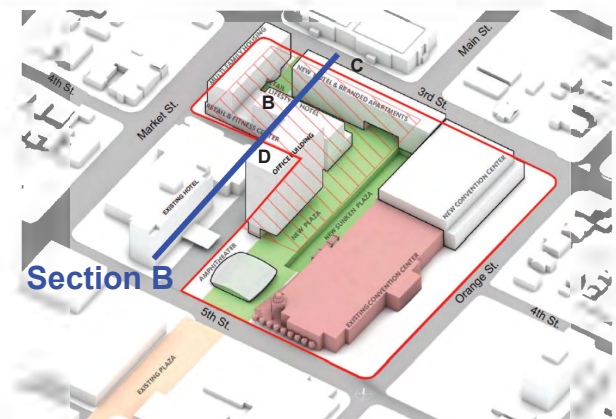
Project Boundary

Building B New Hotel with Fitness and Grocery

Building C New Hotel and Condominiums

Building D New Office Building

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Sources: City

FIGURE 3.0-13

Extended Stay Hotel Concept Rendering



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Sources: City

FIGURE 3.0-14

Office Building Concept Rendering

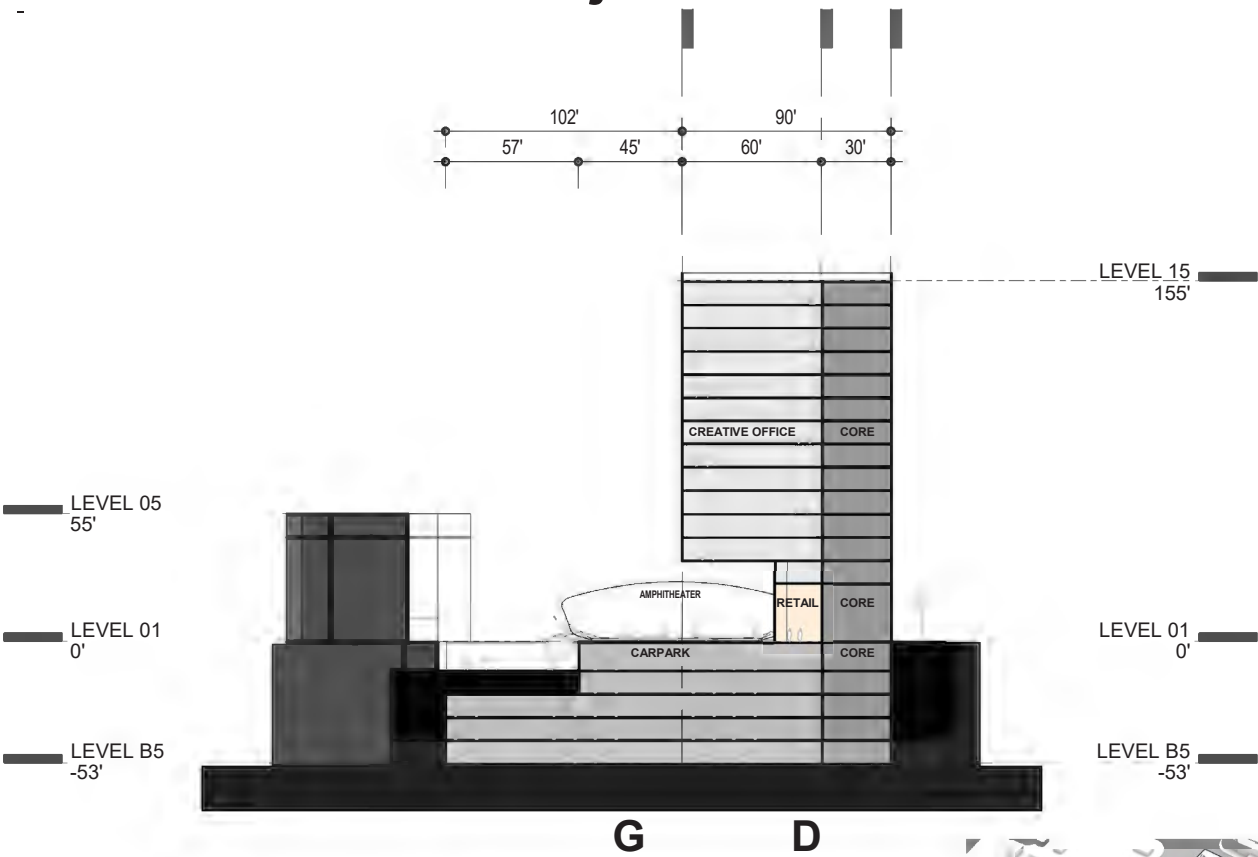


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Sources: City

FIGURE 3.0-15

Project Site Elevation Cross Section C



LEGEND

- Approximate Location of Underground Parking Structure
- Project Boundary
- Building D** New Office Building
- Building G** Potential Amphitheater

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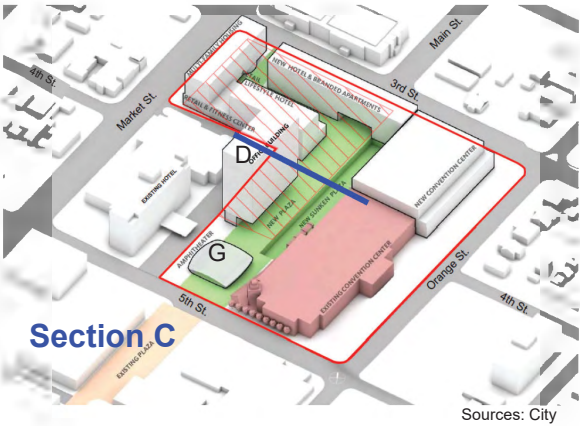


FIGURE 3.0-16

Convention Center Expansion Concept Rendering

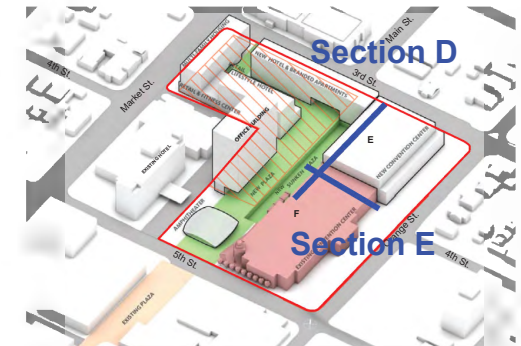
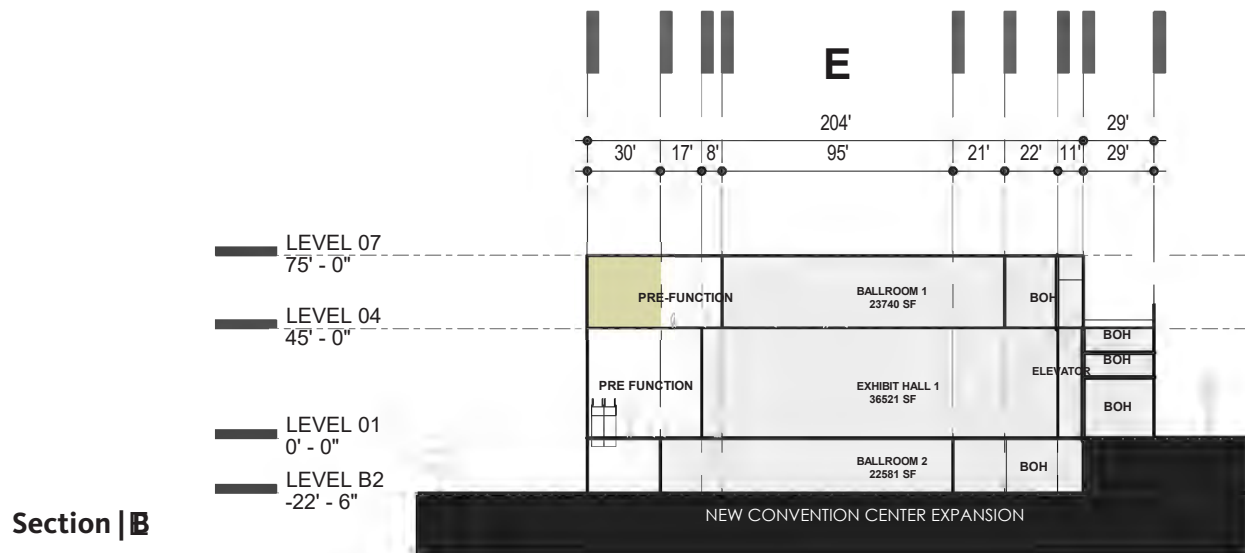
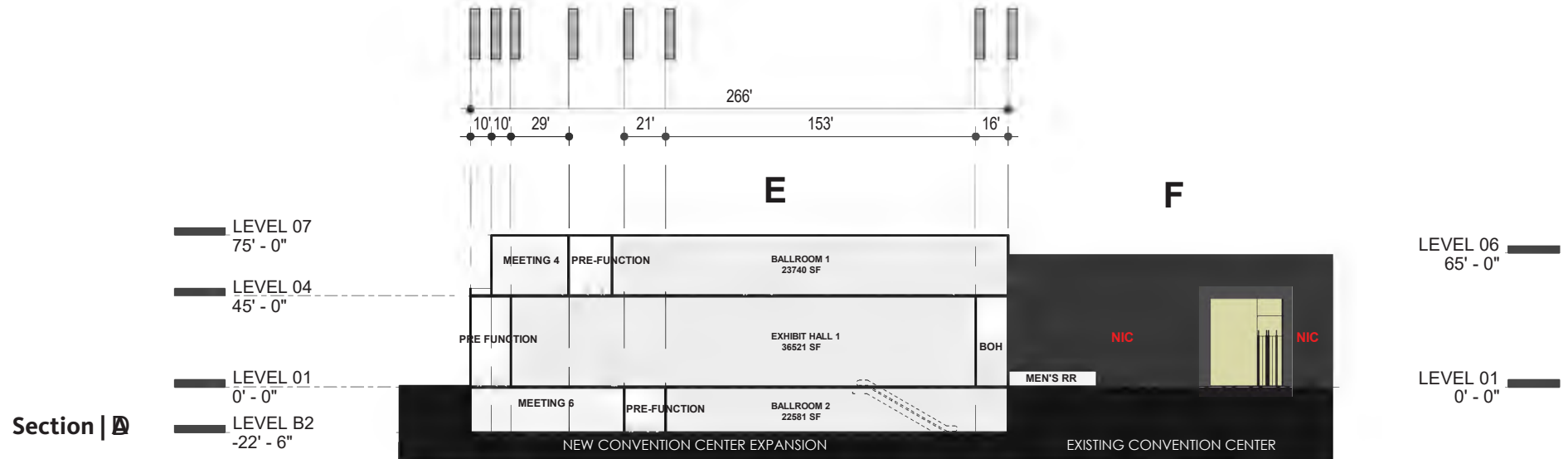


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Sources: City

FIGURE 3.0-17

Convention Center Expansion Elevation Cross Section D and E



- Legend**
- Approximate Location of Underground Parking Structure
 - Project Boundary
 - Building E New Convention Center
 - Building F Existing Convention Center

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FIGURE 3.0-18

Project Site Rendering from Fifth Street



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Sources: City

4.0 Environmental Effects Found Not to be Significant

CEQA provides that a Draft EIR shall focus on all potentially significant effects created by the Project on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study/Notice of Preparation (IS/NOP) as insignificant and unlikely to occur need not be discussed further in the Draft EIR unless information inconsistent with the finding in the Initial Study is subsequently received. The full Initial Study for this Project is found in Appendix A.

4.1 Effects Found Not to be Significant During Preparation of the Initial Study/Notice of Preparation

Section 21100(c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a Project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 of the State *CEQA Guidelines* adds, "Such a statement may be contained in an attached copy of an Initial Study."

The Initial Study prepared for the Riverside Alive Project (Project), (Appendix A) concluded that the proposed Project would not result in significant impacts or impacts would be less than significant with the incorporation of standard mitigation measures identified in the Initial Study, as necessary, to the following issue areas or thresholds within those issue areas as discussed below. The specific issues listed are not discussed further within the body of the Draft EIR. The following is a summary of the discussions from the Initial Study in Appendix A.

4.1.1 Aesthetics

Threshold: Damage Scenic Resources

The Project site does not contain any scenic resources such as rock outcroppings but does contain ornamental tree species which could be considered scenic, 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 to offset the loss of the existing trees. The Project 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. Thus, impacts from Project implementation would not substantially damage scenic resources related to trees, rock outcroppings, or state scenic highways. (IS, pp. 21-22).

Threshold: Create a New Source of Substantial Light or Glare

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 because 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. (IS, p. 22).

4.1.2 Agriculture and Forest Resources

Threshold: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to Non-Agricultural Use

The Project is located within an urbanized area. The Project site is developed and contains the Riverside Convention Center, outdoor plaza, and surface 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 located in an area designated as Urban and Built-Up Land. According to the California Department of Conservation (CDC) California Important Farmland Finder Map, the Project site does 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. (IS, p. 23).

Threshold: Conflict With Existing Zoning for Agricultural Use or a Williamson Act Contract

The site is currently zoned Downtown Specific Plan which does not contain agricultural zoning. 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. Thus, the Project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. (IS, p. 23).

Threshold: Conflict With Existing Zoning or Cause Rezoning of Forest Land, Timberland, or Timberland Zoned for Timberland Production

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. 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. (IS, p. 24).

Threshold: Result in Loss of Forest Land or Conversion of Forest Land to Non-Forest Use

There is no designated forestland on or adjacent to the Project site or within the City. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. (IS, p. 24).

Threshold: Involve Other Changes in Existing Environment Resulting in Conversion of Farmland to Non-Agricultural Use or Conversion of Forest Land to Non-Forest Use

The Project site and surrounding area 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. (IS, p. 24).

4.1.3 Air Quality

Threshold: Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People

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). 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. (IS, p. 26).

4.1.4 Biological Resources

Threshold: Have a Substantial Adverse Effect on Any Species Identified as a Candidate, Sensitive, or Special Status Species

The Project site is within an urbanized area that is 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 habitat nor sensitive species. The Project site is within the Multiple Species Habitat Conservation Plan (MSHCP) and specifically within the Cities of Riverside and Norco Area Plan.

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. No sensitive natural communities occur on the Study Area or Project site. 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. 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. 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. 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 /72 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, with implementation of **MM BIO 1**, the Project 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. (IS, pp. 26-28).

Threshold: Have a Substantial Adverse Effect on Any Riparian Habitat or Other Sensitive Natural Community

The Project site is an existing developed site located in an urbanized area that does not contain riparian habitat or other sensitive natural communities. 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). (IS, p. 28).

Threshold: Have a Substantial Effect on State or Federally Protected Wetlands

There are no federally 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. (IS, pp. 28-29).

Threshold: Interfere Substantially With Movement of Any Native Resident or Migratory Fish or Wildlife Corridor or Impede the Use of Native Wildlife Nursery Sites

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 an MSHCP designated core, extension of existing core, non-contiguous habitat block, constrained linkage or linkage area intended to protect lands for wildlife movement. The Project site is fully developed and completely surrounded by existing dense urban development that lacks connection to native plant communities or habitats. 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. (IS, p. 29).

Threshold: Conflict With Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance

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.

The Project applicant shall be required to pay the SKR fees in accordance with County of Riverside Ordinance 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. 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 biological resources. (IS, pp. 29-30).

Threshold: Conflict With the Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan, or Other Approved Local, Regional, or State Habitat Conservation Plan

The Project site is located within the Cities of Riverside/Norco Area Plan. The Project site is located within the MSHCP and the 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.

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. The Project is consistent with the other Sections. 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. (IS, pp. 30-32).

4.1.5 Cultural Resources

Threshold: Disturb Any Human Remains, Including Those Interred Outside of Formal Cemeteries

The Initial Study determined there to be no known cemeteries located on the Project site. Therefore, the Project would comply with regulatory requirements for the treatment of Native American human remains pursuant to California Health and Safety Code regulations Sections 57051 and 7054, and California Public Resources Code Section 5097.98. These regulations would require all work to halt if human remains are found and would require archaeologist and city to be contained to provide protection measures. 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 **MM 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. (IS, p. 33).

4.1.6 Geology and Soils

Threshold: Direct or Indirect Effect Involving Rupture of a Known Earthquake Fault

There are no Alquist-Priolo zones in the City. Several large active fault systems, occur in the region surrounding the Project site such as: Elsinore, San Jacinto, and the San Andreas. The Project is located within a Seismic Hazard Zone III. 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 from the Downtown Area. The Project would be required to comply

with all California Building Code (CBC) regulations, as well as be required to prepare a geotechnical investigation report prior to issuance of permits and then comply with all geotechnical recommendations as pursuant to Policy PS-1.1 of the 2025 General Plan and RMC Section 16.08.185. 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. (IS, pp. 34-35).

Threshold: Direct or Indirect Effect Involving Ground Shaking Zone

Due to the Project site being approximately 7 to 13 miles away from fault zones, as mentioned above, ground shaking hazards caused by earthquakes can occur that have the potential to cause moderate to intense ground shaking. The Project would be required to comply with all CBC regulations, as well as be required to prepare a geotechnical investigation report prior to issuance of permits and then comply with all geotechnical recommendations as pursuant to Policy PS-1.1 of the 2025 General Plan and RMC Section 16.08.185. 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. (IS, p. 35).

Threshold: Direct or Indirect Effect Involving Ground Failure/Liquefaction

The Project site is located in an area designated with a low potential for liquefaction. The Project would be required to comply with all CBC regulations, as well as be required to prepare a geotechnical investigation report prior to issuance of permits and then comply with all geotechnical recommendations as pursuant to Policy PS-1.1 of the 2025 General Plan and RMC Section 16.08.185. The Project is not anticipated to cause potential substantial adverse effects directly or indirectly, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, impacts are less than significant. (IS, pp. 35-36).

Threshold: Direct or Indirect Effect Involving Landslide Risk

The Project site is located in an urbanized area with generally flat topography and 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. (IS, p. 36).

Threshold: Result in Substantial Soil Erosion or the Loss of Topsoil

The Project site is flat, but erosion and loss of topsoil could occur as a result of Project construction. However, the Project 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 Project is also 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 less than significant. (IS, p. 36).

Threshold: On- or Off-Site Landslide/Lateral Spreading/Subsidence/Liquefaction or Collapse

According to the Initial Study the Project site is located in an urbanized area and the general topography of the Project site is flat. The Project site is not located in an area prone to landslides. The Project site is located in an area with low liquefaction potential. The Project site is located in an area where potential lateral spreading is considered low. The Project would be required to comply with all CBC regulations, as well as be required to prepare a geotechnical investigation report prior to issuance of permits and then comply with all geotechnical recommendations as pursuant to Policy PS-1.1 of the 2025 General Plan and RMC Section 16.08.185. Thus, the Project is not 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. Therefore, impacts would be less than significant. (IS, pp. 36-37).

Threshold: Expansive Soils

The soil type underlying the Project site is Buren fine sandy loam which has a moderate shrink-swell potential. 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*. 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. (IS, p. 37).

Threshold: Septic Tanks

The Project site is an existing development located within an urbanized area. The Project 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. (IS, p. 37).

4.1.7 Hazards and Hazardous Materials

Threshold: Create a Significant Hazard to the Public or Environment Through Routine Transport/Use/Disposal of Hazardous Materials

Based on the Initial Study the proposed Project may include routine transport, use, and disposal of hazardous materials during demolition and construction of the Project. However, 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 Law, the California Accidental Release Protection Program, and the California Health and Safety Code. Non-residential uses allowable as identified by RMC Title 19, pose a minor potential for household hazardous products to be stored or transported to the site during operation. 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. Additionally, the City's Municipal Code

Chapter 9.48 – Unified Hazardous Materials Program, requires any business that utilizes, stores, and or handles 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. (IS, pp. 39-40).

Threshold: 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

There is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be temporarily stored and transported during construction and operation. 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. The Project will comply with the California Fire Code (CFC) requirements for short-term storage. 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. 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. 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. (IS, pp. 40-41).

Threshold: Vicinity of a School

The Initial Study found there are no existing or proposed schools within one-quarter mile of the Project site. The schools nearest the 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, 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. (IS, p. 41).

Threshold: Hazardous Materials Site

The Initial Study determined Project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.25. Thus, the Project would not result in a significant hazard to the public or the environment. Therefore, there would be no impacts. (IS, p. 42).

Threshold: Result in Safety Hazard or Excessive Noise for People Residing or Working in the Project Area Located Within an Airport Land Use Plan

The Project is not located within any airport influence area. The nearest airport is the Flabob Airport located approximately 1.8 miles from the Project site. The Project site lies outside of the land use compatibility zone boundaries of the Flabob Airport. 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.

Threshold: Impair Implementation of or Physically Interfere With an Adopted Emergency Response Plan or Emergency Evacuation Plan

The Project site is located off of Market Street, Fifth Street, Third Street and Orange Street. Market Street has been identified as a Minor/Principal Arterial road for evacuation. The proposed Project will be required to comply with the City's Local Hazard Mitigation Plan adopted July 30, 2018. All local roadways would remain open during Project construction and operation. Construction activities occurring within the Project Site would comply with all conditions, and the City's Local Hazard Mitigation Plan. 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. (IS, pp. 42-43).

Threshold: Wildland Fires

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. Additionally, the Project site is not located within the City's moderate, high, or very high hazard rating area. 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. (IS, p. 43).

4.1.8 Hydrology/Water Quality

Threshold: Violate Any Water Quality Standards or Waste Discharge Requirements or Otherwise Substantially Degrade Surface or Ground Water Quality

During construction, potential threats to surface and ground water quality associated with future implementing projects – short-term grading and construction activities include discharges of construction-related sediment and hazardous materials (e.g., fuels). During 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 California Regional Water Quality Control Board – Santa Ana Region (RWQCB) provides regulatory oversight of water quality in the Groundwater Management Zones (GMZs). To ensure that the Project construction activities do not impair water quality of downstream receiving waters, and because the total land disturbance area is greater than 1 acre, the future applicants proposing development within the Project site will 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 on the Project site by a certified Qualified SWPPP Developer (QSD), with annual reporting and monitoring requirements and enforcement by the RWQCB.

During 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. 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 Downtown Specific Plan (DSP) development standards. The potential to substantially increase surfaces that would lead to surface runoff would be low. Future applicants proposing development within the Project site, pursuant to RWQCB'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. Through compliance with existing regulations that address construction and operational-phase discharges, project impacts will be less than significant. (IS, pp. 43-45).

Threshold: Decrease Groundwater Supplies or Interfere Substantially With Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management of the Basin

The Project site does not use on-site groundwater or support groundwater wells on-site. The existing Project site is currently developed largely with impervious surfaces so provides minimal groundwater recharge. 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. Thus, 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. (IS, p. 45).

Threshold: Result in Substantial Erosion or Siltation On- or Off-Site

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 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 in flooding. Therefore, impacts would be less than significant. (IS, pp. 45-46).

Threshold: Substantially Increase the Rate or Amount of Surface Runoff in a Manner Which Would Result in Flooding On- or Off-Site

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 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. As such 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. (IS, p. 76).

Threshold: Exceed Capacity of Existing or Planned Stormwater Drainage Systems

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. 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. (IS, pp. 46-47).

Threshold: Impede or Redirect Flood Flows

The Project site is located in “Zone X” and future implementing development 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, the Project will not alter the course of a stream or a river. Thus, the Project is not expected to impede or redirect flood flows as a result of such actions. Therefore, impacts would be less than significant. (IS, p. 47).

Threshold: In Flood Hazard, Tsunami, or Seiche Zones, Risk Release of Pollutants Due to Project Inundation

Initial Study found that the Project is not in a flood hazard zone, seiche zone, or tsunami zone. Therefore, impacts would be less than significant. (IS, pp. 47-48).

Threshold: Conflict With or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan

The Initial Study found that the local water quality control plan (Basin Plan) outlines the regulatory programs of the RWQCB, which address ground and surface water quality. The RWQCB requires NPDES permits, construction general permits, storm sewer system permit for post construction BMPs. Future applicants proposing development would be required to prepare and implement a SWPPP during construction and provide the required post-construction storm water quality treatment, leading to no conflicts or obstructions with the Basin Plan. The Project is consistent with the existing land uses and will not conflict with the forthcoming Groundwater Sustainability Plan (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. (IS, p. 48).

4.1.9 Land Use Planning

Threshold: Physically Divide an Established Community

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. (IS, p. 48).

Threshold: Conflict With Any Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

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). 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. (IS, p. 49).

4.1.10 Mineral Resources

Threshold: Loss of a Known Mineral Resource Valuable to the Region and the Residents of the State

According to the Initial Study, the Project site is not located in, nor is it adjacent to, a locally important mineral resource recovery site so 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. (IS, pp. 49-50).

Threshold: Loss of Locally Important Mineral Resource Delineated on a Local General Plan, Specific Plan, or Other Land Use Plan

The Project site is located in an area with no known mineral resources of local or state importance. Therefore, the Project would not result in the loss of available resources. (IS, p. 50).

4.1.11 Noise

Threshold: Located Within a Private Airstrip or an Airport Land Use Plan, Within Two Miles of a Public Airport or Public Use Airport That Would Expose People Residing or Working in the Project Area to Excessive Noise Levels

The Project site is not located within any airport influence area. The Project site lies outside of the land use compatibility zone boundaries of the Flabob Airport which is approximately 1.8 miles from the Project site. 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. (IS, p. 51).

4.1.12 Population and Housing

Threshold: Induce Unplanned Population Growth Directly or Indirectly

The Project proposes a maximum of 168 residential units and a maximum of 376 rooms through hotel development, as well as other commercial uses. As a conservative approach, a range was calculated using the 2024 Department of Finance (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 to 576 additional residents to the City of Riverside. The Project's uses are consistent with the DSP designation, which allows for high-density residential and mixed-use development within the Raincross District. The Project's residential density results in approximately 16 dwelling units per acre, which is well below the maximum allowable density in the DSP. 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. (IS, p. 51).

Threshold: Displace People or Housing Necessitating Construction or Replacement Housing

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. (IS, p. 52).

4.1.13 Public Services

Threshold: Substantial Adverse Physical Impacts to Schools

The proposed Project is within Riverside Unified School District (RUSD) and will result in an increase in the number of school-aged children within RUSD. Based on the 168 residential units proposed, the Project would generate approximately 41 new school-aged children. The Project is expected to generate approximately 163 students under non-residential uses and a combined total of approximately 204 students. Future development would be required to pay development impacts fees pursuant to RMC Chapter 16.556 - school development fee. 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. (IS, p. 53-54).

Threshold: Substantial Adverse Physical Impacts to Parks

The Project proposes to introduce new residential uses to the Project site. Utilizing the City's parkland ratio and calculating the anticipated residents, the Project would create a demand for approximately 1.55 acres of parkland. 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. Thus, there would not be 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. (IS, p. 54).

Threshold: Substantial Adverse Physical Impacts to Other Public Facilities

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. 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. (IS, p. 55).

4.1.14 Recreation

Threshold: Increase Use of Parks or Recreational Facilities

As mentioned above, the Project proposes to introduce new residential and commercial uses. 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. Applicants of future development within the Project site would be required to pay the park development fee. With payment of the park development fee, impacts to parks would not result in physical or accelerated deterioration. (IS, p. 55-56).

Threshold: Include or Require Recreational Facilities

The Project proposes outdoor spaces and an Outdoor Plaza. The Project would bring approximately 576 residents to the area. There are multiple parks surrounding the Project site. 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, future applicants would be required to pay park development fees pursuant to RMC 16.60. (IS, p. 56).

4.1.15 Transportation

Threshold: Increase Hazards Due to a Geometric Design Feature or Incompatible Uses

No sharp curves or other hazardous traffic conditions currently exist within the Project site or within the Project vicinity. 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 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. 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. 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. (IS, p. 57).

Threshold: Result in Inadequate Emergency Access

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. 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. (IS, p. 57).

4.1.16 Utilities and System Services

Threshold: Sufficient Water Supplies Available to Serve the Project and Foreseeable Future Development During Normal, Dry, and Multiple Dry Years

The Project site is located within the Riverside Public Utilities (RPU) Service Area. 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. 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. 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 included as Appendix C of the IS/NOP, 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. (IS, p. 59).

Threshold: Inadequate Wastewater Treatment Capacity

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). Currently, the RRWQCP receives an average daily flow of 26 mgd; therefore, the RRWQCP has a

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. (IS, pp. 59-60).

Threshold: Generate Excess Solid Waste

The proposed Project includes the demolition of the existing surface parking lot and Outdoor Plaza. Anything with salvage value will be segregated and recycled. Some solid waste from demolition will be reused in Project construction. 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 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. The proposed Project would be required to 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. (IS, pp. 60-61).

Threshold: Comply With Federal, State, and Local Management and Reduction Statutes and Regulations Related to Solid Waste

The Project would generate solid waste during construction and operation activities, thus requiring consideration of waste reduction and recycling measures. California cities and counties are required to achieve waste diversion goals. The Project must comply with the City's waste disposal and CALGreen requirements. Therefore, compliance with City waste disposal and CALGreen would ensure compliance with federal, state, and local management and reduction statutes. Thus, impacts regarding compliance solid waste regulations would be less than significant. (IS, p. 61).

4.1.17 Wildfire

Threshold: Substantially Impair an Adopted Emergency Plan or Emergency Evacuation Plan

According to the Initial Study, the Project site is not located in a State Responsibility Area (SRA) or designated as a very high, high, or moderate hazard severity zone by the City. Further, the Project will not impair an adopted emergency response plan or emergency evacuation plan so impacts would be less than significant. (IS, p. 61).

Threshold: Expose Project Occupants to Pollutant Concentrations From Wildfire or Spread of Wildfire Due to Slope, Prevailing Winds, and Other Factors Exacerbated

The Project site is not located within a SRA, or a very high fire, high or moderate hazard severity zone and the Project site has no steep slopes and is not located on or adjacent to affected lands that would exacerbate wildfire risk. 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. (IS, p. 62).

Threshold: Require the Installation or Maintenance of Associated Infrastructure that May Exacerbate Fire Risk or May Result in Impacts to the Environment

The Project site is generally flat with no steep slopes located on or adjacent to the Project site 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 that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. (IS, p. 62).

Threshold: Expose People to Downslope or Downstream Flooding or Landslides, as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes

The Project site and surrounding lands are relatively flat and the 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 low to nonexistent. Thus, the Project would not expose people or structures to significant risks including downslope or downstream flooding or landslides because of runoff, post-fire slope instability, or drainage changes. (IS, p. 62).

5.0 Environmental Analysis

Sections 15126, 15126.2 and 15126.4 of the State *CEQA Guidelines* require consideration and discussion of significant environmental effects and mitigation measures proposed to minimize significant effects. All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation (Section 15126) and an EIR shall identify and focus on the significant effects of the proposed Project on the environment (Section 15126.2).

Sections 5.1 through 5.10 of the Draft EIR examine the potential environmental impacts associated with implementation of the proposed Project and focuses on the following issues:

- Aesthetics (Section 5.1)
- Air Quality (Section 5.2)
- Cultural Resources (Section 5.3)
- Energy (Section 5.4)
- Greenhouse Gas Emissions (Section 5.5)
- Noise (Section 5.6)
- Public Services (Section 5.7)
- Transportation (5.8)
- Tribal Cultural Resources (Section 5.9)
- Utilities and Service Systems (Section 5.10)

Technical Studies

Technical studies providing detailed technical analyses that were used in this Draft EIR were prepared for various environmental issues, such as air quality, energy, greenhouse gas emissions, noise, transportation, and cultural resources. These documents are identified in the discussion for the individual environmental issue and included as technical appendices to the Draft EIR.

Analysis Format

The Draft EIR assesses how the proposed Project would impact the issue areas identified above. Each environmental issue addressed in this Draft EIR is presented in terms of the following subsections:

Setting: Provides information describing the existing setting on or surrounding the Project site which may be affected as a result of the implementation of the Project and provides a description of the “baseline” conditions from which potential impacts are assessed. This section describes the physical conditions that existed when the IS/NOP was published and sent to responsible agencies and the State Clearinghouse.

Related Regulations: Provides a discussion of the applicable regulations with respect to each environmental issue.

Comments Received in Response to the Initial Study/Notice of Preparation: Provides information regarding if comment letters were received in response to the Initial Study/Notice of Preparation (IS/NOP), and if so, how many and from whom.

Thresholds of Significance: Provides criteria for determining the significance of Project impacts for each environmental issue.

Project Design Features: Provides a discussion of the Project design features as it relates to each environmental issue. Project design features are those features or elements of the Project that serve to avoid or minimize potential environmental impacts.

Environmental Impacts: Provides a discussion of the characteristics of the proposed Project that may have an effect on the environment; analyzes the nature and extent to which the proposed Project is expected to change the existing environment, and whether or not the Project impacts are less than or exceed the levels of significance thresholds.

Recommended Mitigation Measures: Identifies mitigation measures to reduce significant adverse impacts to the extent feasible. For the purposes of the Draft EIR and mitigation measures, the term “Project Sponsor” refers to the party proposing development within the Project site via either an entitlement/development application or the City for City-initiated projects.

Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented: Provides a discussion of significant adverse environmental impacts that cannot be feasibly mitigated or avoided, significant adverse environmental impacts that can be feasibly mitigated or avoided, adverse environmental impacts that are not significant, and beneficial impacts.

5.1 Aesthetics

The focus of this section is to analyze potential impacts related to Aesthetics. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics*.

5.1.1 Setting

The Project site is located in an urbanized setting in the City of Riverside (City) at the northeast corner of Fifth Street and Orange Street as depicted in **Figure 3.0-3**. The proposed Project consists of an existing fully developed site, amongst an urbanized area and is completely surrounded by existing development. The Project site and surrounding is located within the Downtown Specific Plan (DSP) which is fully developed with compatible land uses including commercial, residential, hospitality, restaurants, and office. Surrounding land uses are outlined in **Table 3.0-A** in *Section 3.0 – Project Description* of this Draft EIR.

The existing Project site includes the city-owned Parking Lot 33 (Lot 33), the Riverside Convention Center, and Outdoor Plaza in front of the Riverside Convention Center as shown in **Figure 3.0-3**. **Figure 5.1-1 – Existing Views of the Project Site**¹ shows existing conditions at prominent locations of the Project site. As shown in **Figure 3.0-3**, the surrounding area has been fully developed. Specifically adjacent to the southwestern Project boundary there exists a multi-story structure known as Marriot Hotel. In 2014 the Project site was heavily remodeled to the current existing conditions and has not undergone any major changes in the past 10 years. (SE, p. 22) The Project site is composed of asphalt-paved parking areas, driveways, pedestrian pathways, Outdoor Plaza area, landscaping of ornamental trees and shrubs. The site is generally flat, with an elevation of approximately 860-feet above mean sea level (amsl) at the southeast corner and an elevation of 849-feet amsl at the northwest corner. (SE, p. 23).

Scenic Vistas, Resources, and Visual Character

The City is mostly developed and considered an urbanized area. The hills and ridgelines that surround the City provide scenic vistas to residents of Riverside where they are able to experience long distance views of natural terrain. Vista points are found throughout the City, both as viewed from urban areas toward the hills and from the wilderness areas toward Riverside. The most notable scenic vistas in the City include the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. The peaks of Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, Alessandro Heights and the La Sierra/Norco Hills provide scenic views of the City and the region. (GP 2025 EIR, p. 5.1-2). The City of Riverside has also designated Mt. Rubidoux as a City Landmark. (COR)

The higher elevation hills shape the visual outline and drainage area of the City's viewshed. The scenic vistas provide a visual backdrop when viewed from streets, buildings, and open spaces. Nearly every neighborhood in Riverside features some areas of local hills, from southern Arlanza to Hawarden Ridge. These create vistas from many of Riverside's neighborhoods, its local streets and even residents' back yards. (GP 2025 EIR, p. 5.1-2).

¹ All figures showing existing views of the Project height were taken from an average person's height of approximately 5 and a half feet.

The City has designated several scenic and special boulevards within the City that meet local criteria for designation as scenic routes. Market Street has been designated as a Scenic Boulevard, Special Boulevard and Scenic Parkway. (GP 2025 EIR, pp. 5.1-3 – 5.1-4)

Cultural Resources

The City is comprised of cultural resources that form a rich backdrop of both familiar and pleasing streetscapes experienced by Riverside's citizens on a daily basis. These resources enrich the City's character and form a cornerstone of successful revitalization and preservation efforts. The City has identified historic neighborhoods as Historic Districts and Neighborhood Conservation Area. However, the City holds cultural resources throughout the City in structures, such as single-family residences to commercial, religious, and civic buildings as well as bridges, City parks, and trees. These areas and structures have a significant concentration of cultural resources that represent themes important to local history. (GP 2025 EIR, p. 5.1-4) The Project site shares boundaries with two of the City's Historical Districts within the Downtown Specific Plan; Mission Inn Historic District and Heritage Square Historic District² (shown in **Figure 5.3-1** of *Section 5.3 – Cultural/Paleontological Resources* of this Draft EIR). Additionally, the Project shares a boundary with one potential historic district (Miles Square Northwest). **Figure 5.1-2 – Existing Views from Historic Districts**, show existing views from the Mission Inn top floor, the northern edge of the Main Street Pedestrian Mall at the intersection of Sixth Street and Main Street and views from Orange Street.

² Is also known as Heritage Square Neighborhood which is a Residential District.

FIGURE 5.1-1

Existing Views of Project Site



H:\2023\23-3340\GIS\Pro\laesthetics\laesthetics.aprx Map created 25 Nov 2024

Sources: Nearmap 2023, Site Photographs

FIGURE 5.1-2

Existing Views from Historic Districts



Sources: Nearmap 2023, Site Photographs, City of Riverside GIS

5.1.2 Related Regulations

Federal Regulations

There are no federal regulations applicable to the proposed Project.

State Regulations

There are no state regulations applicable to the proposed Project.

Regional Regulations

There are no regional regulations applicable to the proposed Project.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. LU-26, LU-29, LU-33, LU-44, OS-8.):

Land Use and Urban Design Element

Objective LU-8	Emphasize smart growth principles through all steps of the land development process.
Policy LU-8.1	Ensure well-planned infill development Citywide, allow for increased density in selected areas along established transportation corridors.
Policy LU-8.3	Allow for mixed-use development at varying intensities at selected areas as a means of revitalizing underutilized urban parcels.
Objective LU-9	Provide for continuing growth with that General Plan Area, with land uses and intensities appropriately designated to meet the needs of anticipated growth and to achieve the community's objectives.
Policy LU-9.5	Encourage the design of new commercial developments as “integrated centers,” rather than as small individual strip development. Integrate pedestrian access, parking, access, building design and landscape themes across all parcels in the commercial center to unify the development.
Objective LU-11	Create a network of parkways to establish stronger linkages between Riverside's neighborhoods, major elements of its natural environment and neighborhood parks and schools.
Policy LU-11.1	Recognize parkways as distinctive elements of the City's circulation network.
Policy LU-11.2	Recognize Victoria Avenue, Magnolia Avenue/Market Street, University Avenue, Van Buren Boulevard, Riverwalk Parkway, La Sierra Avenue, Arlington Avenue, Canyon Crest Drive, and Overlook Parkway as the fundamental elements of the City's parkway landscape network, and components of Riverside Park
Policy LU-11.3	Seek opportunities to provide enhanced bicycle and pedestrian usage along parkways through the development process.

Objective LU-12	Restore the Magnolia/Market Corridor to its historical role as a scenic "showcase roadway" that spans the City of Riverside while updating its function as a key transit corridor to support future growth.
Policy LU-12.2	Maintain the existing mature heritage landscaping and infill landscaping as appropriate to return the Corridor to being a grand tree-lined parkway.
Policy LU-12.5	Focus commercial development at identified commercial nodes, avoiding disconnected commercial strips along the corridor
Objective LU-27	Enhance, maintain, and grow Riverside's inventory of street trees.
Policy LU-27.1	Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.
Policy LU-27.3	Seek ongoing cooperation from residents in the maintenance, conservation, and protection of street trees.
Policy LU-27.4	Encourage trees on private property to add to the City's urban forest.

Open Space and Conservation Element

Objective OS-2	Minimize the extent of urban development in the hillsides, and mitigate any significant adverse consequences associated with urbanization.
Policy OS-2.4	Recognize the value of ridgelines, hillsides and arroyos as significant natural and visual resources and strengthen their role as features which define the character of the City and its individual neighborhoods.
Policy OS-2.5	Review the feasibility of creating a "night-time sky" ordinance to reduce light pollution.

City of Riverside General Plan 2025 EIR

The are no applicable mitigation measures from the City of Riverside 2025 General Plan EIR that pertain to Aesthetics.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the GPUI EIR that pertain to Aesthetics.

Downtown Specific Plan

The City of Riverside Downtown Specific Plan contains goals, policies, development standards and design standards that are considered applicable to the proposed Project, as identified below (DSP, p. 3-6 – 3-8, 3-9, 6-7 – 6-11, 6-16 – 6-19, 6-21 - 6-22):

Land Use

Goal LU-1	To provide land use opportunities for Downtown to serve as the region's cultural, governmental, arts, and entertainment center with unique and interrelated districts offering a wide range of opportunities for residential lifestyles, work environments, shopping, entertainment, learning, culture, and the arts.
Policy LU 1.1	Maintain the integrity of, and interrelationship between, each (applicable) Downtown district. Raincross District: The pedestrian-oriented center of Downtown, with an emphasis on an intense mixture of residential, specialty commercial, tourist, restaurant, cultural, arts, and civic uses. Design philosophy emphasizes new and infill construction that is compatible with the historic structures that give Downtown its unique identity.
Policy LU-2	Encourage pedestrian-oriented specialty retail shops offering quality goods and services in the Raincross District, and encourage balance between individually owned businesses and franchise or corporate entities.
Policy LU-3	Actively recruit a range of restaurants that includes fine dining, cafes, coffee houses, and sandwich shops, emphasizing a strong presence of outdoor dining and an emphasis on both daytime and evening hours.
Policy LU-4	Encourage mixed-use development with a strong residential presence in the Raincross District, including both new construction and the adaptation of upstairs spaces in existing buildings for residential purposes.
Policy LU-6	Place a strong emphasis on supporting, preserving, and expanding the Raincross District as a major center for culture, learning, and the arts.
Policy LU-7	Promote nightlife activity in the Raincross District with restaurants and a variety of entertainment opportunities.
Policy LU-9	Encourage the public or private construction of centralized, secured trash compactors within the Raincross District, Neighborhood Commercial, and Justice Center Districts, situated in low visibility areas and with adequate provisions for cleaning and maintenance.
Policy LU-10	Encourage the establishment of a vibrant mix of uses that will serve the needs of both residents and visitors and will help create a vibrant daytime, evening, and weekend environment.
Policy LU-11	Promote the expansion of the convention center and related hotel uses to support increased convention and tourist activity.

Urban Design

Goal UD-1

Strengthen the identity and character of Downtown using the existing historic and architectural urban character of the community, while allowing for new structures that are architecturally compatible with, and complementary to, the existing architectural and historic fabric.

Policy UD-1-1

Through design review, ensure that new development enhances the character of the Downtown Districts by requiring design qualities and elements that contribute to an active pedestrian environment, where appropriate, and ensuring that architectural elements are compatible and in scale with the existing historic structures in the Downtown.

6.5 – Development Standards for the Raincross District

The development standards for the Downtown Specific Plan - Raincross District (DSP-RC) are designed to create a place of daytime, evening and weekend activity by providing a high-activity pedestrian environment with a storefront emphasis at the street level. To ensure compatible development with the neighboring districts, any development within the Raincross district is subject to the following development standards. (DSP, 6-7)

6.5.1 – Maximum Floor Area Ratio

A. Outside the Mission Inn Historic District:

The maximum floor area ratio (FAR) in the Raincross District, outside of the Mission Inn and Heritage Square Historic Districts, shall be 3.5, except an increased FAR up to, but not exceeding, 4.5 may be permitted for the site amenity features listed in the following table. Amenities may be combined for increased FAR, except that in no case shall the floor area ratio exceed 4.5.

Amenity	Bonus
Landscaped Courtyard or Atrium. A continuous area which is open and accessible to the public, has a minimum area of 600 continuous square feet with a minimum dimension of 20 feet. Such courtyard or atrium shall be landscaped with greenery, statuary, water features, seating, or combination of the four.	Floor area increased four times the square footage contained within the courtyard.
Arcade or Pergola. A covered pedestrian passageway that connects two public streets; a public street and parking area or mall; or a public street and another arcade or pergola. The arcade or pergola shall be unobstructed, have a minimum width of 15 feet and a minimum vertical clearance of 12 feet and shall be situated at street grade. Arcades and Pergola located within the public right-of-way shall require an encroachment permit from the Public Works Department. Where an arcade or pergola is located within the public right-of-way, the minimum width may be reduced to conform with the width of the right-of- way.	Floor area increased three times the square footage contained within the arcade or pergola.
Other Amenities. Additional floor area ratio may be permitted in conjunction with modified amenities or amenities not listed above with the granting of a Conditional Use Permit, provided the proposed amenities specifically support the purpose and intent of the Raincross District and are compatible with surrounding development and design. Specific floor area bonus shall be negotiated and the amenities must be acceptable to the City.	Floor area bonus negotiated in conjunction with the amenities provided and subject to the granting of a Conditional Use Permit.

6.5.2 – Maximum Unit Density

The maximum dwelling unit density shall be 60 units per acre. The maximum unit density may be increased with the approval of a Conditional Use Permit.

6.5.3 – Maximum Height

A. Outside the Mission Inn Historic District:

The maximum building height in the Raincross District, outside the Mission Inn Historic District, shall be 100 feet, except for the following:

1. The maximum building height shall not exceed 50 feet within 100 feet of the Residential District or a residential zone outside the specific plan boundaries. For purposes of this requirement, where the district boundary line runs down the middle of a street or alley or the residentially zoned property is across a street or alley, the 100 feet shall be completely contained on the property proposed for development, not measured from the middle of the street.
2. For parcels outside the above referenced 100 feet distance from the Residential District or residential zone, building heights may exceed 100 feet with the granting of a Conditional Use Permit, provided that the maximum FAR is not exceeded.

6.5.4 – Minimum Lot Size

The minimum lot size for new parcels shall be 10,000 square feet.

6.5.5 – Front Yard Setback

There shall be no front yard setback; buildings shall be contiguous with the front parcel line (0-foot setback). The front yard setback shall also apply to side and rear yards adjacent to a public street. The following exceptions apply to front yard setbacks:

1. A portion of the front building elevation, not to exceed fifty percent of the length of the building frontage, may be setback up to 20 feet to allow for outdoor use, such as outdoor dining, display, public art, entry forecourts, or other amenity appropriate to an urban setback.

6.5.6 – Rear Yard Setback

No minimum rear yard setback is required, except for the following:

1. Where the rear parcel line abuts the Residential District or a residential zone outside the specific plan boundaries, the minimum rear yard setback shall be 15 feet if there is a public alley (distance from building to rear property line or alley easement), and 25 feet where there is no public alley.
2. When the project contains a residential component (i.e., multiple family residential use, mixed-use or live/work unit), the minimum rear-yard setback shall be 5 if there is a public alley, and 15 feet where there is not public alley. This standard shall not apply to adaptive reuse, or conversion of existing buildings into a residential use.
3. Where both of the above situations apply, the greater setback standard shall apply.

6.5.7 – Interior Side Yard Setback

No minimum interior side yard setback is required, except for the following:

1. When the project contains a residential component (i.e., multiple family residential use, mixed-use or live/work unit), the portion of the building containing the residential use shall be setback a minimum of 15 feet from the interior side parcel line. This standard shall not apply to adaptive reuse, or conversion of existing buildings into a residential use.

6.6 – Design Standards and Guidelines for the Raincross District

The design standards and guidelines for the Raincross District are intended to enhance both these signature buildings and their setting which together contribute to the character of a cohesive downtown.

6.6.2 – Site Planning

Building Orientation

1. Buildings should have a strong street presence, with public entrances and activity areas oriented toward the street.

Setbacks

1. Commercial buildings should generally have a direct interface with public sidewalks with no intervening setback.

Vehicular Access and Parking

1. Parking spaces should not have direct frontage on a street. Access points should be limited to existing alleys wherever possible.
2. When on-site parking is provided, parking should be consolidated on the site. In no case, should the building be surrounded on all sides with parking.

Pedestrian Access

1. Primary access to buildings should be from the street or pedestrian walkways, not parking areas.
2. Walkways should be provided to link parking areas with the street wherever feasible.

Interface between Non-residential and Residential Uses

In several portions of the Specific Plan area, non-residential uses abut residential uses. This condition can specially be observed in the Raincross District, along Fairmount Boulevard between First and Sixth Streets. Issues of privacy, safety, and noise are addressed in these following standards:

1. To provide privacy for adjacent residential properties, taller elements of the building should be set away from those properties. In addition, at residential edges, commercial buildings should maintain low profiles and building heights should be stepped down to the height of adjacent residential zones, utilizing architectural elements such as gables or hip roofs to reduce building mass.
2. When there is no intervening alley or street, appropriate landscape screening shall be provided at the shared property line. Excepting trees, this screening shall not be less than six feet or exceed eight feet in height.
3. Eighty percent of the vertical plane at the property line to a height of six feet shall be opaque.

4. Screening may consist of one (or more) of the following:
 - “Vertical” trees closely spaced
 - “Green” (vine-covered) solid or fenced walls
 - Hedges (minimum height of six feet)
5. The criteria for selecting plant materials, as established in section 15.3.6 shall be followed.
6. Noise or odor generating activities in general, and loading areas, trash and storage areas, and rooftop equipment in particular, should be located as far as possible from adjacent residential uses and shall not be located next to residential properties without fully mitigating their negative effects.
7. Non-residential buildings should be sited so as to avoid significant shading of adjacent residences and compromising residents’ privacy.
8. Windows in non-residential buildings should be oriented to avoid a direct line of sight into adjacent residential buildings or property.
9. Whenever adjacent residential and commercial uses can mutually benefit from connection rather than separation, appropriate connective elements such as walkways, common landscaped areas, building orientation, gates, and/or unfenced property lines should be employed.

Site Furniture

1. Pedestrian amenities are encouraged, including benches, landscaped gathering areas, trash receptacles, etc. Design of improvements should be traditional and related to the signature buildings. Particular attention should be paid to creating shade in the Raincross District as well as all the other districts.

Courtyards and Passages

1. When placed in an appropriate location, between two elements of a building or buildings, a courtyard can provide a visually relaxing pedestrian environment, or a secluded retreat from noise and traffic. Courtyards play an important role in providing spaces for solace and respite in Downtown. Courtyards and pedestrian passages are encouraged to facilitate pedestrian circulation and to provide resting and gathering places. Courtyards should be prominently placed on the site to be seen from the street and to enhance the public environment. They should be placed to terminate vistas, to anchor street corners and along street edges.
2. All courtyards should be provided with amenities such as shade trees, seating areas, water fountains, accent planting, and public art. If space permits, elements such as gazebos, arcades, or pergolas should be incorporated in the courtyard design.
3. Design of improvements should be traditional and related to the signature buildings.

6.6.3 – Architecture

Style

1. Existing buildings should be restored/maintained in a historic style that reflects the actual, historic appearance of the building at its period of historic significance.
2. The historic fabric in Downtown Riverside is interspersed with “contextual” buildings - buildings that are not historic but contribute to the district character as one traverses the district. Similarly, new buildings should not necessarily be stylistically “historic”, but should be compatible with their historic neighbors in terms of massing, modulation, height, and setbacks. New buildings

should be contemporary interpretations using the signature buildings as a source of design inspiration.

Scale

1. Buildings and improvements should be at a pedestrian scale. To maintain a sense of pedestrian scale, larger buildings should be broken into storefront bays about 25 feet wide.
2. The size and mass of a new building should blend with the surrounding district.

Detailing

1. Detailing of existing buildings should be a restoration or replication of historic detailing during the building's period of historic significance.

Roof Design

1. Roof design should reflect/complement significant buildings in the area.

Colors and Materials

1. Muted earthtones and traditional materials should prevail, with brighter colors limited to trim areas. The Mission Inn is a good example of this type of treatment.

6.6.4 – Landscaping

Plant Types

1. Landscaping should be compatible with historic plantings and consist of types suitable for the climate and the exposure in which they are to be planted.

Scale

1. Pedestrian scale plantings should prevail, with larger plantings used as accents.

Relationship to Development

1. Plantings should be used to complement and accent the architecture. They should not be of such a scale and density as to obscure or overwhelm the architecture.

Hardscape

1. Paved areas should make significant use of traditional concrete scoring and pavers.

6.6.5 – Signs

Style

1. Signs should be low-key and complementary to the architecture. Eating and entertainment uses may make greater use of color and innovative design. Historic forms and types should predominate.

Scale

1. Signing should be an accent; the overall effect should be low key and proportional to the building.

Type

2. A variety of forms is acceptable, including painted wood, painted metal, signs painted directly on the building, and traditional neon. Interior illuminated signs, plastic, canister signs, channel letter signs, and other more modern forms of signs are generally not appropriate.

6.8 – Additional Standards For Mixed-Use Development in the Raincross District

The intent of this section is to strengthen the interaction between residential, commercial and employment uses so as to facilitate a more efficient use of transportation systems, to encourage the conservation of land resources and create a vital urban area that is a place of daytime, evening and weekend activity.

6.8.3 – Land Use Requirement for Mixed-Use Development

Mixed-use development integrates compatible office or commercial uses with residential uses within the same building or structure. Mixed-use development in the Raincross District should generally promote retail uses at the street level, and shall have the following use requirements:

1. Ground Floor or Street Level
 - a. Retail uses - The ground floor or street level shall be devoted to pedestrian-oriented retail, restaurant, or similar type of use, except within 165 feet of Fairmount Boulevard between First and Sixth Street and within the Heritage Square Historic District where retail uses are prohibited.
 - b. Office uses - General and professional office uses shall be allowed on the ground floor, except on Main Street where they may only be located off-street or behind retail or restaurant uses to create an active retail edge.
 - c. Residential or lodging uses - Mixed-use projects that have frontage on Main Street between Third and Tenth Streets, Mission Inn Avenue, or University Avenue may have residential or lodging uses on the ground floor only when located off-street or behind retail uses. Residential or lodging uses shall be permitted on the ground floor for all other areas of the Raincross District. A common entrance to the residential portion of the mixed-use project may be located adjacent to the non-residential front, ground floor use.
 - d. Live/work uses - Live/work units shall be permitted on the ground floor, subject to the standards for live/work units set forth in Section 6.7. For mixed-use projects that have frontage on Main Street, Mission Inn Avenue or University Avenue, the first 25 feet of floor area depth at the street level frontage shall be devoted to pedestrian-oriented commercial retail activity. Live/ work unit on the ground floor of all other mixed-use projects shall not be subject to this requirement.
2. Upper Levels
 - a. The upper levels may contain retail (except within 165 feet of Fairmount Boulevard between First and Sixth Streets and within the Heritage Square Historic District where commercial uses are prohibited), office or lodging uses, however, at least one floor of the upper levels must be dedicated to residential or live/work uses.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Aesthetics:

Chapter 19.120.050 – Development Standards. This chapter identifies the development standards applicable to all development in the mixed-use zones.

Chapter 19.550 – Fence, Walls, Landscape Materials. This chapter sets forth standards for the construction and maintenance of fences, walls, and landscape materials to ensure that such features are aesthetically pleasing and provide for privacy and safety without obstructing views and without creating a public safety hazard or nuisance.

Chapter 19.554 – Trash/Recyclable Materials Collection Area Enclosures. This chapter sets forth standards for the construction of trash/recyclable materials collection area enclosures to ensure that such features are aesthetically pleasing and screen the trash and recycle containers without obstructing views or causing a public safety hazard or nuisance.

Chapter 19.556.010 – Outdoor Lighting. This chapter sets forth standards to ensure that outdoor lighting is adequate for safety, security and commerce while preserving the naturally dark night sky by mitigating artificial sky glow and preventing glare and light trespass

Chapter 19.560 – Building Height Measurement. The purpose of this chapter is to establish a method for measuring the height of structures in compliance with the height limits set forth in the Zoning Code and specifies exceptions to height limit.

Chapter 19.590 – Performance Standards. This chapter describes certain characteristics associated with the design and operation of development that have potential to create negative impacts on surrounding uses.

Chapter 19.640 – General Permit Provisions. The purpose of this chapter is to establish the overall structure for the application, review, and action on discretionary permits and legislative actions. Additionally, it identifies and describes the permits regulated by the Zoning Code and identifies those minor activities, uses, and structures that are exempt from permit requirements while requiring compliance with all applicable laws and regulations.

Chapter 19.710 – Design Review. This chapter requires future developments to comply with the design review process. The purpose of this chapter is to protect property values and promote high-quality development by regulating building design, landscaping, and aesthetics. It aims to prevent issues like excessive uniformity, poor design, and inadequate planning, while ensuring that private development aligns with public interests and the character of the city.

Title 20 – Cultural Resources. The purpose of this title is to promote the public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City.

City of Riverside Urban Forestry Policy Manual

The City of Riverside is known as a “City of Trees.” Trees beautify the landscape and enhance the quality of life for all residents. Therefore, the City has created a manual with guidelines that can be used for reference by City Staff, private contractors, volunteer organizations and citizens when working in and around trees within City jurisdiction. (UFPM, p. 4).

Tree Removals Guidelines. The Public Works Department is responsible for the service of the street tree system. Individual trees can affect the environment of the total community. The Public Works Director or the Director's designee shall have the authority to remove any hazardous, diseased, or declining trees, providing that the removals meet the existing criteria as stated in the policy. The Director or Designee shall authorize all tree removals with the authority granted in this policy and a quarterly report will be provided to the Park and Recreation Commission. The Director shall provide the Park and Recreation Commission with a quarterly listing of the tree removals for the Commission's review. The list shall include the locations of the trees and the reason for removal (UFPM, p. 19).

5.1.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding Aesthetics in response to the Initial Study/Notice of Preparation (IS/NOP).

5.1.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G ("Environmental Checklist") to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impact in the following areas and these topics are not addressed in this Draft EIR:

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; and
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

As identified in the IS/NOP prepared for this Project, implementation of the proposed Project would have potentially significant impact in the following areas and these topics are addressed in this Draft EIR:

- Have a substantial adverse effect on a scenic vista; and
- In a non-urbanized area, would substantially degrade the existing visual character or quality of public views of the site and its surroundings. In an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality.

5.1.5 Project Design Features

The Project proposes to demolish the existing Lot 33 and Outdoor Plaza area. During construction the Project site would be fenced with widescreen material to obscure views of the construction areas. 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.

Table 3.0-B of this Draft EIR provides conceptual-level buildout details for the Project. The analysis of this section is based on this maximum "development envelope". A conceptual design of the buildout

details from **Table 3.0-B** are depicted on **Figure 3.0-7**. This Figure portrays that the Project proposes to introduce new vertical structures along the Market Street, Third Street, Orange Street and Fifth Street (represented as buildings A, C, E, G). **Figures 3.0-8** through **3.0-18** provide examples of conceptual renderings and potential elevation cross sections of what the future maximum “development envelope” could look like.

The aesthetic design of the Project will need to comply with the City’s applicable design standards. Since no specific development project is currently under consideration by the City, any future development will be required to comply with the DSP-RC Development Standards and Design Standards such as but not limited to; Floor Area Ratio, Building Height, Building Orientation, Setbacks, Unit Density, Vehicular Access, Parking and Pedestrian Access outlined in Section 6.5 and Section 6.6 of the Downtown Specific Plan. These development standards are intended to ensure developments within the Downtown Specific Plan will be visually compatible with the surrounding land uses. Since there are historic districts in proximity to the Project site, the City will ensure future developments are compliant with the DSP-RC Development Standards and Design Standards as well as all applicable City requirements, so that the historic integrity and significant of the adjacent historic districts are not visually negatively impacted.

As discussed in *Section 3.0 – Project Description* of the Draft EIR, the Project proposes one residential building, two hotel buildings both with a maximum height of 95 feet, one office building with a maximum height of 155 feet and the Riverside Convention Center expansion with a vertical height of 75 feet. The DSP requires buildings within 100 feet of a Residential District to not exceed 50 feet. Due to the proximity of the proposed Riverside Convention Center building to the existing Heritage Square Neighborhood (identified as a Residential District) future development will be reviewed by City staff to assess consistency with the DSP and Title 19. If building heights exceed the DSP height requirements, such building(s) will be evaluated once details are known, as the Project does not propose any specific development at this time. It should be noted that City owned buildings are exempt from Title 19. Since the Project is proposing a maximum height of 155 feet for the proposed office building, pursuant to Section 6.5.3 of the Downtown Specific Plan, future development buildings would be subject to a Conditional Use Permit (CUP).

Additionally, an Outdoor Plaza is proposed as part of the Project and is depicted on **Figures 3.0-15** and **3.0-18** found in *Section 3.0 – Project Description* of this Draft EIR, the Outdoor Plaza will incorporate a flexible outdoor gathering space with potential for a covered or uncovered programable outdoor events. The Project will incorporate landscaping along the Outdoor Plaza, throughout the Project and within the right-of-way with City of Riverside Urban Forestry Policy Manual. Pedestrian paths, open space features, screening walls, landscaping and styles and colors will be in accordance with Section 6.6 – Design Standards and Guidelines for the DSP-RC. Compliance with Design Standards and Guidelines will ensure future development will be complimentary to the surrounding existing community. Furthermore, subterranean parking structure (up to five levels) is proposed. The parking structure will utilize existing driveways and is proposed below the residential, office and hotel buildings. Through the design review process the City will ensure that the proposed development will be compatible with the surrounding architectural styles, principles and elements that compose the Riverside Downtown Area.

5.1.6 Environmental Impacts

Threshold: Have a substantial adverse effect on a scenic vista?

Based on the City's General Plan, Market Street is identified as Scenic Boulevard, Special Boulevard and Scenic Parkway. *Table 5.1-B –Scenic Parkways* of the 2025 General Plan Draft EIR defines Magnolia Avenue/Market Street as a seventeen-mile-long historic parkway, which was once Riverside's grandest streets. (GP 2025 EIR, p. 5.1-19) Through implementation of the Project, future developments may introduce residential buildings up to 9-floors (approximately 95 feet tall) to the Project's frontage along Market Street, shown as Building A on **Figure 3.0-7**. Future development will change the existing view of the Project site from Market Street, the adjacent building (Marriott Hotel) at the northeast corner of Market Street is a multi-story building (approximately 12 floors). However, views of Market Street commencing from Whitter Place to First Street consist of various multi-story buildings similar to those proposed as part of the Project. Therefore, while the view along Market Street next to the Project site will be altered by the proposed Project, the Project would include similar vertical structures to those currently existing along Market Street. The Project would also propose compatible and planned building heights as envisioned in the Downtown Specific Plan. Existing views and proposed views along Market Street are shown on **Figure 5.1-3 – Views at Market St/Third St Intersection** and **Figure 5.1-4 – Views at Market St/Fifth St Intersection**.

The Projects proposed layout would allow structures of up to 95 feet high along Market Street and Third Street. Structures of 75 feet high along Orange Street could be allowed and structures of 155 feet tall could be constructed within the center of the Project site. By implementing this proposed layout, impacts to views from public right-of-way would be reduced due to the implementation of depth. The line of sight from **Figures 5.1-3** and **5.1-4** shows the proposed buildings at the edges of the Project site would mimic the existing Marriott hotel in height. Therefore, the proposed heights would be considered compatible to the other buildings and would follow the design guidelines such that buildings would be designed to be respectful of the adjacent historic districts. Specifically, along Market Street since that is considered a local scenic boulevard, the Project proposes similar and compatible building heights. As shown on **Figures 5.1-3** and **5.1-4**, the views along Market Street will not be significantly changed from the existing condition. The Project would not have a substantial adverse effect on views from Market Street.

As mentioned in *Section 5.1.1 – Setting*, the hillsides and ridgelines in the City provide long distance views of natural terrain and are considered part of the City's scenic vistas. The Project site is relatively flat and not located close to any hillsides or ridgelines. As shown on **Figure 5.1-5 – Views at Orange St/Fourth St Intersection**, the existing conditions provide minimal and obstructed views to Mt. Rubidoux. Views of Mt. Rubidoux from various locations on the site are minimal as shown on **Figure 5.1-6 – Views at Orange St/Fifth St Intersection** and **Figure 5.1-7 – Views at Orange St/Third St Intersection**. Future development would not substantially diminish existing views towards a scenic vista (Mt. Rubidoux). Furthermore, as with current conditions, views of Mt. Rubidoux would still be available along the Project frontage adjacent to Market Street within the public right-of-way. Therefore, the Project would not have a substantial adverse effect on views to the surrounding hillsides and ridgelines.

As indicated in *Section 5.1.1 – Setting*, surrounding historic districts consist of Mission Inn Historic District and Heritage Square Historic District and Miles Square Northwest Potential Historic District. As shown on **Figure 5.1-8 – Mission Inn Top Floor View** and **Figure 5.1-9 – Views at Main St/Sixth St Intersection**, views from the Mission Inn Historic District would be slightly altered by the proposed

Office building (up to 155-feet in height) and proposed Residential building (up to 95-feet in height). However, due to the developed nature of the surrounding urban area and the existing tall buildings, the Project would not substantially change these existing views. **Figure 5.1-10 – Views at Main St/Fifth St Intersection** and **Figure 5.1-11 – Views at Main St/First St Intersection** provide a north to south Project site view which show the existing multi-story buildings in the area and how the Project would change views. Additionally, the Project's future developments will be reviewed by the City to ensure compatibility with the DSP. Furthermore, views of distant mountains can still be seen from these notable local vantage points surrounding the Project site. Therefore, implementation of the Project would not substantially alter views from the Mission Inn Historic District towards a scenic vista.

Views to and from the Project site will be altered through the future development due to the increase in vertical development, specifically at the existing Lot 33 area. **Figures 5.1-5** through **5.1-7** provide views along the Orange Street frontage of the Heritage Square Historic District. Since Lot 33 is relatively flat **Figures 5.1-3, 5.1-5** and **5.1-7** show a greater change in the Project site views due to the Project's proposed vertical component. However, views from the Heritage Square Historic District towards the Project site do not offer unobstructed views to scenic vistas. Therefore, implementation of the Project would not substantially alter views from the Heritage Square Historic District towards a scenic vista.

Moreover, it should be noted that Third Street, Orange Street, and Fourth Street all contain one or more multi-story building aside from what is already existing on the Project site. Therefore, implementation of future development would not introduce a vertical component that is not already predominantly seen in the surrounding area.

In conclusion, the Project's future developments, while altering existing conditions would not result in substantially adverse effects to views along Market Street. Furthermore, future developments will be subject to the City's Design Review process per Municipal Code Chapter 19.640. The City would ensure that future development would adhere to the Downtown Specific Plan's development standards and design guidelines which will ensure that the Project maintains the character and integrity of nearby Historical Districts, contributing to a cohesive and pedestrian-friendly downtown. Thus, by adding more tall buildings to the site, the Project will urbanize this location, without significantly blocking or changing the visual character or scenic vistas of the site. Therefore, the Project would not result in substantial adverse effects on scenic vistas. Impacts would be **less than significant and no mitigation is required**.

FIGURE 5.1-3

Views at Market St/Third St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB

FIGURE 5.1-4

Views at Market St/Fifth St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB

FIGURE 5.1-5

Views at Orange St/Fourth St Intersection

Existing Condition



Proposed Condition



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Sources: City



FIGURE 5.1-6

Views at Orange St/Fifth St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB



FIGURE 5.1-7

Views at Orange St/Third St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB



FIGURE 5.1-8

Mission Inn Top Floor View

Existing Condition



Proposed Condition



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Sources: WEBB

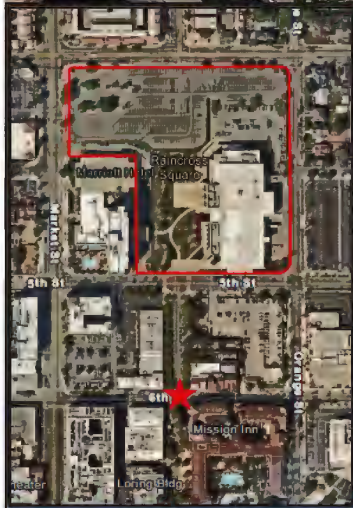
FIGURE 5.1-9

Views at Main St/Sixth St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB



FIGURE 5.1-10

Views at Main St/Fifth St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB



FIGURE 5.1-11

Views at Main St/Third St Intersection

Existing Condition



Proposed Condition



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Sources: WEBB



Threshold: In an urbanized area, would the proposed Project conflict with applicable zoning and other regulations governing scenic quality?

According to *CEQA Statute and Guidelines* Section 21071, a city that has a population of at least 100,000 is considered to be an urbanized area. The City's current population is approximately 316,690 people so the City is considered an urbanized area (DOF). Currently the Project site is in an area that is highly urbanized and fully developed. The Project site has a land use designation and a zoning designation of DSP. Specifically, the Project site is located within the Raincross District of the DSP. A mixed-use development within the Raincross District of the DSP is a Permitted Use. Specific uses within the mixed-use development such as convention and conference facilities, hotels, on-sale of alcoholic beverage are permitted on this site per the DSP with a Conditional Use Permit. Therefore, the Project proposes uses that are consistent with the DSP Raincross District Permitted Uses.

Per the DSP the minimum lot size for a new parcel shall be 10,000 square feet, while the Project is not a new parcel, the Project site is approximately 435,600 square feet³therefore meets this requirement. The Project has identified a maximum height of 155 feet for the office building, 95 feet for the residential and hotel building and 75 feet for the Riverside Convention Center building. The DSP requires buildings within 100 feet of a Residential District to not exceed 50 feet. Although City owned buildings such as the convention center are exempt from Title 19, due to the close proximity of the proposed Riverside Convention Center expansion to the existing Heritage Square Neighborhood (identified as a Residential District), future site plans for the expansion of the convention center would be reviewed by City staff to assess compatibility with the DSP and Title 19. All other proposed building heights would be allowable per the DSP with a CUP and specific setbacks to nearby residential districts. Therefore, the Project proposes heights that are consistent with the current zoning of the DSP. Moreover, as discussed in the Threshold above, the multi-story buildings proposed would align with the urban character of the surrounding areas existing structures.

The DSP restricts the Project site to a maximum of 60 units per acres, additional units may be approval with the used a CUP. The Project being analyzed herein assumes a maximum of 168 residential units as shown in **Table 3.0-B** in *Section 3.0 – Project Description* of the Draft EIR. The proposed units would be approximately 17 units/per acre, which is consistent with the DSP's maximum density assumption of 60 units/acre.

The Project proposes a new Outdoor Plaza that could contain a flexible outdoor gathering space. Per the DSP, the Outdoor Plaza shall be a minimum area of 600 continuous square feet with a minimum dimension of 20 feet. During City review of development application, the City will ensure future development is in compliance with the DSP.

By complying with the DSP and City municipal code, the Project would integrate residential and commercial uses seamlessly within the existing surrounding urban neighborhoods and historic districts. Thus, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality in an urbanized area. Therefore, impacts would be **less than significant**.

³ Per *Section 3.0 – Project Description* the Project site is 10 acres which converts to 435,600 square feet.

5.1.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to Aesthetics since impacts are less than significant.

5.1.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

There are no mitigation measures required to reduce impacts to Aesthetics.

5.2 Air Quality

The focus of this section is to analyze potential impacts related to air quality. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics* of this Draft EIR.

The analysis in this section is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Riverside Alive Project (PR-2024-001675)*, City of Riverside, California, prepared by Albert A. Webb Associates dated February 26, 2025 (the *AQ Study*) (WEBB-A). This report is contained within its entirety in Appendix B of this Draft EIR.

5.2.1 Setting

The Project site is located in the Downtown area of the City of Riverside. The Project site has existing City of Riverside General Plan 2025 (GP 2025) land use designation and a zoning designation of Downtown Specific Plan as reflected in **Figure 3.0-5** and **Figure 3.0-6** of *Section 3.0 – Project Description* of this Draft EIR.

Physical Setting

The proposed Project is located within the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin consists of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Regional and local air quality within the Basin is affected by topography, atmospheric inversions, and dominant onshore flows. Topographic features such as the San Gabriel, San Bernardino, and San Jacinto Mountains form natural horizontal barriers to the dispersion of air contaminants. The presence of atmospheric inversions limits the vertical dispersion of air pollutants. With an inversion, the temperature initially follows a normal pattern of decreasing temperature with increasing altitude; however, at some elevations, the trend reverses and temperature begins to increase as altitude increases. This transition to increasing temperature establishes the effective mixing height of the atmosphere and acts as a barrier to vertical dispersion of pollutants. (SCAQMD 1993, p. A8-2).

Dominant onshore flow provides the driving mechanism for both air pollution transport and pollutant dispersion. Air pollution generated in coastal areas is transported east to inland receptors by the onshore flow during the daytime until a natural barrier (the mountains) is confronted, limiting the horizontal dispersion of pollutants. The result is a gradual degradation of air quality from coastal areas to inland areas, which is most evident with the photochemical pollutants such as ozone formed under reactions with sunlight. (SCAQMD 1993, pp. A8-1–A8-2).

Climate

Terrain and geographical location determine climate in the Basin. The Project site lies within the terrain south of the San Gabriel and San Bernardino Mountains and East of the Santa Ana Mountains. The climate in the Basin is typical of southern California's Mediterranean climate, which is characterized by dry, warm summers and mild winters. Winters typically have infrequent rainfall, light winds, and frequent early morning fog and clouds that turn to hazy afternoon sunshine. (SCAQMD 1993, pp. A8-1–A8-2).

The following includes factors that govern micro-climate differences among inland locations within the basin: 1) the distance of the mean air trajectory from the site to the ocean; 2) the site elevation; 3) the

existence of any intervening terrain that may affect airflow or moisture content; and 4) the proximity to canyons or mountain passes. As a general rule, locations farthest inland from the ocean have the hottest summer afternoons, the lowest rainfall, and the least amount of fog and clouds. Foothill communities in the Basin have greater levels of precipitation, cooler summer afternoons and may be exposed to wind funneling through nearby canyons during Santa Ana winds. Terrain will generally steer local wind patterns. (SCAQMD 1993, pp. A8-1–A8-2).

The Project site is located within the City of Riverside, north of the CA-91 freeway as is reflected in **Figure 3.0-1** of *Section 3.0 – Project Description* of this Draft EIR, within the eastern portion of the Basin (SCAQMD Map). The surrounding area is located within the Downtown Specific Plan as reflected in **Figure 3.0-3** also found in *Section 3.0 – Project Description* of this Draft EIR. More specifically, the Project site is bound by residential uses along Third Street to the north, and Orange Street to the west, Hotel and Commercial Uses to along Five Street to the south and Market Street to the east.

Precipitation and Temperature

Annual average temperatures in the Basin are typically in the low to mid-60s (degrees Fahrenheit, or °F). Temperatures above 100 °F are recorded for all portions of the basin during the summer months. (SCAQMD 1993, p. A8-1).

The climatological station closest to the Project site is a National Weather Service (NWS) Cooperative station located in Riverside. As shown in **Table 5.2-A – Riverside Fire Station 3, Meteorological Data**, climatological data from the NWS at this station spanning from 1981-2010 shows December as the coldest month with an annual high average temperature of 68.8° F and an annual low average of 41.6° F and August as the warmest month with an annual high average temperature of 95.7° F and an annual low average of 60.7° F. (WRCC).

The rainy season in the basin is from November to April. Summer rainfall can occur as widely scattered thunderstorms near the coast and in the mountainous regions in the eastern basin. Rainfall averages vary over the basin. For example, the City of Riverside averages 9 inches of rainfall, while the City of Los Angeles averages 14 inches. Rainy days vary from 5 to 10 percent of all days in the basin, with the most frequent occurrences of rainfall near the coast. (SCAQMD 1993, p. A8-1).

Over this same period of time, the climatological data from the Riverside Fire Station 3 NWS Cooperative station shows an annual average precipitation of 9.89 inches. Approximately eighty-two (82) percent of the annual rainfall occurs during the November to March rain season.¹ The highest monthly average rainfall occurs during February. However, year to year patterns in rainfall are unpredictable due to fluctuations in the weather. General meteorological data as measured at the Riverside Fire Station 3 weather station is shown in **Table 5.2-A** below. (WRCC).

2. From Table 5.2-A: sum of average precipitation November – March: 8.16 / annual average precipitation: 9.98 = 0.82, or 82 percent.

Table 5.2-A – Riverside Fire Station 3 Meteorological Data

Month	Temperature (°F)		Average Precipitation (inches)
	Average High	Average Low	
January	69.1	42.3	1.81
February	69.8	44.3	2.39
March	73.1	46.4	1.79
April	77.6	49.8	0.70
May	82.4	54.9	0.19
June	88.4	58.9	0.08
July	94.6	63.3	0.04
August	95.7	64.1	0.12
September	91.5	60.7	0.15
October	83.5	54.1	0.46
November	72.6	44.9	0.78
December	68.8	41.6	1.39
Annual Average	80.8	52.3	9.89

Source: WRCC; 1981-2010 Monthly Climate Summary

Winds

The interaction of land (offshore) and sea (onshore) breezes control local wind patterns in the area. Daytime winds typically flow from the coast to the inland areas, while the pattern typically reverses in the evening, flowing from the inland areas to the ocean. Air stagnation may occur in the early evening and early morning during periods of transition between day and nighttime flows.

Approximately 5 to 10 times a year, the Project site vicinity experiences strong, hot, dry desert winds known as the Santa Ana winds. These winds, associated with atmospheric high pressure, originate in the upper deserts, and are channeled through the passes of the San Bernardino Mountains and into the inland valleys. Santa Ana winds can last for a period of hours or days, and gusts of over 60 miles per hour have been recorded.

High winds, such as the Santa Ana winds, affect dust generation characteristics, and create the potential for off-site air quality impacts, especially with respect to airborne nuisance and particulate emissions. Local winds in the project area are also an important meteorological parameter because they control the initial rate of dilution of locally generated air pollutant emissions. (GP 2025 EIR, pp. 5.3-4-5.3-5).

Categories of Emission Sources

Air pollutant emissions sources are typically grouped into two categories: stationary and mobile sources. These emission categories are defined and discussed in the following subsections.

Stationary Sources

Stationary sources are divided into two major subcategories: point and area sources. Point sources consist of a single emission source with an identified location at a facility. A single facility could have multiple point sources located on-site. Stationary point sources are usually associated with manufacturing and industrial processes. Examples of point sources include boilers or other types of combustion equipment at oil refineries, electric power plants, etc. Area sources are small emission sources that are

widely distributed but are cumulatively substantial because there may be a large number of sources. Examples include residential water heaters; painting operations; lawn mowers; agricultural fields; landfills; and consumer products, such as barbecue lighter fluid and hair spray. (SCAQMD 1993, p. 1-1).

Mobile Sources

Mobile sources are motorized vehicles, which are classified as either on-road or off-road. On-road mobile sources typically include automobiles and trucks that operate on public roadways. Off-road mobile sources include aircraft, ships, trains, and self-propelled construction equipment that operate off public roadways. Mobile source emissions are accounted for as both direct source emissions (those directly emitted by the individual source) and indirect source emissions, which are sources that by themselves do not emit air contaminants but indirectly cause the generation of air pollutants by attracting vehicles. Examples of indirect sources include office complexes, commercial and government centers, sports and recreational complexes, and residential developments. (SCAQMD 1993, p. 1-2).

Air Pollution Constituents

Criteria Pollutant

Air pollutants are classified as either primary or secondary, depending on how they are formed. Primary pollutants are generated daily and are emitted directly from a source into the atmosphere. Examples of primary pollutants include: carbon monoxide (CO), nitrogen dioxide (NO₂), nitric oxide (NO), sulfur dioxide (SO₂), particulates (PM-10 and PM-2.5) and various hydrocarbons (HC), also known as volatile organic compounds (VOC) or reactive organic gases (ROG).

Secondary pollutants are created over time and occur within the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O₃), which is one of the products formed when oxides of nitrogen (NO_x) reacts with hydrocarbons (HC), in the presence of sunlight. The predominant source of air emissions generated by the Project development is expected to be vehicle emissions. Motor vehicles primarily emit CO, NO_x, and VOC/ROG/HC (Volatile Organic Compounds/Reactive Organic Gases/Hydrocarbons). (GP 2025 EIR, p. 5.3-5).

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (NAAQS). Six “criteria” air pollutants were identified using specific medical evidence available at that time, and NAAQS were established for those chemicals. The State of California has adopted the same six chemicals as criteria pollutants but has established different allowable levels. The six criteria pollutants are: CO, NO₂, O₃, Pb, PM-10, PM-2.5, and SO₂ (GP 2025 EIR, p. 5.3-5). The following is a further discussion of the pollutants mentioned above, as well as VOCs.

- **Carbon Monoxide (CO)** – A colorless, odorless toxic gas produced by incomplete combustion of carbon-containing substances. Concentrations of CO are generally higher during the winter months when meteorological conditions favor the build-up of primary pollutants. Automobiles are the major source of CO in the basin, although various industrial processes also emit CO through incomplete combustion of fuels. In high concentrations, CO can cause serious health problems in humans by limiting the red blood cells’ ability to carry oxygen. (SCAQMD 1993, p. 3-2, GP 2025 EIR, p. 5.3-5).
- **Oxides of Nitrogen (NO_x)** – Those that are important in air pollution are nitric oxide (NO) and nitrogen dioxide (NO₂). NO is a colorless, odorless gas formed by a combination of nitrogen and oxygen when combustion takes place under high temperatures and pressures. NO₂ is a reddish-brown gas formed by the combination of NO with oxygen. Combustion in motor vehicle engines, power plants, refineries, and other industrial operations, as well as ships, railroads, and aircraft

are the primary sources of NO_x. NO₂ at atmospheric concentrations is a potential irritant that can cause coughing in healthy people; can alter respiratory responsiveness and pulmonary functions in people with preexisting respiratory illness; and potentially lead to increased levels of respiratory illness in children. (GP 2025 EIR, pp. 5.3-5 – 5.3-6).

- **Ozone (O₃)** – A colorless, toxic gas that irritates the lungs and damages materials and vegetation. During the summer's long daylight hours, plentiful sunshine provides the energy needed to fuel photochemical reactions between NO₂ and VOC which result in the formation of O₃. Conditions that lead to high levels of O₃ are adequate sunshine, early morning stagnation in source areas, high surface temperatures, strong and low morning inversions, greatly restricted vertical mixing during the day, and daytime subsidence that strengthens the inversion layer (all of which are characteristic of western Riverside County). Ozone represents the worst air pollution-related health threat in the basin as it affects people with preexisting respiratory illness, as well as reduces lung function in healthy people. Studies have shown that children living within the basin experience a 10–15 percent reduction in lung function. (SCAQMD 1993, p. 3-2). Sources of the pollutants that create ozone include vehicles, power plants, industrial boilers, refineries, chemical plants, and household and domestic chemicals. (GP 2025 EIR, p. 5.3-6).
- **Atmospheric Particulate Matter (PM)** – Made up of fine solid and liquid particles, such as soot, dust, aerosols, fumes, and mists. PM-10 consists of particulate matter that is 10 microns or less in diameter, and PM-2.5 consists of particulate matter of 2.5 microns or less in size. Both PM-10 and PM-2.5 can be inhaled into the deepest part of the lung, attributing to health effects. The presence of these fine particles by themselves cause lung damage and interfere with the body's ability to clear its respiratory tract. Said particles can also act as a carrier of other toxic substances. (SCAQMD 1993, p. 3-3, GP 2025 EIR, p. 5.3-6).

Sources that contribute to particulate matter pollution include: road dust, windblown dust, agriculture, construction, fireplaces and wood burning stoves, and vehicle exhaust. Specifically, SCAQMD data indicates that the largest component of PM-10 particles in the area comes from dust (unpaved roads, unpaved yards, agricultural lands, and vacant land that has been disked). PM-2.5 particles are mostly manmade particles resulting from combustion sources. Organic carbon particles generated from paints, degreasers, and vehicles are another source of PM-2.5 pollution. The last notable constituent of PM-2.5 sources is elemental carbon, which is used as a surrogate for diesel particulates. (GP 2025 EIR, p. 5.3-6).

- **Sulfur Dioxide (SO₂)** – A colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. SO₂ can result in temporary breathing impairment in asthmatic children and adults engaged in active outdoor activities. When combined with PM, SO₂ can cause symptoms such as shortness of breath and wheezing; and, with long-term exposure, it can lead to the exacerbation of existing cardiovascular disease and respiratory illnesses. Although SO₂ concentrations have been reduced to levels well below state and federal standards, further reductions in SO₂ emissions are needed because SO₂ is a precursor to sulfate and PM-10. Major sources of Sulfur Dioxide include power plants and industrial boilers. The highest levels of Sulfur Dioxide emissions typically occur near large industrial complexes. (GP 2025 EIR, pp. 5.3-6 – 5.3-7).
- **Lead (Pb)** – Lead concentrations once exceeded the state and federal air quality standards by a wide margin but have not exceeded state or federal air quality standards at any regular monitoring station since 1982. Health effects associated with lead include neurological impairments, mental retardation, and behavioral disorders. At low levels, lead can damage the nervous systems of fetuses and result in lowered IQ levels in children. Though special monitoring sites immediately downwind of lead sources recorded very localized violations of the state

standard in 1994, no violations have been recorded at these stations since 1996. Unleaded gasoline has greatly contributed to the reduction in lead emissions in the Basin. Since the proposed Project will not involve leaded gasoline, or other sources of lead emissions, this criteria pollutant is not expected to be a factor with Project implementation. (GP 2025 EIR, p. 5.3-7).

- **Reactive Organic Gases/Volatile Organic Compounds (ROG/VOC)** – It should be noted that there are no state or federal ambient air quality standards for VOCs because they are not classified as criteria pollutants. VOCs are regulated; however, a reduction in VOC emissions reduces certain chemical reactions, which contribute to the formation of ozone. VOCs are also transformed into organic aerosols in the atmosphere, contributing to higher PM-10 and lower visibility levels. Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations of VOC because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere, even at low concentrations, are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis. Some hydrocarbon components classified as VOC emissions are thought or known to be hazardous. Benzene, for example, is a hydrocarbon component of VOC emissions that is known to be a human carcinogen. (SCAQMD 2005, p. 1-5).

Toxic Air Contaminants

Toxic air contaminants (TACs) are chemicals generally referred to as “non-criteria” air pollutants which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are generally present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at very low concentrations. For those TACs that cause cancer, there is no concentration that does not present some low-level risk. In other words, there is no threshold below which adverse health impacts are not expected to occur. This contrasts with the criteria pollutants for which acceptable levels of exposure can be determined, and for which the state and federal governments have set ambient air quality standards. The majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being PM from diesel-fueled engines, known as diesel particulate matter (DPM). In addition to DPM, benzene and 1,3-butadiene are also significant contributors to overall ambient public health risk in California. (SCAQMD 2005, pp. 1-6 – 1-7).

SCAQMD has conducted a detailed TAC emission inventory, air sampling, and dispersion modeling study called the “Multiple Air Toxics Exposure Study in the South Coast Air SoCAB” (MATES-II, SCAQMD 2000), MATES-III (SCAQMD 2008), MATES-IV (SCAQMD 2014), and MATES-V (SCAQMD 2021) (collectively, “MATES Studies”).

The MATES Studies provided information on the importance of various TACs in terms of their relative health risks, as well as their spatial distribution across the Basin. The MATES-V information can be used to characterize the “background” health risks from both regional and local TAC emission sources based on the available toxics emission inventory for the year 2018 and a comprehensive modeling effort.

As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES-V are 53 percent lower at the 10 monitoring sites compared to MATES-IV and 86 percent lower since MATES-II based on monitored data. According to MATES V, the Project area has an average cancer risk of 469 in one million.² Based on other SCAQMD analyses of projected DPM emissions in future years, significant decreases in DPM health impacts are expected

² MATES V Data Visualization Tool (<https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>)

within the next 5-10 years. These reductions reflect recent and continued efforts by the SCAQMD, the California Air Resources Board (CARB), and U.S. Environmental Protection Agency (EPA) that reduce DPM emissions, especially from mobile sources. (SCAQMD 2021, p. ES-6).

Sources and Effects of Criteria Air Pollutants

Sources and typical effects of criteria pollutants are summarized in **Table 5.2-B – Primary Sources and Effects of Criteria Pollutants** below.

The correlation between project-specific emissions and potential health impacts is complex and the SCAQMD has determined the attempting to quantify health risks from relatively small projects (i.e., very large regional projects)) would not be appropriate because it may be misleading and unreliable for various reasons including modeling limitations as well as where in the atmosphere the air pollutants interact and form. (SCAQMD 2015, pp. 9-15). To date, SCAQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health. However, if a project in the Basin exceeds the SCAQMD regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standard(s) are met in the Basin.

Table 5.2-B – Primary Sources and Effects of Criteria Pollutants

Pollutant	Primary Effects
Ozone (O ₃)	Respiratory Symptoms Worsening of lung diseases leading to premature death Damage to lung tissue Crop, forest and ecosystem damage Damage to a variety of materials, including rubber, plastics, fabrics, paint and metals.
PM-2.5 (particulate matter less than 2.5 microns in aerodynamic diameter)	Premature death Hospitalization for worsening of cardiovascular disease Hospitalization for respiratory disease Asthma-related emergency room visits Increased symptoms, increased inhaler usage
PM-10 (particulate matter less than 10 microns in aerodynamic diameter)	Premature death & hospitalization, primarily for worsening of respiratory disease Reduced visibility and material soiling
Nitrogen Oxides (NO _x)	Lung irritation Enhanced allergic responses
Carbon monoxide (CO)	Chest pain in patients with heart disease Headache Light-headedness Reduced mental alertness
Sulfur Oxides (SO _x)	Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits
Lead	Impaired mental functioning in children Learning disabilities in children Brain and kidney damage

Table 5.2-B – Primary Sources and Effects of Criteria Pollutants

Pollutant	Primary Effects
Hydrogen Sulfide (H ₂ S)	Nuisance odor (rotten egg smell) At high concentrations: headache & breathing difficulties
Sulfate	Same as PM-2.5, particularly worsening of asthma and other lung diseases Reduces visibility
Vinyl Chloride	Central nervous system effects, such as dizziness, drowsiness & headaches Long-term exposure: liver damage & liver cancer
Visibility Reducing Particles	Reduced airport safety, scenic enjoyment, road safety, and discourages tourism
Toxic Air Contaminants About 200 chemicals have been listed as toxic air contaminants	Cancer Reproductive and development effects Neurological effects

Source: <https://ww2.arb.ca.gov/resources/common-air-pollutants>

Monitored Air Quality

The Project site is located within SCAQMD Source Receptor Area (SRA) 23. The most recently published data for SRA 23's Riverside County Metropolitan station 1 is presented in **Table 5.2-C – Air Quality Monitoring Summary: 2021 - 2023 (SRA 23)** below. This data indicates that the baseline air quality conditions in the Project area include occasional events of unhealthful air. However, the frequency of smog alerts has dropped significantly in the last decade. Atmospheric concentrations of ozone and particulate matter are the two most significant air quality concerns in the Project area. Locally, no second stage alert (0.35 ppm/hour) has been called by SCAQMD in over twenty years. In fact, the last second stage alert was in Upland in 1988.

Table 5.2-C – Air Quality Monitoring Summary: 2021-2023 (SRA 23)

	Pollutant/Standard	Monitoring Year		
		2021	2022	2023
No. Days Exceeded	Ozone (O₃):			
	California Standard:			
	1-Hour - 0.09 ppm	20	30	48
	8-hour – 0.07 ppm	57	72	70
	Federal Primary Standards:			
	8-hour 0.070 ppm	55	70	69
	Max 1-Hour Conc. (ppm)	0.117	0.122	0.139
	Max 8-Hour Conc. (ppm)	0.097	0.095	0.106
No. Days Exceeded	Carbon Monoxide (CO):			
	California Standard:			
	1-Hour - 20 ppm	0	0	0
	8-Hour – 9.0 ppm	0	0	0
	Federal Primary Standards:			
	1-Hour – 35 ppm	0	0	0
	8-Hour – 9.0 ppm	0	0	0
	Max 1-Hour Conc. (ppm)	2.1	3.3	1.4
	Max 8-Hour Conc. (ppm)	1.8	1.2	1.2
No. Days Exceeded	Nitrogen Dioxide (NO₂):			
	California/Federal Standard:			
	1-Hour – 0.18 ppm (180 ppb)/ 0.10 ppm (100 ppb)	0	0	0
	Federal Standard:			
	Federal/State AAM (53.4 / 30 ppb)	14.3	13.2	12.1
	Max 1-Hour Conc. (ppb)	52.0	55.9	54.70
No. Days Exceeded	Sulfur Dioxide (SO₂):			
	California Standards:			
	1-Hour – 0.25 ppm (250 ppb)	0	0	0
	Federal Primary Standards:			
	1-Hour - 0.075 ppm (75 ppb)	0	0	0
	Max. 1-Hour Conc. (ppb)	2.1	6.7	3.1
No. Days Exceeded	Suspended Particulates (PM-10)			
	California Standards:			
	24-Hour – 50 µg/m ³	16	55	43
	Federal Primary Standards:			
	24-Hour - 150 µg/m ³	0	0	0
	State AAM (20 µg/m ³)	34.2	37.0	32.7
	Max. 24-Hour Conc. (µg/m ³)	76	153	166
No. Days Exceeded	Fine Particulates (PM-2.5):			
	Federal Primary Standards:			
	24-Hour – 35 µg/m ³	10	1	1
	Federal/State AAM (12µg/m ³)	12.58	10.80	10.47
	Max. 24-Hour Conc. (µg/m ³)	82.1	38.5	48.7

Source: SCAQMD 2024

Notes: AAM=annual arithmetic mean; ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms/cubic meter.

Attainment Status

The EPA has established NAAQS for the six criteria pollutants described in **Table 5.2-C** above, to protect human health, with an adequate margin of safety (GP 2025 EIR, p. 5.3-5). Likewise, CARB has developed statewide thresholds for each of the criteria pollutants. If the concentration of one or more criteria pollutants within a geographic area is found to exceed the established statewide or NAAQS threshold level for one of the criteria pollutants, the area is considered to be in nonattainment for that pollutant. (CARB 2023).

The proposed Project site is located in an area that is designated as nonattainment for PM-10 by the state, as well as nonattainment for ozone, and PM-2.5 under both the state and federal standards as reflected in **Table 5.2-D – Attainment Status**, below. As a result, SCAQMD is required to develop an Air Quality Management Plan (AQMP) for the Basin to bring the area into attainment for all criteria pollutants.

Table 5.2-D – Attainment Status

Criteria Air Pollutant	Attainment Designation	
	State	Federal
Ozone (O ₃)	Nonattainment	---
8-Hour Ozone (O ₃)	---	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen dioxide (NO ₂)	Attainment	Unclassified/Attainment
Sulfur dioxide (SO ₂)	Attainment	Unclassified/Attainment
PM-10	Nonattainment	Attainment
PM-2.5	Nonattainment	Nonattainment

Source: CARB 2023

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the SCAQMD, may include children, the elderly, athletes, and people who are sick. Sensitive receptors include residential uses, school playgrounds, childcare facilities, athletic facilities, hospitals, retirement homes, and convalescent homes. (SCAQMD 2005, pp. 2-1 and G-5). Sensitive receptors in the Project vicinity primarily include existing residences to the north and east of the Project site.

5.2.2 Related Regulations

The Federal and State Ambient Air Quality Standards (AAQS) establish the context for the local air quality management plans (AQMP) and for determination of the significance of a project's contribution to local or regional pollutant concentrations. Federal and State AAQS are presented in **Table 5.2-C** above. The AAQS represent the level of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise, all referred to as "sensitive receptors." As stated above, SCAQMD defines a "sensitive receptor" as a land use or facility such as schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes. (SCAQMD 1993, p. 1-2).

Federal Regulations

Clean Air Act (CAA)

The EPA is the lead Federal Agency charged with the implementation and enforcement of the Clean Air Act (CAA). As part of this effort, the EPA is responsible for the establishment of national ambient air quality standards (referred to herein as the “Federal Standards” or NAAQS). They are designed to protect those sensitive receptors most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The CAA Amendments dictate that states containing areas violating the NAAQS must revise their SIPs to include extra control measures to reduce air pollution. California’s SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The SIP is periodically modified to reflect the latest emissions inventories, plans and rules and regulations of the various agencies with jurisdiction over the state’s air basins. The EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

The 1977 federal CAA Amendments required the EPA to identify national emissions standards for hazardous air pollutants (HAPs) to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal CAA Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

State Regulations

California Environmental Protection Agency (CalEPA)

The mission of the California Environmental Protection Agency (CalEPA) is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality. This is accomplished by developing, implementing, and enforcing environmental laws that regulate air, water and soil quality, pesticide use and waste recycling and reduction. Relevant to air quality, the CalEPA consists of the CARB and the Office Environmental Health Hazard Assessment (OEHHA).

In 2012, the Legislature passed Senate Bill (SB) 535, which targets disadvantaged communities in California for investment of proceeds from the State’s cap-and-trade program to improve public health, quality of life, and economic opportunity in California’s most burdened communities, while also reducing pollution. SB 535 directed that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed Assembly Bill (AB) 1550, which now requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities. CalEPA has prepared a list of disadvantaged communities for the purpose of SB 535 and CalEnviroScreen is a general mapping tool developed by OEHHA to help identify California communities that are most affected by sources of pollution.

According to CalEnviroScreen 4.0, the census tract containing the Project site is located within a disadvantaged community. (OEHHA 2024) This is also reflected on Figure 3.9-1, Environmental Justice Communities, of the Phase 1 General Plan Update EIR (GPUI EIR).

With regard to the Community Air Protection Program (CAPP), each year CARB's governing board (Board) is required to consider selecting communities for participation in the CAPP per AB 617. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first four years of the Program, the Board selected 17 communities where these focused actions are underway (CARB 2022a). The City of Riverside is not one of the selected communities and to date has not been nominated to participate in the CAPP. (CARB 2022b).

California Air Resource Board (CARB)

CARB is part of the California Environmental Protection Agency (CalEPA) and is responsible for overseeing the implementation of the California Clean Air Act (CCAA), meeting State requirements of the Federal Clean Air Act, and the establishment of State ambient air quality standards. (SCAQMD 2005, p. 1-11) Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as non-attainment. Attainment status is shown in **Table 5.2-D** above. CARB is also responsible for setting emission standards for vehicles sold in California and for other emission-sources including consumer goods and off-road equipment. In general, these vehicle emissions standards are more restrictive than those established at the federal level. CARB also established passenger vehicle fuel specifications, which became effective in March 1996.

California also regulates toxic air contaminants (TACs) through its air toxics program, mandated in Chapter 3.5 (Toxic Air Contaminants) of the Health and Safety Code (H&SC Sections 39660, et seq.) and Part 6 Air Toxics "Hot Spots" Information and Assessment (H&SC Sections 44300, et seq.). The CARB, working in conjunction with the OEHHA, identifies toxic air contaminants. Air toxic control measures may then be adopted to reduce ambient concentrations of the identified toxic air contaminant below a specific threshold based on its effects on health, or to the lowest concentration achievable through use of best available control technology for toxics (T-BACT). The program is administered by the CARB. Air quality control agencies, including the SCAQMD, must incorporate air toxic control measures into their regulatory programs or adopt equally stringent control measures as rules within six months of adoption by the CARB. (SCAQMD 2005, pp.1-6 – 1-7)

California Energy Code (California Code of Regulations, Title 24)

The California Energy Code (CCR Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle. (CEC Standards).

These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. (CEC 2022). They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. The current 2022 Building Energy Efficiency Standards, which went into effect January 1, 2023, focuses on four key areas in new construction of homes and business by encouraging 1) electric heat pump technology and use, 2) establishing electric-ready requirements when natural gas is installed, 3) expanding solar photovoltaic (PV) system and battery storage standards, and 4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes be electric-ready. That means buildings with gas stoves have electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and electric vehicle (EV) charging to meet all

Californians' needs. (CEC 2022). The Project will be subject to the Title 24 Standards in effect at the time of building permits.

It is projected that the 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. (CEC 2022).

California's Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. (CEC Title 20).

California Green Building Code

Part 11 of the California Green Building Standards Code in Title 24 of the California Code of Regulations is also known as the CALGreen Code. (CBSC 2022) The development of the CALGreen Code is intended to: (1) cause a reduction in greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The current cycle of the CALGreen Code was adopted in 2022 and became effective January 1, 2023.

The following are examples of some of the 2022 CALGreen Code requirements applicable to this Project:

Non-Residential

CALGreen Section 5.106.4: Bicycle parking. Comply with Sections 5.106.4.1 and 5.106.4.1.2 or meet local ordinance, whichever is stricter.

- 5.106.4.1 Short-term bicycle parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
- 5.106.4.1.2 Long-term bicycle parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5 percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; and 3. Lockable, permanently anchored bicycle lockers. Note: Additional information on recommended bicycle accommodations may be obtained from Sacramento Area Bicycle Advocates.

CALGreen Section 5.106.5.3: Construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 5.106.5.3.1 and shall be provided in accordance with regulations in the *California Building Code* and the *California Electrical Code*.

- 5.106.5.3.1 Electric Vehicle (EV) Capable spaces shall be provided in accordance with Table 5.106.5.3.1(provided below) and the following requirements:
 1. Raceways complying with the California Electrical Code and no less than 1-inch (25 mm) diameter shall be provide and shall originate at a service panel or subpanel(s) serving the area and shall terminate in close proximity to the proposed location of the EV Capable space

- and into a suitable listed cabinet, box, enclosure or equivalent. A common raceway may be used to serve multiple EV capable spaces.
2. A service panel or subpanel(s) shall be provided with panel space and electrical load capacity dedicated 208/240 volt, 40-ampere minimum branch circuit for each EV capable space, with delivery of 30-ampere minimum to an installed Electrical Vehicle Supply Equipment (EVSE) at each Electric Vehicle Charging Station (EVCS)
 3. The electrical system and any on-site distribution transformers shall have sufficient capacity to supply full rated amperage at each EV capable space.
 4. The service panel or subpanel circuit directory shall identify the reserved overcurrent protective device space(s) as "EV CAPABLE." The raceway termination location shall be permanently and visibly marked as "EV CAPABLE."

CALGreen Code Table 5.106.5.3.1 shows the number of parking spaces required EV Capable Spaces and the number of EV Capable Spaces provided with EVSE. **Table 5.2-E – CALGreen Code Electric Vehicle Charging Space Calculation**, is reflected below.

Table 5.2-E – CALGreen Code Electric Vehicle Charging Space Calculation

Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces Provided with EVSE) ^{2,3}
0-9	0	0
10-25	4	0
26-50	8	2
51-75	13	3
76-100	17	4
101-150	25	6
151-200	35	9
201 and over	20 percent of total ¹	25 percent of EV capable spaces ¹

Source: CBSC 2022

Notes:

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provides with EVSE) In column 3 count toward the total number of required EV capable spaces shown in column 2.
3. At least one Level 2 EVSE shall be provided.

CALGreen Section 5.106.5.5: EV charging: medium-duty and heavy-duty. Construction shall comply with Section 5.106.5.5.1 to facilitate future installation of EVSE. Construction for warehouses, grocery stores and retail stores, office buildings, and manufacturing facilities with planned off-street loading spaces shall also comply with Section 5.106.5.5.1 for future installation of medium- and heavy-duty EVSE.

- 5.106.5.5.1 EV charging readiness requirements for warehouses, grocery stores, office buildings, manufacturing facilities and retail stores with planned off-street loading spaces. In order to avoid future demolition when adding EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s) or subpanel(s) shall be installed at the time of construction in accordance with the California Electrical Code. Construction plans and specifications shall include, but are not limited to, the following:

1. The transformer, main service equipment and subpanels shall meet the minimum power requirement in Table 5.106.5.5.1 to accommodate the dedicated branch circuits for the future installation of EVSE.
2. The construction documents shall indicate one or more location(s) convenient to the planned off-street loading space(s) reserved for medium- and heavy-duty ZEV charging cabinets and charging dispensers, and a pathway reserved for routing of conduit from the termination of the raceway(s) or busway(s) to the charging cabinet(s) and dispenser(s), as shown in Table 5.106.5.5.1.
3. Raceway(s) or busway(s) originating at a main service panel or a subpanel(s) serving the area where the potential future medium- and heavy-duty EVSE will be located and shall terminate in close proximity to the potential future location of the charging equipment for medium- and heavy-duty vehicles.
4. The raceway(s) or busway(s) shall be of sufficient size to carry the minimum additional service load to the future location of the charging for medium- and heavy-duty ZEVs as shown in Table 5.106.5.5.1.

CALGreen Code Table 5.106.5.5.1 shows the raceway conduit and panel power requirements for medium- and heavy-duty EVSE by building types. **Table 5.2-F – CALGreen Code Requirements for Medium- and Heavy-Duty EVSE**, is reflected below.

Table 5.2-F – CALGreen Code Requirements for Medium- and Heavy-Duty EVSE

Building Type	Building Size (SQ. FT)	Number of Off-Street Loading Spaces	Additional Capacity Required (KVA) for Raceway & Busway and Transformer & Panel
Grocery	10,000 to 90,000	1 or 2	200
		3 or Greater	400
	Greater than 90,000	1 or Greater	400
Retail	10,000 to 135,000	1 or 2	200
		3 or Greater	400
	Greater than 135,000	1 or Greater	400
Office	10,000 to 135,000	1 or 2	200
	10,000 to 135,000	3 or Greater	400
	Greater than 135,000	1 or Greater	400
Warehouse	20,000 to 256,000	1 or 2	200
		3 or Greater	400
	Greater than 256,000	1 or Greater	400

Source: CBSC 2022

CALGreen Section 5.504.5.3: Filters. In mechanically ventilated buildings, provide regularly occupied areas of the building with air filtration media for outside and return air that provides at least a Minimum Efficiency Reporting Value (MERV) of 13. MERV 13 filters shall be installed prior to occupancy, and

recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

Residential

CALGreen Section 4.106.4: EV charging for new construction. New construction shall comply with Sections 4.106.4.1 or 4.106.4.2 to facilitate future installation and use of EV chargers. EVSE shall be installed in accordance with the *California Electrical Code*.

- 4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box, or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible, or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
- 4.106.4.2 New multifamily dwellings, hotels, and motels and new residential parking facilities. When parking is provided parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Section 4.106.4.2.1 and 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.
- 4.106.4.2.1 Multifamily development projects with less than 20 dwelling units; and hotels and motels with less than 20 sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.
 1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.
 2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
- 4.106.4.2.2 Multifamily development projects with 20 or more dwelling units, hotels, and motels with 20 or more sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.
 1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-

site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.

2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
3. EV Chargers. Five (5) percent of the total number of parking spaces shall be equipped with Level 2 EVSE. Where common use parking is provided, at least one EV charger shall be located in the common use parking area and shall be available for use by all residents or guests.

When low power Level 2 EV charging receptacles or Level 2 EVSE are installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

- 4.106.4.2.2.1 Electric vehicle charging stations (EVCS). Electric vehicle charging stations required by Section 4.106.4.2.2.1.2, Item 3, shall comply with Section 4.106.4.2.2.1.1.
- 4.106.4.2.2.1.1 Location. EVCS shall comply with at least one of the following options:
 1. The charging space shall be located adjacent to an accessible parking space meeting the requirements of the *California Building Code*, Chapter 11A, to allow use of the EV charger from the accessible parking space.
 2. The charging space shall be located on an accessible route, as defined in the *California Building Code*, Chapter 2, to the building.

Regional Regulations

South Coast Air Quality Management District

The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the Basin, which covers an area of 6,745 square miles. The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The SCAQMD has developed a variety of plans and rules aiming to improve air quality within the Basin, as discussed below. (SCAQMD 2005, pp. 1-11 – 1-12).

Air Quality Management Plan

All areas designated as non-attainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures.

The SCAQMD adopted an updated AQMP in December 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs to meet various ozone and PM-2.5 standards. It includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard of 70 parts per billion (ppb). (SCAQMD 2022, p. ES-2).

The 2022 AQMP includes a total of 49 control measures: 31 control measures target stationary sources and are categorized into four groups (NO_x Control Measures, Co-Benefits from Climate and Energy Programs, Limited Strategic VOC Measures and Other Measures; and the remaining 18 control measures target mobile sources and are facility-based mobile source measures, emission reductions from incentive programs, and partnerships with local, State, federal, and international entities. (SCAQMD 2022, pp. ES-7 – ES-8).

The NO_x measures are further grouped by residential, commercial, and large industrial combustion. Many control measures focus on widespread deployment of zero emission (ZE) and low NO_x technologies through a combination of regulatory approaches and incentives and will require technology assessments to better understand where and when ZE and low NO_x technologies can be implemented. (SCAQMD 2022, p. ES-7).

The residential and commercial measures are frequently referred to as “building measures,” which are in line with California’s aggressive climate goals to reduce greenhouse gases (GHG) emissions across various sectors. State climate actions, such as Title 24 energy code requirements and building electrification (e.g., Assembly Bill 3232), can also help reduce NO_x emissions. In addition, CARB has proposed a statewide zero GHG emissions standard for residential and commercial building appliances, which would have criteria pollutant co-benefits. SCAQMD has also developed multiple building-related control measures to address emissions from residential and commercial combustion equipment for space heating, water heating, cooking, and others. (SCAQMD 2022, p. ES-7).

The AQMP utilizes the population and growth estimates compiled by the Southern California Association of Governments (SCAG) in their 2020 Regional Transportation Plan/Sustainable Community Strategy (2020 RTP/SCS), known as Connect SoCal. (SCAQMD 2022, p. 3-22).

SCAG’s population and employment projections are based on the City’s growth projections provided by cities, including from cities’ general plans (SCAG 2024, p. 47). Should a project demonstrate compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed, and the project would not conflict with implementation of such a plan.

Rule 220

SCAQMD Rule 220 gives the Executive Officer the power to exempt a source from prohibitions outlined in SCAQMD Regulations IV and XI, Prohibitions and Source Specific Standards respectively, if they can make the finding that the installation of controls and/or process changes required to achieve compliance with the subject prohibitory rule will result in a net adverse impact on air quality. One of the conditions of

the permits on exemptions issued under Rule 220 is that alternative controls and/or process changes which will result in the greatest practical net emission reduction be included for project operation. (Rule 220).

Rule 402

SCAQMD Rule 402 (Nuisance) prohibits the discharge of air containments in such quantities that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public but does not apply to odors emanating from agricultural operations necessary for growing of crops or the raising of fowl or animals. (Rule 402).

Rule 403

The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. The potential requirements include the application of water or chemical stabilizers to disturbed soils at least twice a day, covering all haul vehicles before transport of materials, restricting vehicle speeds on unpaved roads to 15 mph, and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, it is required to establish a vegetative ground cover on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph (Rule 403). In addition, projects that disturb 50 or more acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD.

Rule 481

SCAQMD Rule 481 applies to all spray painting and spray coating operations and equipment and requires all spray coating equipment to be (1) operated inside an approved control enclosure, (2) applied using high velocity-low pressure (HVLP), electrostatic and/or airless spray equipment, or (3) applied using which has an equal effectiveness to either of the two approved methods. (Rule 481).

Rule 1108

SCAQMD Rule 1108 applies to cutback and emulsified asphalt used at project sites. (Rule 1108).

Rule 1113

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the volatile organic content (VOC) content in paints and paint solvents. This rule will dictate the VOC content of paints available for use during the construction of the buildings. (Rule 1113).

Rule 1143

SCAQMD Rule 1143 aims to reduce emissions of VOCs from the use, storage, and disposal of consumer paint thinners and multi-purpose solvents commonly used in thinning of coating materials, cleaning of coating application equipment and other solvent cleaning operations by limiting their VOC content. Additionally, Rule 1143 requires several best management practices to reduce VOCs during use and application of paint thinners and other solvents. For example, this Rule requires containers to be closed when not in use. This Rule also establishes requirements for appropriate labelling and disclosure of contents for containers and storage areas of these corrosive, flammable substances. (Rule 1143).

Rule 1186

SCAQMD Rule 1186 is intended to reduce the amount of particulate matter entrained in the ambient air as a result of vehicular traffic on paved and unpaved public roads, and at livestock operations. This includes requirements for local governments that contract for street sweeping services to utilize only certified street sweeping equipment. (Rule 1186).

Rule 1303

SCAQMD Rule 1303 prohibits issuance of permits for any relocation or for any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia unless a best available control technology (BACT) is employed for the new or relocated source as specified by the Clean Air Act or other regulations. (Rule 1303).

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project, as identified below: (GP 2025, pp. AQ-26 – AQ-29, AQ-31 – AQ-35)

Air Quality Element

Policy AQ-1.3	Separate, buffer and protect sensitive receptors from significant sources of pollution to the greatest extent possible.
Policy AQ-1.5	Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.
Policy AQ-1.6	Provide a mechanism to create opportunities for mixed-use development that allows the integration of retail, office, institutional and residential uses for the purpose of reducing costs of infrastructure construction and maximizing the use of land.
Policy AQ-1.7	Support appropriate planned residential developments and infill housing, which reduce vehicle trips.
Policy AQ-1.12	Support mixed-use land use patterns but avoid placing residential and other sensitive receptors in close proximity to businesses that emit toxic air contaminants to the greatest extent possible. Encourage community centers that promote community self-sufficiency and containment and discourage automobile dependency.
Policy AQ-1.16	Design safe and efficient vehicular access to commercial land uses from arterial streets to ensure efficient vehicular ingress and egress.
Policy AQ-1.19	Require future commercial areas to foster pedestrian circulation through the land use entitlement process and/or business regulation.
Objective AQ-2	Reduce air pollution by reducing emissions from mobile sources.
Policy AQ-2.22	Monitor traffic and congestion to determine when and where the City needs new transportation facilities to achieve increased mobility efficiency.

Policy AQ-2.25	Support the development of alternative fuel infrastructure that is publicly accessible.
Objective AQ-4	Reduce particulate matter, as defined by the Environmental Protection Agency, as either airborne photochemical precipitates or windborne dust.
Policy AQ-4.2	Reduce particulate matter from agriculture (e.g., require use of clean nondiesel equipment and particulate traps), construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way and offroad vehicles to the extent possible as provided in SCAQMD Rule 403.
Policy AQ-5.7	Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.

City of Riverside General Plan 2025 EIR

The following are applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Air Quality (GP 2025 EIR, p. 5.3-50 – 5.3-53).

MM Air 1: To mitigate for potential adverse impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other methods sanctioned by the SCAQMD. The analysis of construction-related air quality impacts shall be included in the development project's CEQA analysis, including recommended mitigation measures. Proposed mitigation measures may include extending the construction period as feasible in order to ensure air quality thresholds are not exceeded. The analysis shall address pollution levels near sensitive receptors and require mitigation to reduce emissions.

MM Air 2: To mitigate for potential adverse impacts resulting from construction activities, development projects must abide by the SCAQMD's Rule 403 concerning Best Management Practices for construction sites in order to reduce emissions during the construction phase. Measures may include:

- Development of a construction traffic management program that includes, but is not limited to, rerouting construction related traffic off congested streets, consolidating truck deliveries, and providing temporary dedicated turn lanes for movement of construction traffic to and from site;
- Sweep streets at the end of the day if visible soil material is carried onto adjacent paved public roads;
- Wash off trucks and other equipment leaving the site;
- Replace ground cover in disturbed areas immediately after construction;
- Keep disturbed/loose soil moist at all times;
- Suspend all grading activities when wind speeds exceed 25 miles per hour;
- Enforce a 15-mile per hour speed limit on unpaved portions of the construction site.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the GPUI EIR that pertain to Air Quality.

Downtown Specific Plan

There are no City of Riverside Downtown Specific Plan goals or policies that are considered applicable to the proposed Project.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Air Quality:

Chapter 19.120.050 – Development Standards. This chapter identifies the development standards applicable to all development in the mixed-use zones.

Chapter 16.26 – Electrification of New Buildings. The City requires building electrification in certain newly constructed buildings. 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. However, the City Council adopted an Ordinance on July 2, 2024, repealing Chapter 16.26 of the Riverside Municipal Code.

5.2.3 Comments Received in Response to the Initial Study/Notice of Preparation

One comment letter was received related to air quality in response to the Initial Study/Notice of Preparation (IS/NOP). The comment letter was received from the Californians Allied for a Responsible Economy (CARE CA) and is included in Appendix A of this Draft EIR.

5.2.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G ("Environmental Checklist") to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impact in the following area and this topic is not addressed in this Draft EIR:

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

As identified in the IS/NOP prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Conflict with or obstruct implementation of the applicable air quality plan;
- 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; and
- Expose sensitive receptors to substantial pollutant concentrations.

5.2.5 Project Design Features

The Project does not include design features that would specifically avoid or reduce potentially significant impacts to Air Quality. However, future development would be designed and constructed to meet all applicable standards under Title 24, including the CALGreen Code, as described in *Section 5.2.2*, above.

5.2.6 Environmental Impacts

Threshold: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The City is located within the Basin, which is under the jurisdiction of SCAQMD. SCAQMD prepares and regularly updates an AQMP to establish a comprehensive program to lead the Basin into compliance with all federal and state air quality standards, the most recent of which is the 2022 AQMP. (WEBB-A, p. 1).

As outlined in *Section 5.2.2*, above, the control measures and related emission reduction estimates included in the AQMP are based on emissions projections for a future development scenario derived from land use, population, and employment estimates defined in consultation with local governments. To do this, the AQMP utilizes the population and growth estimates compiled by the SCAG in their 2020 RTP/SCS (Connect SoCal). (SCAQMD 2022, pp. 3-22). As stated previously, SCAG's population and employment projections for the City are based on the City's growth projections (SCAG 2024, p. 47), which are outlined in the GP 2025. Thus, since the 2022 AQMP is consistent with the 2020 RTP/SCS, the 2022 AQMP is also consistent with the growth assumptions in the GP 2025. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed, and the project would not conflict with implementation of such a plan.

The SCAG Connect SoCal growth forecast is updated every four years and was recently updated in April 2024. The Project will comply with all the 2024-2050 RTP/SCS regional policies, as discussed in this Draft EIR's *Section 6.0 Consistency with Regional Plans*. Furthermore, as stated in *Section 3.0 – Project Description* the proposed Project is consistent with the General Plan Land Use Designation and zoning Designation of Downtown Specific Plan (DSP). Since no specific development application is currently under consideration, a maximum development envelope is evaluated. As outlined in **Table 3.0-B – Proposed Project Uses**, the Project proposes a total of 168 residential units, 376 hotel rooms as well as other commercial uses. As discussed in *Section 4.1.12 – Population and Housing* of this Draft EIR, the Project would result in a population increase of approximately 514 to 576 persons. The Project's residential density results in approximately 16 dwelling units per acre, which is well below the maximum allowable density in the DSP. As such, the Project does not induce unplanned growth. SCAG RTP/SCS growth forecast indicates that in the year 2019 the jobs-to-housing ratio for Riverside County was 1.68:1, which by definition is considered jobs-rich. SCAG predicted that the City would remain a job-rich area with the projected 2050 population growth. As such, the resulting increase in population and employment growth is not substantial compared to what was analyzed in the City's GPUI, and the additional housing from this infill development would help the City fulfill its State housing requirements. As such, the proposed Project would not conflict with the goals and objectives of the AQMP.

Additionally, the control measures contained within the 2022 AQMP will still apply to the Project site, and through this compliance, the Project will not obstruct implementation of the 2022 AQMP. Such control measures include, for example, taking credit for energy efficiency mandates (e.g., Title 24), and other programs that provide incentives, rebates, and loans for efficiency projects. Moreover, the mobile source control measures in the 2022 AQMP were based on a variety of control technologies that focus on

accelerated retrofits or replacement of existing vehicles or equipment, acceleration of vehicle turnover through voluntary vehicle retirement programs, and greater use of cleaner fuels. The measures will also encourage greater deployment of zero-emission vehicles and equipment technologies such as plug-in hybrids, battery-electric, and fuel cells. (SCAQMD 2022, p. 4-21).

For these reasons, the proposed Project will not conflict with or obstruct implementation of the AQMP. Therefore, impacts are **less than significant**.

Threshold: Would the Project 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?

The portion of the Basin within which the proposed Project site is located is designated as a non-attainment area for PM-10 under State standards, and as a nonattainment area for ozone and PM-2.5 under both State and federal standards as reflected in **Table 5.2-D** above. SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same (SCAQMD 2003). Consequently, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Project-specific air quality impacts have been analyzed, as described below.

Air quality impacts can be described in a short- and long-term perspective. Short-term impacts occur during site preparation and Project construction, whereas long-term impacts are associated with Project operation. A discussion of the Project's potential short-term construction-period and long-term operational-period air quality impacts is provided below.

The construction and operational emissions from the proposed Project were evaluated in the *AQ Study* (cited as WEBB-A and included in Appendix B) using methodology and guidance prepared by the SCAQMD for quantification of emissions and evaluation of potential impacts related to air quality. As recommended by SCAQMD staff, the California Emissions Estimation Model (CalEEMod™, Version 2022.1.) program was used to quantify Project-related emissions.

SCAQMD's Regional Significance Threshold Analysis

The thresholds shown in **Table 5.2-G – SCAQMD CEQA Regional Significance Thresholds** below are from the SCAQMD's CEQA Handbook and are the standard regional thresholds for determining significance under CEQA sanctioned by the SCAQMD. These regional significance thresholds were developed by the SCAQMD based on the estimated daily emissions of a major stationary source.

Table 5.2-G – SCAQMD CEQA Regional Significance Thresholds

Emission Threshold	Units	VOC	NO_x	CO	SO_x	PM-10	PM-2.5
Construction	lbs/day	75	100	550	150	150	55
Operations	lbs/day	55	55	550	150	150	55

Construction Emissions

The default parameters within CalEEMod were used and these default values reflect a worst-case scenario, which means that Project emissions are expected to be equal to or less than the estimated emissions. In addition to the default values used, assumptions relevant to model inputs for short-term construction emission estimates used are described below. Construction activities associated with the

Project may result in emissions of SCAQMD criteria pollutants VOC, NO_x, CO, SO₂, PM-10, and PM-2.5. (WEBB-A, pp. 2 - 4).

Construction is anticipated to begin no earlier than January 2026. The Project will be developed in one phase. Construction related emissions may result from construction activities involving demolition grading, building construction, paving, and painting (architectural coatings), with the approximate construction schedule shown below in **Table 5.2-H – Estimated Construction Schedule**. Working days are assumed to be 5 days per week.

Table 5.2-H – Estimated Construction Schedule

Construction Activity	Start Date	End Date	Total Working Days
Demolition	January 1, 2026	January 31, 2026	22
Grading	February 1, 2026	May 31, 2026	85
Building Construction	June 1, 2026	August 31, 2028	589
Paving	December 1, 2026	January 31, 2027	44
Architectural Coating	April 1, 2027	August 31, 2028	371

Construction activities will use the following heavy-duty off-road construction equipment as shown in **Table 5.2-I – Construction Equipment** below, based on estimates from the City. The engine tier for each piece of equipment is calculated using CalEEMod defaults for the statewide fleet average emissions factors. Each piece of equipment is assumed to operate 8 hours per day. (WEBB-A, p. 3).

Table 5.2-I – Construction Equipment

Construction Activity	Off-Road Equipment	Unit Amount
Demolition	Concrete/Industrial Saw	1
	Excavator	3
	Rubber Tired Dozers	2
	Crushing/Proc. Equipment	1
Grading	Excavator	2
	Graders	1
	Rubber Tired Dozers	1
	Rubber Tired Loader	1
	Tractor/Loader/Backhoes	3
	Scrapers	2
Building Construction	Cranes	2
	Forklifts	6
	Generator Sets	2
	Tractors/Loaders/Backhoes	6
	Welders	2
Paving	Pavers	2
	Paving Equipment	2
	Rollers	2
Architectural Coatings	Air Compressors	2

Other assumptions that were included in the calculations of construction emissions include the following (WEBB-A, p. 3-4):

- The existing surface parking and outdoor plaza area will be demolished. Approximately 10,200 tons of parking lot debris was estimated to be hauled off-site using the CalEEMod default hauling trip length of 20 miles per one-way trip. Debris material may be crushed on-site and reused as engineered fill. Therefore, crushing/processing equipment was included in demolition activities.
- Project construction of the underground parking structure is estimated to require the export of approximately 500,000 cubic yards of soil. Based on the CalEEMod default truck capacity of 16 cubic yards, approximately 368 truckloads of soil would be exported daily over a period of 85 days. The export site is currently unknown. Therefore, the CalEEMod default was utilized which assumes a hauling trip length of 20 miles per one-way trip.
- Off-site improvements would be located along the site frontage and upsizing existing potable water pipelines in Third Street between Market Street and Orange Street and upsizing sewer pipeline in Market Street from Mission Inn Avenue to 11th Street, which assume a footprint of approximately 10-feet wide and cover approximately 0.58 acres.
- To evaluate Project compliance with SCAQMD Rule 403 for fugitive dust control during grading, the Project utilized the option of watering the Project site three times daily which achieves a control efficiency of 74 percent for PM-10 and PM-2.5 emissions. Two (2) one-way vendor trips per day were added to the grading and paving activities to account for water truck trips.
- To evaluate Project compliance with SCAQMD Rule 403 for fugitive dust control during the demolition phase, the Project utilized the option of watering the demolished area 2 times daily which achieves a control efficiency of 36 percent for PM-10 and PM-2.5 emissions. Two (2) one-way vendor trips per day were added to the demolition activities to account for water truck trips.

As shown in **Table 5.2-J – Estimated Unmitigated Maximum Daily Construction Emissions** below, peak daily construction emissions from the Project will not exceed any SCAQMD criteria pollutant thresholds (WEBB-A, pp. 4).

Table 5.2-J – Estimated Unmitigated Maximum Daily Construction Emissions

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	75	100	550	150	150	55
2026	36.40	86.80	87.7	0.41	18.30	6.87
2027	27.60	40.10	96.80	0.13	15.80	4.45
2028	27.40	34.30	92.40	0.12	15.70	4.36
Maximum	36.40	86.80	96.80	0.41	18.30	6.87
Exceeds Threshold?	No	No	No	No	No	No

Source: WEBB-A, Table 2

Notes: Numbers are the maximum of summer or winter emissions in a given year and may not match due to rounding within the model.

Evaluation of **Table 5.2-J** above, indicates that criteria pollutant emissions from construction activities will not exceed any of the SCAQMD regional daily thresholds during Project construction. No mitigation is required.

Operational Emissions

Operational (long-term) emissions are evaluated at build-out of a project. The Project is assumed to be operational in 2028. Operational activities associated with the proposed Project may result in emissions of SCAQMD criteria pollutants VOC, NO_x, CO, SO₂, PM-10, and PM-2.5. Operational emissions are expected from the following primary sources: area, energy, and mobile sources. Mobile source emissions refer to on-road motor vehicle emissions generated from the Project's traffic and based on the Project-specific *Traffic Study*, which is included in Appendix E of the Draft EIR. Weekend residential trip rates were obtained from the Institute of Transportation Engineers (ITE) Manual, 11th Edition. CalEEMod defaults were utilized for trip purpose (primary, pass-by and diverted trips) for all land uses except the commercial retail uses. The pass-by trip purpose for the commercial retail was based on the *Traffic Study* data for weekday trips and the ITE Manual (11th Edition) for the weekend trips. The *Traffic Study's* internal capture trip reduction of approximately 10 percent Project wide was not applied, further providing a conservative analysis. Additionally, an aspect of Project design was incorporated into the modeling to account for the Project's location within a Transit-Oriented Development (TOD) area. TOD refers to a project built in compact, walkable areas that have easy access to public transit and ideally in a location with a mix of uses, including housing, retail offices and community facilities. Residents, employees, and visitors in these areas would have easy access to public transit which can reduce vehicle trips and associated emissions. To account for the Project site being located within a TOD, the CalEEMod measure for providing a TOD was utilized with CalEEMod default data. (WEBB-A, pp. 4-5).

Area source emissions from the Project include stationary combustion emissions of natural gas used for space and water heating (shown in a separate row as energy), yard and landscape maintenance, consumer use of solvents and personal care products, and an average building square footage to be repainted each year. CalEEMod computes area source emissions based upon default factors and land use assumptions. CalEEMod defaults were utilized with the exception of fireplaces and wood stoves, which are not proposed in the residential uses. (WEBB-A, p. 5).

Energy sources emissions from the Project are generated as a result of activities in buildings that consume energy in the form of natural gas and electricity. CalEEMod estimates incorporate the 2019 Title 24 energy efficiency standards. However, it should be noted the most recent 2022 Title 24 standards became effective in January 2023 and apply to this Project and therefore the Project's emissions are overstated. While criteria pollutants are emitted during the generation of electricity, this electricity generation typically takes place off-site at power plants. For this reason, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users and as such are not reported by CalEEMod. Therefore, any regulations that reduce electricity consumption do not change the Project's criteria pollutant emissions estimates.

The Project's summer and winter operational emissions are shown in **Table 5.2-K – Estimated Unmitigated Daily Project Operation Emissions (Summer)** and **Table 5.2-L – Estimated Unmitigated Daily Project Operation Emissions (Winter)** below.

Table 5.2-K – Estimated Unmitigated Daily Project Operation Emissions (Summer)

Source	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Area	34.30	0.71	83.10	0.00	0.14	0.10
Energy	0.36	6.55	5.23	0.04	0.50	0.50
Mobile	53.80	51.50	499.00	1.34	123.00	31.80
Total	88.46	58.76	587.33	1.38	123.64	32.40
Exceeds Threshold?	Yes	Yes	Yes	No	No	No

Source: WEBB-A, Table 3

Note: Emissions reported as zero are rounded and not necessarily equal to zero.

Table 5.2-L – Estimated Unmitigated Daily Project Operation Emissions (Winter)

Source	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Area	21.40	0.00	0.00	0.00	0.00	0.00
Energy	0.36	6.55	5.23	0.04	0.50	0.50
Mobile	50.60	55.20	417.00	1.26	123.00	31.80
Total	72.36	61.75	422.23	1.30	123.50	32.30
Exceeds Threshold?	Yes	Yes	No	No	No	No

Source: WEBB-A, Table 4

Note: Emissions reported as zero are rounded and not necessarily equal to zero.

Evaluation of the data presented on the above tables indicates that criteria pollutant emissions from operation of this Project will exceed the SCAQMD regional daily thresholds for VOC, NO_x, and CO during summer and VOC and NO_x during winter.

As shown in **Table 5.2-K** and **Table 5.2-L**, the Project's mobile source emissions make up the majority of the estimated total Project-related emissions.³ However, as discussed below, there are limited, if any, feasible mitigation measures that can be applied to the Project to substantially reduce the mobile source emissions from the Project.

Implementation of mitigation measures **MM AQ 1** through **MM AQ 9** are recommended to reduce these emissions during operation. As outlined in *Section 5.2.8*, below, **MM AQ 1** through **MM AQ 7** reduce the Project's operational VOC, NO_x, and CO emissions from mobile sources by encouraging the use of alternative transportation and telecommuting. **MM AQ 8** through **MM AQ 9** reduce emissions from energy sources by encouraging increased use of solar energy systems and energy efficient appliances. **MM AQ 1** through **MM AQ 9** do not have quantitative reductions associated with them available in CalEEMod and given that the majority of Project-generated emissions are from mobile sources, the emissions are outside the jurisdiction and control of the Project and City. Although mitigation measures **MM AQ 1** through **MM**

³ Note impacts related to vehicle miles traveled (VMT) are evaluated in accordance with State *CEQA Guidelines* Section 15064.3, subdivision (b). Refer to *Section 5.8 – Transportation*, for further details.

AQ 9 will serve to potentially reduce mobile source and energy emissions, it is reasonable to assume that the amount of criteria pollutant reductions resulting from their implementation would not reduce Project emissions below the threshold of significance.

Conclusion

Based on the analysis summarized above, construction emissions associated with the Project would not exceed SCAQMD regional construction thresholds and no mitigation is required. Short-term impacts are less than significant.

However, the Project's long-term operational emissions of VOC, NO_x, and CO exceed the SCAQMD regional operation thresholds. Although mitigation measures **MM AQ 1** through **MM AQ 9** will serve to potentially reduce mobile source and energy emissions, it is reasonable to assume that the amount of criteria pollutant reductions resulting from their implementation would not reduce Project emissions below the threshold of significance. Thus, as further discussed in *Section 5.2.8* below, even with implementation of existing regulations and **MM AQ 1** through **MM AQ 9**, the proposed Project will 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 for long-term operational emissions. Therefore, impacts are **significant and unavoidable**.

Threshold: Would the Project expose sensitive receptors to substantial pollutant concentrations?

SCAQMD's Localized Significance Threshold Analysis

Local significance thresholds (LSTs) were initially established in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. SCAQMD published its Final Localized Significance Threshold Methodology, which recommends that certain air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. LSTs represent the maximum emissions from project sites that are not expected to result in an exceedance of the state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). SCAQMD states that lead agencies can use the LSTs as another indicator of significance in air quality impact analyses. This analysis makes use of methodology included in SCAQMD's Final Localized Significance Threshold Methodology. (WEBB-A, p. 6). The Project is in SRA 23 for the LST.

Construction-Related Localized Air Quality Impacts

According to the LST methodology, only on-site emissions need to be analyzed. Emissions associated with vendor and worker trips are mobile source emissions that occur off-site. The emissions analyzed under the LST methodology are NO_x, CO, PM-10, and PM-2.5. (WEBB-A, p. 6).

SCAQMD has provided LST lookup tables to allow users to readily determine if the daily emissions for proposed construction or operational activities could result in significant localized air quality impacts for projects five acres or smaller. The LST thresholds are estimated using the maximum daily disturbed area (in acres) and the distance of the Project to the nearest sensitive receptors (in meters). Based on this SCAQMD guidance and the Project's equipment list during grading (above), Project construction will disturb approximately 5.5 acres per day. Although disturbance exceed five acres per day, per SCAQMD, the LST threshold and tables can be used as a screening tool to determine if dispersion modeling would be necessary. Therefore, the Project's on-site emissions from CalEEMod and LST-Look-Up Tables for the five-acre site were utilized as a screening-level analysis. (WEBB-A, p. 6).

The LST are estimated using the maximum daily disturbed area (in acres) and the distance of the Project to the nearest sensitive receptors (in meters). The nearest sensitive receptors are existing residential properties to the north on Third Street and east on Orange Street. The closest receptor distance on the LST look-up tables is 25 meters. According to LST methodology, projects with boundaries closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, a receptor distance of 25 meters (85 feet) was used to ensure a conservative analysis.

The results summarized in **Table 5.2-M – LST Results for Unmitigated Daily Construction Emissions** below.

Table 5.2-M – LST Results for Unmitigated Daily Construction Emissions

Pollutant	Peak Daily Emissions (lb/day)			
	NO _x	CO	PM-10	PM-2.5
LST for 5-acre site at 25 meters	270	1,577	13	8
Demolition – 2026	21.50	67.10	7.78	2.18
Grading – 2026	29.60	32.60	3.69	2.09
Building Construction – 2026	21.30	28.10	0.82	0.75
Building Construction – 2027	20.30	28.10	0.73	0.67
Building Construction – 2028	19.30	28.10	0.65	0.60
Paving - 2026	7.12	9.94	0.32	0.29
Paving – 2027	6.94	9.95	0.30	0.27
Architectural Coatings – 2027	2.22	3.00	0.05	0.05
Architectural Coatings – 2028	2.16	2.98	0.04	0.04
Maximum¹	29.60	67.10	7.78	2.09
Exceeds Threshold?	No	No	No	No

Source: WEBB-A, Table 5

Notes:

1. Maximum emissions are the greater of either: 1) demolition or grading alone, or 2) the sum of building construction and Paving in 2026; 3) the sum of building construction and paving in 2027; 4) the sum of building construction and architectural coating in 2027; 5) the sum of building construction and architectural coating in 2028, because these activities overlap. Maximum emissions are rounded and shown in bold.

As indicated in the above table, Project-related short-term construction emissions do not exceed the SCAQMD-established LSTs. No mitigation is required.

Operation-Related Localized Air Quality Impacts

This Project involves the construction of a mixed-use residential, retail and commercial development. The existing Convention Center has a diesel-powered emergency generator that is approximately 200 horsepower (hp). The proposed expansion of the Convention Center may require an upgrade to the existing emergency generator or a new emergency generator of similar size. According to the LST methodology, LSTs would apply to the operational phase if a project includes stationary sources or on-site mobile equipment generating on-site emissions. Because the new emergency generator would only be used during emergency power outages and routine testing, emissions would be negligible. The City would be required to obtain an SCAQMD permit to install and operate the emergency generator. The SCAQMD permitting process would ensure that the Project meets regulatory requirements through the

application review process and by placing specific operating conditions on the permit such as operating hour limits. As such, no further analysis of the emergency generator was prepared. (WEBB-A, p. 7).

CO Hot Spots Analysis

The AQ *Study* conducted an analysis to evaluate impacts to sensitive receptors regarding CO hot spots. A CO “hot spot” is a localized concentration of CO that is above the state or federal 1-hour or 8-hour AAQS. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. (WEBB-A, p. 7).

Based on the information presented below, a CO “hot spot” analysis is not needed to determine whether the addition of Project related traffic will contribute to an exceedance of either the state or federal AAQS for CO emissions in the Project area. (WEBB-A, p. 7).

The analysis prepared for CO attainment in the Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Basin. CO attainment was thoroughly analyzed as part of the SCAQMD’s 2003 Air Quality Management Plan (2003 AQMP) and the Revised 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 2003 AQMP, peak carbon monoxide concentrations reported in the 1992 CO Plan in the Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. (WEBB-A, pp.7 - 8).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Blvd. and Imperial Highway (Lynwood); Wilshire Blvd. and Veteran Ave. (Westwood); Sunset Blvd. and Highland Ave. (Hollywood); and La Cienega Blvd. and Century Blvd. (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated in the 1992 CO Plan and subsequent 2003 AQMP was that at Wilshire Blvd. and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the Level of Service in the vicinity of the Wilshire Blvd./Veteran Ave. intersection and found it to be level E at peak morning traffic and Level F at peak afternoon traffic. The hot spot analysis was conducted at intersections subject to extremes in vehicle volumes and vehicle congestion and did not predict any violation of CO standards. Per the *Traffic Study* (included as Appendix E of this Draft EIR, when considering Project-related traffic in the General Plan horizon year of 2045, the segment with the highest average daily trips would be approximately 27,029 on Market Street between Third Street and Fifth Street, which is lower than the values studied by SCAQMD. Therefore, it can reasonably be concluded that Project-related traffic would not have daily traffic volumes exceeding those at the intersections modeled in the 2003 AQMP, nor would there be any reason unique to the meteorology to conclude that intersections affected by the Project would yield higher CO concentrations if modeled in detail. Thus, the Project would not result in CO hot spots. (WEBB-A, p. 8).

Conclusion

Based on the LST analysis, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors within the Project vicinity for any criteria pollutants. No mitigation is required for localized impacts. Additionally, the Project would not result in CO hot spots. Thus, the proposed Project will not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts are **less than significant**.

5.2.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts to air quality.

The following mitigation measures are recommended to reduce VOC, NO_x, and CO emissions from Project operation:

- MM AQ 1: Residential Commute Trip Reduction.** Upon a residential dwelling unit being rented or sold, the Project Sponsor or its designee shall notify and offer to the prospective tenant, as soon as it may be done, disclosure materials describing available public transit, ridesharing and non-motorized commuting opportunities available in the vicinity of the Project. Such information shall be transmitted no later than the finalization of a rental contract, lease, or purchase agreement. A draft of this disclosure shall be submitted to the City of Riverside Planning Division for review prior to the issuance of the certificate of occupancy.
- MM AQ 2: Non-Residential Commute Trip Reduction.** Prior to occupancy, the Project Sponsor or its designee shall notify and offer to the prospective tenant, as soon as it may be done, disclosure materials describing available public transit, ridesharing and non-motorized commuting opportunities available in the vicinity of the Project site. Such information shall be transmitted no later than the finalization of a lease or purchase agreement. A draft of this disclosure shall be submitted to the City of Riverside Planning Division for review prior to the issuance of the certificate of occupancy.
- MM AQ 3: Carpool/Vanpool.** Prior to occupancy, the Project Sponsor or its designee shall provide designated carpool/vanpool parking in desirable locations on the Project site to encourage employees to rideshare. Plans shall be provided to the City Building and Safety Division prior to issuance of building permits.
- MM AQ 4: Electric Vehicle Charging.** Prior to occupancy, the Project Sponsor or its designee shall facilitate future installation of electric vehicle supply equipment in accordance with Section 5.106.5.3.2, Multiple Charging Space Requirements, of the California Green Building Standards Code Part 11 by providing excess electric vehicle (EV) charging spaces than required by the CalGreen Code in effect at the time of building permit issuance. Construction plans and specifications shall be provided to the City Building and Safety Division prior to issuance of building permits.
- MM AQ 5: Non-Residential Bicycle Facilities.** Prior to occupancy, the Project Sponsor or its designee shall provide and maintain secure bicycle parking (in excess of existing code at the time of building permit), bike lockers, and personal lockers to encourage employees to bicycle to work. Shower facilities shall be provided on plans, where feasible, and as determined in coordination with the City of Riverside Planning Division prior to issuance of a building permit.
- MM AQ 6: Telecommute.** The Project Sponsor or its designee shall install broadband infrastructure or other communication technologies in office uses that encourage telecommuting and working from home. The Project Sponsor or its designee shall submit documentation to the City Building and Safety Division prior to occupancy.

- MM AQ 7: Unbundle Residential Parking Costs.** The Project Sponsor or its designee shall provide information to the residential property owner and/or property management firm about the benefits of providing unbundled, or separate, residential parking costs from property costs for rental or condo units, which allows those who wish to purchase parking spaces to do so at an additional cost. Unbundled parking costs may decrease vehicle ownership and, therefore, result in a reduction in VMT and GHG emissions. The Project Sponsor or its designee shall submit documentation to the City Planning Division prior to occupancy.
- MM AQ 8: Energy Efficient Appliances.** Where appliances are installed by Project Sponsor or its designee, Energy Star-rated appliances (or other equivalent technology) for clothes washers, dish washers, refrigerators, ceiling fans, and commercial food service equipment shall be installed. Said Energy Star-rated appliances shall be noted on the plans prior to the issuance of any building permit and verified upon final inspection.
- MM AQ 9: Solar Energy Systems.** The Project Sponsor or its designee shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the Project site to be installed in the future, with a specified electrical generation capacity, such as equal to the building's projected energy needs. The City Building and Safety Division shall verify sizing and location before issuance of building permits.

5.2.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

Implementation of mitigation measures **MM AQ 1** through **MM AQ 7** would reduce the Project's operational emissions of VOC, NO_x, and CO by encouraging the use of alternative transportation and telecommuting. Mitigation measures **MM AQ 8** and **MM AQ 9** reduce the Project's operational emissions of VOC, NO_x, and CO by encouraging increased use of solar energy systems and energy efficient appliances. However, **MM AQ 1** through **MM AQ 9** do not have quantitative reductions associated with them available in CalEEMod and given that the majority of Project-generated emissions are from mobile sources, the emissions are outside the jurisdiction and control of the Project and City.

On this basis, it is concluded that Project operational-source VOC, NO_x, and CO emissions cannot be definitively reduced below applicable SCAQMD thresholds. Therefore, the proposed Project's impacts would remain **significant and unavoidable** and a statement of overriding considerations will be required prior to Project approval.

5.3 Cultural/Paleontological Resources

The focus of this section is to analyze potential impacts related to cultural resources and paleontological resources. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. The analysis for cultural resources (historical and archaeological) in this section is based on the *Cultural Resources Technical Report for Riverside Alive Project*, City of Riverside, California, prepared by South Environmental, dated July 2024 (SE). This report is attached as Appendix C of this Draft EIR. Paleontological resources are evaluated in this section of this Draft EIR, even though in the Initial Study checklist paleontological resources are within the geology/soils topic area. Since all of the impacts associated with geology/soils were found to have no impact, or less than significant impacts in the Initial Study/Notice of Preparation (IS/NOP) (attached as Appendix A of this Draft EIR), paleontology is discussed here within Cultural Resources. The analysis for paleontological resources is based on existing data from the City of Riverside General Plan 2025 Final Program Environmental Impact Report (GP 2025 EIR) and the County of Riverside General Plan. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics*.

5.3.1 Setting

The Project is in a fully developed area surrounded by residential and commercial businesses within the City of Riverside, California.

Environmental Setting

The Project site is located northeast of Fifth Street, southwest of Third Street, southeast of Market Street, and northwest of Orange Street as shown on **Figure 3.0-3** in *Section 3.0 - Project Description* of this Draft EIR. More broadly, the Project site is northwest of State Highway (SH) 91 and is within the City of Riverside, California. The area within the Project site includes recent developments and ornamental landscaping, and the surrounding area is a dense urban environment within downtown Riverside.

The topography within the study area is relatively flat. The highest elevation for the Project site is approximately 860 ft above mean sea level (amsl) at the southeast corner. The lowest elevation for the Project site is approximately 849 ft amsl at the northwest corner.

Historic Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). (SE, p. 31).

Spanish Period (1769–1822)

In search of the legendary Northwest Passage, Spanish explorer Juan Rodríguez Cabrillo stopped in 1542 at present-day San Diego Bay. Cabrillo explored the shorelines of present-day Catalina Island as well as San Pedro and Santa Monica Bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Spain laid claim to California based on the surveys conducted by Cabrillo and Vizcaíno.

The 1769 overland expedition by Captain Gaspar de Portolá marks the start of California's Historic period. With a band of 64 soldiers, missionaries, Baja (lower) California Native Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July of 1769, while Portolá was exploring southern California, Franciscan

Fr. Junípero Serra founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

A major emphasis during the Spanish Period in California was the construction of missions and associated presidios to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns, but just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles).

In 1774, Juan Bautista de Anza lead an overland expedition northward from Sonora, Mexico to explore the inland areas of California and find an acceptable passage to Monterey in Alta California. In 1775, de Anza lead a group of 240 immigrants along the same 1,200-mile route, crossing the Santa Ana River near modern Riverside, before continuing to Mission San Gabriel. The group successfully made it to Monterey with only one fatality. Some continued to San Francisco to establish the presidio and mission on the peninsula. (SE, pp. 31-32).

Mexican Period (1822–1848)

After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants.

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary Southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities. (SE, p. 32).

American Period (1848 – Present)

The Mexican–American War ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period. California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. Territories.

The Gold Rush began in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity.

On January 5, 1852, leaders of the Cahuilla, Cupeño, Luiseño, and Serrano signed the Treaty of Temecula. Between March 1851 and January 1852, 18 treaties were produced with at least 139 tribes.

“Treaties were conducted with tribes under false pretense. It was not for peace as written, but instead to acquire title to the land by extinguishing the Aboriginal title”. In July 1852, the U.S. Senate rejected all treaties, and the land was never returned to the tribes. By 1875, the U.S. government allowed reservations to be established by the Luiseño in the region. However, that same year, the District Court of San Francisco ordered the eviction of the Temecula Indians from their ancestral village on the Little Temecula Rancho, displacing hundreds of people and stripping them of their homes and possessions. In 1882, an Executive Order signed by President MacArthur set aside land for the Pechanga Reservation after author Helen Hunt Jackson reported horrific living conditions to the U.S. Government, forcing Congress to act. (SE, pp. 32-33).

City of Riverside (1870-Present)

During the Mexican Period, much of the City of Riverside was part of Rancho Rubidoux. In 1869, Thomas W. Cover purchased large amounts of Rancho Rubidoux with ambitions to establish a silk industry in California with silk expert Louis Prevost and even created the California Silk Center Association. In March of 1870, John Wesley North issued a circular entitled “A Colony for California” to promote the idea of founding an agriculture-based colony in California, which led to the formation of the Southern California Colony Association later that same year. In August of 1870, California Colony Association directors decided on the Jurupa Rancho along the banks of the Santa Ana River, purchased a section of the Jurupa Rancho from the California Silk Association. By the end of 1870, present-day Riverside was surveyed and platted as a townsite. Once platted, the colony focused on agriculture with a variety of crops ranging from citrus to nuts to sweet potatoes and sugar beets. Riverside quickly grew and reached over 1,000 residents by 1880, and by 1890, the population reached 4,600. During this period of growth, in 1883, the City of Riverside incorporated.

The 1870s and 1880s were also a period of infrastructure development for Riverside. Reliable water supplies were crucial to the success of the areas agricultural based economic system. During these years the canals were constructed, and water companies were formed to manage this need. By 1895, the citrus industry was booming, which led to Riverside becoming the wealthiest city per capita in the United States. The success of the citrus industry also sparked railroad development in the area during this time starting with the California Southern Railroad in 1882 and continuing to the construction of the San Jacinto Valley Railroad in 1888.

After World War II, the City began to diversify its economic base and served as the county seat. During this time, the City had manufacturing facilities and a variety of professional services like architecture, accounting, banking, legal, and technology. The Press Enterprise reported in 1953 that Riverside was ranked number 14 among the fastest growing cities in the west. In addition, developments in advanced education came to Riverside in the 1950s with the establishment of the University of California Riverside campus opening in 1954. The postwar era also brought about the need for city limit expansions and annexation of new parts of the City began as early as 1954. This annexation also allowed for suburban development throughout the area. Infrastructure improvements also dominated the postwar era in Riverside with the construction of major highways like Interstate 215 and SH 91.

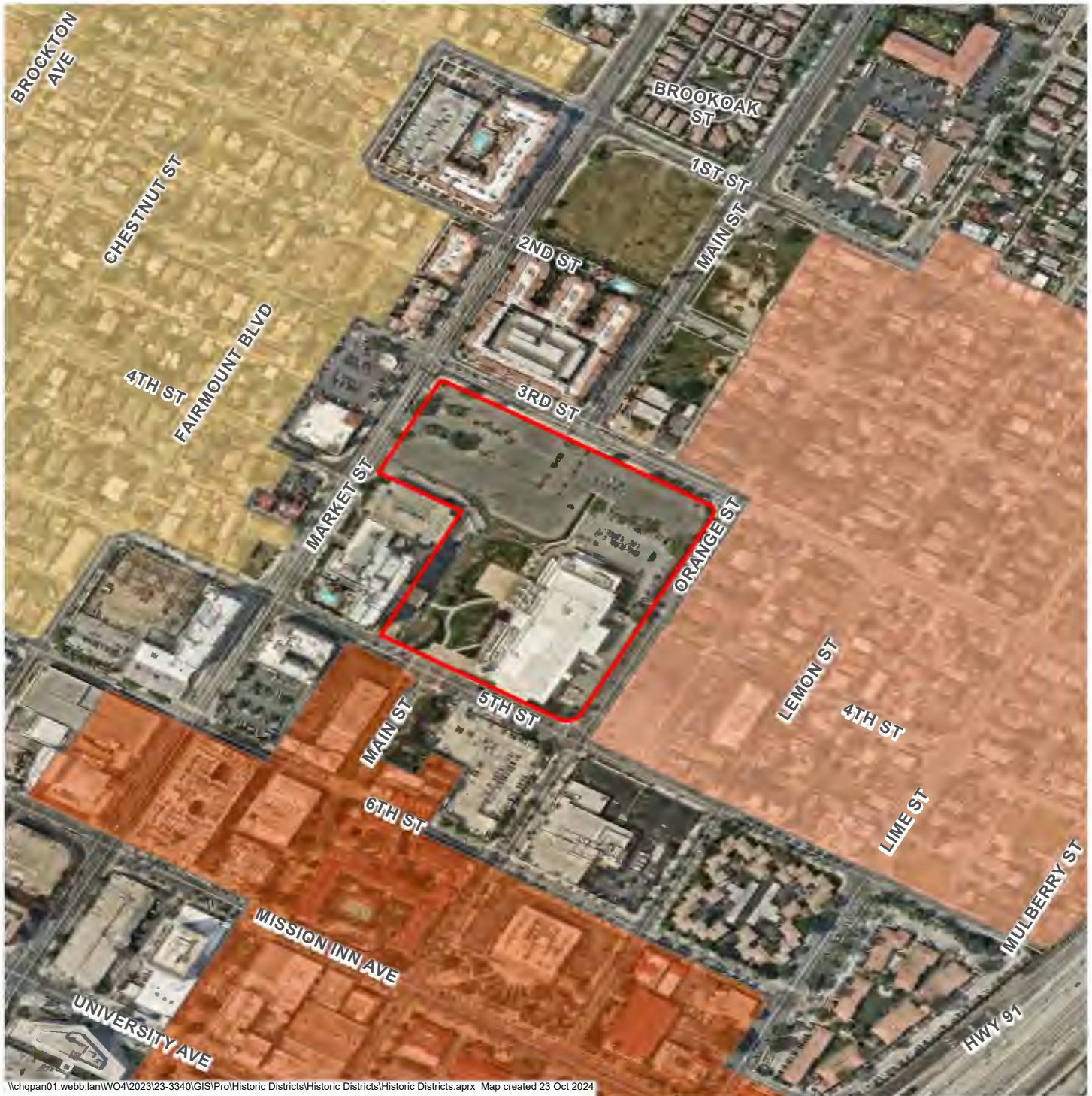
In tandem with all of the developments occurring in Riverside, there was also significant growth and development of the City’s built environment from the late 19th century to the mid-20th century. The protection of these important buildings and structures was formalized in 1969, when the City Council established the Historic Preservation Program. As a result of this program, many important buildings have been saved such as the Mission Inn and the Catherin Bettner home. There have also been numerous historic districts established throughout the City to further protect and preserve the city’s architectural and cultural history.

In more recent years, the City has continued to diversify its economic base and support the population of 1.3 million people (2010 Census). Despite changes in the regional economic focus and the general shifts in social movements in California over the last decade, Riverside continues to be one of the fastest growing areas in the country. (SE, pp. 33-34).

Three historic districts (Mission Inn Historic District, Heritage Square Historic District, Mile Square Northwest Potential Historic District) are located near the Project site. These three Historic Districts are shown in relation to the Project site on **Figure 5.3-1 – Historic Districts**. The Mission Inn Historic District was designated in 1986, notably as the City Center known for the architectural style of Mission Revival. In 1988, the Cultural Heritage Board approved the designation of the Heritage Square Historic District which exhibits the highest percentage of nineteenth century architecture of any neighborhood in Riverside. Lastly, The Mile Square Northwest Potential Historic District has not been designated but is eligible under CRHR Criterion 3 and is assigned under status code of 551 (individually listed or designated locally). This district represents one of the first waves of residential development in Riverside.

FIGURE 5.3-1

Historic Districts



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LEGEND

- Project Site
- Heritage Square Historic District
- Mission Inn Historic District
- Miles Square Northwest Potential Historic District



0 220 440 Feet

Sources: City of Riverside GIS

Prehistoric (Archaeological) Setting

Paleoindian Tradition (ca. 13,000-10,000 BP)

The timing and entry routes of America's first successful inhabitants is a topic of ongoing investigation. According to the archaeological record, the earliest known peoples of Southern California migrated from the north, along the coast approximately 12,000 years before present (BP) during the terminal Pleistocene. These paleo coastal peoples had well-developed maritime technologies and their presence is evidenced by sites on the northern Channel Islands and the mainland coast of central California. Daisy Cave site on San Miguel Island has revealed human occupation dating to approximately 10,400 BP. Further supporting this timeline, reevaluations of human remains recovered from the Arlington Springs Site on Santa Rosa Island, have radiocarbon dated isolated bone proteins to approximately 11,000 BP. (SE, p. 24).

San Dieguito Complex (ca. 10,000-7,500 BP)

In the northern interior valleys of Southern California, the San Dieguito Complex is the earliest cultural pattern that is supported by the archaeological record, with sites dating as far back as 9,400 BP. The Holocene setting for these first peoples was one of extreme environmental change with the extinction of megafauna coinciding with continental warming, which resulted in vast expanses of shallow pluvial lakes surrounded by wetlands, a shift in tree lines and biotic zones to higher elevations, and a transformation of the geologic and floral landscape. Not much is known of the lifeways of these people, however sites are typically associated with lacustrine, marsh, and estuarine ecosystems with inland and coastal variants. Distinctions between these two expressions- such as settlement patterns, degree of sedentism, site stratification, and specific artifacts- appear to be related to regional/environmental settings rather than cultural differences. Subsistence strategies seem to depend on hunting and gathering vegetal sources related to these ecosystems. Resource exploitation was focused on small and large game, waterfowl, eggs, mollusks, and presumably vegetal foods. Toolkits are characterized by crescentics, percussion flaked foliate knives/points, large leaf-shaped points, engraving tools, choppers, core hammers, pebble hammerstones, and a variety of large ovoid, domed, or rectangular scrapers, unknown perishable technologies, and an apparent absence of ground stone tools. (SE, p. 24).

Encinitas Tradition (9,400-1,000 BP)

The Encinitas Tradition encompassed the region of California extending from Santa Barbara to the Mexican border and is divided into four regional expressions including the Topanga Pattern (northern coastal/near-coastal groups), the Greven Knoll Pattern (northern inland groups), the La Jolla Pattern (southern coastal/near-coastal groups), and Pauma Pattern (southern inland groups). The project site is located within the prehistoric culture area of the Greven Knoll Pattern. The majority of Encinitas Tradition sites, especially along the coast, date between 7,000 and 3,000 BP. This Tradition roughly coincides with the Altithermal climactic trend which began in California and other areas between 8,000 and 7,500 years ago. This was an arid warming trend that affected both marine and terrestrial environments. This Tradition is generally characterized by small, mobile groups with generalized, flexible subsistence strategies and a well-developed collecting economy that appears to be focused on plant resources, shellfish, and other resources depending on the environmental setting (coastal or inland). The toolkit includes an abundance of manos and metates, crudely fashioned core and flake tools, bone tools, shell ornaments, and a paucity of projectile points and vertebrate remains. It has been commonly accepted that this tradition had a reduced emphasis on hunting, however this idea is generally founded on limited understanding of traditional usage of ground stone. There is also a need for a theoretical reconsideration of factors such as the impact of climate change on the preservation of the lithic record and possible shifts in subsistence practices, such as pulverizing long bones for maximized protein extraction. (SE, p. 25).

Greven Knoll Pattern (9,400-1,000 BP)

The Greven Knoll Pattern is divided into three phases and represents the Encinitas Tradition in the northern interior region of Southern California. It is essentially a regional configuration of the Millingstone paradigm. Greven Knoll sites are typically located in valley settings and are associated with milling stone tools, an apparent link with Mojave Desert groups, and a lack of contact with coastal peoples. Several Greven Knoll sites in the Lake Perris region have yielded artifacts such as Lake Mojave, Pinto, and Silver Lake projectile point styles as well as obsidian materials sourced from the Coso Volcanic Field which indicate contact with northern Mojave Desert and southern Great Basin Desert groups. Sites in Riverside County (CA-RIV-6069/8712 and CA-RIV-2798) have been dated to Greven Knoll I and II chronologies and may date as far back as the Late Pleistocene. Greven Knoll, Phase I (9,400 to 4,000 BP) toolkits are characterized by an abundance of manos/metates, core tools, hammerstones, charmstones, occasional coggled stones and discoidals, and large dart points including Pinto points. During Phase II (4,000 to 3,000), settlement patterns and toolkit profiles remained relatively the same, with a prevailing absence of shell, scrapers, and mortars/pestles. Notable changes include the adoption of Elko points, a significant increase in the percentage of manos, and a decreased percentage of points and bone tools. Contextually, it was during this phase, around 3,500 BP, that the Takic expansion into coastal areas of Southern California, brought drastic and abrupt cultural change reflective of population replacement and resulting in the isolation of Greven Knoll groups from the coast. Distinguishing cultural traits of Phase III (3,000 to 1,000 BP) sites include mortuary practices using flexed inhumations under cairns with rare cremations, and an apparent shift in subsistence practices indicated by a paucity of hunting tools, the adoption of scraper planes, and the limited emergence of mortar/pestle technology. Toolkits are characterized by scraper planes as a cultural marker, an abundance of manos/metates, Elko points, (few) mortars/pestles, choppers, hammerstones, late discoidals, and a continued absence of shell artifacts. (SE, pp. 25-26).

Palomar Tradition (1,250-150 BP)

The Palomar Tradition represents a replacement of Encinitas Tradition groups beginning in southern Orange County and resulting in major shifts in technologies, artifact types, settlement patterns, economic systems, and possibly spiritual belief systems/practices. This Tradition can be conceived of as Late Prehistoric cultural patterns within a region generally bound on the northwest by the Santa Ana River, the northeast by the San Bernardino Mountain Range, and with a southern edge extending east-west from the southeast end of the San Bernardino Range (near the Chocolate Mountains), back to the coast. The appearance of bow and arrow technology as well as new rock art styles are cultural markers of this shift. This tradition was preceded by a significant shift in the exchange of obsidian, indicated by a dramatic decrease in favored materials sourced from the north, which were replaced with lower quality materials from Obsidian Butte in Imperial Valley. The Palomar Tradition is divided into cultural patterns and phases, with the San Luis Rey Pattern representing western groups extending east into interior valleys, and the Peninsular Pattern representing Palomar groups occupying regions further east and northeast. The project site is located at the eastern edge of San Luis Rey Pattern culture area. This tradition overlaps with the Medieval Climactic Anomaly (MCA), which was a period of extreme fluctuations in weather that subjected populations to extended periods of notably warmer weather and intense drought. The MCA lasted for several centuries between 1,200BP and 650BP. (SE, p. 26).

San Luis Rey Pattern (1,000-150 BP)

The San Luis Rey Pattern represents the Palomar Tradition in southern Orange County, northern San Diego County, and the northern interior valleys of Southern California and is represented by two phases (Sutton 2011, 2015). San Luis Rey Phase I (1,000 to 500 BP) sites represent a rapid diffusion/adoption of proto-Cupan language and material culture patterns beginning along the southern Orange County coast around 1,250BP and eventually reaching the northern inland valleys around 1,000BP. Settlement patterns

are generally dispersed, however inland valley settlements demonstrated a dramatic increase in intensity, likely due to drought and population or resource pressures. Significant changes in material culture suggest major subsistence shifts and include a notable decrease in scrapers, the adoption of Cottonwood triangular points and steatite shaft straighteners which likely indicates the adoption of bow and arrow technology, an increase in the use of bedrock milling features and pestles, and milling features that contain both slicks and (occasional) mortars. These groups likely had a subsistence focus on small game hunting and gathering of seeds and nuts. Toolkits include bone awls, ornaments (i.e., stone pendants and Olivella shell beads), dark greasy middens, the Rancho Bernardo style of rock art, ceramic and stone pipes, and an absence of ceramics.

Phase II (500 to 150 BP) sites represent distinct changes in settlement patterns, subsistence, toolkits, mortuary practices, and rock art. Settlement patterns are notably more sedentary with larger villages near permanent sources of water and smaller satellite sites that were likely seasonal camps related to special-use areas. In some areas a lowland winter/upland summer seasonal-round village settlement pattern was practiced. During this phase, interior valley groups experienced a loss of territory due to the migration of groups from the northern Coachella Valley. Later into Phase II, villages became increasingly consolidated, developing into complexes, likely as a result of Euro-American presence and resource scarcity. Cultural traits include the adoption of ceramics, an emphasis on collecting, increased reliance on acorns and large game resources, and mortuary practices in favor of pit cremations without formal cemeteries. Toolkits are characterized by deep concave base Cottonwood points, Tizon Brown pottery, limited Colorado Buff Ware, ceramic pipes, a significant increase in bedrock mortars and milling features containing multiple elements, the San Luis Rey style of rock art, and the appearance of European domestic animal species and material culture. Notably, cupule rocks and rock rings appear during this phase. This pattern closely resembles ethnohistoric/ethnographic Luiseño groups.

Paleontological Setting

Paleontology is the study of the developing history of life on Earth, of ancient plants and animals based on the fossil record (evidence of their existence preserved in rocks). This field includes the study of body fossils, tracks, burrows, cast-off parts, fossilized feces, and chemical residues. Modern paleontology sets ancient life in its context, by studying how long-term physical changes of global geography and climate have affected the evolution of life and how ecosystems have responded to these changes and have changed the planetary environment in turn, and how these mutual responses have affected today's patterns of biodiversity. (GP 2025 EIR, p. 5.5-3)

The geology of the area is comprised of sand and gravel alluvium from the San Bernardino Mountain to the northeast. These mountains are part of the Transverse Ranges that are built up by the convergence of the Pacific and North American plates along the San Andreas fault. The San Bernardino Mountains are comprised of igneous (i.e., granodiorite and monzodiorite) and metamorphic (i.e. schist and gneiss) rocks. (SE, p. 21).

Soils in the Project site are predominantly (approximately 85%) comprised of Buren Series which form in alluvium. These soils have a higher sand content in upper layers and shifts to higher loam content in deeper layers. The color of the soils range from yellowish-brown (10YR 5/4) at upper layers to a pale brown (10YR 6/3) and then to light yellowish brown (10YR 6/4) at deeper layers. Other soils series include Cajalco, Arlington, Wyman, and Hanford at minor levels (approximately 2%). (SE, p. 23).

A review of the USGS mineral resources online spatial data for geology indicates that existing development is underlain by Older Quaternary alluvium and marine deposits (Qoa), generally dating to the Pleistocene geologic age. Terminal Pleistocene-era alluvial formations do have the potential to

support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use and represent ongoing processes of development that have the potential to preserve cultural material in context. (DOC-C).

5.3.2 Related Regulations

Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. 300101 et seq.) is legislation intended to preserve historical and archaeological sites in the United States of America. The act created the National Register of Historic Places, the list of National Historic Landmarks, and the State Historic Preservation Offices (SHPO). Among other things, the act requires federal agencies to evaluate the impact of all federally funded or permitted projects on historic properties (buildings, archaeological sites, etc.) through a process known as "Section 106 Review." (NPS-A).

National Register of Historic Places

Developed in 1981 pursuant to Title 36 CFR Section 60, the NRHP provides an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment. It should be noted that the listing of private property on the NRHP does not prohibit any actions which may otherwise be taken by the property owner with respect to the property. The listing of sites in California to the National Register is initiated through an application submitted to the State Office of Historical Preservation. Applications deemed suitable for potential consideration are handled by the State Historic Preservation Officer. All NRHP listings for sites in California are also automatically added to the California Register of Historical Resources by the State of California. The listing of a site on the NRHP does not generally result in any specific physical protection. Among other things, however, it does create an additional level of CEQA (and NEPA, the National Environmental Protection Act) review to be satisfied prior to the approval of any discretionary action occurring that might adversely affect the resource. (NPS-B).

Antiquities Act of 1906

The only federal law protecting fossil resources on public lands is the Antiquities Act of 1906 (16 United States Code [USC] 431–433). Enacted when Theodore Roosevelt was president, the Antiquities Act was designed to protect nonrenewable fossil and cultural resources from indiscriminate collecting. Specific paleontological sites can be protected under the National Registry of Natural Landmarks (16 USC 461–467), and at least three paleontological Landmarks are known in California. National Environmental Protection Act (NEPA) (42 USC 4321) directs Federal agencies to use all practicable means to "...preserve important historic, cultural, and natural aspects of our national heritage...". It must be noted that Section 106 of the National Historic Preservation Act (NHPA) does not apply to paleontological resources unless they are found in culturally related contexts.

State Regulations

State Historic Preservation Office

The State Historic Preservation Office (SHPO) is a state governmental function created per the NHPA, which called for the creation of a state agency to implement provisions of the law, including the preparation of a comprehensive historic preservation plan and a statewide survey of historical resources (SHPO-A). SHPO administers the National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks, and the California Points of Historical Interest

programs. The responsibilities of the SHPO include identifying, evaluating, and registering historic properties; ensuring compliance with federal and state regulatory obligations; encouraging the adoption of economic incentives programs designed to benefit property owners; encouraging economic revitalization by promoting a historic preservation ethic through preservation education and public awareness and, most significantly, by demonstrating leadership and stewardship for historic preservation in California. SHPO maintains the California Historical Resources Information System (CHRIS), which includes the statewide Historical Resources Inventory database. (SHPO-B).

California Environmental Quality Act

CEQA requires the lead agency to determine whether the proposed development project will have a significant effect on the environment. California Public Resource Code (PRC) Sections 21083.2 and 21084.1 and State *CEQA Guidelines* Section 15126.4 deal with the definitions of unique and non-unique archaeological resources and historical resources, respectively.

PRC Section 21083.2 directs the lead agency to determine whether the project may have a significant effect on unique archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources.

PRC Section 21084.1 and State *CEQA Guidelines* Section 15064.5(b)) identify that a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” An “historical resource” is any site listed or eligible for listing in the CRHR. The CRHR listing criteria are intended to examine whether the resource in question: (a) is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; (b) is associated with the lives of persons important in our past; (c) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (d) has yielded, or may be likely to yield, information important in pre-history or history.

The term “historical resource” also includes any site described in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1(q)). CEQA also applies to “unique archaeological resources.” PRC Section 21083.2(g) defines a “unique archaeological resource” as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Under PRC Section 21084.1 and State *CEQA Guidelines* Section 15064.5(a), all historical resources and unique archaeological resources, as defined by statute, are presumed to be historically or culturally significant for purposes of CEQA. The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption. A site or resource that does not meet

the definition of “historical resource” or “unique archaeological resource” is not considered significant under CEQA and need not be analyzed further.

Per State *CEQA Guidelines* Section 15064.5(b)(1) and PRC Section 5020.1(q), a significant cultural impact results from a “substantial adverse change in the significance of an historical resource [including a unique archaeological resource]” due to the “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

CEQA requires the lead agency to consider whether a project will have a significant effect on unique archaeological resources and to avoid unique archaeological resources when feasible or mitigate any effects to less-than-significant levels per PRC Section 21083.2. The State CEQA Statutes (PRC Section 21083.2(g)) define a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Paleontological resources cannot be replaced once they are destroyed. Therefore, paleontological resources are considered nonrenewable scientific resources and are protected under CEQA. According to Appendix G of the State *CEQA Guidelines*, a project could have a significant effect if it would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. In order to determine the uniqueness of a given paleontological resource, it must first be identified or recovered (i.e., salvaged). Therefore, mitigation of adverse impacts to paleontological resources is mandated by CEQA.

California Register of Historical Resources

In 1992, the California legislature established the California Register of Historical Resources (CRHR) to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change. State law protects cultural resources by requiring evaluations of the

significance of historical resources in CEQA documents as identified in PRC Section 5024.10 et seq. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the State *CEQA Guidelines*. These criteria are similar to those used in federal law. The California Register of Historical Resources (CRHR) is maintained by the state Office of Historic Preservation. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are state historical landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. PRC Section 5020.1(j), defines the term “historical resource” to include but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.”

Native American Heritage Commission

The Native American Heritage Commission (NAHC), created in statute in 1976, is a nine-member body, appointed by the Governor, to identify and catalog cultural resources (i.e., places of special religious or social significance to Native Americans, and known graves and cemeteries of Native Americans on private lands) in California. The NAHC is also charged with ensuring California Native American tribes’ accessibility to ancient Native American cultural resources on public lands (i.e. Sacred Lands File), overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the Native American Graves Protection and Repatriation Act (NAGPRA). (NAHC 2023).

Human Remains

According to Section 15064.5 of the State *CEQA Guidelines*, all human remains are assigned special importance and specific procedures are to be used when Native American remains are discovered. These procedures are discussed within Public Resources Code Section 5097.98 (PRC 5097.98). PRC 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains.

California Health & Safety Code (Sections 7050.5, 7051, and 7054)

Sections 7050.5, 7051, and 7054 of the California Health & Safety Code collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), as well as the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, treatment of the remains prior to, during and after evaluation, and reburial procedures. (HSC 7050.5, HSC 7051, and HSC 7054).

California Public Resources Code Section 5097.98

California Public Resources Code Section 509.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the State *CEQA Guidelines*.

California Public Resources Code Section 5097.5

California Public Resources Code Section 5097.5 protects, among other things, paleontological sites on State lands. Sections 4306 and 4309 of the California Administrative Code establish authority and processes to protect paleontological resources while allowing mitigation through the permit process. Potential impacts to paleontological resources must be assessed for any project subject to review under CEQA.

Regional Regulations

There are no regional regulations applicable to the proposed Project.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. HP-25, HP-27, HP-28):

Historic Preservation Element

Objective HP-1 To use historic preservation principles as an equal component in the planning and development process.

Policy HP-1.3 The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Objective HP-2 To continue an active program to identify, interpret and designate the City's cultural resources.

Objective HP-3 To promote the City's cultural resources as a means to enhance the City's identity as an important center of Southern California history.

Objective HP-4 To fully integrate the consideration of cultural resources as a major aspect of the City's planning, permitting and development activities.

Policy HP-4.3 The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Objective HP-5 To ensure compatibility between new development and existing cultural resources.

Policy HP-5.1 The City shall use its design and plot plan review processes to encourage new construction to be compatible in scale and character with cultural resources and historic districts.

Policy HP-5.2 The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.

Objective HP-6 To actively pursue funding for a first-class historic preservation program, including money needed for educational materials, studies, surveys, staffing, and incentives for preservation by private property owners.

Objective HP-7 To encourage both public and private stewardship of the City's cultural resources.

City of Riverside General Plan 2025 EIR

The are no applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Cultural Resources or Paleontological Resources.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the General Plan Update Phase 1(GPUI) EIR that pertain to Cultural Resources or Paleontological Resources.

Downtown Specific Plan

The City of Riverside Downtown Specific Plan contains goals and policies that are considered applicable to the proposed Project, as identified below (DSP, p. 26):

- Goal UD-1 Strengthen the identity and character of Downtown using the existing historic and architectural urban character of the community, while allowing for new structures that are architecturally compatible with, and complementary to, the existing architectural and historic fabric.
- Policy UD-1-1 Through design review, ensure that new development enhances the character of the Downtown Districts by requiring design qualities and elements that contribute to an active pedestrian environment, where appropriate, and ensuring that architectural elements are compatible and in scale with the existing historic structures in the Downtown.
- Policy UD-1-6 Establish development standards to preserve the view of historic buildings along Mission Inn Avenue from the vantage point of the Riverside 91 Freeway.
- Goal HP-1 Strengthen and enhance the historic character of Downtown Riverside, which is unique to the Inland Empire, through the preservation and maintenance of Downtown's historically significant sites and structures.
- Policy HP-1-4 Through design review, encourage new development to be compatible with adjacent historical structures in scale, massing, building materials, and general architectural treatment.
- Policy HP-1-5 Work with interested groups and individuals to further tailor the historic design guidelines to each of the designated historic districts within the specific plan boundaries.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Cultural Resources (historical):

Title 20 – Cultural Resources. The purpose of this title is to promote the public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having

special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City for the following reasons:

- To safeguard the City's heritage as embodied and reflected in such resources;
- To encourage public knowledge, understanding and appreciation of the City's past;
- To foster civic and neighborhood pride and a sense of identity based on the recognition and use of cultural resources;
- To promote the enjoyment and use of cultural resources appropriate for the education and recreation of the people of the City;
- To preserve diverse and harmonious architectural styles and design preferences reflecting phases of the City's history and to encourage complementary contemporary design and construction;
- To enhance property values and to increase economic and financial benefits to the City and its inhabitants;
- To protect and enhance the City's attraction to tourists and visitors, thereby stimulating business and industry;
- To identify as early as possible and resolve conflicts between the preservation of cultural resources and alternative land uses;
- To integrate the preservation of cultural resources and the extraction of relevant data from such resources into public and private land management and development processes;
- To conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment;
- To implement the City's General Plan; and
- To work in concert with the City's Zoning Code.

5.3.3 Comments Received in Response to the Initial Study/Notice of Preparation

One comment letter was received related to cultural resources in response to the Initial Study/Notice of Preparation (IS/NOP). The comment letter was received from the Native American Heritage Commission (NAHC) and is included in Appendix A of this Draft EIR. No comments were received regarding paleontological resources in response to the Initial Study/Notice of Preparation (IS/NOP).

5.3.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G ("Environmental Checklist") to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impact in the following area and this topic is not addressed in this Draft EIR:

- Disturb any human remains, including those interred outside of dedicated cemeteries.

As identified in the IS/NOP prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; and
- Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5; and
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

5.3.5 Project Design Features

As illustrated in the Project renderings and elevations in *Section 3.0 – Project Description* (and in Appendix C), the Project proposes multiple uses on site which would result in multiple buildings of up to 95 feet tall that border the surrounding historic districts of Heritage Square, Mission Inn, and Mile Square Northwest Potential Historic District. These buildings may be significantly taller than those in the adjacent historic districts. As shown on **Figure 5.3-1**, the northernmost portion of the Mission Inn Historic District is across the street from the southwestern boundary of the Project site along Fifth Street, the Heritage Square Historic District is across Orange Street from the eastern Project boundary between Third and Fourth Street as well as partially north of the Project boundary for homes on the north and south side of Orange Street from Third Street to First Street, and the easternmost boundary of the Miles Square Potential Historic District is across Market Street near Fifth Street from the Project's southwestern boundary at Fourth Street. However, the tallest Project elements will be located in the center of the Project site with shorter Project elements creating approaches and setbacks. These approaches and setbacks minimize the significance of the taller structures of the Project with a gradual increase in height of the structures and therefore, generally retaining the relationship to the street. The proposed Project building heights are not uncommon from other buildings surrounding the historic districts.

The proposed Project will be based on a modern architectural form and designed to ensure that there is no historical conjecture to detract from the surrounding historical districts. The design of the Project will also utilize modern materials to distinguish it from historic buildings and structures that are nearby. In addition, the proposed Project is separated from the historic districts by city streets, so there is no potential to impair other historical resources or properties. For these reasons, the Project will not inhibit any of the Historic Districts' ability to continue to convey their historical significance. (SE, p. 43).

5.3.6 Environmental Impacts

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

The analysis herein is based upon the *Cultural Resources Technical Report* (CRTR) consisting of a records search; search of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF); an intensive-level pedestrian survey of the Project site by a qualified cultural resources specialist; analysis of potential project-related indirect impacts to historical resources; building development and archival research; background research and historic map and aerial review; development of an appropriate prehistoric, ethnographic and historic context for the Project site; and management recommendations. (SE, p. 2)

On March 7, 2024, South requested a California Historical Resources Information System (CHRIS) Records search from the Eastern Information Center (EIC). The EIC completed a records search of the CHRIS database for the Project site plus a one quarter mile radius buffer on April 10, 2024. The search identified and collected the records for any previously recorded cultural resources and cultural resource studies and reviewed the following lists in an effort to identify resources meeting the respective criteria for the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. (SE, p. 12). The EIC records search results indicate 44 previously recorded cultural resources are located within the one-quarter-mile search radius of the Project site.

No historical resources were identified within the Project site (SE, p. 1.). The intensive-level pedestrian survey of the Project site and surrounding areas did not identify any buildings or structures of historic age within the Project site. A review of historical aerial photographs was conducted to better understand the history of the Project site and any past disturbances. Historical aerial photographs indicate in 1948, the block currently bound by Third Street to the north, Orange Street to the east, Fifth Street to the south, and Market Street to the west was split into four equal blocks by Main Street running on a north-south and Fourth Street running on an east-west. Residences lined the west side of Orange Street and the east side of Main Street, near Fourth Street. The blocks between Main Street and Market Street appeared to be developed with large commercial properties. In 1978, Main Street and Fourth Street were closed off and incorporated to create one large block and a large building (the old Convention Center) was constructed. This large block was bound by Market Street to the west, Third Street to the north, Orange Street to the west, and Fifth Street to the south, thus creating the block containing the Project site. Additionally, most of the buildings on the current Project site were demolished. The northern end of the Project site was a paved parking lot. By 1984, the western third of the block containing the Project site was cleared of development and in 1985 three multi-story buildings appeared on the east side of Market Street. By 1994, the southwest section of the Project site was comprised of one large building. There was little change to the Project site between 1994 and 2002, but the areas around the Project site appeared to have various building demolitions and new construction. By 2009 the parking lots in the northeast quadrant of the Project site were reconfigured and expanded to cover the north side of the Project site. In 2014, the Convention Center was heavily remodeled with a central lawn located where a building once stood. The parking lots in the northern half of the site were reconfigured. There has been no discernable change to the site over the past 10 years. (SE, pp. 21-22).

Because the Project site does not contain any buildings or structures of historic age, the CRTR focused on documenting viewsheds to and from the Project site. These viewsheds include three adjacent historic districts (i.e., the Mission Inn Historic District to the southwest, the Heritage Square Historic District to the east, and the Mile Square Northwest Potential Historic District to the west) and the proposed new construction (**Figure 5.3-1**). (SE, p. 35).

Mission Inn Historic District

The Mission Inn Historic District is one of the most recognizable districts in the City due to its namesake, the Mission Inn (P-33-005791). The district is generally bounded by Sixth Street to the north, Eleventh Street to the south, Market Street to the west, and the 91 Riverside Freeway to the east. Along with The Mission Inn, the district includes other notable historic commercial and civic buildings such as Riverside County Courthouse, First Congregational Church, and Fox Theatre. The district predominantly features the architectural styles of Mission Revival, Spanish Colonial Revival, and Art Deco. Newer buildings such as the former De Anza Theatre and Goodyear Tire garage reflect the changing style aesthetics in the early- and mid-twentieth century towards Art Deco and Streamline Moderne. During the 1950s and 1960s, many of the commercial buildings were faced with aluminum sheeting, windows were covered,

and facades smoothed over. This remodeling technique often joined multiple structures and obscured original architectural features. The period of significance for the district ranges from circa 1889 to 1946 with many buildings designed by world-renowned architects like Arthur Benton, Julia Morgan, G. Stanley Wilson, and Myron Hunt. According to the City's Historic District Report, the district was last surveyed in 2004 and was assigned a status code of 5S1, individually listed or designated locally. (SE, pp. 19-20).

The northernmost portion of the Mission Inn Historic District is across the street from the southwestern boundary of the Project site along Fifth Street. Views from Fifth Street looking south down Main Street can be seen from the public right-of-way (outside of the Project site) and would remain unobstructed after Project completion. Views of the Mission Inn Historic District from Third Street would be compromised after construction of the proposed Project, as there would no longer be a direct line of sight from Third Street looking south down Main Street through the existing plaza. However, views looking toward the Mission Inn have evolved outside the period of significance of the district. The Mission Inn Historic District's period of significance is circa 1889-1946. A 1948 historic aerial photograph of the Project site shows that prior to the development of the Project site as it exists today, the Project site was comprised of homes and commercial buildings, with present-day Main Street continuing without interruption. However, between 1968 and 1978, the existing plaza containing the Project site was constructed. This change interrupted the continuation of Main Street between Third and Fifth Streets and altered the original street pattern and built environment looking toward the district. Still, views of the Mission Inn Historic District and other architecture within the downtown core remained visible from Third Street. While the proposed new development would eliminate most views of the Mission Inn Historic District and other downtown buildings from Third Street, it would establish a pedestrian axis between Third Street and Fifth Street to maintain pedestrian connectivity to the surrounding area and open space. While the proposed Project would impact this particular view of the district from Third Street, it would not have a significant impact on the district itself and will be providing a pedestrian axis. Therefore, the proposed Project will not impact the views to the Mission Inn Historic District. (SE, pp. 38-39).

Heritage Square Historic District

The Heritage Square Historic District (P-33-011521) highlights one of Riverside's first residential sectors. The district is located north of the City's downtown area and is bounded by First Street to the north, Fifth Street to the south, Orange Street and Lemon Street to the west, and Mulberry Street to the east. The district is comprised of residential buildings with large, landscaped yards and mature trees along the boulevards. The majority of the residences are one or two-story single-family homes, with a few instances of multi-family residences. The period of significance for the district ranges from 1880 to 1918. Popular architectural styles in the district include Arts and Crafts/Craftsman, Classical Revival, Eastlake, French Second Empire, Mission Revival, Queen Anne, Shingle, Spanish Colonial Revival, and Victorian Stick. In addition to its significance for its collection of architectural styles (NRHP Criterion C), the district is also eligible under NRHP Criterion A for its representation of early residential development patterns in the City. Based on the City's Historic District Report, the district has a status code of 3S (appears eligible for the NRHP individually through survey evaluation), based on the last intensive level survey conducted in 1996. A review of the State Built Environment Resource Directory (BERD) indicates the district has a status code of 2S2 (individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR). (SE, p. 20).

The Heritage Square Historic District is located to the north and east of the proposed Project site. It is significant for its collection of residential buildings from the 1880s to the 1920s. The district is an NRHP-eligible historic district under Criterion A for its connection to the early development of Riverside and under Criterion C for its collection of period revival residences. While most of the district does not have a

direct line of sight to the Project site, there are a few homes along Orange Avenue and Third Street across the street from the Project site with partial views. However, the existing Convention Center's construction in 2014 and the parking areas associated with it have already removed any historical viewsheds/adjacent historic setting that would have been associated with these early residential homes. The district would remain visible on approach from Orange Avenue or Third Street upon completion of construction. Views of the Heritage Square Historic District from Market Street would be lost following completion of Project construction however, these are not historic viewsheds, because the open plaza and parking lot did not exist prior to the 1960s. Further, only a few homes are visible from these vantage points and views from Market Street do not represent significant or historical viewsheds of the district. Therefore, the proposed Project would not have a significant impact on the district itself. Therefore, the proposed Project will not impact the views to the Heritage Square Historic District. (SE, p. 40).

Mile Square Northwest Potential Historic District

The Mile Square Northwest Potential Historic District is a residential area bounded by Houghton and Crescent Avenues to the north, Sixth Street to the south, Market Street to the east, and Redwood Drive to the west. The district is comprised of 436 residences with a period of significance of circa 1880 to 1952. The area was surveyed intensively in 2003 and was determined eligible under CRHR Criterion 3. According to the City's Historic District Report the district was assigned a status code of 5S1 (individually listed or designated locally). (SE, p. 20).

The Mile Square Northwest Potential Historic District is located west of the Project site. It is significant for its collection of residential buildings from circa 1880 to 1952. The district is bound by Market Street (east), Houghton and Crescent Avenues (north), Sixth Street (south), and Redwood Drive (west). Only buildings on the east side of the neighborhood have potential viewsheds that could be obscured by the height of the new development. However, there has already been significant development along Market Street that has created a visual barrier between the neighborhood and the Project site. Such instances of this recent development include Starbucks, CVS, Marriott, and Hampton Inn. There are also multiple mixed-use buildings along the Market Street Corridor between First Street and Sixth Street that create a visual barrier between the neighborhood and the subject property. The only vantage point where the Project site would be partially visible to the district is at the corner of Fifth Street and Market Street, but it is only partially visible because of the current Marriott Hotel on the corner. Additionally, the line of sight is only from secondary elevations and not the primary elevations of the district buildings, as they are oriented to face Fifth Street. As there are 436 residences within the district and approximately 5 buildings with any potential view of the proposed Project site, there is no potential for impact to the historical integrity or significance of the district. Therefore, the proposed Project will not impact the views to the Mile Square Northwest Potential Historic District. (SE, p. 41).

Although the Project site is not located within a designated historic district, there are three historic districts (the Mission Inn Historic District, Heritage Square Historic District, and Miles Square Northwest Potential Historic District) in proximity to the Project site which are considered historical resources as defined by CEQA. Potential direct and indirect impacts to these historic districts resulting from construction and operation of the proposed Project have been outlined above, and in detail in Appendix C, and indicate the proposed Project will not adversely impact any of the districts or their historic settings/viewsheds. (SE, p. 44.) Therefore, the proposed Project will not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 and as a result impacts will be **less than significant**. No mitigation measures are recommended for historical resources.

Threshold: Would the Project cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5?

A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research and an archaeological pedestrian survey were conducted as part of the CRTR for this Project.

The archaeological pedestrian survey focused on identifying exposed ground surface for the presence of historic artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), sediment discolorations that might indicate the presence of a cultural midden, depressions, and other features that might indicate the former presence of structures or building (e.g., post holes, foundations). No archaeological or tribal cultural resources were identified as a result of the survey. The Project site is completely developed and consists of modern buildings, parking lots, and planned landscaping. (SE, p. 35).

The CHRIS record searches indicated that 12 previously conducted cultural resource studies overlap with the Project site. An additional 13 studies were identified outside the Project site within the one-quarter mile records search radius. The CHRIS records indicate that 44 previously recorded cultural resources have been identified within the one-quarter mile radius of the Project site. One archeological site is located within the one-quarter mile radius of the Project site. None of the previously recorded archaeological resources overlap with the Project site. (SE, pp. 12-15).

As part of the CRTR, the Native American Heritage Commission (NAHC) was contacted on March 5, 2024 to request a Sacred Lands File (SLF) and a list of potentially interested Native American Tribes for the purposes of general Native American consultation under CEQA. The NAHC responded to the request on March 19, 2024, and reported negative results. The NAHC recommended contacting several local Native American Tribes pursuant to AB 52. (SE, p. 20).

The potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is always possible and the Project site is within the Traditional Land Use Areas for multiple tribes. Development of the Project site may have buried unknown cultural resources associated with Native American use. (SE, p. 44).

Pursuant to AB 52, the City notified nine Native American tribes in the area of the proposed Project. Soboba Band of Luiseño Indians, Pechanga Band of Luiseño Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians were the only tribes to request consultation. Detailed responses and results of consultation are included in *Section 5.9 – Tribal Cultural Resources* of this Draft EIR.

Though the CRTR was negative for cultural resources, the existing development within the Project site provided little to no observable ground surface for inspection; thus, the negative findings of the archaeological survey are an unreliable indicator of the archaeological sensitivity of the Project site. Proposed ground disturbances indicate a potential for an inadvertent discovery of unknown archaeological resources and human remains to occur during Project implementation especially during excavation and construction of the proposed subsurface parking structure. Implementation of mitigation measures **MM CR 1** through **MM CR 8** would ensure the proper treatment of any archaeological resources and human remains encountered during ground disturbing activities. (SE, pp. 44-45.) Thus, with implementation of mitigation measures **MM CR 1** through **MM CR 8**, the Project will not cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5. Therefore, impacts are **less than significant with mitigation incorporated**.

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

In order to assess whether a particular project area has the potential to contain significant fossil resources at the subsurface, published geologic mapping was reviewed to determine the geology and stratigraphy of the area. It is known that a number of locations in the Planning Area of the GP 2025 have a variety of known significant paleontological resources. Ground-disturbing activities in the fossil bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. (GP 2025 EIR, p. 5.5-26-27). The City's GP 2025 EIR does not map paleontological resources, so the following analysis is based on the County of Riverside data. According to the County of Riverside Map My County GIS database, the Project site is classified as High Sensitivity (High A) for paleontological resources. Geologic units with high sensitivity for paleontological resources are those that have proven to yield vertebrate or significant invertebrate, plant or trace fossils in the past or are likely to contain new vertebrate materials, traces, or trackways. Rock units with high sensitivity also may include those that contain datable organic remains older than late Holocene (e.g., animal nests or middens). Typically, a field survey as well as on-site construction monitoring is required; any significant specimens discovered are to be prepared, identified, and curated into a museum, and a final report documenting the significance of the finds is required.

The proposed Project site is located within High Sensitivity (High A) of the County's Paleontological Sensitivity map, which contains older Quaternary alluvium, which has high potential to contain significant fossil resources (DOC-C). Currently, the Project site is completely developed and there is limited access to survey for paleontological resources. However, the Project proposes to include a subterranean parking facility at a maximum depth of 53-feet below the ground surface. Based on the High A Sensitivity, mapping across the entire Project area, and the Project excavation to extend beyond artificial fill, there exists the potential for inadvertent impacts to unknown paleontological resources. Due to the ground-disturbing activities the Project Sponsor will need to implement a Paleontological Resource Impact Mitigation Program (PRIMP) prior to construction. Therefore, mitigation measure **MM CR 9** will require implementation of a PRIMP by a qualified paleontologist for construction activities that extend below the depth of artificial fill and below pavement. With implementation of existing regulations and GP 2025 Policy HP-1.3 related to the discovery and protection of paleontological resources and **MM CR 9**, impacts to a unique paleontological resource or site or unique geologic feature are **less than significant with mitigation incorporated**.

5.3.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts to cultural (archaeological) and paleontological resources.

In the event of an inadvertent discovery of archaeological resources during excavation and ground disturbing activities, the mitigation measures **MM CR 1** through **MM CR 8** shall be implemented to eliminate or reduce potentially significant impacts to archaeological resources to below the level of significance. Due to the significant amount of ground-disturbing activities especially given the subterranean parking structure, required implementation of **MM CR 9**, a PRIMP will reduce potentially significant adverse impacts to paleontological resources to below the level of significance.

MM CR 1: **Consultation.** Upon submittal of entitlement application and prior to the issuance of the grading permit the Project Sponsor and the City shall contact Consulting Tribes (Soboba Band of Luiseño Indians, Pechanga Band of Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians) to provide an electronic copy of the plans for review. Additional consultation shall occur between the City, Project Sponsor, and Consulting Tribes to discuss any proposed site design changes and review any new impacts to Tribal Cultural Resources and/or potential avoidance/preservation of the Tribal Cultural Resources on the Project site. The City and the Project Sponsor shall make all attempts to avoid and/or preserve in place as many Tribal Cultural Resources as possible that are located on the Project site if the site design and/or proposed grades should be revised.

MM CR 2: **Archaeological Monitoring.** Since no specific development plans have been prepared to date, the future Project Sponsor(s) will retain a qualified archaeologist to review final grading and construction plans along with geotechnical testing results to determine the depth at which native soils exist that would require archaeological monitoring. The areas to be monitored shall be provided to the Planning Department and Consulting Tribes for review prior to the issuance of a grading permit. At least 30 days prior to issuance of a grading permit for private development or before any site grading, excavation and/or initial ground disturbing activities take place, the Project Sponsor shall retain a Secretary of Interior Standards qualified archaeological monitor, with regional experience, to monitor all initial ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project Archaeologist, in consultation with Consulting Tribes the Project Sponsor and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and tribal monitoring activities that will occur on the Project site. Details in the plan shall include:
 - a. Grading and development scheduling;
 - b. The development of a schedule in coordination with the Project Sponsor and the Project Archaeologist for designated Tribal Monitors from the Consulting Tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project Archaeologists;
 - c. The protocols and stipulations that the Project Sponsor, Consulting Tribes, and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered archaeological resources and Tribal Cultural Resource deposits that shall be subject to a resource evaluation; and
 - d. Avoidance, treatment and final disposition of any archaeological or Tribal Cultural Resources, sacred sites, and human remains if discovered on the Project site.

MM CR 3: Tribal Monitor. Prior to issuance of grading permit, the Project Sponsor shall engage each of the Consulting Tribe(s), choosing to monitor, regarding Tribal Monitoring. The Project Sponsor shall provide evidence to the City that they have reached an agreement with each of the Consulting Tribe(s) regarding the following:

1. The treatment of known cultural resources;
2. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and
3. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities.

The Project Sponsor shall provide sufficient evidence that they have made a reasonable effort to reach an agreement with the Consulting Tribes in regard to items 1-3, as listed above.

MM CR 4: Treatment and Disposition of Tribal Cultural Resources. In the event that Tribal Cultural Resources are inadvertently discovered during the course of grading for this Project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. All work shall be halted in the area of the discovery and may be redirected to an alternate area of the Project site, based on the direction of the Project Archaeologist and Tribal Monitor(s). Work may recommence once culturally appropriate treatment has been agreed upon by the City, Project Sponsor, and Consulting Tribes.
2. Notification to City and Consulting Tribes: Within 24 hours of discovery, the City and the Consulting Tribe(s) shall be notified via email and phone by the Project Archaeologist. The Project Sponsor shall provide the City evidence of notification to Consulting Tribes. Consulting Tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
3. Inadvertent Finds Assessment:
 - a. All ground disturbance activities within 100 feet of the discovered Tribal Cultural Resources shall be halted until a meeting is convened between the Project Sponsor, the Project Archaeologist, the Tribal Representative(s), and the Planning Division to discuss the significance of the find.
 - b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the Planning Division, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the Tribal Cultural Resources.
 - c. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.

- d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the Consulting Tribes. This may include avoidance of the cultural resources through project design, in-place preservation of Tribal Cultural Resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.
 - e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribes, and shall be submitted to the City for their review and approval prior to implementation of the said plan.
4. Temporary Curation and Storage: During the course of construction, all discovered Tribal Cultural Resources that cannot be avoided and are not subject to relocation shall be temporarily curated in a secure location on site. The removal of any artifacts from the Project site will need to be approved by the Consulting Tribes and thoroughly inventoried with Tribal Monitor oversight of the process. Historical archaeological resources, which are not of Native American cultural patrimony may be stored at the offices of the Project Archaeologist.
5. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all Tribal Cultural Resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to Tribal Cultural Resources. The Project Sponsor shall relinquish the artifacts through one or more of the following methods, in order of preference, and provide the City of Riverside Community and Economic Development Department with evidence of same:
- a. Preservation in Place of the Tribal Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
 - b. Accommodate the process for on-site reburial of the discovered items with the Consulting Tribes. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all cataloguing and basic recordation, that has been approved by the Consulting Tribes has been completed.
 - c. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation.

- MM CR 5: Phase IV Report.** At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City and Consulting Tribes documenting monitoring activities conducted by the Project Archaeologist and Tribal Monitors within 60 days of completion of ground disturbing activities. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the Project Archaeologist and Tribal Monitors. All reports produced will be submitted to the City of Riverside, the applicable California Historical Resources Information System (CHRIS) Information Center, and Consulting Tribes.
- MM CR 6: Human Remains.** If human remains are discovered, 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). (GP Objective 23.3, CEQA). *This mitigation measure was identified as MM CR-1 in the Initial Study. This mitigation measure has been renumbered to MM CR 6 for purposes of inclusion in the Project’s Mitigation Monitoring and Reporting Program.*
- MM CR 7: Non-Disclosure.** It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.
- MM CR 8: Cultural Sensitivity Awareness.** The Secretary of Interior qualified Project Archaeologist and Tribal Monitor(s) shall attend the pre-grading meeting with the Project Sponsor’s contractors to provide a briefing regarding the potential inadvertent cultural discoveries prior to the start of construction activities. This shall include the description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. Neither Project Archaeologist nor Consulting Tribe shall be allowed to bring any samples of the cultural and archeological artifacts to this meeting. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

MM CR 9: **Paleontological Resource Impact Mitigation Program (PRIMP).** Construction activities that extend below the depth of artificial fill and below pavement may impact significant paleontological resources throughout the Project area, but especially in the area of the proposed subterranean parking structure. Therefore, prior to the issuance of grading permits for private development or any site grading, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified professional paleontologist as defined by paleontology industry standards and/or the Society of Vertebrate Paleontology guidelines. The PRIMP will include a Worker's Environmental Awareness Program training which can be done concurrently with **MM CR 8** to all field personnel to describe the types of paleontological resources that may be found and the procedures to follow if any are encountered; the monitoring plan will indicate where construction monitoring should occur and the frequency of required monitoring (e.g., full-time, spot-checks, etc.); the monitoring plan will also provide details about fossil collection, analysis, and preparation for permanent curation at an approved repository; and lastly, the monitoring plan will describe the different reporting standards to be used, such as monitoring with negative findings versus monitoring resulting in fossil discoveries.

5.3.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

The above analysis determined that no direct impacts to historical resources would occur from the Project. Indirect historic impacts associated with the scale of development proposed by the Project in proximity to nearby historic districts were evaluated and could occur. However, through implementation of Project design which places the taller buildings in the center of the site and shorter buildings along Orange Street, which is closest to the edge of the Heritage Square Historic District, shall minimize said indirect impacts. Since no specific development has been proposed, but it is expected that significant subterranean construction and excavation is needed by the Project envisioned, there is the potential to find unexpected archaeological and paleontological resources. Even though the CRTR determined that likelihood is low to find those resources and there are no known resources within the Project site, implementation of mitigation measures **MM CR 1** through **MM CR 8**, would reduce impacts to archaeological resources to **less than significant**. Implementation of mitigation measure **MM CR 9** would reduce impacts to paleontological resources to **less than significant**. There would be no remaining impacts after such measures are implemented.

5.4 Energy

The focus of this section is to analyze potential impacts related to energy. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics*.

The analysis in this section is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Riverside Alive Project, City of Riverside, California*, prepared by Albert A. Webb Associates dated February 26, 2025 (WEBB-A) and the *Energy Consumption Calculations*, prepared by Albert A. Webb Associates, December 2024 (WEBB-B). These documents are contained within their entirety in Appendix B to this document.

5.4.1 Setting

Energy sources are classified as non-renewable if they cannot be replenished in a short period of time. Therefore, non-renewable energy resources include fossil fuels. Fossil fuels, which consist of oil, coal, natural gas, and associated byproducts, provide the energy required for the vast majority of motorized vehicles and generation of electricity at power plants. Thus, the discussion of energy conservation most relevant to the Project is focused on Project-generated electricity demand, natural gas demand, and fuel consumption.

Electricity

The City of Riverside (City) is the primary distribution provider for electricity in the City and, as such, operates its own electrical utility, known as the City of Riverside Public Utilities (RPU). RPU provides service to most of the City including the Project site.

The City and RPU are dedicated to conserving energy generated by fossil fuels and increasing its portfolio of renewable energy sources. In 2023, 46.4 percent of RPU's energy supply was generated from renewable energy sources, which includes geothermal, wind, and solar power (RPU 2023a). RPU entered into its first significant contracts for renewable energy in 2002 and 2003, met a 20 percent Renewable Portfolio Standard (RPS) goal in 2010, and exceeded the RPS mandate of 33 percent by the year 2020, and is currently expected to exceed the 60 percent by 2030 RPS mandate three years ahead of schedule. (IRP, p. 1-2). RPU's future forecasted RPS levels show that they will exceed 50 percent by 2026, and achieve 80.5 percent by 2030, exceeding the mandate of Senate Bill (SB) 100 procurement targets. Therefore, it is anticipated that RPU will achieve 105 percent RPS in 2038 and remain 100 percent through the 2045 study horizon. Thus, RPU will be able to satisfy its minimum RPS compliance obligations in all compliance periods through 2030 per SB 100 (IRP, p. 12-2).

RPU's electricity consumption by sector as of 2022 is provided in **Table 5.4-A – RPU Electricity Consumption in 2022 (GWh)**.

Table 5.4-A – RPU Electricity Consumption in 2022 (GWh)

Agricultural & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Streetlight	Total Usage¹
33.73	1,015.65	56.44	286.93	19.06	795.30	15.30	2,221.41

Source: CEC2022a

Notes:

1. All units are in millions of kilowatt-hours (note one million kilowatt-hours equals one gigawatt-hour (GWh)) and rounded to the nearest whole number.

As reported by the California Energy Commission (CEC), RPU consumed approximately 2,221 million kilowatt-hours (kWh) in 2022, of which approximately 795 million kWh were consumed by the residential sector and approximately 1,016 million kWh were consumed by the commercial building sector, which are the sectors most relevant to the proposed Project. (CEC 2022a).

Natural Gas

The Southern California Gas Company (SCG) provides natural gas service to the City. As a public utility, SCG is under the jurisdiction of California Public Utilities Commission (CPUC) but can also be affected by actions of federal regulatory agencies (CPUC NGC). SCG is the principal distributor of natural gas in Southern California, providing retail and wholesale customers with transportation, exchange, and storage services, and also procurement services to most retail core customers. SCG is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery and electric generation customers in Southern California. (CGEU 2024, p. 102).

California's existing gas supply portfolio is regionally diverse and includes supplies from on- and off-shore California sources, southwestern United States supply sources, the Rocky Mountains, and Canada (CGEU 2024, p. 119). The CPUC regulates natural gas utility service for approximately 11 million customers that receive natural gas from Pacific Gas and Electric (PG&E), SCG, San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. (CPUC NGC).

Natural gas demand in SCG's service area for core, non-residential markets is expected to decrease at an annual average rate of 0.2 percent through 2040, residential gas demand is expected to decline at an annual average rate of 0.6 percent, and commercial demand is projected to decrease at an annual average rate of 1.2 percent per year. (CGEU 2024, pp. 104; 107 – 108) .

SCG projects total gas demand to decrease at an annual rate of approximately 0.7 percent from 2024 to 2040. By comparison, the total gas demand in 2022 had been projected by SCG to decline at an annual rate of 1.5 percent over the forecast horizon. The difference between the two forecasts is caused primarily by the modest economic growth, the forecasted energy efficiency and fuel substitution, tighter standards created by revised Title 20 and Title 24 Codes and Standards, and renewable energy goals that impact gas-fired electricity. (CGEU 2024, p. 104).

SCG also implements energy efficiency (EE) programs. SCG's conservation and energy efficiency activities are intended to help customers evaluate energy efficient options, and encourage customers to install energy efficient equipment, such as offering rebates for new hot water heaters (CGEU 2024, p. 117). SCG's cumulative annual energy efficiency cumulative savings goals for the residential sector, core commercial and industrial sector, and noncore commercial and industrial sector are expressed in billion

cubic feet (Bcf) (CGEU 2024, p. 118). SCG's goals for energy efficiency for 2024-2040 period are based on the 2023 EE forecast scaled to the goals approved in the recent EE proceeding goals decision, D.23-08-005, which set EE goals through 2035. (CGEU 2024, p. 118). SCG is subject to energy efficiency targets established by the Clean Energy and Pollution Reduction Act, or Senate Bill 350 (SB 350). SB 350, which was signed into law on October 7, 2015, extends the Renewable Portfolio Standard (RPS) target to 50 percent by 2030, which later was amended by 100 Percent Clean Energy Act of 2019, or Senate Bill 100 (SB 100). Additionally, the law requires the State to double statewide energy efficiency savings in both the electric and natural gas sectors by 2030. (CGEU 2024, pp. 146).

Natural gas service must be provided in accordance with SCG's policies and extension rules on file with CPUC at the time contractual agreements are made. The viability of natural gas is based on present conditions of gas supply and regulatory policies. The natural gas consumption by sector within SCG's service area is provided in **Table 5.4-B – Natural Gas Consumption in SCG Service Area (2022)**.

Table 5.4-B – Natural Gas Consumption in SCG Service Area (2022)

Agricultural & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Total Usage¹
77	867	99	1,651	147	2,230	5,026

Source: CEC2022b

Notes:

1. All numbers in millions of therms and rounded to the nearest whole number.

As shown in the table above, SCG consumed approximately 5.0 billion therms in 2022, of which approximately 2.2 billion therms were consumed by the residential sector and 867 million therms were consumed by the commercial building sector, which are the sectors most relevant to the proposed Project. (CEC 2022b).

Transportation Fuel

Fossil fuels are known to create the United States' transportation fuels. Fossil fuel energy sources include oil, coal, and natural gas, which are non-renewable resources that formed when prehistoric plants and animals died and were gradually buried by layers of rock; however, fossil fuel industries drill or mine for these energy sources, burn them to produce electricity, or refine them for use as fuel for heating or transportation. (USDOE).

The U.S. and specifically California is defined by the automobile: in 2024, there were over 35.7 million vehicles registered in California by the Department of Motor Vehicles (CDMV 2024). In 2022, 42.4 percent¹ of all of California's energy use was used for transportation, approximately 2,915.8 trillion British thermal units (Btu) (USEIA F35). In 2022, California consumed 533,951 thousand barrels² of petroleum for transportation uses, which is approximately 2,860.0 trillion Btu. (USEIA CT7).

The 2023 Integrated Energy Policy Report (IEPR) provides the results of the California Energy Commissions assessments of a variety of energy related issues facing California. The IEPR contains

¹ 2,915.8 trillion Btu (from transportation consumption in California) / 6882.4 trillion Btu (from total energy consumption in California) = approximately 42.4 percent.

² One barrel (in reference to petroleum) is a unit of volume equal to 42 U.S. gallons (USEIA Glossary)

major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors. The most recent forecast shows transportation electricity demand in California steadily increases through 2040 due to increases in the use of zero emission vehicles (ZEV) (TEFA, pp. 136-140).

Over the last 10 years, California's consumption of gasoline has decreased from approximately 15.1 billion gallons in 2015 to approximately 13.6 billion gallons in 2023 (CDTFA Gas) while the consumption of diesel fuel has remained fairly steady changing from approximately 2.8 billion gallons in 2015 to approximately 3 billion gallons in 2023 (CDTFA Diesel).

5.4.2 Related Regulations

Federal Regulations

At the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy (DOE), and the United States Environmental Protection Agency (USEPA) are three agencies with substantial influence over energy policies and programs. Federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major federal energy-related laws and plans are discussed below.

Energy Independence and Security Act

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. Among other key measures, the Act would do the following, which would aid in the reduction of national mobile and non-mobile GHG emissions:

- 1 Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- 2 Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- 3 While superseded by the National Highway Traffic and Safety Administration (NHTSA) and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs." (WH).

Federal Energy Policy and Conservation Act (EPCA)

The Federal Energy Policy and Conservation Act (EPCA) of 1975 grants specific authority to the President of the U.S. to fulfill obligations of the U.S. under the international energy program; provide for the creation of a Strategic Petroleum Reserve capable of reducing the impact of severe energy supply interruptions; conserve energy supplies through energy conservation programs; provide for improved energy efficiency of motor vehicles, major appliances and other consumer products; provide a means for verification of energy data to assure the reliability of energy data; and to conserve water by improving

the water efficiency of certain plumbing products and appliances. Furthermore, the EPCA establishes fuel economy standards for on-road motor vehicles in the US. (EPCA 2022).

The NHTSA, which is part of USDOT, is responsible for establishing additional vehicle standards and revising existing standards under the EPCA. In 2012, NHTSA established passenger and light truck Corporate Average Fuel Economy (café) standards for model years (MY) 2017 through 2021 which required, on an average industry fleet-wide basis, a range from 40.3 to 41.0 miles per gallon in model year (MY) 2021 (NHTSA 2012). In 2019, the NHTSA and USEPA amended certain café and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. However, in March 2022, the NHTSA and USEPA revised the standards covering MY 2024 through 2026 and would require an industry fleet-wide average of roughly 49 mpg in MY 2026. (NHTSA 2022).

The Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) builds upon the initiatives established in the ISTEA legislation discussed previously (DOT). TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs (FHWA 2015). TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (FHWA 1998).

Energy Star Program

In 1992, the USEPA introduced Energy Star as a voluntary labeling program to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components, such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specification for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now includes qualifying commercial and industrial buildings as well as homes.

State Regulations

At the State level, the CEC and CPUC are two agencies with authority over different aspects of energy. CPUC regulates privately-owned utilities in the energy, rail, telecommunications, and water sectors. CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes, and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from setting State fuel economy standards for new on-road motor vehicles. Major State energy-related laws and plans are discussed below.

California Air Resources Board (CARB)

The California Air Resources Board (CARB) is part of the California Environmental Protection Agency and is responsible for overseeing the implementation of the California Clean Air Act, meeting State requirements of the Federal Clean Air Act, and the establishment of State ambient air quality standards. CARB is also responsible for setting emission standards for vehicles sold in California and for other emissions-sources including consumer goods and off-road equipment. In general, these vehicle

emissions standards are more restrictive than those established at the federal level. CARB also established passenger vehicle fuel specifications, which became effective in March 1996.

Advanced Clean Cars

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog-causing pollutants and GHGs with requirements for greater numbers of ZEVs. By 2025, when the rules will be fully implemented, the new automobiles will emit 40 percent fewer GHG emissions and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of ZEVs each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles (EV) (CARB ACCP).

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the USEPA GHG requirements for those same model years (CARB 2012). In 2022, the Advanced Clean Cars II program was approved, which will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will have zero emissions.

Low Carbon Fuel Standard

Executive Order S-01-07 was signed on January 18, 2007, the Low Carbon Fuel Standard (LCFS) and mandated a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In 2009, CARB adopted the LCFS and began implementation on January 1, 2011.

CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (CARB 2024a).

California Energy Commission (CEC)

The CEC was formed by Assembly Bill 1575 (AB 1575), also known as the Warren-Alquist Act (CEC WAA) and is the State's primary energy policy and planning agency. AB 1575 also requires EIRs to consider wasteful, inefficient, and unnecessary consumption of energy and was the driving force behind the creation of Appendix F to the *CEQA Guidelines*. CEC was established to address the State's energy challenges and is responsible for the creation of the State Energy Plan. The State Energy Plan identifies the emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan recommends that the State assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. The State Energy Plan also identifies a number of strategies, including providing assistance to public agencies and fleet operators, encouraging urban designs that reduce vehicles miles traveled, and accommodating pedestrian and bicycle access.

California Public Utilities Commission (CPUC)

CPUC regulates investor-owned electric and natural gas utilities operating in California, which includes SCG (CPUC Electric). The CPUC regulates the natural gas rates and natural gas services, including in-State transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering, and billing (CPUC NGC). In 2008, the CPUC adopted the state's first "Long-Term Energy Efficiency Strategic Plan" for achieving energy savings in various sectors throughout California. In 2011, the Strategic Plan was updated to include a chapter related to lighting (CPUC EESP).

California Energy Code – Title 24 of the California Code of Regulations

Energy consumption by new buildings in the State is regulated by The California Energy Code via the Building Energy Efficiency Standards. These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality (CEC Standards). Building efficiency standards are enforced through the local building permit process, via plan check and inspections (CEC Standards).

The California Energy Code (Title 24, Part 6 of the California Code of Regulations (CCR) was established in 1976 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle. The current code is the 2022 Building Energy Efficiency Standards, and it went into effect on January 1, 2023. (CEC Standards).

The purpose of Title 24, specifically Part 11, known as the California Green Building Standards (CALGreen) Code, is to encourage sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State (CALGreen). The current cycle of the CALGreen Code was adopted in 2022 and became effective January 1, 2023. Applicable requirements of the CALGreen Code can be found in *Section 5.5 – Greenhouse Gas Emissions*.

Over the next 30 years, the 2022 Energy Code is estimated to provide \$1.5 billion in consumer benefits and reduce 10 million metric tons of GHGs, equivalent to taking nearly 2.2 million cars off the road for a year. Expanded adoption of new energy-efficient technologies will help reduce costs of the technology over time. (CEC Infographic). Local government agencies may adopt and enforce energy standards for new buildings, provided that standards meet or exceed those contained in Title 24 (CEC LO). The City's municipal code, Chapter 16.13 – Energy Code, adopted the 2022 Energy Code standards. (RMC).

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction in California (cities, counties, and approved regional solid waste management agencies) responsible for enacting plans and implementing programs to divert 25 percent of their solid waste by 1995 and 50 percent by year 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year. The California Department of Resources Recycling and Recovery (CalRecycle) oversees and provides assistance to local governments as they develop and implement plans to meet the mandates of the AB939 and subsequent legislation. (CalRecycle 2024a) As of 2007, jurisdictional diversion rates are no longer calculated; with the passage of the Per Capita Disposal Measurement System (SB 1016) only per capita disposal rates are measured. CalRecycle compares each jurisdiction's reported disposal tons to

population to calculate per capita disposal in pounds per person per day (CalRecycle JD). The City achieved an annual per capita disposal rate of 8.6 pounds per day per resident, and 19.5 pounds per day per employee in 2022, the most recent data available (CalRecycle Riverside).

AB 939 further requires each city to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would manage solid waste generated within the city (PRC 41000-41003). The City's solid waste management must be consistent with the hierarchy of waste management practices of AB 939, which are (in order of priority): (1) source reduction; (2) recycling and composting; (3) environmentally safe transformation and environmentally safe land disposal, at the discretion of the city or county (PRC 40051). SRREs shall place primary emphasis on implementation of all feasible source reduction, recycling, and composting programs while identifying the amount of landfill and transformation capacity that will be needed for solid waste which cannot be reduced at the source, recycled, or composted. Each SRRE shall include, but is not limited to, all of the following components for solid waste generated in the jurisdiction of the plan: (a) A waste characterization component; (b) A source reduction component; (c) A recycling component; (d) A composting component; (e) A solid waste facility capacity component; (f) An education and public information component; (g) A funding component; and (h) A special waste component (PRC 41000-41003). California local jurisdictions are required to submit annual reports to CalRecycle to update it on their progress toward implementing the AB 939 goals (CalRecycle 2024b).

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter (PRC 41780.01). The state did not meet its 75 percent by 2020 recycling goal set out in AB 341. However, CalRecycle identified five strategies and three additional focus areas that can be pursued by the state to reach the 75 percent goal (CalRecycle 2020).

Riverside's Public Works Department provides solid waste services to the City of Riverside, including the Project site (GP 2025 EIR, p. 5.16-15).

Renewable Portfolio Standard

Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California's RPS requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020 (SB 1078, SB 1368). In 2015, SB 350 was signed into law, which mandated a 50 percent mandate by December 31, 2030. SB 350 includes interim annual targets with three-year compliance periods. In addition, SB 350 requires that 65 percent of procurement must be derived from long-term contracts of 10 or more years. In 2018, SB 100 was signed into law, which again increases the mandate to 60 percent by 2030 and requires all California's electricity to come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019 (CPUC RPS). Utilities are required to disclose to consumers "accurate, reliable, and simple to understand information on the sources of energy, and the associated emissions of greenhouse gases, which are used to provide electric services." (PUC 398.1).

Assembly Bill 1109

Assembly Bill 1109 (AB 1109), the Lighting Efficiency and Toxic Reduction Act, required the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from

the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018 (AB-1109).

Senate Bill 100

Senate Bill 100 (SB 100), signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 established a landmark policy requiring renewable energy and zero-carbon resources supply 100 percent of electric retail sales to end-use customers by 2045. SB 100:

- Sets a 2045 goal of powering all retail electricity sold in California and state agency electricity needs with renewable and zero-carbon resources — those such as solar and wind energy that do not emit climate-altering greenhouse gases.
- Updates the state's Renewables Portfolio Standard to ensure that by 2030 at least 60 percent of California's electricity is renewable.
- Requires the Energy Commission, CPUC and CARB to use programs under existing laws to achieve 100 percent clean electricity and issue a joint policy report on SB 100 by 2021 and every four years thereafter.

Senate Bill 350

Senate Bill 350 (SB 350), signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are (SB-350):

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

Regional Regulations

There are no regional regulations applicable to the proposed Project.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. A-35; OS-54 – OS-55; PF-28):

Air Quality Element

Objective AQ-5	Increase energy efficiency and conservation in an effort to reduce air pollution. policies that are considered applicable to the proposed Project, as identified below:
Policy AQ-5.1	Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.
Policy AQ-5.3	Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.

Policy AQ-5.6 Support the use of automated equipment for conditioned facilities to control heating and air conditioning.

Policy AQ-5.7 Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.

Open Space & Conservation Element

Policy OS-8.2 Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments.

Policy OS-8.3 Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.

Policy OS-8.4 Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.

Policy OS-8.5 Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).

Policy OS-8.6 Require all new development to incorporate energy efficient lighting, heating, and cooling systems pursuant to the Uniform Building Code and Title 24.

Policy OS-8.7 Encourage mixed use development as a means of reducing the need for auto travel.

Policy OS-8.10 Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.

Policy OS-8.12 Require bicycle parking in new non-residential development.

Public Facilities and Infrastructure Element

Objective PF-6 Provide affordable, reliable, and, to the extent practical, environmentally sensitive energy resources to residents and businesses.

Policy PF-6.3 Promote and encourage energy conservation.

Policy PF-6.4 Encourage energy-efficient development through its site plan and building design standard guidelines.

Policy PF-6.5 Promote green building design.

City of Riverside General Plan 2025 EIR

The are no applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Energy.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

There are no applicable mitigation measures from the GPUI EIR that pertain to Energy.

Downtown Specific Plan

There are no City of Riverside Downtown Specific Plan goals or policies that are considered applicable to the proposed Project.

City of Riverside Restorative Growthprint

The Riverside Restorative Growthprint, adopted January 2016, consists of the City's Economic Prosperity Action Plan and Climate Action Plan (CAP), which work in conjunction to spur entrepreneurship and smart growth while advancing the City's GHG emission reduction goals through the year 2035 (RRG). The CAP prioritizes the implementation of policies that enable the City to fulfill the requirements of State initiatives, Assembly Bill 32 and Senate Bill 375. The CAP includes a baseline GHG inventory for local government operations and for the community as a whole and establishes emission reduction targets consistent with State law. Through stakeholder engagement and cost-benefit analysis, the CAP resulted in strategies, measures, and actions for reducing emissions that align with the City's planning priorities and its vision of a future economy based on clean, green businesses and business practices.

Envision Riverside 2025, City of Riverside Strategic Plan

The City's 2025 Strategic Plan, known as Envision Riverside, identifies a clear vision for the future of Riverside's Economy, Community and Environment. It is comprised of the City Council's strategic policies and operational workplan to advance the City's potential. One of the six priorities of Envision Riverside is Environmental Stewardship, with one of the major themes being Sustainability and Resiliency. Environmental Stewardship goals include: rapidly decreasing Riverside's carbon footprint by acting urgently to reach a zero carbon electric grid with the goal of reaching 100 percent zero carbon electricity production by 2040 with continuing to ensure safe, reliable, and affordable energy for all residents; and implementing the requisite measures to achieve citywide carbon neutrality no later than 2040.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Energy.

Chapter 16.07 – Green Code. This chapter adopts the California Green Building Code or "Green Code" standards as the City's standards.

Chapter 16.13 – Energy Code. This chapter adopts the California Energy Code, 2022 Edition, Part 6 of Title 24 standards as the City's standards.

Chapter 16.26 – Electrification of New Buildings. This chapter sets forth the City's standards for the electrification of newly constructed buildings. 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. However, the City Council adopted an Ordinance on July 2, 2024, repealing Chapter 16.26 of the Riverside Municipal Code.

5.4.3 Comments Received in Response to the Initial Study/Notice of Preparation

One comment letter was received regarding Energy in response to the Initial Study/Notice of Preparation (IS/NOP). The comment letter was received from Californians Allied for a Responsible Economy (CARE CA) and is included in Appendix A of this Draft EIR.

5.4.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A), prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.4.5 Project Design Features

The Project does not include design features that would specifically avoid or reduce potentially significant impacts to Energy. However, future development would be designed and constructed to meet all applicable standards under Title 24, including the CALGreen Code, as described in *Section 5.4.2*, above.

5.4.6 Environmental Impacts

Threshold: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The analysis in this section addresses each of the six potential energy impacts identified in Appendix F of the State *CEQA Guidelines* and utilizes the assumptions from the *Air Quality/Greenhouse Gas Analysis* (WEBB-A found in Appendix B of this Draft EIR) for this Project evaluated in *Sections 5.2 – Air Quality* and *5.5 – Greenhouse Gas Emissions* of this Draft EIR. Because the California Emissions Estimator Model (CalEEMod) program used in WEBB-A does not display the amount and fuel type for construction-related sources, additional calculations were conducted in the *Energy Consumption Calculations* (WEBB-B found in Appendix B of this Draft EIR) and are summarized below.

State *CEQA Guidelines Appendix F* provides for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. Pursuant to impact possibilities listed in State *CEQA Guidelines Appendix F*, an impact with regard to energy consumption and conservation will occur if implementation of the proposed Project will:

- Result in the wasteful, inefficient, or unnecessary consumption of energy. Impacts may include:
 1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal;
 2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
 3. The effects of the project on peak and base period demands for electricity and other forms of energy;
 4. The degree to which the project complies with existing energy standards;
 5. The effects of the project on energy resources;
 6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The analysis below addresses each of the six potential energy impacts identified in the State *CEQA Guidelines Appendix F*.

1. *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.*

Construction

Project construction would require the use of construction equipment for demolition, grading, building construction, paving, and painting (architectural coating) activities, as well as construction workers and vendors traveling to and from the Project site (WEBB-A, pp. 3 - 4). Construction equipment requires diesel as the fuel source (see **Table 5.4-C – Construction Energy Use**, below). Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files as part of WEBB-A. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of SCAQMD's *CEQA Air Quality Handbook* (SCAQMD 1993, p. A9-6).

Fuel consumption from construction worker and vendor/delivery trucks was calculated using trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip as provided in the CalEEMod output files and divided by the corresponding county-specific miles per gallon factor using the 2021 version of CARB's Emission FAcT (EMFAC) model. Consistent with CalEEMod, construction worker trips were assumed to include 100 percent gasoline powered vehicles. Construction vendor trucks were assumed to be medium-duty and heavy-duty diesel trucks (WEBB-B, Table 1 and 2).

As shown below in **Table 5.4-C**, a total of 617,636 gallons of diesel fuel, and 364,211 gallons of gasoline is estimated to be consumed during Project site construction.

Table 5.4-C – Construction Energy Use

Fuel	Fuel Consumption (Gallons)
Diesel	
On-Road Construction Trips ¹	447,611
Off-Road Construction Equipment ²	170,025
Diesel Total	617,636
Gasoline	
On-Road Construction Trips ¹	364,211
Off-Road Construction Equipment ³	--
Gasoline Total	364,211

Source: WEBB-B, Table 1

Notes:

1. On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod for construction in 2026 and fleet-average fuel consumption in gallons per mile from EMFAC2021 web-based data for Riverside (South Coast) portion of the Basin. See Table 2 for calculation details.
2. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on SCAQMD CEQA Air Quality Handbook, Table A9-3E.
3. All emissions from off-road construction equipment were assumed to be diesel.

The annual fuel usage for on-road construction trips can be broken down more specifically as follows: 364,211 gallons of gasoline for worker trips (as shown above, under “On-Road Construction Trips” and 239,996 gallons of diesel for vendor trips. The annual fuel usage for hauling trips associated with the Project is 207,615 gallons of diesel (WEBB-B, Table 2).

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment is also required to comply with regulations limiting idling to five minutes or less (CCR 13).

Furthermore, there are no unusual Project site characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. For comparison, the State of California consumed approximately 13.6 billion gallons of gasoline (CDTFA Gas) and approximately 3 billion gallons of diesel fuel (CDTFA Diesel) in 2023, which is the most recent published data. Thus, the fuel usage during Project construction would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in the State of California. Furthermore, it is expected that construction-related fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Operation

The Project will promote building energy efficiency through compliance with energy efficiency standards (Title 24 and CALGreen, as discussed under Section 5.4.2). The Project also reduces vehicle fuel usage due to compliance with regulatory programs that reduce VMT. AB 1493 ("the Pavley Standard") requires reduction in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. Executive Order S-01-07 went into effect in 2010 and required a reduction in the carbon intensity of transportation fuels used in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars I and II program, first introduced in

2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2035.

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the *Air Quality/Greenhouse Gas Analysis* completed for this Project based on the 2019 Title 24 standards (WEBB-A). The Project site's electrical consumption was estimated to be approximately 17,744,893 kWh of electricity per year; this is the sum of the building electricity (17,233,679 kWh/year) and electricity related to the Project's water consumption (511,214 kWh/year). Additionally, the Project's natural gas consumption was estimated to be approximately 24,540,756 kilo-British thermal units (kBTUs) per year for the proposed land uses (WEBB-B, Table 3).

In comparison to the Project, RPU produced approximately 2.2 billion kWh of electricity in 2022 (CEC 2022a) and SCG produced approximately 5 billion therms of natural gas in 2022 (CEC 2022b). At full build-out, the Project site's electricity demand would be a negligible amount of the existing electricity use and the natural gas demand would be a negligible percent of the existing natural gas use in SCG's service area.

Energy impacts associated with transportation during operation were also assessed using the traffic data contained in (WEBB-A). Based on the annual VMT, gasoline and diesel consumption rates were calculated using the Riverside County-specific miles per gallon in EMFAC2021. A total of 275,151 gallons of diesel fuel, 1,739,832 gallons of gasoline (which includes 16,512 gallons from plug in hybrid electric vehicles), 16,511 gallons of natural gas and 1,055,128 kWh of electricity from electric vehicles (which includes 180,912 kWh from plug in hybrid electric vehicles) is estimated to be consumed each year from the Project operation (WEBB-B, Table 3). As stated above, the State of California consumed approximately 13.6 billion gallons of gasoline (CDTFA Gas) and 3 billion gallons of diesel fuel (CDTFA Diesel) in 2023. Thus, the annual fuel usage during Project operation would account for a negligible percent of the existing diesel fuel and gasoline related energy consumption in California.

To summarize, regulations previously identified related to energy conservation and fuel efficiency include, but are not limited to, Title 24 building energy efficiency standards and CALGreen, Pavley standards, and the Advanced Clean Cars Program. Collectively, compliance with regulatory programs would ensure that future development would not result in the inefficient, unnecessary, or wasteful consumption of energy with regards to the Project's energy requirements and its energy use efficiencies.

2. *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

As addressed above, the Project's electricity consumption was minimal in comparison to RPU's supply. Future development will be required to comply with applicable state, RPU, and GP goals and policies that require energy conservation and increase reliance on renewable energy to reduce electricity demand within the Project site. As discussed above, RPU's total electricity consumption was approximately 2,221 million kilowatt-hours in 2022 as reflected in **Table 5.4-A** above. Therefore, Project demand is anticipated to be a negligible amount of RPU's existing electricity use. As such, there will be adequate capacity to serve the proposed Project.

As addressed above, the Project's natural gas consumption was estimated to be approximately 24,546,756 kBtus per year (or 245,467 therms per year). Future development will comply with applicable California Public Utilities Commission (CPUC), state, SCG, and GP goals and policies that require energy conservation to reduce natural gas demand within the Project area. As discussed above, the Project demand would be a negligible percent of SCG's existing natural gas use. As the proposed Project's overall consumption of natural gas use is comparatively insignificant to existing SCG-wide use and as SCG continuously expands its network, as needed, to meet the need in Southern California, there will be adequate capacity to serve the proposed Project. Further, towards this same end, it should also be noted that SCG projects total gas demand to decline at an annual rate of 0.7 percent from 2024 to 2040 as a result of energy efficiency and updated fuel substitution assumptions, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 20 and 24 Codes and Standards, and renewable energy goals (CGEU 2024, p.104). Therefore, the Project would not have a significant effect on local and regional energy supplies.

3. *The effects of the project on peak and base period demands for electricity and other forms of energy.*

As described above, RPU produced approximately 2,221 million kWh in 2022 as reflected in **Table 5.4-A**, above, and the Project is expected to have a negligible impact to RPU's total electricity usage. Therefore, it can be stated that the Project will not have a substantial effect on energy supplies.

Future development will meet Title 24 building energy efficiency standards and CALGreen. With regard to peak hour demands, purveyors of energy resources, including RPU, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. Future development will support these efforts through GP policies identified above that will not only reduce energy consumption during peak hour demands, but also during the base period. To this end, the Project will not substantially affect peak and base period demands for electricity or other forms of energy, such as natural gas.

4. *The degree to which the project complies with existing energy standards.*

Future development would be required to comply with City, state and federal energy conservation measures related to construction and operations. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT. As described above, future development will be required to meet and/or exceed these regulatory requirements.

The California Energy Code standards include provisions applicable to all buildings, residential and non-residential, which are mandatory requirements for efficiency and design. The provisions would be accomplished through implementation of energy reduction measures, such as energy efficient lighting and appliances. Future development would be required to comply with existing energy standards.

In addition, future development will be consistent with applicable goals and policies within the GP. Through implementation of energy conservation measures and sustainable practices, the Project will

not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

5. *The effects of the project on energy resources.*

The effects of the Project on energy supplies and resources from a capacity standpoint are described above in the preceding analysis. In regard to the effects of the Project on energy resources, through compliance with California Title 24 and CALGreen Standards the Project does not result in the inefficient, unnecessary, or wasteful consumption of energy. Notable regulatory measures that are discussed above include compliance with California Title 24 and CALGreen Standards, RPS, Pavley standards and the Advanced Clean Cars Program.

6. *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

As stated above, energy impacts associated with transportation during construction and operation of the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy through adherence to existing regulations and GP 2025 policies. Regarding efficient transportation alternatives, the Project will provide alternative transportation choices because Riverside Transit Agency (RTA) operates two bus routes that travel along Market Street, Routes 12 and 29. One existing bus stop is provided along the Project frontage. Additionally, future development will comply with CALGreen requirements which require bike racks and electric vehicle (EV) capable parking spaces and electric vehicle charging stations (EVCS). Implementation of these various measures decreases reliance on fossil fuels. For the reasons described above, the Project promotes efficient alternative transportation choices.

In conclusion, for the reasons outlined above, the proposed Project will not result in the wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. Therefore, impacts would be **less than significant**.

Threshold: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As stated in Section 5.4.2, above, the City of Riverside's General Plan 2025 Air Quality Element identifies objectives and policies that indirectly increase energy efficiency and reduce energy consumption in the City. Additionally, the City's Riverside Restorative Growthprint includes a CAP, which advances the City's GHG emission reduction goals through the year 2035. CAP Table B.3-2, 2020 and 2035 Reductions from Local Measures, lists local GHG reduction measures that increase energy efficiency and reduce energy consumption.

As stated in Section 5.5 – *Greenhouse Gas Emissions* of this Draft EIR, future development will comply with the regulations and GHG reduction goals, policies, actions, and strategies outlined in the City's CAP. As previously stated, future development will be required to comply with Title 24 standards for insulation, glazing, lighting, shading, photovoltaic systems on residential homes, and water and space-heating systems in all new construction. The future development will also be required to comply with the CALGreen Code which implements sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Moreover, the service

providers (RPU and SCG) are subject to renewable energy requirements under the RPS. Through the use of modern energy-efficient construction materials and practices, compliance with current Title 24 standards, the proposed Project will be consistent with the state's energy conservation standards.

Thus, the proposed Project would not conflict with an adopted energy conservation plan. Therefore, impacts would be **less than significant**.

5.4.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to energy resources since impacts are less than significant.

5.4.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

There are no mitigation measures required to reduce impacts to energy resources.

5.5 Greenhouse Gas Emissions

The focus of this section is to analyze potential impacts related to greenhouse gas emissions (GHGs). The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics* of this Draft EIR.

The analysis in this section is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Riverside Alive Project (PR-2024-001675)*, City of Riverside, California, prepared by Albert A. Webb Associates dated February 26, 2025 (WEBB-A). This report is contained within its entirety in Appendix B of this Draft EIR.

5.5.1 Setting

Naturally occurring gases dispersed in the atmosphere determine the Earth's climate by trapping infrared radiation (heat). This phenomenon is known as the greenhouse effect and without it, the Earth would be about -2 degrees Fahrenheit (°F). Overwhelming evidence shows that human activities are increasing the concentration of GHGs in the atmosphere, trapping more heat, and changing the global climate. The most significant contributor is the burning of fossil fuels for transportation, electricity generation, and other purposes, which introduces large amounts of carbon dioxide and other GHGs into the atmosphere. Collectively, these gases intensify the natural greenhouse effect, causing global average surface and lower atmospheric temperatures to rise, a phenomenon known as global climate change. (WRCOG CAP, p. 1-4). The most common GHG is carbon dioxide (CO₂), which constitutes approximately 81 percent of all GHG emissions in California (CARB 2024a).

Greenhouse Gases

Gases responsible for global climate change in the Basin and their relative contribution to the overall warming effect are CO₂ (55 percent), chlorofluorocarbons (CFCs) (24 percent), methane (CH₄) (15 percent), and nitrous oxide (N₂O) (6 percent). It is widely accepted that continued increases in GHG will contribute to global climate change although there is uncertainty concerning the magnitude and timing of future emissions and the resultant warming trend. (SCAQMD 2005, p. 1-8).

“Stratospheric ozone depletion” refers to the slow destruction of naturally occurring ozone, which lies in the upper atmosphere (called the stratosphere) and which protects Earth from the damaging effects of solar ultraviolet radiation. Certain compounds, including CFCs, halons, carbon tetrachloride, methyl chloroform, and other halogenated compounds, accumulate in the lower atmosphere and then gradually migrate into the stratosphere. In the stratosphere, these compounds participate in complex chemical reactions to destroy the upper ozone layer. Destruction of the ozone layer increases the penetration of ultraviolet radiation to the Earth's surface, a known risk factor that can increase the incidence of skin cancers and cataracts, contribute to crop, and fish damage, and further degrade air quality. (SCAQMD 2005, p. 1-8).

GHG and ozone-depleting gases include, but are not limited to, the following (SCAQMD 2005, pp. 1-8 – 1-9):

- **Carbon dioxide** – Carbon dioxide results from fossil fuel combustion in stationary and mobile sources. It contributes to the greenhouse effect, but not to stratospheric ozone depletion. In the Basin, approximately 48 percent of carbon dioxide emissions come from transportation,

residential and utility sources which contribute approximately 13 percent each, 20 percent come from industry, and the remainder comes from a variety of other sources.

- **Methane** – Atmospheric methane is emitted from both non-biogenic and biogenic sources. Non-biogenic sources include fossil fuel mining and burning, biomass burning, waste treatment, geologic sources, and leaks in natural gas pipelines. Biogenic sources include wetlands, rice agriculture, livestock, landfills, forest, oceans, and termites. Methane sources can also be divided into anthropogenic and natural. Anthropogenic sources include rice agriculture, livestock, landfills, waste treatment, some biomass burning, and fossil fuel combustion. Natural sources are wetlands, oceans, forests, fire, termites, and geological sources. Anthropogenic sources currently account for more than 60 percent of the total global emissions. It is a greenhouse gas and traps heat 40–70 times more effectively than carbon dioxide. In the Basin, more than 50 percent of human-induced methane emissions come from natural gas pipelines, while landfills contribute 24 percent. Methane emissions from landfills are reduced by SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Active Landfills. Methane emissions from petroleum sources are reduced by a number of rules in SCAQMD Regulation XI that control fugitive emissions from petroleum production, refining, and distribution.
- **Other regulated greenhouse gases include Nitrous Oxide, Sulfur Hexafluoride, Hydrofluorocarbons, and Perfluorocarbons¹** – These gases all possess heat-trapping potentials hundreds to thousands of times more effective than carbon dioxide. Emission sources of nitrous oxide gases include, but are not limited to, waste combustion, wastewater treatment, fossil fuel combustion, and fertilizer production. Because the volume of emissions is small, the net effect of nitrous oxide emissions relative to carbon dioxide or methane is relatively small. Sulfur hexafluoride, hydrofluorocarbon, and perfluorocarbon emissions occur at even lower rates.
- **Chlorofluorocarbons** – Chlorofluorocarbons (CFCs) are emitted from blowing agents used in producing foam insulation. They are also used in air conditioners and refrigerators and as solvents to clean electronic microcircuits. CFCs are primary contributors to stratospheric ozone depletion and to global warming. Sixty-three percent of CFC emissions in the South Coast Air Basin come from the industrial sector. Federal regulations require service practices that maximize recycling of ozone-depleting compounds (both CFCs, hydro-chlorofluorocarbons and their blends) during the servicing and disposal of air-conditioning and refrigeration equipment. SCAQMD Rule 1415 – Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems requires CFC refrigerants to be reclaimed or recycled from stationary refrigeration and air conditioning systems. SCAQMD Rule 1405 – Control of Ethylene Oxide and Chlorofluorocarbon Emissions from Sterilization or Fumigant Processes requires recovery of reclamation of CFCs at certain commercial facilities and eliminates the use of some CFCs in the sterilization processes. Some CFCs are classified as TACs and regulated by SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants and SCAQMD Rule 1402 Control of Toxic Air Contaminants from Existing Sources.
- **Halons** – These compounds are used in fire extinguishers and behave as both ozone-depleting and GHG. Halon production ended in the United States in 1993. SCAQMD Rule 1418 – Halon Emissions from Fire Extinguishing Equipment requires the recovery and recycling of halons used in fire extinguishing systems and prohibits the sale of halon in small fire extinguishers.

¹. <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>

- **Hydro-chlorofluorocarbons** – HCFCs are solvents, similar in use and chemical composition to CFCs. The hydrogen component makes HCFCs more chemically reactive than CFCs, allowing them to break down more quickly in the atmosphere. These compounds deplete the stratospheric ozone layer, but to a much lesser extent than CFCs. HCFCs are regulated under the same SCAQMD rules as CFCs.
- **1,1,1,-trichloroethane (TCA)** – TCA (methyl chloroform) is a solvent and cleaning agent commonly used by manufacturers. It is less destructive on the environment than CFCs or HCFCs, but its continued use will contribute to global warming and ozone depletion. 1,1,1-trichloroethane (TCA) is a synthetic chemical that does not occur naturally in the environment. No TCA is supposed to be manufactured for domestic use in the United States after January 1, 2002 because it affects the ozone layer. TCA had many industrial and household uses, including use as a solvent to dissolve other substances, such as glues and paints; to remove oil or grease from manufactured metal parts; and as an ingredient of household products such as spot cleaners, glues, and aerosol sprays. SCAQMD regulates this compound as a toxic air contaminant under Rules 1401 and 1402.

Global Warming Potentials

Individual GHGs have varying global warming potential and atmospheric lifetimes. The Intergovernmental Panel on Climate Change (IPCC) developed the Global Warming Potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of individual GHGs is determined through a comparison with the GWP of CO₂. For example, CO₂ has a GWP of one (since we are using CO₂ to compare other gases), and CH₄ has a GWP of 28 (over a 100-year time period), meaning that on a molecule by molecule basis, CH₄ has 28 times the global warming potential of CO₂ over a 100-year time period (IPCC 2013, pp. 710-714). CO₂-equivalents (CO₂E) are the emissions of GHG multiplied by the GWP. The CalEEMod program calculates the CO₂E based on the GWPs reported in the IPCC Fifth Assessment Report (IPCC 2013). **Table 5.5-A – Global Warming Potentials and Atmospheric Lifetimes** shows the GWP and atmospheric lifetimes of various GHGs with relatively long atmospheric lifetimes from the IPCC 2013 report.

Table 5.5-A – Global Warming Potentials and Atmospheric Lifetimes

Gas	Atmospheric Lifetime	Global Warming Potential (100 Year Time Horizon)
Carbon Dioxide (CO ₂)	--	1
Methane (CH ₄)	12.4	28-34
Nitrous Oxide (N ₂ O)	121	265-298
Hydrofluorocarbons (HFCs) HFC-134a	13.4	1,300-1,550
Perfluoromethane (CF ₄)	50,000	6,630-7,350
Chlorofluorocarbons (CFC) CFC-11	45	4,660-5,350

Source: IPCC 2013, Table 8.7

Effects of Climate Change

Agriculture

Global climate change can cause drought, higher temperatures, saltwater contamination through rising sea levels, flooding, and increased risk of pests. Because California feeds not only its own residents, but the entire U.S. and other countries as well, production declines could lead to food shortages and higher prices. (OAG 2024).

Forest and Biodiversity

Forest and rangelands cover over 80% of California's 100 million acres. Climate change will affect tree survival and growth, reducing these lands' productivity and changing their habitats. In addition, climate change makes forests more vulnerable to fires by increasing temperatures and making forests and brush drier. Today's fire season in the western United States starts earlier, lasts longer, and is more intense than in the last several decades. Wildfire occurrence statewide could increase several fold by the end of the century, increasing fire suppression and emergency response costs and damage to property. (OAG 2024).

California is one of the most biologically diverse regions of the world, with the highest number of unique plant and animal species of all 50 states and the greatest number of endangered species. Climate change will adversely affect plant and wildlife habitats and the ability of the State's varied ecosystems to support clean water, wildlife, fish, timber and other goods and services. (OAG 2024).

Public Health

Californians already experience the worst air quality in the nation. Hotter temperatures lead to more smog, which can damage lungs, and increases childhood asthma, respiratory and heart disease, and death. Certain segments of the population are at greater risk, including the elderly, infants, persons with chronic heart or lung disease, people who cannot afford air conditioning, and those who work outdoors. As temperatures rise, the number of days of extreme heat events also will rise, causing increases in the risk of injury or death from dehydration, heatstroke, heart attack and respiratory problems. (OAG 2024).

Sea Level Rise

The sea level along California's coasts has risen nearly eight inches in the past century and is projected to rise by as much as 20 to 55 inches by the end of the century. A 55-inch sea level rise could put nearly half a million people at risk of flooding by 2100, and threaten property and infrastructure, including roadways, buildings, hazardous waste sites, power plants, and parks and tourist destinations. (OAG 2024).

As sea levels rise, saltwater contamination of the State's delta and levee systems will increase. Saltwater contamination of the Sacramento/San Joaquin Delta will threaten wildlife and the source of drinking water for 20 million Californians. Farmland in low areas may also be harmed by salt-contaminated water. (OAG 2024).

Water Resources

The Sierra Nevada snowpack functions as the most important natural reservoir of water in California. Under current conditions, the snowpack is created in fall and winter and slowly releases about 15 million acre-feet of water in the spring and summer, when California needs it most. California's dams and water storage facilities are built to handle the snow melt as it happened in the past. Higher temperatures are

now causing the snowpack to melt earlier and all at once. Earlier and larger releases of water could overwhelm California's water storage facilities, creating risk of floods and water shortages. (OAG 2024).

5.5.2 Related Regulations

International Regulations

International Treaties and Other Developments

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change. It was adopted in Kyoto, Japan, on December 11, 1997 and entered into force on February 16, 2005. The major feature of the Kyoto Protocol is that it commits its Parties (a number of industrialized countries; see page 20 of UN 1997 for a list of all Parties to the Kyoto Protocol) by setting internationally binding GHG emission reduction targets (UN Kyoto). The targets amount to an average of five percent reduction against 1990 levels over the five-year period 2008-2012 (UN 1997, p. 3). The major distinction between the Protocol and the Convention is that while the Convention encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so (UN 1997, p. 4). Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." (UN 1997, p. 9).

Negotiations after Kyoto have continued in an attempt to address the period after the first "commitment period" of the Kyoto Protocol, concluded at the end of 2012 (UN 1997, p. 3). In 2011, parties to the protocol agreed in principle to negotiate a new comprehensive and legally binding climate agreement by 2015 and to enter it into force for all parties starting from 2020. Negotiations took place under the Ad Hoc Group on the Durban Platform for Enhanced Action (UN ADP). Culminating in the adoption of the Paris Agreement by the Conference of the Parties on December 12, 2015 (UN 2015, p. 1 and 25). The Paris Agreement seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. (UN 2015, p. 3).

In accordance with Article 21, paragraph 1, of the Paris Agreement, the Agreement shall enter into force on the thirtieth day after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55 percent of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval or accession with the Depositary (the Secretary-General of the United Nations) (UN 2015, pp. 23-24). The Paris Agreement entered into force on November 4, 2016 (UN Paris). The United States ratified the Paris agreement on September 3, 2016 (UN 2024). In accordance with its article 20, the Agreement was open for signature at the United Nations Headquarters in New York from April 22, 2016 until April 21, 2017 by States and regional economic integration organizations that are Parties to the United Nations Framework Convention on Climate Change (UN 2015, p. 22). On June 1, 2017, President Donald Trump announced that he would withdraw the United States from the Paris Agreement (White House 2017). However, with President Biden's day one executive order, the United States rejoined the Paris Agreement on January 27, 2021. (EO 14008). On January 20, 2025, President Trump's day-one executive order directed the immediate withdrawal

from the Paris Agreement.² State-wide and local efforts (discussed below) continue to promote and enforce regulations to reduce GHG emissions and meet the goals.

Federal Regulations

Previously the United States Environmental Protection Agency (USEPA) had not regulated GHGs under the Clean Air Act (CAA) because it asserted that the Act did not authorize it to issue mandatory regulations to address global climate change and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007)) (MASS), however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the USEPA to decide whether the gases endangered public health or welfare. On December 7, 2009, the USEPA issued an Endangerment Finding under Section 202(a) of the CAA, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the USEPA has not promulgated major regulations on GHG emissions, but it has begun to develop them.

The USEPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before Congress adopts major climate change legislation. The USEPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. To date, Congress, under the Consolidated Appropriations Act of 2008 (HR 2764), has established mandatory GHG reporting requirements for some emitters of GHGs. On September 22, 2009, the USEPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the USEPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 MT or more a year of GHGs. (EPA).

Regarding vehicle emission standards, in 2019, the National Highway Traffic Safety Administration (NHTSA) and USEPA amended certain existing Corporate Average Fuel Economy (café) and greenhouse gas emissions standards for passenger cars and light trucks and established new standards, covering model years 2021 through 2026. The rule also revoked California's ability to set its own, higher fuel efficiency standards, which are granted by waiver. California has filed two lawsuits against the USEPA over proposed amendments and repeal of the waiver. In May 2021, NHTSA proposed to repeal the amended standards, but the decision was not finalized. (NHTSA 2021). In March 2022, EPA's most recent decision, they rescinded the action to revoke California's ability to set its own higher fuel efficiency standards. This restored California's authority to implement its own GHG emissions standards. (NHTSA 2022).

Multi-State/Regional Area Regulations

California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. CARB's Cap-and-Trade Program, is intended to link California and the other member states and provinces. As of January 1, 2014, California's Cap-and-Trade Program is linked to Quebec's pursuant to the Agreement Between the California Air Resources Board and the Government du Québec Concerning the Harmonization and Integration of Cap-and-Trade Programs Reducing Greenhouse Gas Emissions, in accordance with the direction in CARB's Resolution 13-7 (CARB 2013, p. 9). As of January 1, 2018, California's and Québec's Cap-and-Trade Programs will

² <https://www.whitehouse.gov/presidential-actions/2025/01/putting-america-first-in-international-environmental-agreements/>

also be linked with Ontario's Cap-and-Trade Program (CARB 2017a), all three jurisdictions harmonizing their respective programs per their joint agreement (CARB 2017b).

State Regulations

California has adopted various administrative initiatives and also enacted a variety of legislation relating to climate change, much of which sets aggressive goals for GHG emissions reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in environmental review documents prepared under CEQA. In particular, the amendments to the State *CEQA Guidelines* do not require or suggest specific methodologies for performing an assessment or thresholds of significance, and do not specify GHG reduction mitigation measures. Instead, the CEQA amendments continue to rely on lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below (CNRA 2009a). In addition, no state agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents. Thus, lead agencies exercise their discretion determining how to analyze GHGs.

The discussion below provides a brief overview of the CARB and Office of Planning and Research (OPR) documents and of the primary legislation that relates to climate change that may affect the emissions associated with the proposed Project. It begins with an overview of the primary regulatory acts that have driven GHG regulation and analysis in California.

Assembly Bill 32 and Senate Bill 32

The California Global Warming Solutions Act of 2006 (AB 32) was signed into law in September 2006 after considerable study and expert testimony before the legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. The Act directed CARB to set a GHG emission limit based on 1990 levels to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner (AB 32). AB 32 was followed by Senate Bill 32 (SB 32) in 2016, which expanded this goal for statewide GHG emissions to be 40 percent below 1990 levels by 2030 (SB 32). AB 1279, signed into law September 2022, requires the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels and directs CARB to work with relevant state agencies to achieve these goals.

In December 2008, CARB adopted a Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various categories of emissions. CARB determined that achieving the 1990 emission levels would require a reduction of GHG emissions of approximately 28.5 percent to achieve 2020 emissions levels in the absence of new laws and regulations (i.e. business as usual). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a Cap-and-Trade Program. The key elements of the Scoping Plan include (CARB 2008, pp. ES-3 – ES-4):

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards,
- Achieving a statewide renewable energy mix of 33 percent,

- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions,
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets,
- Adopting and implementing measures pursuant to existing state laws and policies including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard,
- Creating targeted fees including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

The CARB approved the final “First Update to the Climate Change Scoping Plan” in May 2014. The first update describes California’s progress towards AB 32 goals stating that “California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014, p. ES2). Specifically, “if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050” (CARB 2014, p. 34). The first update laid the groundwork for the greenhouse gas emission goals set forth in Executive Order S-3-05 and B-16-2012 (CARB 2017c, p. 5), which set an objective for California to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050. (CARB 2014, p. 1).

CARB adopted a second update to the Scoping Plan in 2017 to reflect the 2030 target codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown’s Executive Order B-30-15. Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 million metric tons of carbon dioxide equivalent (million MTCO₂E). The companion bill to SB 32, AB 197, provides additional direction to CARB on the following areas related to the adoption of strategies to reduce GHG emissions (CARB 2017c, pp. 2 - 3):

- Requires annual posting of GHG, criteria, and toxic air contaminant data throughout the State, organized by local and sub-county level for stationary sources and by at least a county level for mobile sources.
- Requires CARB, when adopting rules and regulations to achieve emissions reductions and to protect the State’s most affected and disadvantaged communities, to consider the social costs of GHG emissions and prioritize both of the following:
 - Emissions reductions rules and regulations that result in direct GHG emissions reductions at large stationary sources of GHG emissions and direct emissions reductions from mobile sources.
 - Emissions reductions rules and regulations that result in direct GHG emissions reductions from sources other than those listed above.
- Directs CARB, in the development of each scoping plan, to identify for each emissions reduction measure:
 - The range of projected GHG emissions reductions that result from the measure.

- The range of projected air pollution reductions that result from the measure.
- The cost-effectiveness, including avoided social costs, of the measure.

CARB's 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The 2017 Scoping Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources. (CARB 2017c, pp. 5 - 6).

The CARB approved the most recent scoping plan update in December 2022 (CARB 2022a). CARB's 2022 Scoping Plan lays out the sector-by-sector roadmap for California to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The previous Scoping Plans have focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. The 2022 Scoping Plan addresses recent legislation (AB 1279) and direction from the current Governor and extends and expands upon the earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The 2022 Scoping Plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, the 2022 Scoping Plan will (CARB 2022a, pp. 2 - 3):

- Identify a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identify technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focus on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrate equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporate the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Rely on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluate the substantial health and economic benefits of taking action.
- Identify key implementation actions to ensure success.

The 2022 Scoping Plan outlines how carbon neutrality can be achieved by taking measures to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches. The actions and outcomes in the plan will achieve: significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Senate Bill 375 and SCAG Regional Transportation Plan/Sustainable Community Plan

SB 375 provides for a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32 (SB 375). SB 375 includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 also requires Metropolitan Planning Organizations (MPOs) relevant to the Project area (including the Southern California Association of Governments (SCAG)) to incorporate a "sustainable communities strategy" (SCS) into their regional transportation plans (RTPs) that will achieve GHG emission reduction targets by reducing vehicle miles traveled (VMT) from light duty vehicles through development of more compact, complete, and efficient communities.

On September 23, 2010, CARB adopted Regional Targets for the reduction of GHG applying to the years 2020 and 2035 (CARB 2010). For the area under SCAG's jurisdiction including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035.

SCAG's SCS is included in the SCAG Connect SoCal (2024-2050 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) (SCAG 2024). CARB updated the regional targets in 2018 to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature and the Governor's office. For the SCAG region, the updated targets are eight percent below 2005 per capita emissions levels by 2020 and 19 percent below by 2035. (SCAG 2024, p. 185).

Connect SoCal SCS has been found to meet State targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, thereby meeting the GHG reduction targets established by the CARB for the SCAG region. However, decreased travel during the shutdowns in response to the COVID-19 pandemic most likely helped the achievement of the 2020 target, so continued effort will be necessary to sustain progress to reach the 2035 target. (SCAG 2024, p. 185).

Senate Bill 605

On September 21, 2014, Governor Edmund Brown signed Senate Bill 605 (SB 605), which requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCP) in the state no later than January 1, 2016. As defined in the statute, SLCP means "an agent that has a relatively short lifetime in the atmosphere, from a few days to a few decades, and a warming influence on the climate that is more potent than that of carbon dioxide." SB 605, however, does not prescribe specific compounds as SLCP or add to the list of GHGs regulated under AB 32. In developing the strategy, CARB must complete an inventory of sources and emissions of SLCP in the state based on available data, identify research needs to address any data gaps, identify existing and potential new control measures to reduce emissions, and prioritize the development of new measures for SLCP that offer co-benefits by improving water quality or reducing other air pollutants that impact community health and benefit disadvantaged communities (SB 605). In March 2017, CARB approved the Short-Lived Climate Pollutants Reduction Strategy that lays out a range of options to reduce SLCP emissions in California, including regulations, incentives, and other market-supporting activities. The SLCP Strategy was also informed of the 2017 Scoping Plan (CARB 2017d).

Senate Bill 97 (CEQA Guidelines)

SB 97 required OPR to prepare amended State *CEQA Guidelines* for submission to the California Natural Resources Agency (CNRA) regarding GHG analysis and feasible mitigation of the effects of GHG emissions as required by CEQA. These amendments became effective as of March 18, 2010 (CNRA SB 97). The State *CEQA Guidelines* were also more recently amended as of December 2018; this amendment include several changes in State *CEQA Guidelines* Section 15064.4, which discusses determining the significance of impacts from GHG emissions, in order to reflect current case law on climate change analysis and help the public and policymakers understand a project's potential contribution to climate change. (CNRA 2018, pp. 17 - 20).

The current State *CEQA Guidelines* adopted pursuant to the 2010 and 2018 amendments state in Section 15064.4(a) that lead agencies should "make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. State *CEQA Guidelines* Section 15064.4(a) notes that an agency may identify emissions by either quantifying the emissions or by relying on "qualitative analysis or other performance based standards."

State *CEQA Guidelines* Section 15064.4(b) provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment:

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, Section 15064.7(c) of the State *CEQA Guidelines* specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence". Similarly, the 2010 revision to Appendix G, Environmental Checklist Form which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds (there were no revisions to the GHG emissions thresholds in the 2018 State *CEQA Guidelines* amendments). Rather, Appendix G asks whether the project would conflict with a plan, policy, or regulation adopted to reduce GHG emissions or generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency.

Accordingly, the State *CEQA Guidelines* Section 15064 do not prescribe specific methodologies for performing an assessment of GHG impacts, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, it emphasizes the lead agency's discretion to determine the appropriate thresholds of significance consistent with the manner in which other impact areas are handled in CEQA.

The State *CEQA Guidelines* Section 15126.4(c) indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to a project, these potential mitigation measures set forth in Section 15126.4(c), may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in

GHG emissions resulting from a project through implementation of project features or project design; (3) off-site measures, including offsets, to mitigate a project's emissions; (4) measures that sequester greenhouse gas; and (5) In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

Energy-Related Sources

Renewable Portfolio Standards

Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California's Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020 (SB 1078, SB 1368). The 33 percent standard is consistent with the RPS goal established in the Scoping Plan (CARB 2008). As interim measures, the RPS requires 20 percent of retail sales to be sourced from renewable energy by 2013 and 25 percent by 2016. Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

Senate Bill 350 (SB 350), signed in 2015, increased the RPS from 33 percent in 2020 to 50 percent by 2030 and will double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030. (CARB 2017c, p. 2).

Senate Bill 100 (SB 100) was subsequently signed in 2018 and directs the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and CARB to plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also accelerates the RPS target to 50 percent by 2026 and to 60 percent by 2030. (SB-100).

Assembly Bill 1109

Assembly Bill 1109 (AB 1109), the Lighting Efficiency and Toxic Reduction Act, required the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018 (AB-1109).

Senate Bill 350

Senate Bill 350 (SB 350), signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are,

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

Mobile Sources

Mobile Source Reductions (AB 1493)

Assembly Bill 1493 ("the Pavley Standard" or AB 1493) required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 through 2016. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorizes CARB to grant emission reduction credits for reductions of GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the starting point for reduction. (CARB 2017e).

In 2004, CARB applied to the EPA for a waiver under the federal Clean Air Act to authorize implementation of these regulations. The waiver request was formally denied by the USEPA in December 2007 after California filed suit to prompt federal action. (CARB 2008, p. 39). In January 2008, the State Attorney General filed a new lawsuit against the EPA for denying California's request for a waiver to regulate and limit GHG emissions from these vehicles. In January 2009, President Barack Obama issued a directive to the EPA to reconsider California's request for a waiver. On June 30, 2009, the EPA granted the waiver to California for its GHG emission standards for motor vehicles. As part of this waiver, EPA specified the following provision: CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles (cars and light trucks) by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. These standards will apply to all passenger and light duty trucks used by customers, employees of and deliveries to the proposed Project.

Low Carbon Fuel Standard

Executive Order S-01-07 was signed on January 18, 2007, the Low Carbon Fuel Standard (LCFS) and mandated a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In 2009, CARB adopted the LCFS and began implementation on January 1, 2011.

CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (CARB 2024b).

Advanced Clean Cars

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025.

The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles.

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the EPA GHG requirements for those same model years (CARB 2012). In 2022, the Advanced Clean Cars II program was approved, which will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will have zero emissions. (CARB 2022b).

Transportation Fuel: Phased-In Cap-and-Trade Compliance Obligation

Pursuant to AB 32, CARB was allowed, but not required, to include among mechanisms intended to reduce GHG emissions a "system of market-based declining annual aggregate emission limits." As noted above, CARB developed a Scoping Plan that directed CARB staff to develop, among other programs, a cap-and-trade mechanism that would apply a declining aggregate cap on GHG emissions and provide a flexible compliance system using tradable instruments. On October 20, 2011, CARB adopted the final cap-and-trade regulation (CCR Title 17, Subchapter 10, Article 5). The program will impose a "cap" on the total GHG emissions from covered entities in the state and the quantity of emissions allowed under the cap will decrease each year, ultimately reaching the goal of returning state-wide GHG emissions to 1990 levels by 2020. The quantity of allowed emissions actually increased between 2014 and 2015, but that was to account for the addition of the fuel importers and distributors and additional electricity importers to the program as discussed below. The net effect is to reduce overall GHG emissions.

The Cap-and-Trade Program started on January 1, 2012 and will proceed in "compliance phases," the first of which began on January 1, 2013. In the first phase, the program applies to electric utilities, importers of electricity, and specified industries, including refineries. Approximately 350 electric utilities and approximately 600 industrial facilities were included in the initial phase of the program. In 2015, importers and distributors of fossil fuels were added to the program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blend stock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tonnes or more of CO₂e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California. Phasing in of cap-and-trade compliance obligations for transportation fuel providers further reduces GHG emissions attributable to mobile sources, beyond the GHG emissions reductions achieved by the Pavley Standard, LCFS, and Advanced Clean Cars Program discussed above. This analysis does not incorporate GHG emissions reductions based on cap-and-trade compliance obligations applicable to transportation fuel suppliers.

Building Standards

California Energy Code (California Code of Regulations, Title 24)

The California Energy Code (CCR Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle (CEC Standards).

These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. (CEC 2022). They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. The current 2022 Building Energy Efficiency Standards, which went into effect January 1, 2023, focuses on four key areas in new construction of homes and business by encouraging 1) electric heat pump technology and use, 2) establishing electric-ready requirements when natural gas is installed, 3) expanding solar photovoltaic (PV) system and battery storage standards, and 4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes be electric-ready. That means buildings with gas stoves have electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and electric vehicle (EV) charging to meet all Californians' needs. (CEC 2022). The Project will be subject to the Title 24 Standards in effect at the time of building permits.

It is projected that the 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. (CEC 2022).

California's Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. (CEC Title 20).

Green Building Standards

Part 11 of the California Green Building Standards Code in Title 24 of the CCR is also known as the CALGreen Code. The development of the CALGreen Code is intended to: (1) cause a reduction in greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor.

The CALGreen Code requires waste reduction measures including: providing readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling, and a minimum 65 percent diversion of construction and demolition waste from landfills. Water reduction measures include: separate water meters for buildings in excess of 50,000 square feet; moisture-sensing irrigation systems for larger landscaped areas; and the reduction of generation of wastewater by either installing water-conserving fixtures or using non-potable water systems. Pollution reduction measures include requiring low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particleboard.

The 2022 CALGreen Code (CCR, Title 24, Part 11) became effective January 1, 2023. (CBSC 2022). Specific sections of the CALGreen Code that are applicable to this Project include, but are not limited to:

Non-Residential

CALGreen Section 5.106.4: Bicycle parking. Comply with Sections 5.106.4.1 and 5.106.4.1.2 or meet local ordinance, whichever is stricter.

5.106.4.1 Short-term bicycle parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.

5.106.4.1.2 Long-term bicycle parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5 percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; and 3. Lockable, permanently anchored bicycle lockers. Note: Additional information on recommended bicycle accommodations may be obtained from Sacramento Area Bicycle Advocates.

CALGreen Section 5.106.5.3: Construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 5.106.5.3.1 and shall be provided in accordance with regulations in the California Building Code and the California Electrical Code.

5.106.5.3.1 Electric Vehicle (EV) Capable spaces shall be provided in accordance with Table 5.106.5.3.1(provided below) and the following requirements:

1. Raceways complying with the California Electrical Code and no less than 1-inch (25 mm) diameter shall be provide and shall originate at a service panel or subpanel(s) serving the area and shall terminate in close proximity to the proposed location of the EV Capable space and into a suitable listed cabinet, box, enclosure or equivalent. A common raceway may be used to serve multiple EV capable spaces.
2. A service panel or subpanel(s) shall be provided with panel space and electrical load capacity dedicated 208/240 volt, 40-ampere minimum branch circuit for each EV capable space, with delivery of 30-ampere minimum to an installed Electrical Vehicle Supply Equipment (EVSE) at each Electric Vehicle Charging Station (EVCS)
3. The electrical system and any on-site distribution transformers shall have sufficient capacity to supply full rated amperage at each EV capable space.
4. The service panel or subpanel circuit directory shall identify the reserved overcurrent protective device space(s) as "EV CAPABLE." The raceway termination location shall be permanently and visibly marked as "EV CAPABLE."

CALGreen Code Table 5.106.5.3.1 shows the number of parking spaces required EV Capable Spaces and the number of EV Capable Spaces provided with EVSE. **Table 5.5-B – CALGreen Code Electric Vehicle Charging Space Calculation**, is reflected below.

Table 5.5-B – CALGreen Code Electric Vehicle Charging Space Calculation

Total Number of Actual Parking Spaces	Number of Required Capable Spaces	Number of EVCS (EV Capable Spaces Provided with EVSE) ^{2,3}
0-9	0	0
10-25	4	0
26-50	8	2
51-75	13	3
76-100	17	4
101-150	25	6
151-200	35	9
201 and over	20 percent of total ¹	25 percent of EV capable spaces ¹

Source: CBSC 2022

Notes:

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provides with EVSE) In column 3 count toward the total number of required EV capable spaces shown in column 2.
3. At least one Level 2 EVSE shall be provided.

CALGreen Section 5.106.5.5: EV charging: medium-duty and heavy-duty. Construction shall comply with Section 5.106.5.5.1 to facilitate future installation of EVSE. Construction for warehouses, grocery stores and retail stores, office buildings, manufacturing facilities with planned off-street loading spaces shall also comply with Section 5.106.5.4.1 for future installation of medium- and heavy-duty EVSE.

5.106.5.5.1 EV charging readiness requirements for warehouses, grocery stores, office buildings, manufacturing facilities and retail stores with planned off-street loading spaces. In order to avoid future demolition when adding EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s) or subpanel(s) shall be installed at the time of construction in accordance with the California Electrical Code. Construction plans and specifications shall include, but are not limited to, the following:

1. The transformer, main service equipment and subpanels shall meet the minimum power requirement in Table 5.106.5.5.1 to accommodate the dedicated branch circuits for the future installation of EVSE.
2. The construction documents shall indicate one or more location(s) convenient to the planned off-street loading space(s) reserved for medium- and heavy-duty ZEV charging cabinets and charging dispensers, and a pathway reserved for routing of conduit from the termination of the raceway(s) or busway(s) to the charging cabinet(s) and dispenser(s), as shown in Table 5.106.5.5.1.
3. Raceway(s) or busway(s) originating at a main service panel or a subpanel(s) serving the area where the potential future medium- and heavy-duty EVSE will be located and shall terminate in close proximity to the potential future location of the charging equipment for medium- and heavy-duty vehicles.

4. The raceway(s) or busway(s) shall be of sufficient size to carry the minimum additional service load to the future location of the charging for medium- and heavy-duty ZEVs as shown in Table 5.106.5.5.1.

CALGreen Code Table 5.106.5.5.1 shows the raceway conduit and panel power requirements for medium- and heavy-duty EVSE. **Table 5.5-C – CALGreen Code Requirements for Medium- and Heavy-Duty EVSE**, is reflected below.

Table 5.5-C – CALGreen Code Requirements for Medium- and Heavy-Duty EVSE

Building Type	Building Size (SQ. FT)	Number of Off-Street Loading Spaces	Additional Capacity Required (KVA) for Raceway & Busway and Transformer & Panel
Grocery	10,000 to 90,000	1 or 2	200
		3 or Greater	400
	Greater than 90,000	1 or Greater	400
Retail	10,000 to 135,000	1 or 2	200
		3 or Greater	400
	Greater than 135,000	1 or Greater	400
Office	10,000 to 135,000	1 or 2	200
	10,000 to 135,000	3 or Greater	400
	Greater than 135,000	1 or Greater	400
Warehouse	20,000 to 256,000	1 or 2	200
		3 or Greater	400
	Greater than 256,000	1 or Greater	400

Source: CBSC 2022

CALGreen Section 5.504.5.3: Filters. In mechanically ventilated buildings, provide regularly occupied areas of the building with air filtration media for outside and return air that provides at least a Minimum Efficiency Reporting Value (MERV) of 13. MERV 13 filters shall be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

Residential

CALGreen Section 4.106.4: EV charging for new construction. New construction shall comply with Sections 4.106.4.1 or 4.106.4.2 to facilitate future installation and use of EV chargers. EVSE shall be installed in accordance with the California Electrical Code.

4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box, or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible, or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.

4.106.4.2 New multifamily dwellings, hotels, and motels and new residential parking facilities. When parking is provided parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Section 4.106.4.2.1 and 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.

4.106.4.2.1 Multifamily development projects with less than 20 dwelling units; and hotels and motels with less than 20 sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.
2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.

4.106.4.2.2 Multifamily development projects with 20 or more dwelling units, hotels, and motels with 20 or more sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.
2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
3. EV Chargers. Five (5) percent of the total number of parking spaces shall be equipped with Level 2 EVSE. Where common use parking is provided, at least one EV charger shall be located in the common use parking area and shall be available for use by all residents or guests.

4. When low power Level 2 EV charging receptacles or Level 2 EVSE are installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

4.106.4.2.2.1 Electric vehicle charging stations (EVCS). Electric vehicle charging stations required by Section 4.106.4.2.2.1.2 Item 3, shall comply with Section 4.106.4.2.2.1.1.

4.106.4.2.2.1.1 Location. EVCS shall comply with at least one of the following options:

1. The charging space shall be located adjacent to an accessible parking space meeting the requirements of the California Building Code, Chapter 11A, to allow use of the EV charger from the accessible parking space.
2. The charging space shall be located on an accessible route, as defined in the *California Building Code*, Chapter 2, to the building.

Waste Diversion

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Public Resources Code Sections 40000 et seq.) requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.³ Additionally, jurisdictions are not prohibited from implementing source reduction, recycling, and composting activities designed to exceed these requirements.⁴

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.⁵ In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal.⁶

Other Potentially Applicable State Regulations or Policies

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 creating the Refrigerant Management Program (RMP) to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. This regulation is set forth in sections 95380 to 95398 of CCR Title 17. The RMP is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-

3 Cal. Pub. Res. Code Section 41780(a).

4 Cal. Pub. Res. Code Section 41780(b).

5 Cal. Pub. Res. Code Section 41780.01(a).

6 Cal. Pub. Res. Code Section 41780.02.

residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions. CARB subsequently adopted regulations that establish GWP limits for new refrigeration and air conditioning equipment with more than 50 pounds of a high GWP refrigerant. (CARB 2009).

Executive Order S-13-08

On November 14, 2008, Governor Arnold Schwarzenegger signed Executive Order S-13-08 which called on state agencies to develop a strategy for identification of and preparation for expected climate change impacts in California. The resulting 2009 California Climate Adaptation Strategy (CAS) report was developed by the CNRA in coordination with the Climate Action Team (CAT). The report presents the best available science relevant to climate impacts in California and proposes a set of recommendations for California decision-makers to assess vulnerability and promote resiliency in order to reduce California's vulnerability to climate change. Guidance regarding adaptation strategies is general in nature and emphasizes incorporation of strategies into existing planning policies and processes.

In addition to requiring the CAT to create a Climate Adaptation Strategy, Executive Order S-13-08 ordered the creation of a comprehensive Sea Level Rise Assessment Report. The report, published in June 2012, indicates that the sea level along most of California's coast is expected to rise about one meter over the next century and is likely to increase the risk of damage in the form of flooding, coastal erosion, and wetland loss due to storm surges and high waves. The sea level increase is slightly higher than projected for global sea levels (NRC, 2012; ONPI 2012).

Executive Order S-13-08 also called for the California Ocean Protection Council (OPC) to work with the other CAT State agencies to develop interim guidance for assessing the potential impacts of sea level rise due to climate change in California. In coordination with National Academy of Sciences (NAS) efforts, the OPC drafted interim guidance recommending that state agencies consider a range of sea level rise scenarios for the years 2050 and 2100 in order to assess project vulnerability, reduce expected risks, and increase resiliency to sea level rise. The draft resolution and interim guidance document is consistent with the Ocean Protection Act (Division 26.5, Public Resource Code Section 3561 5(a)(1)), which specifically directs the OPC to coordinate activities of state agencies to improve the effectiveness of state efforts to protect ocean resources. An update to the 2009 CAS report, the final "Safeguarding California Plan," was published in July 2014.⁷

Senate Bill X7-7 (Water Conservation Act of 2009)

The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convey, treat, and distribute the water and it also reduces emissions from wastewater treatment. (WCA 2009).

The Department of Water Resources adopted a regulation on February 16, 2011 that sets forth criteria and methods for exclusion of industrial process water from the calculation of gross water use for purposes of urban water management planning. The regulation would apply to all urban retail water suppliers required to submit an Urban Water Management Plan, as set forth in the Water Code, Division 6, Part 2.6, Sections 10617 and 10620.

⁷ State of California, https://resources.ca.gov/CNRALegacyFiles/docs/climate/Final_Safeguarding_CA_Plan_July_31_2014.pdf.

Model Water Efficient Landscape Ordinance

The Model Water Efficient Landscape Ordinance (Ordinance) was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20 percent consistent with (SBX7-7) 2020 mandate are expected upon compliance with the Ordinance. Governor Brown's Drought Executive Order of April 1, 2015 (EO B-29-15) directed DWR to update the Ordinance through expedited regulation. The California Water Commission approved the revised Ordinance, which became effective December 15, 2015. New development projects that include landscape areas of 500 square feet or more are subject to the Ordinance. The update requires: more efficient irrigation systems; incentives for graywater usage; improvements in on-site stormwater capture; limiting the portion of landscapes that can be planted with high water use plants; and reporting requirements for local agencies.

The City of Riverside has codified landscaping and irrigation requirements under Water Efficient Landscaping and Irrigation in Title 19, Chapter 19.570 of the City Municipal Code.

Regional Regulations

South Coast Air Quality Management District

SCAQMD is principally responsible for comprehensive air pollution control for Los Angeles, Orange, and the urbanized portions of Riverside and San Bernardino Counties, including the Project site. SCAQMD works directly with SCAG, County transportation commissions and local governments, and cooperates actively with all federal and state government agencies to regulate air quality.

In April 2008, SCAQMD convened a Working Group to develop GHG significance thresholds. On December 5, 2008, SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for projects where SCAQMD is the lead agency. As to all other projects where SCAQMD is not the lead agency, the Board has, to date, only adopted an interim threshold of 10,000 MTCO₂E per year for industrial stationary source projects (SCAQMD 2008).

For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions; Tier 2 is consistency with a GHG reduction plan; Tier 3 is a screening value or bright line; Tier 4 is a performance based standard; and Tier 5 is GHG mitigation offsets (SCAQMD 2008). According to the presentation given at the September 28, 2010 Working Group meeting, SCAQMD staff proposed a Tier 3 draft thresholds for residential, commercial, and mixed-use projects at 3,500, 1,400, and 3,000 MTCO₂E/yr, respectively. Alternatively, a lead agency has the option to use 3,000 MTCO₂E/yr as a threshold for all non-industrial projects. Although both options are recommended by SCAQMD, a lead agency is advised to use only one option and to use it consistently. For the Tier 4 draft threshold, SCAQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a percent emission reduction target; instead, it referenced the San Joaquin Valley Air Pollution Control District (SJVAPCD) approach. The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. The second Tier 4 option is to utilize an efficiency target for 2020 and 2035 of 4.8 and 3.0 metric tons per service population per year for project level thresholds (SCAQMD 2010).

The Working Group has not convened since the fall of 2010. As of December 2024, the proposal has not been considered or approved for use by SCAQMD's Board. In the meantime, no GHG significance thresholds are approved for use in the Basin.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. AQ-26 – AQ-27, A-35, A-36, A-38; OS-54 – OS-55; PF-28):

Air Quality Element

Objective AQ-1	Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.
Policy AQ-1.5	Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.
Policy AQ-1.6	Provide a mechanism to create opportunities for mixed-use development that allows the integration of retail, office, institutional and residential uses for the purpose of reducing costs of infrastructure construction and maximizing the use of land.
Policy AQ-1.7	Support appropriate planned residential developments and infill housing, which reduce vehicle trips.
Policy AQ-1.12	Support mixed-use land use patterns, but avoid placing residential and other sensitive receptors in close proximity to businesses that emit toxic air contaminants to the greatest extent possible. Encourage community centers that promote community self-sufficiency and containment and discourage automobile dependency.
Objective AQ-5	Increase energy efficiency and conservation in an effort to reduce air pollution.
Policy AQ-5.1	Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.
Policy AQ-5.3	Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.
Policy AQ-5.6	Support the use of automated equipment for conditioned facilities to control heating and air conditioning.
Policy AQ-5.7	Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.
Objective AQ-8	Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards.
Policy AQ-8.17	Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.

Open Space & Conservation Element

Objective OS-8	Encourage the efficient use of energy resources by residential and commercial users.
Policy OS-8.2	Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments.
Policy OS-8.3	Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.
Policy OS-8.4	Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.
Policy OS-8.5	Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).
Policy OS-8.6	Require all new development to incorporate energy efficient lighting, heating, and cooling systems pursuant to the Uniform Building Code and Title 24.
Policy OS-8.7	Encourage mixed use development as a means of reducing the need for auto travel.
Policy OS-8.10	Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.
Policy OS-8.12	Require bicycle parking in new non-residential development.

Public Facilities and Infrastructure Element

Objective PF-6	Provide affordable, reliable, and, to the extent practical, environmentally sensitive energy resources to residents and businesses.
Policy PF-6.3	Promote and encourage energy conservation.
Policy PF-6.4	Encourage energy-efficient development through its site plan and building design standard guidelines.
Policy PF-6.5	Promote green building design.

City of Riverside General Plan 2025 EIR

The are no applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Greenhouse Gas Emissions.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the GPUI EIR that pertain to Greenhouse Gas Emissions.

Downtown Specific Plan

There are no City of Riverside Downtown Specific Plan goals or policies that are considered applicable to the proposed Project.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Greenhouse Gas Emissions:

Chapter 16.26 – Electrification of New Buildings. The City requires building electrification in certain newly constructed buildings. 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. However, the City Council adopted an Ordinance on July 2, 2024, repealing Chapter 16.26 of the Riverside Municipal Code.

Chapter 19.570 – Water Efficient Landscaping and Irrigation. The City has codified landscaping and irrigation requirements to increase water use efficiency and promote the use of recycled water.

City of Riverside Restorative Growthprint

The Riverside Restorative Growthprint, adopted January 2016, consists of the City's Economic Prosperity Action Plan and Climate Action Plan (CAP), which work in conjunction to spur entrepreneurship and smart growth while advancing the City's GHG emission reduction goals through the year 2035 (RRG). The CAP prioritizes the implementation of policies that enable the City to fulfill the requirements of State initiatives, Assembly Bill 32 and Senate Bill 375. The CAP includes a baseline GHG inventory for local government operations and for the community as a whole and establishes emission reduction targets consistent with State law. Through stakeholder engagement and cost-benefit analysis, the CAP resulted in strategies, measures, and actions for reducing emissions that align with the City's planning priorities and its vision of a future economy based on clean, green businesses and business practices.

Envision Riverside 2025, City of Riverside Strategic Plan

The City's 2025 Strategic Plan, known as Envision Riverside, identifies a clear vision for the future of Riverside's Economy, Community and Environment. It is comprised of the City Council's strategic policies and operational workplan to advance the City's potential. One of the six priorities of Envision Riverside is Environmental Stewardship, with one of the major themes being Sustainability and Resiliency. Environmental Stewardship goals include: rapidly decreasing Riversides' carbon footprint by acting urgently to reach a zero carbon electric grid with the goal of reaching 100% zero carbon electricity production by 2040 with continuing to ensure safe, reliable, and affordable energy for all residents; and implementing the requisite measures to achieve citywide carbon neutrality no later than 2040.

5.5.3 Comments Received in Response to the Initial Study/Notice of Preparation

One comment letter was received related to Greenhouse Gas Emissions in response to the Initial Study/Notice of Preparation (IS/NOP). The comment letter was received from the Californians Allied for a Responsible Economy (CARE CA) and is included in Appendix A of this Draft EIR.

5.5.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

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

5.5.5 Project Design Features

The Project does not include design features that would specifically avoid or reduce potentially significant impacts to Greenhouse Gas Emissions. However, future development would be designed and constructed to meet all applicable standards under Title 24, including the CALGreen Code, as described in *Section 5.5.2*, above.

5.5.6 Environmental Impacts

Threshold: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The following discussion is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for Riverside Alive Project (PR-2024-001675)*, City of Riverside (WEBB-A), (included as Appendix B). The methodology used within the analysis is consistent with draft guidance prepared by the SCAQMD for quantification of emissions and evaluation of potential impacts related to GHG emissions. As recommended by SCAQMD staff, the California Emissions Estimator Model (CalEEMod™) version 2022.1 program was used to quantify Project-related emissions from short-term construction and long-term operation.

Amendments to State *CEQA Guidelines* Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is

supported by substantial evidence (see State *CEQA Guidelines* Section 15064.7(c)). The CNRA has also clarified that the State *CEQA Guidelines* amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (see State *CEQA Guidelines* Section 15064(h)(3)). A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.

The City has not formally adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the SCAQMD, CARB, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. However, the City of Riverside utilizes the SCAQMD significance threshold of 3,000 MTCO₂E/yr for non-industrial projects.

The analysis calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality model, as described above. The primary purpose of quantifying the Project's GHG emissions is to satisfy State *CEQA Guidelines* Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

Short-Term Analysis

Construction-Related Emissions

The CalEEMod model calculates GHG emissions from fuel usage by construction equipment and construction-related activities, like construction worker trips, for the Project. CalEEMod also calculates the indirect GHG emissions related to electricity consumption. The CalEEMod output results for construction-related GHG emissions present the GHG emissions estimates for the Project for CO₂, methane (CH₄), nitrous oxide (N₂O), refrigerants (R), and CO₂e.⁸ **Table 5.5-D – Project Construction Equipment GHG Emissions**, summarizes the GHG emissions estimates for the Project in metric tons/year (MT/yr). (WEBB-A, p. 9).

Table 5.5-D – Project Construction Equipment GHG Emissions

Phase	Metric Tons per year (MT/yr)				
	Total CO ₂	Total CH ₄	Total N ₂ O	Total R	Total CO ₂ E
2026	4,036	0.09	0.45	3.62	4,176
2027	3,055	0.07	0.21	3.08	3,123
2028	2,043	0.04	0.14	1.91	2,088
Total	9,134	0.20	0.80	8.61	9,387
Amortized¹					312.90

Source: WEBB-A, Table 6

Notes:

1. Construction emissions were amortized over a 30-year period, as recommended by SCAQMD.

⁸ CO₂e is the sum of CO₂ emissions estimated plus the sum of CH₄, N₂O, and refrigerant emissions estimated multiplied by their respective global warming potential (GWP).

Evaluation of **Table 5.5-D** indicates that an estimated 9,387 MTCO₂E will occur from Project construction equipment over the course of the estimated construction period. Since the 2008 SCAQMD guidance document⁹ recommends that construction emissions be amortized for a project lifetime of 30 years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies, the total GHG emissions from Project construction were amortized and are included in **Table 5.5-F – Total Unmitigated Project-Related Annual GHG Emissions**, below. (WEBB-A, p. 9).

Long-Term Analysis

Area Source Emissions

CalEEMod estimates the GHG emissions associated with area sources which include landscape equipment emissions, architectural coating, consumer products, and hearths. Landscape equipment servicing the Project site create CO₂ resulting from fuel combustion based on the Project's land uses. Consumer products consist of consumer use of solvents and personal care products and architectural coatings consist of an average building square footage to be repainted each year. Hearth emissions apply to dwelling units; however, no fireplaces are proposed within the residential uses. **Table 5.5-F** summarizes the GHG emissions from the Project's area source emissions. (WEBB-A, p. 9).

Energy-Related Emissions

CalEEMod estimates the GHG emissions associated with building electricity and natural gas usage (non-hearth) for each land use type. Electricity and natural gas used in buildings is typically generated at an off-site power plant which indirectly generates GHG emissions. The default energy usage values used in CalEEMod are based on the CEC sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies and reflect 2019 Title 24 improvements. However, these estimates are conservative since, the most recent 2022 Title 24 standards became effective in January 2023 and apply to this Project. (WEBB-A, pp. 9-10).

Table 5.5-E – Energy-Related GHG Emissions, summarizes the energy-related GHG emissions estimates reported by CalEEMod for the Project.

Table 5.5-E – Energy-Related GHG Emissions

Source	Metric Tons per year (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Total R	Total CO ₂ E
Electricity	3,358	0.26	0.03	--	3,374
Natural Gas	1,302	0.12	0.00	--	1,306
Total	4,660	0.38	0.03	--	4,680

Source: WEBB-A, Table 7

Notes: Emissions reported are as zero are rounded and not necessarily equal to zero.

Mobile Source Emissions

CalEEMod estimates the annual GHG emissions from Project-related vehicle usage based on trip generation data contained in defaults or in a project-specific traffic analysis. CalEEMod also estimates the GHG emissions from refrigerant leakage from vehicle air conditioning (A/C) systems. A Project-specific *Traffic Study* (included in Appendix E of the Draft EIR) was utilized for weekday trip rates and the

⁹ [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2)

most recent Institute of Traffic Engineers (ITE) Trip Generation Manual, 11th Edition, was used for weekend trip rates. Similarly, the pass-by trip purpose for the commercial retail uses was based on the *Traffic Study* data for weekday trips and the ITE Manual (11th Edition) for the weekend trips. The *Traffic Study*'s internal capture trip reduction of approximately 10 percent was not applied, further providing a conservative analysis. In addition, the CalEEMod measure for being located within a Transit-Oriented Development (TOD) was utilized with CalEEMod default data, which reduces emissions from increased transit and pedestrian accessibility. **Table 5.5-F** shows the mobile source emissions of GHG from the Project. (WEBB-A, p. 10).

Solid Waste Emissions

CalEEMod also calculates the GHG emissions associated with the disposal of solid waste into landfills based on default data contained within the model for waste disposal rates, composition, and the characteristics of landfills throughout the state. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. CalEEMod default values were used. **Table 5.5-F** shows the solid waste GHG emissions from the Project. (WEBB-A, p. 10).

Water-Related Energy Usage

Electricity is also indirectly used in water supply, treatment, and distribution, as well as wastewater treatment in Southern California and plays a large role in GHG production.

There are three processes necessary to supply potable water to urban users (i.e., residential, commercial, and industrial): (1) supply of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, the wastewater is treated and either reused as reclaimed/recycled water or returned to the environment. CalEEMod calculates the GHG emissions from these processes based on default emissions factors and water/wastewater generation rates for a project's location. The total Project annual water demand was obtained from the Project's water demand estimates included in IS/NOP Appendix C. The outdoor water demand was calculated using CalEEMod defaults based on an assumed landscape coverage of approximately 15 percent of the Project site. **Table 5.5-F** shows the resulting GHG emissions from water-related energy usage for the Project. (WEBB-A, p. 10).

Refrigerants

Refrigerants are substances used in equipment for air conditioning (A/C) and refrigeration equipment associated with the buildings. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use based on industry data from the United States Environmental Protection Agency. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. GHG emissions associated with refrigerants were calculated by CalEEMod defaults and shown in **Table 5.5-F – Total Project GHG Emissions**. (WEBB-A, pp. 10-11).

Total Project GHG Emissions

As shown in **Table 5.5-F – Total Unmitigated Project-Related Annual GHG Emissions**, using all the emissions quantified above, the total GHG emissions generated from the Project is approximately 23,455.20 MTCO₂E/yr which includes construction-related emissions amortized over a typical project life of 30 years.

Table 5.5-F – Total Unmitigated Project-Related Annual GHG Emissions

Source	Metric Tons per year (MT/yr)				
	CO ₂	CH ₄	N ₂ O	R	Total CO ₂ E
Amortized Construction	--	--	--	--	312.90
Area	37.20	0.00	0.00	--	37.30
Energy	4,660	0.38	0.03	--	4,680
Mobile	16,808	0.69	0.80	22.00	17,085
Solid Waste	103	10.3	0.00	--	359
Water	123	2.43	0.06	--	201
Refrigerants	--	--	--	780	780
Total	21,731.20	13.80	0.89	802.00	23,455.20

Source: WEBB-A, Table 8

Notes: Emissions reported as zero are rounded and not necessarily equal to zero.

As discussed above, the City has been using the SCAQMD's 3,000 MTCO₂E/yr draft threshold for non-industrial projects for the purpose of evaluating the GHG impacts associated with proposed general development projects. As shown in **Table 5.5-F**, the total GHG emissions from the Project exceed the SCAQMD threshold of 3,000 MTCO₂E/yr.

As shown in **Table 5.5-F**, the Project's mobile source GHG emissions make up approximately 73 percent of the estimated total Project-related GHG emissions. However, as discussed below, there are limited, if any, feasible mitigation measures that can be applied to the Project to substantially reduce the mobile source GHG emissions from the Project. Although the Project will comply with existing regulations such as Title 24 and the CALGreen code, reductions from compliance with these regulations has not been included in the emissions estimates in this analysis so that a conservative analysis of the Project's GHG emissions can be presented.

As discussed under the *Mobile Source Emissions* subheading, above, the internal trip reduction anticipated between the Project's residential and non-residential uses (estimated to be approximately 10 percent from the *Traffic Study*) was not estimated in the analysis to be conservative. The degree of GHG emissions reduction from the internal trips is not assured and the effect on GHG emissions would depend on the future residents and customers and employees of the non-residential uses. It is also important to note that mobile source emissions are regulated at the state and federal level and the Project's GHG emissions estimates reflect the Project's opening year and as such do not account for future reductions that will occur through implementation of regulations such as the Advanced Clean Cars II program that requires 100 percent of new light-duty vehicle sales be zero emission (ZEV) by 2035.

There are mitigation measures that can be incorporated which focus on reducing the mobile GHG emissions by reducing the amount of car trips that are used by the future Project residents, employees and visitors. As outlined in *Section 5.5.8*, below, **MM AQ 1** through **MM AQ 7** reduce the Project's operational emissions of GHG emissions from mobile sources by encouraging the use of alternative transportation and telecommuting. **MM AQ 8** through **MM AQ 9** reduce GHG from energy sources by encouraging increased use of solar energy systems and energy efficient appliances. **MM AQ 1** through **MM AQ 9** do not have quantitative reductions associated with them available in CalEEMod and given that the majority of Project-generated emissions are from mobile sources, the emissions are outside the

jurisdiction and control of the Project and City. Although mitigation measures **MM AQ 1** through **MM AQ 9** will serve to potentially reduce mobile source and energy emissions, it is reasonable to assume that the amount of GHG reductions resulting from their implementation would not reduce Project emissions from the estimated 23,455.20 MTCO₂E/yr to the 3,000 MTCO₂E/yr threshold of significance. Thus, even with implementation of existing regulations and **MM AQ 1** through **MM AQ 9**, the Project will generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, impacts are **significant and unavoidable even with mitigation incorporated**.

Threshold: Would the Project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emission of greenhouse gases?

As explained in the Threshold above, pursuant to Section 15064.4 of the State *CEQA Guidelines*, a lead agency may rely on qualitative analysis to determine the significance of impacts from GHG emissions. A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project. As such, the GHG plan consistency for the Project is based on the Project's consistency with the SCAG's Connect SoCal (2024-2050 RTP/SCS), the applicable 2025 General Plan goals and policies, the City's CAP, and the 2022 Scoping Plan. The SCAG 2024-2050 RTP/SCS includes strategies for the region to reach the regional target of reducing GHG from the transportation sector. The City's CAP and General Plan contain strategies, goals, and policies that would help implement energy efficient, transportation, water efficient, and waste reduction measures and would subsequently reduce GHG emissions within the City. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

Consistency with SCAG Connect SoCal

Connect SoCal (2024-2050 RTP/SCS) includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The Connect SoCal plan is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. *Section 6.0 – Consistency with Regional Plans* of this Draft EIR includes **Table 6.0-B – Proposed Project Consistency with the Connect SoCal 202-205 RTP/SCS Goals**, which presents a side-by-side comparison of the Connect SoCal Goals and a discussion regarding the Project's consistency, non-consistency, or non-applicability with each goal. **Table 6.0-B** identifies that the proposed Project would be consistent with all applicable SCAG Connect SoCal policies.

City of Riverside General Plan

The General Plan identifies objectives and policies that encourage a reduction in the City's overall GHG emissions. **Table 5.5-G – Consistency with City of Riverside General Plan** evaluates the Project's consistency with applicable General Plan policies.

Table 5.5-G – Consistency with City of Riverside General Plan

Relevant Objectives and Policies		Project Consistency
Air Quality Element		
Objective AQ-1: Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.		
Policy AQ-1.5 Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.		Consistent: The Project is infill and using an existing developed site. The area surrounding the Project site is developed and urbanized with a variety of land uses, including commercial, residential, office, and public facilities.
Policy AQ-1.7: Support appropriate planned residential developments and infill housing, which reduce vehicle trips.		Consistent: The Project is located within the Downtown Specific Plan (DSP) and proposes mixed-use infill development consistent with the DSP.
Objective AQ-5: Increase energy efficiency and conservation in an effort to reduce air pollution.		
Policy AQ-5.1: Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.		Consistent: The Project will include a waste reduction/recycling program, pursuant to existing regulations.
Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.		Consistent: The Project will comply with the latest Title 24 and the CALGreen code that support the use of renewable energy sources.
Policy AQ-5.6: Support the use of automated equipment for conditioned facilities to control heating and air conditioning.		Consistent: The Project will comply with the latest Title 24 and CALGreen code that support efficient heating and air conditioning systems.
Policy AQ-5.7: Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.		Consistent: The proposed Project will be designed and constructed to meet all applicable standards under Title 24.
Objective AQ-8: Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards.		
Policy AQ-8.17: Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.		Consistent: The Project will comply with the latest CALGreen code, which requires a minimum of 65 percent of construction waste be recycled.
Open Space & Conservation Element		
Policy OS-8.2: Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments.		Consistent: The Project will be designed and constructed to meet all the applicable standards of Title 24.
Policy OS-8.3: Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.		Consistent: The Project will comply with the latest Title 24 and the CALGreen code that support the use of alternative energy sources.
Policy OS-8.4: Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.		Consistent: The Project will comply with the latest Title 24 and the CALGreen code that support the use of alternative energy sources.
Policy OS-8.5: Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).		Consistent: The Project will be designed and constructed to meet the City's water efficient landscaping and irrigation requirements in the Municipal Code as well as requirements outlined in the DSP.

Table 5.5-G – Consistency with City of Riverside General Plan

Relevant Objectives and Policies	Project Consistency
Policy OS-8.6: Require all new development to incorporate energy efficient lighting, heating, and cooling systems pursuant to the Uniform Building Code and Title 24.	Consistent: The Project will be designed and constructed to meet all the applicable standards of the Uniform Building Code and Title 24.
Policy OS-8.7: Encourage mixed use development as a means of reducing the need for auto travel.	Consistent: The Project proposes development of residential, hotel, office, commercial-retail uses as well as a Convention Center expansion.
Policy OS-8.10: Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.	Consistent: The Project will provide several pedestrian pathways to facilitate the movement of pedestrians within the site. The Project site will also provide pedestrian linkage to the surrounding area by providing connection to the existing sidewalks. The Project area is currently being served by Riverside Transit Agency, providing public transportation along Market Street.
Policy OS-8.12: Require bicycle parking in new non-residential development.	Consistent: The Project site will provide bicycle parking, meeting, or exceeding the current CALGreen requirements.
Public Facilities and Infrastructure Element	
Objective PF-6: Provide affordable, reliable, and, to the extent practical, environmentally sensitive energy resources to residents and businesses.	
Policy PF-6.3: Promote and encourage energy conservation.	Consistent: The Project will be designed and constructed to meet all applicable standards under CALGreen and Title 24.
Policy PF-6.4: Encourage energy-efficient development through its site plan and building design standard guidelines.	Consistent: The proposed Project will be designed and constructed to meet all applicable standards under CALGreen.
Policy PF-6.5: Promote green building design.	Consistent: The proposed Project will be designed and constructed to meet all applicable standards under CALGreen.

Consistency with City of Riverside Climate Action Plan

The City's CAP provides a roadmap for the City to achieve deep GHG emissions reductions through the year 2035. The CAP prioritizes the implementation of policies that enable the City to fulfill AB 32 and SB 375 requirements. CAP Table B.3-2, 2020 and 2035 Reductions from Local Measures, lists local GHG reduction measures. **Table 5.5-H – Project Consistency with the City of Riverside Climate Action Plan**, compares the proposed Project to applicable reduction measures from the CAP.

Table 5.5-H – Project Consistency with the City of Riverside Climate Action Plan

Applicable Measures	Project Consistency
Measure E-2: Shade Trees. Strategically plant trees at new residential developments to reduce the urban heat island effect.	Consistent. The Project will be designed and constructed to meet the City's water efficient landscaping and irrigation requirements in the Municipal Code as well as requirements outlined in the DSP.

Table 5.5-H – Project Consistency with the City of Riverside Climate Action Plan

Applicable Measures	Project Consistency
Measure T-1: Bicycle Infrastructure Improvements. Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.	Consistent. As part of the City's Riverside PACT Plan, Market Street is designated as Class II Buffered Bike Lane and currently provides striped bike lanes on both sides of the roadway; additionally, Third Street is designated as a Class II Bike Lane and currently also provided striped bike lines. Fifth Street is designated as Class III Bike Route and Orange Street is designated as a Class IV Cycle Track on the northern portion of the road towards Third Street, however, no buffer or barrier currently exist. Bike lane improvements are part of the City's capital improvement projects. As such, the City, rather than individual development projects, are responsible for the timing of implementation of bike lane improvements.
Measure T-2: Bicycle Parking. Provide additional options for bicycle parking.	Consistent. The Project site will provide bicycle parking, meeting, or exceeding the current CALGreen requirements.
Measure T-3: End of Trip Facilities Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.	Consistent. End of trip commute facilities can include showers, changing rooms, lockers, and bicycle storage/parking which encourage employees to walk and bike to work. As stated, the Project would provide bicycle parking spaces, meeting, or exceeding the current CALGreen requirements thereby encouraging alternative travel modes.
Measure T-6: Density. Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.	Consistent. The proposed Project includes mixed use construction of residential, hotel and commercial-retail buildings which would therefore increase household and employment density in the Project area.
T-8 Pedestrian Only Areas. Encourage walking by providing pedestrian-only community areas.	Consistent. The Project will provide a pedestrian network along streets and on-site internal pedestrian walkways.
Measure T-19: Alternative Fuel & Vehicle Technology and Infrastructure. Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.	Consistent. The Project site would include electric vehicle charging stations and parking spaces to promote use of alternative fuel vehicles, consistent with the current CALGreen code.
W-1: Water Conservation and Efficiency. Reduce per capita water use by 20% by 2020.	Consistent. The Project will be designed and constructed to meet all applicable standards under the City's Municipal Code and CALGreen.
SW-1: Yard Waste Collection. Provide green waste collection bins community-wide.	Consistent. The Project would comply with applicable solid waste requirements from the City and State.
SW-2 Food Scrap and Paper Diversion. Divert food and paper waste from landfills by implementing commercial and residential collection programs.	Consistent. The Project would be required to participate in applicable waste diversion programs. The Project would also be subject to all applicable State and City requirements for solid waste reduction.

2022 Scoping Plan

The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. For example, current transportation sector measures are implemented by the manufacturers, which includes the Advanced Clean Cars II and the Low Carbon Fuel Standard. The Project is also subject to building code requirements under the building energy efficiency standards (Title 24) and green building standards (CALGreen) that improve building energy efficiency and promote transportation electrification. New buildings are required to comply with the applicable building code requirements and standards in place at the time building permit documentation submittals are made.

The 2022 Scoping Plan identifies three priority areas for local jurisdictions: transportation electrification, VMT reduction, and building electrification. As stated above, the Project supports both transportation electrification and building electrification through compliance with existing City and State standards. The Project would also provide sidewalks, bike racks, and pedestrian walkways which promotes alternative modes of transportation (walking, biking, and transit) and reduces VMT.

For these reasons outlined above, the proposed Project does not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, impacts would be **less than significant**.

5.5.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse GHG impacts. The analysis above does shows that the Project will exceed the threshold (3,000 MTCO₂E/yr) and that the majority of these emissions from the Project are from the mobile sources (cars) from future residents and customers.

Mitigation measures **MM AQ 1** through **MM AQ 9**, listed in *Section 5.2 – Air Quality* of this Draft EIR, shall be implemented to reduce the Project's GHG emissions from mobile and energy sources. There are no additional feasible mitigation measures that would reduce the Project's cumulative impacts related to GHG emissions to a less than significant level.

5.5.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

Although the Project does not conflict with an applicable plan, policy or regulation adopted to reduce GHG, the Project's GHG emissions exceed the SCAQMD draft threshold of 3,000 MTCO₂E/yr which is being utilized as the City's threshold for this Project. Implementation of local, state, and federal regulations outlined in *Section 5.5.2* and mitigation measures listed *Section 5.2 – Air Quality* of this Draft EIR will reduce the Project's GHG emissions from mobile and energy sources. However, there are no additional feasible mitigation measures that would reduce the Project's overall GHG emissions to a less than significant level. Therefore, the Project's cumulative GHG impacts will be significant and unavoidable and a statement of overriding considerations will be required prior to Project approval.

5.6 Noise

The focus of this section is to analyze potential impacts related to noise. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics* of this Draft EIR.

The analysis in this section is based on the *Noise Analysis Report Riverside Alive*, prepared by dBF Associates, dated December 19, 2024 (dBF). This report is herein referred to as the Noise Analysis and is contained in its entirety in Appendix D of this Draft EIR.

5.6.1 Setting

The Project site is located in an urbanized setting in the City of Riverside (City) at the northeast corner of Fifth Street and Orange Street as shown on **Figure 3.0-3 – On-Site Project Boundary**. The proposed Project site is fully developed, in downtown Riverside, CA, and completely surrounded by existing urban development including commercial, residential, hospitality, restaurants, and office. (Refer to **Table 3.0- A – Surrounding Land Uses**) Noise-sensitive land uses in the Project area include single and multi-family residences to the north and west, and hotels to the east and south. The primary existing noise source in the Project area is vehicular traffic along Market Street, Fifth Street, Orange Street, and Third Street (dBF, p. 15).

Characteristics of Sound

This section presents a discussion of noise fundamentals applicable to the Project. Sound is a pressure wave created by a moving or vibrating source that travels through an elastic medium such as air. Noise is most often defined as unwanted sound. The City is subject to typical urban noises, such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities (GP 2025 EIR, p. 5.11-2).

Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting, time of day and type of activity during which the noise occurs, and sensitivity of the individual (dBF, p. 3).

Sound levels caused by line sources (i.e., variable or moving sound sources such as traffic) generally decrease at a rate of 3 to 4.5 dBA when the distance from the road is doubled, depending on the ground surface hardness between the source and the receiving property (dBF, p. 18).

Noise Fundamentals

Although sound can be easily measured, the perceptibility is subjective and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this to human frequency-dependent response, the A-weighting filter system is used to adjust measured sound levels and is expressed as dBA. Noise levels using A-weighted measurements

are written dB(A) or dBA. **Table 5.6-A – Typical Noise Levels of Common Sounds** below, shows the relationship of various noise levels to common noise events. (GP 2025 EIR, p. 5.11-2).

Table 5.6-A – Typical Noise Levels of Common Sounds

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	rock band
jet fly-over at 1,000 feet	105	
	100	
gas lawnmower at 3 feet	95	
	90	
	85	food blender at 3 feet
diesel truck, 50 mph at 50 feet	80	garbage disposal at 3 feet
noisy urban area during daytime	75	
gas lawnmower at 100 feet	70	vacuum cleaner at 10 feet
commercial area	65	normal speech at 3 feet
heavy traffic at 300 feet	60	
	55	large business office
quiet urban area during daytime	50	dishwasher in next room
	45	
quiet urban area during nighttime	40	theater, large conference room (background)
quiet suburban area during nighttime	35	
	30	library
quiet rural area during nighttime	25	bedroom at night, concert hall (background)
	20	
	15	broadcast/recording studio
	10	
	5	
lowest threshold of human hearing	0	lowest threshold of human hearing

Source: CT-A, Table 2-5; GP 2025 EIR, Table 5.11-A

From the noise source to the receiver, noise changes both in level and frequency spectrum. The most obvious change is the decrease in noise as the distance from the source increases. The manner in which noise reduces with distance depends on whether the source is a point or line source as well as ground absorption, atmospheric effects, and refraction, and shielding by natural and manmade features. Sound from small, localized sources radiates uniformly outward as it travels away from the source in a spherical pattern. The noise drop-off rate associated with this geometric spreading is 6 dBA per each doubling of the distance (dBA/DD). (CT-A, pp. 2-27-2.28).

Transportation noise sources, such as roadways, are typically analyzed as line sources since at any given moment the receiver may be impacted by noise from multiple vehicles at various locations along the roadway. Because of the geometry of a line source, the noise drop-off rate associated with the geometric spreading of a line source is 3 dBA/DD. (CT-A, pp. 2-27-2.28; FTA, p. 69; dBF, p. 18).

Decibels are measured on a logarithmic scale, which quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as

a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3 dBA decrease. (CT-A, pp. 2-15, 6-5).

It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA; that a change of 5 dBA is readily perceptible, and that an increase (decrease) of 10 dBA sounds twice (half) as loud. (CT-A, pp. 6-5; dBF, p. 3).

Noise Descriptors

Because community noise (environmental, residential, or domestic sources) fluctuates over time, a single measure called the Equivalent Sound Level (L_{eq}) is often used to describe the time-varying character of community noise (dBF, p. 5).

The L_{eq} is the energy-averaged A-weighted sound level during a measured time interval and is equal to the level of a continuous steady sound containing the same total acoustical energy over the averaging time period as the actual time-varying sound. Additionally, it is often desirable to know the acoustic range of the noise source being measured. This is accomplished through the L_{max} and L_{min} indicators, which represent the root-mean-square maximum and minimum noise levels obtained during the measurement interval. The L_{min} value obtained for a particular monitoring location is often called the “acoustic floor” for that location. (dBF, p. 5).

To describe the time-varying character of environmental noise, the statistical noise descriptors L_{10} , L_{50} , and L_{90} are commonly used. They are the noise levels equaled or exceeded during 10, 50, and 90 percent of a stated time, respectively. Sound levels associated with L_{10} typically describe transient or short-term events, whereas levels associated with L_{90} describe the steady-state (or most prevalent) noise conditions. (dBF, p. 5)

Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (L_{dn}). CNEL is a 24-hour weighted average measure of community noise. CNEL is obtained by adding five decibels to sound levels in the evening (7:00 PM to 10:00 PM), and by adding ten decibels to sound levels at night (10:00 PM to 7:00 AM). This weighting accounts for the increased human sensitivity to noise during the evening and nighttime hours. L_{dn} is a similar 24-hour average measure that weighs only the nighttime hours. (dBF, p. 5).

The Day-Night Average Sound Level (L_{dn} or DNL) is also an adjusted average A-weighted sound level for a 24-hour day, similar to CNEL. It is calculated by adding a 10-dB adjustment to sound levels during nighttime hours (10:00 p.m. to 7:00 a.m.); there is no adjustment applied to evening hours. DNL is considered to be equivalent to CNEL. (dBF, p. 5).

Sound Transmission Class (STC) is a single-number rating of the effectiveness of a material or construction assembly to impede the transmission of airborne sound (dBF, p. 5).

Groundborne Vibration

Ground-borne vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads (FTA, p. 112). Some common sources of groundborne vibration are trains, buses on rough roads, and construction activities such as blasting, pile-driving, and operating heavy earthmoving equipment.

Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration may be comprised of a single pulse, a series of pulses, or a continuous oscillatory motion. The ground motion caused by vibration is measured in vibration decibels (VdB). The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. The general human response to different levels of groundborne vibration velocity levels is described in **Table 5.6-B – Human Response Levels to Groundborne Vibration** below. (GP 2025 EIR, p. 5.11-4).

Table 5.6-B – Human Response Levels to Groundborne Vibration

Vibration Velocity	Human Behavior
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day

Source: GP 2025 EIR, Table 5.11-B

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If roadways are smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is general threshold where minor damage can occur in fragile buildings. **Table 5.6-C – Typical Levels of Groundborne Vibration** below, presents the typical vibration levels and its sources. (GP 2025 EIR, p. 5.11-4).

Table 5.6-C – Typical Levels of Groundborne Vibration

Human/Structural Response	Velocity Level (VdB)	Typical Sources (50 ft from source)
Threshold, minor cosmetic damage fragile buildings	100	Blasting from construction projects Bulldozers and other heavy tracked construction equipment
Difficulty with tasks such as reading a VDT screen	90	Commuter train, upper range
Residential annoyance, infrequent events (ex: commuter rail)	80	Rapid transit, upper range
Residential annoyance, infrequent events (ex: rapid transit)	70	Commuter rail, typical Bus or truck over bump Rapid transit, typical Bus or truck, typical
Approx. threshold for human perception	60	Typical background vibration
	50	

Source: GP 2025 EIR, Table 5.11-C

The PPV is the velocity of the soil particles resulting from a disturbance. **Table 5.6-D – Vibration Damage Potential**, below, shows FTAs building damage threshold.

Table 5.6-D – Vibration Damage Potential

Building Category	PPV (in/sec)
Reinforced-concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Non-engineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: FTA, Table 7-5

Existing Site and Surrounding Conditions

As the Project site is located within an existing urban setting. A RION Model NL-31 American National Standards Institute (ANSI) Type 1 Integrating Sound Level Meter (SLM) sound level meter was used to document existing ambient noise levels. The meter was mounted on a tripod roughly 5 feet above ground to simulate the average height of the human ear. The microphone was fitted with a windscreen. The sound level meter was calibrated before the measurement periods. Simultaneous traffic counts were conducted during the measurement periods. Four (4) short-term daytime noise measurements were taken on March 27, 2024, at the locations shown on **Figure 5.6-1 – Ambient Noise Measurement Locations**. The closest sensitive receptors to the Project site are occupied residential properties along the north and east adjacent to the Project site. (dBF, pp. 22).

Table 5.6-E – Existing (Ambient) Noise Levels below, provides a summary of the existing ambient noise data. Ambient noise levels ranged between 55.4 and 68.5 dBA L_{eq} at the four locations monitored. The primary existing noise source in the vicinity of the project is vehicular traffic on surface streets. (dBF, p. 15).

Table 5.6-E – Existing (Ambient) Noise Levels (dBA)

Measurement Location	L_{eq}	L_{min}	L_{max}	L_{10}	L_{15}	L_{90}
ML1 Southeast corner	57.4	49.0	72.7	59.7	53.4	50.5
ML2 Southwest corner	55.4	48.8	69.2	58.2	52.6	50.2
ML3 Northwest corner	68.5	57.7	87.5	70.0	65.0	59.9
ML4 Northeast corner	67.0	52.1	90.2	69.4	64.5	56.9

Source: dBF Table 2

Notes:

- (a) Noise levels are measured in weighed decibels (dBA)

FIGURE 5.6-1

Ambient Noise Measurement Locations



H:\2023\23-3340\GIS\Pro\noise\noise.aprx Map created 03 Dec 2024

Sources: dBF

Vehicular Traffic

As previously stated, vehicular traffic on the adjacent roadways (shown on **Figure 5.6-1**) is the primary contributing factor to the existing noise sources. Listed below are existing roadway conditions from observations from the site visit: (dBF, p. 15).

Third Street is adjacent to the Project site on the north, with one westbound and two eastbound through lanes. Its posted speed limit is 30 miles per hour (mph). The existing vehicle mix is approximately 93.5 percent cars, four percent medium trucks, and two and one-half percent heavy trucks.

Fifth Street is adjacent to the Project site on the south, with one westbound and one eastbound through lane. Its speed limit is unposted; typical traffic was observed at 25 mph. The existing vehicle mix is approximately 95 percent cars and five percent medium trucks.

Orange Street is adjacent to the Project site on the east, with one northbound and one southbound through lane. Its posted speed limit is 25 mph. The existing vehicle mix is 100 percent cars.

Market Street is adjacent to the Project site on the west, with two northbound and two southbound through lanes. Its posted speed limit is 35 mph. The existing vehicle mix is 98 percent cars, one percent medium trucks, and one percent heavy trucks.

5.6.2 Related Regulations

To limit the population's exposure to physically and/or psychologically damaging noise levels, the federal government, the State, various County governments, and the City have established standards and ordinances to control noise.

Federal Regulations

Noise Control Act of 1972

The United States Environmental Protection Agency's (EPA's) Office of Noise Abatement and Control was established to coordinate federal noise control activities. (EPA 2024b) The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA 2024a).

In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at lower levels of government. Consequently, in 1982 responsibilities for regulating noise control policies were transferred to State and local governments. However, noise control guidelines and regulations contained in EPA rulings in prior years remain in place by designated Federal agencies, allowing more individualized control for specific issues by designated Federal, State, and local government agencies. (EPA 2024b).

Federal Transit Administration and Federal Railroad Administration Standards

Although the Federal Transit Administration (FTA) standards are intended for federally-funded mass transit projects, the impact assessment procedures and criteria included in the *FTA Transit Noise and Vibration Impact Assessment Manual*, September 2018, are routinely used for projects proposed by local

jurisdictions. The FTA and Federal Railroad Administration (FRA) have published guidelines for assessing the impacts of ground-borne vibration associated with rail projects, which have been applied by other jurisdictions to non-rail projects. The FTA measure of the threshold of architectural damage for conventional sensitive structures is 0.2 inch per second peak particle velocity (PPV).

Occupational Safety and Health Administration (OSHA)

The federal government regulates occupational noise exposure common in the workplace through the Occupational Safety and Health Administration (OSHA). Noise regulations apply to the operation of construction equipment and may apply to industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and will not be addressed further in this analysis. (OSHA).

State Regulations

State of California General Plan Guidelines 2003

Through not adopted by law, the State of California General Plan Guidelines 2003 and updated in 2017, published by the California Governor's Office of Planning and Research Guidelines (OPR Guidelines), provide guidance for the compatibility of projects within areas of specific noise exposure. The OPR Guidelines identify the suitability of several types of construction relative to a range of outdoor noise levels and provide each local community some flexibility in setting local noise standards that allow for the variability in community preferences. The OPR Guidelines include a Noise and Land Use Compatibility Matrix that identifies acceptable and unacceptable community noise exposure limits for various land use categories. The City of Riverside has utilized the State's noise/land use compatibility matrix as a model to create their own. (OPR 2017, pp. 131-140, 374).

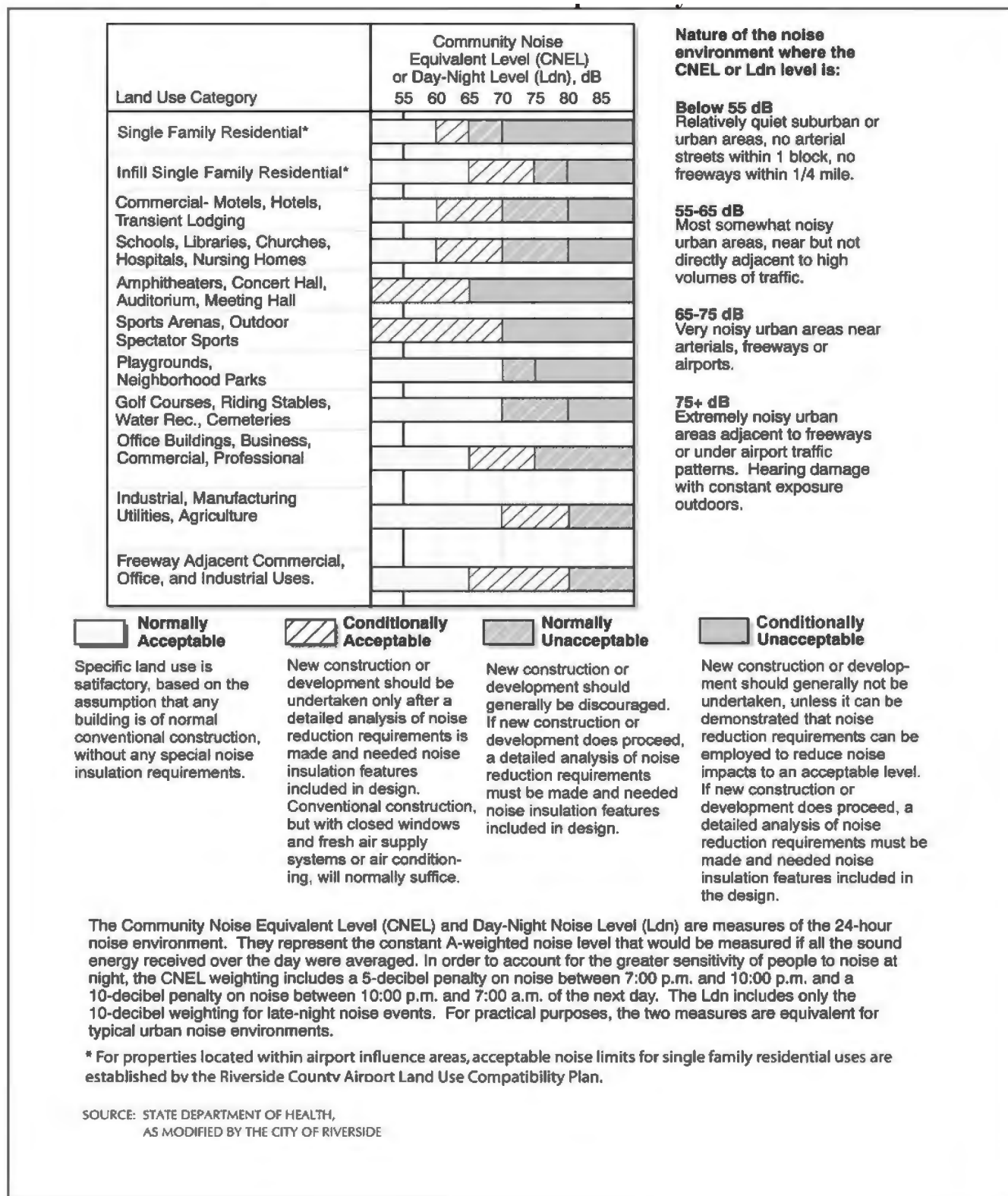
Figure 5.6-2 – Land Use/Noise Compatibility Guidelines depicts the land use compatibility chart for community noise prepared by the State of California, Department of Health, as adopted by the City of Riverside. It identifies normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for siting various new land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and the needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. (GP 2025 EIR, pp. 5.11-14 – 5.11-15.)

California Code of Regulations, Part 2, Title 24, Appendix Chapter 35, Section 3501 establishes the State Noise Insulation Standards, which limit the interior noise level exposure within new hotels, motels, dormitories, long-term care facilities, apartment houses and dwellings. This State standard indicates that interior noise levels attributable to exterior noise sources shall not exceed 45 dB (CNEL or L_{dn}) in any habitable room.

California Code Regulations Title 24, Part 2 was adopted in 1974 by the California Commission on Housing and Community Development to set noise insulation standards for residential buildings. Title 24 establishes standards for interior noise attributable to outside noise sources and requires the preparation of acoustical studies wherever a residential building is proposed within the 60 dBA CNEL noise contour created by a freeway, expressway, parkway, major street, thoroughfare, rail line, rail transit line, or industrial noise source. Said acoustical study must show that the building has been designed to limit the intrusion of exterior noise such that interior noise levels do not exceed 45 dBA CNEL. (GP 2025 EIR, p. 5.11-6).

FIGURE 5.6-2

Land Use/Noise Compatibility Guidelines



H:\2023\23-3340\GIS\Pro\noise\noise.aprx Map created 03 Dec 2024

Sources: GP 2025 EIR

Regional Regulations

There are no regional regulations applicable to the proposed Project.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives, policies and implementation tools that are considered applicable to the proposed Project, as identified below (GP 2025, pp. 5.11-17 – 5.11-20):

Noise Element

In compliance with California Government Code Section 65302, the GP 2025 Noise Element identifies noise and land use compatibility criteria that identifies “Normally Acceptable,” “Conditionally Acceptable,” “Normally Unacceptable,” and “Conditionally Unacceptable” noise exposure ranges for various land uses as shown on **Figure 5.6-2 – Land Use/Noise Compatibility Guidelines** (Figure N-10 of the GP 2025).

These standards are primarily used for planning purposes such as determining a project’s compatibility with a proposed site with regard to existing and future acoustical impacts upon a project site sourced from the surrounding environment. In other words, the noise impacts from existing surrounding land uses to a proposed project.

The “Normally Acceptable” range is defined as: specific land use is satisfactory, based on the assumption that any building is of normal conventional construction, without any special noise insulation requirements.

The “Conditionally Acceptable” range is defined as: new construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

The “Normally Unacceptable” range is defined as: new construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and include needed noise insulation features in design.

The “Conditionally Unacceptable” range is defined as: new construction or development should generally not be undertaken, unless it can be demonstrated that noise reduction requirements can be employed to reduce noise impacts to an acceptable level. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and include needed noise insulation features in the design.

Noise Element Policies

Objective N-1	Minimize noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment.
Policy N-1.1	Continue to enforce noise abatement and control measures particularly within residential neighborhoods.

- Policy N-1.2 Require the inclusion of noise-reducing design features in development consistent with standards in Figure N-10 – Noise/Land Use Compatibility Criteria (see **Figure 5.6-2** of this Draft EIR, above), Title 24 California Code of Regulations and Title 7 of the Municipal Code.
- Policy N-1.3 Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.
- Policy N-1.4 Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.
- Policy N-2.1 Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards in Figure N-10 – Noise/Land Use Compatibility Criteria (see **Figure 5.6-2** of this Draft EIR, above) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions.
- Policy N-4.1 Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).
- Policy N-4.5 Use speed limit controls on local streets as appropriate to minimize vehicle traffic noise.

Noise Element Implementation Tools

- Tool N-1: Review development proposals to ensure that the noise standards and compatibility set forth in the Noise Element are met to the maximum extent practicable. Require acoustical analyses for all proposed development within the 60 dB CNEL contour as shown in the Noise Element and for all proposed residential projects within the vicinity of existing and proposed commercial and industrial areas. Require mitigation, where necessary, to reduce noise levels to meet standards and construction methods.
- Tool N-2: Implement CEQA during the development review process for new projects. Assess future development projects' potential for noise and ground-borne vibration impacts related to noise land use compatibility, construction-related noise, on-site stationary noise sources, and vehicular-related noise.
- Tool N-3: Continue to enforce City noise regulations to protect residents from excessive noise levels associated with nuisance and stationary noise sources (Title 7 of the City of Riverside Municipal Code). Periodically evaluate regulations for adequacy and revise, as needed, to address community needs and changes in legislation and technology.

Tool N-4: Ensure proposed development meets Title 24 Noise Insulation Standards for construction.

Tool N-9: Enforce vehicle speed limits on City roadways as a means of reducing vehicle noise.

Circulation and Community Mobility Element

Policy CCM-2.9 Design all street improvement projects in a comprehensive fashion to include consideration of street trees, pedestrian walkways, bicycle lanes, equestrian pathways, signing, lighting, noise, and air quality wherever any of these factors are applicable.

Policy CCM-6.2 Encourage the use of telecommunications by Riverside residents, employees, and students as a means to reduce air and noise pollution generated by traffic.

City of Riverside General Plan 2025 EIR

The following noise mitigation measure from the City of Riverside General Plan 2025 EIR is applicable to the proposed Project.

MM NOISE 1: To minimize impacts resulting from or to proposed projects such that noise levels exceed General Plan Noise Element standards, projects shall be reviewed against the noise compatibility matrix in the Noise Element of the General Plan (Table 5.11-D, herein) and Figures 5.11-6, 5.11-7, 5.11-8, 5.11-9, and 5.11-10 of this EIR to determine suitability of the use in relation to adjacent land uses and noise sources such as roadways, freeways, and airports. To the extent required by the compatibility matrix or one of the figures, a noise study shall be required to evaluate noise levels against standards and to recommend suitable mitigation consistent with Title 24 regulations and the City's Noise Code. Mitigation may include but not be limited to: walls, berms, interior noise insulation, double paned windows, or other noise mitigation measures as appropriate, in the design of new residential or other noise sensitive land uses. (GP 2025 EIR, p. 5.11-42).

The preparation of the Noise Analysis satisfied mitigation measure **MM NOISE 1**.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

There are no applicable mitigation measures from the General Plan Update Phase 1 (GPU1) EIR that pertain to Noise.

Downtown Specific Plan

The City of Riverside Downtown Specific Plan contains goals and policies that are considered applicable to the proposed Project, as identified below (DSP, pp. 6-16 – 6-17):

6.6.2 – Site Planning

Interface between Non-residential and Residential Uses

In several portions of the Specific Plan area, non-residential uses abut residential uses. This condition can specially be observed in the Raincross District, along Fairmount Boulevard between First and Sixth Streets. Issues of privacy, safety, and noise are addressed in these following standards:

1. To provide privacy for adjacent residential properties, taller elements of the building should be set away from those properties. In addition, at residential edges, commercial buildings should maintain low profiles and building heights should be stepped down to the height of adjacent residential zones, utilizing architectural elements such as gables or hip roofs to reduce building mass.
2. When there is no intervening alley or street, appropriate landscape screening shall be provided at the shared property line. Excepting trees, this screening shall not be less than six feet or exceed eight feet in height.
3. Eighty percent of the vertical plane at the property line to a height of six feet shall be opaque.
4. Screening may consist of one (or more) of the following:
 - “Vertical” trees closely spaced
 - “Green” (vine-covered) solid or fenced walls
 - Hedges (minimum height of six feet)
5. The criteria for selecting plant materials, as established in section 15.3.6 shall be followed.
6. Noise or odor generating activities in general, and loading areas, trash and storage areas, and rooftop equipment in particular, should be located as far as possible from adjacent residential uses and shall not be located next to residential properties without fully mitigating their negative effects.
7. Non-residential buildings should be sited so as to avoid significant shading of adjacent residences and compromising residents’ privacy.
8. Windows in non-residential buildings should be oriented to avoid a direct line of sight into adjacent residential buildings or property.
9. Whenever adjacent residential and commercial uses can mutually benefit from connection rather than separation, appropriate connective elements such as walkways, common landscaped areas, building orientation, gates, and/or unfenced property lines should be employed.

City of Riverside Municipal Code

The following sections of the City’s Municipal Code are applicable and pertain to Noise:

Chapter 16.08.175 – Exterior Noise Insulation Standards. This section establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, apartment houses, and all other dwellings including detached single-family dwellings from the effects of excessive exterior noise, including but not limited to, hearing loss or impairment and persistent interference with speech and sleep. This section also requires submittal of an acoustical analysis with the building permit application.

- **Interior Levels.** Interior day-night average sound levels (L_{dn}) with windows closed, attributable to exterior sources shall not exceed an L_{dn} of 45 decibels (dBA) in any habitable room.

- **Airport noise source.** Residential structures to be located within an L_{dn} contour of 60 dBA or higher require an acoustical analysis showing that the structure has been designed to limit intruding noise to the allowable interior noise levels prescribed in this subsection. The L_{dn} contour shall be determined in accordance with L_{dn} noise levels anticipated by the Riverside general plan or by more current L_{dn} contour maps developed for governmental agencies and deemed acceptable by the Planning Director.
- **Vehicular and industrial noise sources.** Residential buildings or structures to be located within L_{dn} contours of 60 dBA or higher from the select system of County roads and City streets (as specified in Section 186.4 of the State Streets and Highways Code), freeways, State highways, railroads, rapid transit lines and industrial noise sources shall require an acoustical analysis showing that the proposed building has been designed to limit intruding noise to the allowable interior noise levels prescribed in this subsection. The L_{dn} contour shall be determined in accordance with L_{dn} noise levels anticipated by the Riverside General Plan or by more current L_{dn} contour maps developed for governmental agencies and deemed acceptable by the Planning Director. Exception: Railroads, where there are no nighttime (10:00 p.m. to 7:00 a.m.) railway operations and where daytime (7:00 a.m. to 10:00 p.m.) railway operations do not exceed four per day.
- **Compliance.** Evidence of compliance with this chapter of the municipal code shall consist of submittal of an acoustical analysis report, prepared under the supervision of a person experienced in the field of acoustical engineering, with the application for building permit. The report shall show topographical relationship of noise sources and dwelling site, identification of noise sources and their characteristics, predicted noise spectra at the exterior of the proposed dwelling structure considering present and future land usage, basis for the prediction (measured or obtained from published data), noise attenuation measures to be applied, and an analysis of the noise insulation effectiveness of the proposed construction showing that the prescribed interior noise level requirements are met. If interior allowable noise levels are met by requiring that windows be inoperable or closed, the design for the structure must also specify the means that will be employed to provide ventilation, and cooling if necessary, to provide a habitable interior environment.

Chapter 7.25.010 – Exterior Sound Level Limits. This section specifies standards for exterior sound level limits. Per RMC 7.25.010 it is unlawful to for any person to cause or allow the creation of any noise that exceeds the levels set forth in **Table 5.6-F – Exterior Noise Standards**. This table summarizes the exterior noise standards by land use. If the measured ambient noise level exceeds that permissible within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five decibel increments in each category as appropriate to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

Table 5.6-F – Exterior Noise Standards

Land Use	Time Period	Noise Level
Residential	Nighttime ¹	45 dBA
	Daytimme ¹	55 dBA
Office/Commercial	Anytime	65 dBA

Table 5.6-F – Exterior Noise Standards

Land Use	Time Period	Noise Level
Industrial	Anytime	70 dBA
Community Support	Anytime	60 dBA
Public Recreation Facility	Anytime	65 dBA
Non-Urban	Anytime	70 dBA

Source: MC, Table 7.25.010 B

Notes:

1. Nighttime hours 10 p.m. to 7 a.m.; Daytime hours 7 a.m. to 10p.m

Based on the ambient noise measurements collected as part of the Noise Analysis (reported in **Table 5.6-E**), noise levels at locations ML2, ML3, and ML4 (as shown on **Figure 5.6-1**), exceed the residential land use exterior noise standard of 55 dBA during daytime hours. As indicated in **Table 5.6-E**, the existing ambient noise levels at locations ML2, ML3, and ML4 are 55.4 L_{eq} dBA, 68.5 L_{eq} dBA, and 67.0 L_{eq} dBA, respectively.

Chapter 7.30.015 Interior Noise Level Limits. This section specifies standards for operational noise sources. **Table 5.6-G – Interior Noise Standards** below summarizes the interior noise standards by land use at when measured inside the dwelling unit, school, or hospital.

Table 5.6-G – Interior Noise Standards

Land Use	Time Period	Noise Level
Residential	Nighttime ¹	35 dBA
	Daytime ¹	45 dBA
School	Daytime ¹ while school is in session	45 dBA
Hospitals	Anytime	45 dBA

Source: MC, Table 7.30.015

Notes:

1. Nighttime hours 10 p.m. to 7 a.m.; Daytime hours 7 a.m. to 10 p.m.

Chapter 7.35.020 – Exemptions. This chapter, specifically subsection (G) Construction identifies those uses exempt from noise ordinance. Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday.

5.6.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding Noise in response to the Initial Study/Notice of Preparation (IS/NOP).

5.6.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impact in the following area and this topic is not addressed in this Draft EIR:

- For a project located within the vicinity of a private airstrip of 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.

As identified in the IS/NOP, prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- 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; and
- Generation of excessive groundborne vibration or groundborne noise levels.

5.6.5 Project Design Features

The Project does not include design features that would specifically avoid or reduce potentially significant impacts to Noise.

5.6.6 Environmental Impacts

Threshold: Would the Project result in 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?

Project-related noise impacts are evaluated from the perspective of noise impacts to the Project and noise impacts from the Project.

Temporary Noise Levels

Construction

Construction noise is considered temporary because once construction is completed this noise source ceases. On-site construction and demolition of the structures at the Project site will result in the generation of new temporary noise from the transport of workers, the movement of construction materials to and from the Project site, demolition of the existing structures, excavation, grading, and building activities. The closest sensitive receptors to the Project site, i.e., existing occupied residences, are located to the north and east of the Project site. The Project would implement conventional

construction techniques and equipment. The primary noise sources from Project construction would be from site preparation. Grading could require the following standard equipment: scrapers, graders, backhoes, loaders, tractors, cranes, and miscellaneous trucks to import or export fill. Sound levels of typical construction equipment range from 65 dBA to 95 dBA at 50 feet from the source. Worst-case, that is the highest, construction noise levels are associated with grading activities. (dBF, p. 21).

The Datakustik Cadna/A industrial noise prediction model was used to estimate construction noise levels. **Table 5.6-H – Grading Noise Source levels**, provides the assumptions utilized during modeling. It was assumed that up to four pieces of equipment at any given time would operate continuously within the grading area boundary. No correction was applied for downtime associated with equipment maintenance, breaks, or similar situations. No noise reduction related to ground effects, atmospheric absorption, or intervening topography was included in the model in order to produce a worst-case construction noise outcome. (dBF, p. 21).

Table 5.6-H – Grading Noise Source Levels

Noise Source	Noise Level	Number
Rubber Tired Dozer	80 dBA at 10 meters	1
Rubber Tired Loader	75 dBA at 10 meters	1
Excavator	78 dBA at 10 meters	2
Grader	80 dBA at 10 meters	1
Tractor / Loader / Backhoe	82 dBA at 10 meters	3
Scraper	80 dBA at 10 meters	2

Source: dBF Table 5

During shoring of the underground parking structure, a percussion or vibratory hammer or a hydraulic driver / ram may be used; this equipment may generate noise levels up to approximately 88 dBA at 10 meters (approximately 33 feet). During building construction, two cranes would be used; each crane could generate a noise level of up to approximately 78 dBA at 10 meters (approximately 33 feet). (dBF, p. 25).

Construction equipment constantly moves around the site, thus noise levels at Project boundaries would vary due to distance from construction equipment. Without the inclusion of any noise abatement during construction, grading activities could produce noise levels ranging up to 78 dBA L_{eq} at the property lines of the surrounding residences located along Third Street and Orange Street. RMC 7.35.020(G) indicates that construction between 7:00 a.m. and 7:00 p.m. on weekdays or between 8:00 a.m. and 5:00 p.m. on Saturday is exempt from noise limits. Construction activities and the delivery of construction materials and equipment would occur within these hours (dBF, p. 22). As such, temporary noise impacts as a result of Project site construction would be **less than significant**.

Future development may require off-site improvements related to water and sewer facilities as noted in *Section 3.4.5 -Infrastructure and Utilities* of this Draft EIR. However, off-site construction activities within the right-of-way (ROW) are exempt from the City's General Noise Regulations outlined in RMC chapter 7.35. RMC 7.35.020 (E) states construction within City ROW is exempt from the provisions of RMC Chapter 7.35 when, in the opinion of the Public Works Director or designee, such work will create traffic

congestion and/or hazardous or unsafe conditions. (dBF, pp. 15, 26). As such, temporary noise impacts as a result of Project-related construction within the City's ROW would be **less than significant**.

Through compliance with RMC Section 7.35, Project-related construction noise levels would not exceed the City's acceptable noise levels so temporary noise related impacts would be **less than significant without mitigation required**.

Permanent Noise Levels

Operations – Noise Impacts From the Project

During Project operations, noise would potentially result from mechanical equipment for the new buildings, events at the Outdoor Plaza/Amphitheater, and Project-generated traffic as discussed in the following paragraphs.

Mechanical Equipment

Since no specific development is proposed at this time, mechanical systems for the Project have not been designed. Mechanical systems are designed and equipment selection and placement are determined when architectural plans are prepared. Nonetheless, it is reasonably foreseeable that the mechanical systems for any future Project buildings would be selected, designed, placed, and screened such that the resulting noise levels would be lower than the allowable levels of 55 dBA during daytime hours and 45 dBA during nighttime hours. (dBF, p. 20).

For purposes of the analysis in the Noise Study, it was assumed: (i) no more than 10 pieces of mechanical equipment would be located within any 100 square foot area; (ii) the noise level of each piece of equipment would be no greater than 59 dBA at 3 feet; (iii) all equipment would be placed a minimum of 25 feet from any property line, and (iv) equipment would be shielded by a parapet wall with a minimum height equal to height of the equipment. If these conditions are met, mechanical noise would be in compliance with RMC Section 7.25.010. (dBF, p. 20).

In the event future implementing development projects propose installation of mechanical equipment inconsistent with the four assumptions used in the *Noise Study*, an acoustical analysis shall be prepared as part of the Development Application review process to confirm noise levels would be no greater than 55 dBA between 7:00 a.m. and 10:00 p.m., and 45 dBA between 10:00 p.m. and 7:00 a.m. Compliance shall be ensured through implementation of mitigation measure **MM NOI 1**. Impacts would be **less than significant with mitigation**.

Outdoor Plaza/Amphitheater

The proposed potential Outdoor Plaza/Amphitheater is expected to be utilized for low-intensity community events, generally between the hours of 7:00 a.m. and 10:00 p.m. These events may occasionally include the use of low-level public address/sound amplification equipment. If such equipment is used, the event coordinator would be required to ensure sound levels do not exceed 65 dBA at any time at the surrounding commercial land uses, or 55 dBA between 7:00 a.m. and 10:00 p.m. and 45 dBA between 10:00 p.m. and 7:00 a.m. at any residential land use. Therefore, noise impacts from the outdoor plaza/amphitheater would be **less than significant**.

Project Generated Traffic

Project-generated trips, which includes both residential and commercial uses from the proposed Project, would need to result in a doubling of the traffic volumes on a road segment in order to result in an audible increase in ambient noise levels. On all but five segments, the Project would add a peak-hour

volume of less than the existing volume. These growths in traffic would result in traffic noise increases of less than 3 dBA L_{dn} / CNEL; as such, they would be not perceptible to the average person and less than significant. As shown in **Table 5.6-I – Project-Generated Traffic Noise Levels**, the remaining five road segments in which Project-generated trips would add peak-hour traffic equal to or greater than the existing peak-hour traffic, would result in noise levels between 53 dBA to 60 dBA, which would not exceed a level considered Normally Compatible. (dBF, p. 20). Therefore, noise impacts from Project generated traffic would be **less than significant**.

Table 5.6-I – Project-Generated Traffic Noise Levels

Roadway	Segment	Peak-Hour Traffic Volumes			Noise Levels at 50 feet from Street Centerline		
		Existing	Project	Existing plus Project	Existing	Existing plus Project	Change
Orange Street	Third Street – Fourth Street	122 (AM)	133	255	50 dBA	53 dBA	3 dBA
		120 (AM)	214	133	50 dBA	55 dBA	5 dBA
	Fourth Street – Fifth Street	162 (PM)	168	214	51 dBA	55 dBA	4 dBA
		73 (AM)	413	168	48 dBA	56 dBA	8 dBA
	Fifth Street – Sixth Street	136 (PM)	354	413	51 dBA	56 dBA	5 dBA
		85 (AM)	412	354	49 dBA	56 dBA	7 dBA
Fifth Street	Sixth Street – Mission Inn Avenue	185 (PM)	354	412	52 dBA	57 dBA	5 dBA
		198 (AM)	438	354	54 dBA	60 dBA	6 dBA
	Market Street – Orange Street	222 (PM)	360	438	55 dBA	59 dBA	4 dBA

Source: dBF Table 4

Operation – Traffic Noise Impacts to the Project Site

The existing and future noise environment may have impacts on the proposed residential land uses. As such, an analysis to determine impacts to these land uses was conducted. The existing and future noise environment would continue to be a result of vehicular traffic on Market Street, Fifth Street, Third Street, and Fourth Street. (dBF, pp. 15, 18).

The Federal Highway Administration (FHWA) Traffic Noise Model (TNM) version 2.5 was used to estimate traffic noise levels. The modeling effort considered the peak-hour traffic volume, average estimated vehicle speed, and estimated vehicle mix, i.e., percentage of cars, medium trucks, heavy trucks, buses, and motorcycles. The model was calibrated using actual traffic counts and sound level measurements. Modeled sound levels were within 2 dBA of measured sound levels; accordingly, no adjustment was made to future modeled levels. (dBF, p. 18).

The Noise Analysis utilized traffic projections¹ calculated from the Traffic Study, existing speed limits and existing traffic mix to evaluate a worst-case scenario for traffic noise levels. (dBF, p. 18).

¹ Noise Analysis utilized Cumulative Conditions plus Project 2045 traffic projections from the Traffic Study

- Third Street - PM peak-hour volume of 1,638 vehicles between Market Street and Main Street, and 1,950 vehicles between Main Street and Orange Street. Existing speed limit of 30 mph and traffic mix of 93.5 percent cars, 4 percent medium trucks, and two and one-half percent heavy trucks.
- Fifth Street - PM peak-hour volume of 621 vehicles west of Orange Street. Existing speed limit of 25 mph and traffic mix of approximately 95 percent cars and 5 percent medium trucks.
- Orange Street - PM peak-hour volume of 293 vehicles between Third Street and Fourth Street, and 359 vehicles between Fourth Street and Fifth Street. Existing speed limit of 25 mph and traffic mix of 100 percent cars were assumed to remain constant in the future.
- Market Street - PM peak-hour volume of 2,152 vehicles between Third Street and Fourth Street. Existing speed limit of 35 mph and traffic mix of 98 percent cars, one percent medium trucks and one percent heavy trucks.

Table 5.6-J – Project Land Use Compatibility, shows the projected exterior roadway noise levels at the proposed Project land uses.

Table 5.6-J – Project Land Use Compatibility

Project Land Use	Noise Level at Property Line	Threshold(s)	Compatibility
Hotel and apartments along Third Street west segment	68 dBA CNEL	<u>Hotel</u> Normally Compatible = up to 60 dBA CNEL Conditionally Compatible = 60-70 dBA CNEL <u>Apartments</u> Normally Compatible = up to 65 dBA CNEL Conditionally Compatible = 65-75 dBA CNEL	Conditionally Compatible
Hotel, apartments, and convention center along Third Street west segment	68 dBA CNEL	<u>Hotel</u> Normally Compatible = up to 60 dBA CNEL Conditionally Compatible = 60-70 dBA CNEL <u>Apartments</u> Normally Compatible = up to 65 dBA CNEL Conditionally Compatible = 65-75 dBA CNEL <u>Convention Center</u> Conditionally Compatible = up to 65 dBA CNEL	Conditionally Compatible
Amphitheater along Fifth Street	62 dBA CNEL	Conditionally Compatible = up to 65 dBA CNEL	Conditionally Compatible
Multi-family housing along Market Street	68 dBA CNEL	Normally Compatible = up to 65 dBA CNEL Conditionally Compatible = 65-75 dBA CNEL	Conditionally Compatible
Convention center along Orange Street	60 dBA CNEL	Conditionally Compatible = up to 65 dBA CNEL	Conditionally Compatible

Source: dBF Table 4

Table 5.6-J, shows future exterior noise levels in the residential and lodging building façades to be approximately 68 dBA CNEL which would exceed 60 dBA L_{dn} / CNEL. Thus, assuming an interior reduction of 20 dBA, the interior noise levels in habitable rooms may be approximately 48 dBA L_{dn} / CNEL which exceeds the RMC Section 16.08.175 and CBC Section 1206.4 maximum residential noise limit of 45 dBA L_{dn} / CNEL in habitable rooms. (dBF, pp. 19-20). However, through compliance with RMC Section 16.08.175 B 5, which requires preparation of an acoustical analysis report with the application for building permit and implementation of mitigation measure **MM NOI 2** which would require building

design with sufficient noise attenuation measures to ensure interior noise levels do not exceed 45 dBA L_{dn} / CNEL, impacts would be **less than significant with mitigation incorporated**.

Future development of the Project site may include the following outdoor use areas: pool, pedestrian pathways, Outdoor Plaza, and amphitheater uses. Future exterior composite noise levels in these areas would range between 60 dBA CNEL and 68 dBA CNEL (shown in **Table 5.6-J**), which is considered Conditionally Compatible. (dbF, p. 19). With implementation of mitigation measure **MM NOI 3**, impacts to outdoor use areas would be **less than significant with mitigation incorporated**.

Conclusion

Through compliance with RMC 7.35.020(G), RMC 7.35.020 (E), and implementation of mitigation measures **MM NOI 1**, **MM NOI 2** and **MM NOI 3**, the Project would not result in 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, permanent operational noise impacts would be reduced to **less than significant with mitigation incorporated**. (dbF, p. 20).

Threshold: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in vibration velocity decibels (VdB) and assesses the potential for building damage using vibration levels in peak particle velocity (PPV) (inches per second [in/sec]). Federal Transit Administration typical vibration levels associated with construction equipment are presented in **Table 5.6-K – FTA Vibration Source Levels for Construction Equipment** below.

Table 5.6-K – FTA Vibration Source Levels for Construction Equipment

Equipment	Reference PPV/Lv at 25 feet	
	PPV (in/sec)	Lv (VdB)
Pile Driver (impact), Typical	0.644	104
Pile Driver (sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson drilling	0.089	87
Loaded Truck	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: FTA, Table 7-4

The greatest vibration levels are anticipated to occur during the use of a large bulldozer during grading and vibratory hammer (caisson drilling) during construction of the subterranean parking structure. As shown in **Table 5.6-K** above, a large bulldozer and caisson drilling output the same vibration level of 0.089 PPV at 25 feet. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the Project boundary (assuming the construction equipment would be used at or near the Project boundary) because vibration impacts normally occur within and to buildings.

To determine potential construction vibration damage annoyance the following formula was used $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$. Where PPV_{ref} is the reference equipment and D is the distance from the equipment to the receiver in feet. (FTA, p. 185). The Project's grading activities would include one large bulldozer. The large bulldozer could be operated as close as 65 feet² from the property line of adjacent residential lots located to the north and east of the Project site. At approximately 65 feet, the large bulldozer would generate approximately 0.02 in/sec PPV. As shown in **Table 5.6-D – Vibration Damage Potential** above, the threshold at which there is a risk of “architectural” damage to buildings extremely susceptible to vibration damage is 0.12 (in/sec) PPV. Because the large bulldozer would generate vibration below the lowest FTA threshold, the potential for building damage resulting from vibration during Project construction is low.

To determine the potential construction vibration annoyance to humans, the following formula was used $L_{vdB}(D) = L_{vdB}(25\text{ ft}) - 30 \log(D/25)$. Where $L_{vdB}(25\text{ ft})$ is the reference equipment and D is the distance from the equipment to the receiver in feet. (FTA, p. 185). The large bulldozer could be operated as close as 65 feet to the nearest residential property line and would generate approximately 75 VdB. As shown in **Table 5.6-B – Human Response Levels to Groundborne Vibration** above, the GP 2025 EIR has identified that 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible and 85 VdB is acceptable only if there are an infrequent number of events per day. Thus, vibration greater than or equal to 85 VdB would be considered annoying to people. Because construction-related vibration would not exceed 85 VdB, vibration impacts associated with construction would be **less than significant**.

Operations

Once operational, activities at the proposed Project site are not anticipated to generate vibration. Thus, the only expected Project-generated source of vibration would be from Project traffic. Potentially significant vibration levels generated from Project-related traffic on the adjacent roadways (i.e., Market Street, Fifth Street, Third Street, Orange Street). Per Caltrans' *Transportation Noise and Vibration Manual*, vehicular traffic on roadways rarely generates vibration amplitudes high enough to cause structural or cosmetic damage (CT-C, p. 14). because the rubber tires and suspension systems of on road vehicles provide vibration isolation.

As previously stated, FTA's vibration damage criteria is 0.2 PPV (in/sec) and the human annoyance level is 75 VdB. This worst-case vibration level from truck traffic would not exceed FTAs thresholds. Furthermore, it is expected that actual vibration levels within the Project area from truck traffic would be lower than this worst-case level when soil type and pavement conditions are considered so vibration from Project-related traffic on the adjacent roadways would not be significant. As such, vibration impacts associated with Project generated traffic would be **less than significant**.

² Based on the width of Collector Streets per Section 5.8 – Transportation of this Draft EIR.

Conclusion

As discussed in the preceding paragraphs, the Project would not result in generation of excessive groundborne vibration or groundborne noise levels during Project construction or operation. Therefore, impacts would be **less than significant** and no mitigation is required.

5.6.7 Recommended Mitigation Measures

An Environmental Impact Report is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines* Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to Noise.

There are no mitigation measures required to reduce impacts related to an increase in temporary or permanent construction noise levels or impacts related to excessive groundborne vibration or groundborne noise levels since less than significant impacts are anticipated from implementation of the Project. Project generated exterior noise levels were found to be less than significant. The following mitigation measures shall be implemented to eliminate or reduce potentially significant impacts related to traffic noise to new residential units and outdoor uses:

MM NOI 1: Placement Criteria for Mechanical Equipment. To ensure that noise from mechanical equipment associated with future implementing development projects on the Project site is consistent with City noise standards, prior to the issuance of the earlier of a building permit or use permit, the City shall verify that the design of the mechanical equipment meets the following criteria: (i) no more than ten (10) pieces of mechanical equipment shall be located within any 100-square foot area; (ii) the noise; (ii) the noise level of each piece of equipment shall not exceed 59 dBA at three (3) feet; (iii) all mechanical equipment shall be placed a minimum of 25 feet away from any property line. The mechanical equipment installed shall not exceed a noise level of 59 dBA at 3 feet; and (iv) all mechanical equipment shall be shielded by a solid parapet wall with a minimum height equal to the height of the equipment.

In the event one or more of the above criteria is not met, the Project Sponsor shall retain a noise specialist, meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5, to prepare an acoustical analysis to confirm that mechanical noise from the implementing development project not meeting the criteria set forth in this mitigation measure shall not exceed the City's noise standards. Any recommendations identified in the acoustical analysis that are necessary to meet City standards shall be incorporated into the implementing development project.

MM NOI 2: Residential Interior and Exterior Noise. Prior to issuance of a building permit for any residential building or unit, the Project Sponsor shall retain a noise specialist, meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5, to prepare an acoustical analysis to confirm that the noise insulation proposed in the final design is sufficient to achieve interior noise levels at or below 45 CNEL and exterior noise levels at or below 65 CNEL. Interior noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the residences, to the extent such measures are necessary, to ensure that interior noise levels are at or below 45 CNEL. Measures may include, but not be limited to, upgraded building façade elements

(windows, doors, and /or exterior wall assemblies) with Sound Transmission Class (STC) rating of 35 or higher. If the interior limit can be achieved only with the windows closed, then the building design shall include mechanical ventilation that meets California Building Code requirements. Exterior noise attenuation measures, which shall be unit/structure specific, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 dBA CNEL.

MM NOI 3: Non-Residential Exterior Noise. Prior to issuance of a building permit or use permit for any non-residential structure or non-residential use that includes any outdoor gathering or dining areas, the Project Sponsor shall retain a noise specialist, meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5, to prepare an acoustical analysis to confirm that the noise insulation proposed in the final design is sufficient to achieve exterior noise levels at or below 65 CNEL in any outdoor gathering or dining areas. Noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the non-residential area, to the extent such measures are necessary, to ensure that exterior noise levels are at or below 65 CNEL. Exterior noise attenuation measures, which shall be specific to the ultimate location of the outdoor area, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 dBA CNEL.

5.6.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

Through compliance with applicable local regulations and General Plan policies listed above, and implementation of mitigation measures **MM NOI 1**, **MM NOI 2**, and **MM NOI 3**, Project-related noise at the interior of future habitable rooms would be equal to or less than 45 dBA L_{dn} /CNEL, Project-related noise at residential exterior areas would be equal to or less than 65 dBA L_{dn} /CNEL, and Project-related noise at non-residential outdoor gathering or dining areas would be equal to or less than 65 dBA L_{dn} /CNEL. Since, with mitigation, Project-related noise levels would not exceed City standards, impacts would be **less than significant**.

5.7 Public Services

The focus of this section is to analyze potential impacts related to Public Services, including fire protection and police protection. It was determined in the Initial Study/Notice of Preparation (Appendix A of this Draft EIR) that the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for schools, parks, and libraries. The following discussion addresses the potential for adverse impacts to fire and police protection services that could result from the construction and operations because of the Project. Cumulative impacts related to this topic are discussed in *Section 7.0 – Other CEQA Topics*.

5.7.1 Setting

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 community of Woodcrest, and to the west by the Cities of Corona and Norco. The Project site is comprised of approximately 10 acres, located at the northeast corner of Fifth Street and Market Street as discussed in *Section 3.0 – Project Description* of this Draft EIR. The Project site is located within Downtown Riverside.

Fire Protection Services

The Riverside Fire Department (RFD) provides fire protection for the City. RFD is an all-hazard emergency service agency that provides fire protection, emergency medical services, fire safety inspections, community education, and emergency preparedness planning and training for the City. RFD is comprised of six divisions: Administration, Fire Prevention, Operations, Special Services, Urban Search and Rescue, and Training. RFD's major facilities include 14 fire stations located throughout the City, Administration/Prevention offices, an Emergency Operations Center, and a Fire Training Center to advance the training of personnel. (GPUI EIR, p. 3.10-1). The three closest fire stations are Station 1 – Downtown, which is within 0.5 miles south of the Project site, Station 4 – University, which is within 2 miles east of the Project Site and Station 6 – Northside, which is within 1.9 miles north of the Project site. These three fire stations are shown on **Figure 5.7-1 – Fire Station Locations**. (GE). Based on availability at the time of a call, one of these three stations would respond to the Project site.

RFD is organized into two types of fire stations: a Single-Company Station or a Multi-Company Station. Currently, the RFD houses 4 Multi-Company Stations and 10 Single-Company Stations. As shown in **Table 5.7-A – Fire Station Summary** below, Station 1 is a Multi-Company Station which has more than one piece of apparatus and more personnel than the Single-Company Stations. They respond to fires, hazardous material responses, etc. with units from their same location to supplement their staffing immediately upon arrival of their units. Station 1 – Downtown serves the Downtown neighborhood and portions of the Northside, Wood Streets, Grand, Victoria, Eastside, and Hunter Industrial Park neighborhoods. Station 4 and Station 6 are Single-Company Stations which have only one unit. There are fewer personnel in the Single-Company Stations; this is because they respond alone from their Stations on fires, hazardous material responses, etc. (GP 2025 EIR, p. 5.13-6). Station 4 also has access to a water tender that is deployed on an as-needed basis. When in use the water tender is operated by a staff member from Engine 4. Station 4 – University serves the Eastside, University, and Hunter Industrial Park neighborhoods, and portions of Victoria neighborhood. (RFD). Station 6 – Northside serves the Northside and portions of the Hunter Industrial Park neighborhoods.

Table 5.7-A – Fire Station Summary

Station No.	Equipment	Staffing ¹	Maximum Travel Distance ² (Miles)
Station 1 - Downtown	Engine 1 Truck 1 Squad 1 Battalion 1 Brush 1 ATV 1 Utility 1	On duty personnel include: one battalion chief, two captains, two engineers, three firefighter/paramedics and two firefighters Total: 10 personnel	0.5
Station 4 - University	Engine 4 Water Tender 4	On duty personnel include: one captain, one engineer, one firefighter and one firefighter/paramedic Total: 4 personnel	2.0
Station 6 - Northside	Engine 6 Engine 836 ³	On duty Station 6 personnel include; one captain, one engineer, one firefighter and one firefighter/paramedic. Total: 4 personnel	1.9

Source: RFD, Google Road

Notes:

1. Staffing level and equipment data was obtained from RFD website
2. Travel distances are derived from Google Road data.
3. Engine 836 is a reserve unit housed at Station 6, which can be moved to other Stations. Engine 836 is used when the front-line fire engine is in for maintenance.

Station 1 Engine 1 is the primary fire engine for RFD. Engine 1 is a triple combination fire engine; “triple combination” refers to the apparatus having three main components: water tank, fire pump and hose. Station 4 Engine 4 and Station 6 Engine 6 are also triple combination fire engines. Station 1 Truck 1 or quint truck (ladder) company performs fire suppression duties at structure, vehicle, wildland, and other types of fires, such as providing a water supply and advancing attack hoselines. In addition, Truck 1 performs forcible entry, search and rescue, ventilation, salvage and overhaul, and utilities control, and provides access to upper levels of a structure. Truck 1 may also provide elevated water streams, extrication, and basic or Advanced Life Support Care (ALS). RFD is in the process of staffing truck companies with 4 personnel with the 4th person as a Firefighter/Paramedic to provide Advance Life Support Care (ALS) when making calls. (RFD).

The City’s Fire Department Operations Division responds to over 45,000 service calls annually and has an average response rate of approximately 7 minutes and 59 seconds (GPUI EIR, p. 3.10-3). RFD has established a performance goal for emergency response to arrive within 8 minutes of dispatch over 90 percent of the time, slower than the 5-minute response time that is generally preferred by fire officials for urban areas. (GPUI EIR, p. 3.10-3).

Police Protection Services

The Riverside Police Department (RPD) provides police protection services to the City from four RPD stations. The nearest police station to the Project site is Orange Station which is approximately 0.5 miles south of Project site. The locations and services provided at each station are shown below in

Table 5.7- B – Riverside Police Stations.

Table 5.7-B – Riverside Police Stations

Station	Address	Services/Divisions	Personnel	Ward
Orange Station	4102 Orange Street	Headquarters, Support Services Division – Personnel Bureau, Community Services, Records Bureau, and Administrative Functions	70	1
Lincoln Station	8181 Lincoln Avenue	Field Operations Division – Patrol/Traffic Functions, and Technical Services Unit (Bomb Squad)	184	4
Magnolia Station	10540 Magnolia Avenue	Investigations and Special Operations Divisions – Investigations, Forensics, Property Room, Communications (Dispatch), Neighborhood Policing Centers, and Training Bureau	281	6
Aviation	7020 Central Avenue	Air Support, METRO (SWAT) Team	25	3

Source: GPUI EIR, p. 3.10-4, Table 3.10-2

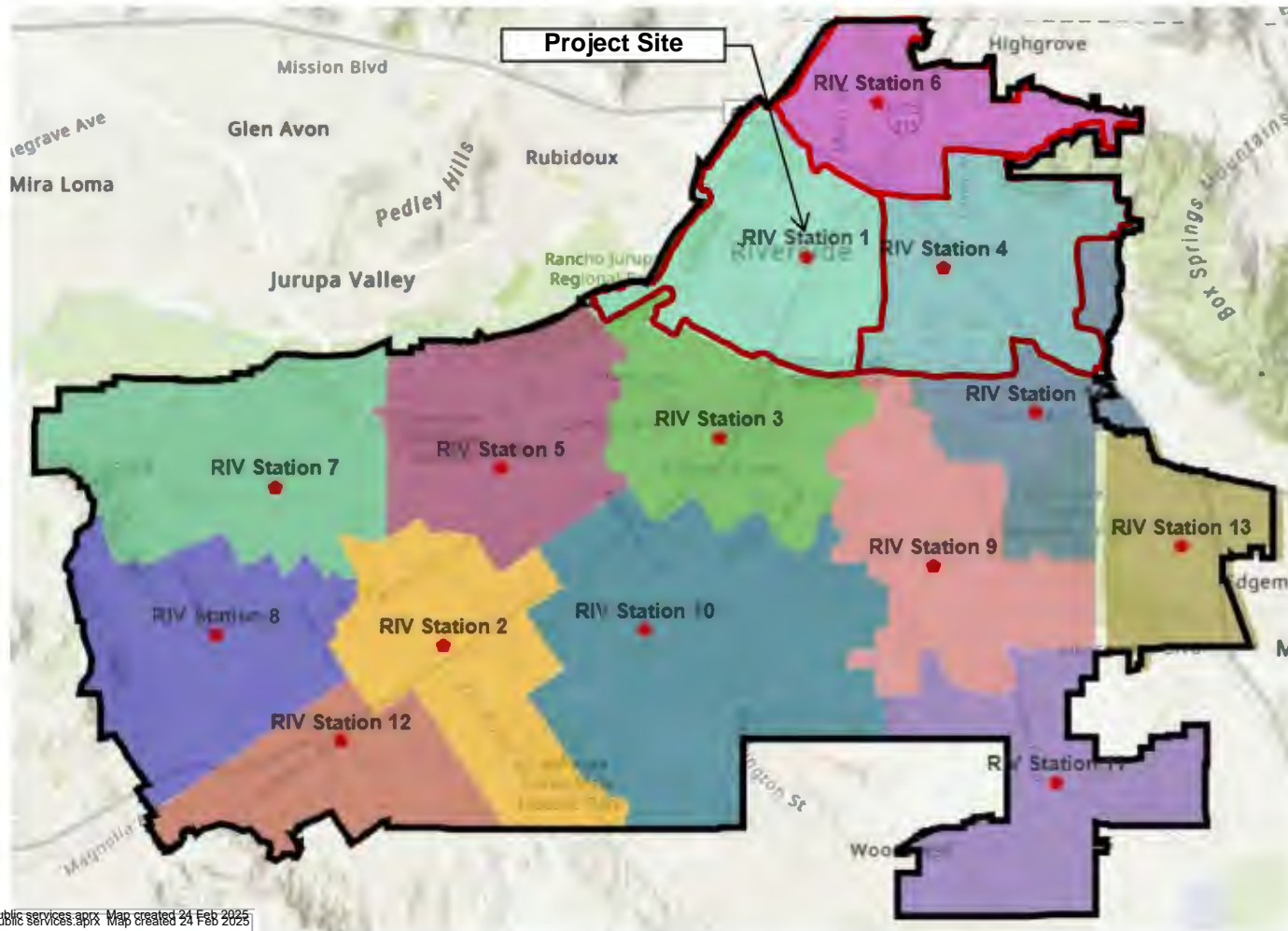
The Field Operations Division provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services for the City. The Field Operations Division is managed by a Captain who oversees patrol officers, sergeants, lieutenant Watch Commanders, an Executive Lieutenant, and civilian support staff. The Field Operations Division includes over 130 patrol officers, 21 Sergeants, six Lieutenant Watch Commanders, one Executive Lieutenant, one Traffic Lieutenant, and a civilian support staff position. (GPUI EIR, p. 3.10-4).

RPD has implemented a decentralized Neighborhood Policing Center model in an effort to provide more equitable and responsive services across the City. Additionally, RPD does not use a formula for calculating the number of officers per capita. According to the RPD Policy Manual, adequate staffing ensures that proper supervision is available for all shifts. (GPUI EIR, p. 3.10-4).

The precinct-based system of the police department automatically assigns officers to certain districts of the City which allows the officers to become more familiar with the areas of the community they are assigned to. This method is called community policing and balances reactive responses to calls for service with proactive problem-solving to prevent crime incidences. There are two essential criteria for police response. The first criteria are Priority One calls. These calls are urgent and include life-threatening incidents such as an in-progress robbery or a bodily injury. Police officers typically respond to Priority One calls within seven minutes from the time calls for service are received. The second criteria is Priority Two-Nine calls. These calls are less urgent and include non-life-threatening incidences such as past burglary, petty theft, shoplifting, etc. and these calls are typically responded to based on priority. (GPUI EIR, p. 3.10-4).

FIGURE 5.7-1

Fire Station Locations



LEGEND

- Fire Stations serving the Project Site
- Fire Stations



Sources: RFD CRA

5.7.2 Related Regulations

Federal Regulations

There are no federal regulations directly applicable to these Public Services with respect to the proposed Project.

State Regulations

California Fire Code

The California Fire Code (Title 24, Part 9) is based on the 2021 International Fire Code and includes amendments from the State of California as well as local Riverside Municipal Code (RMC) amendments fully integrated into the code. The California Fire Code (CFC) contains fire safety related building standards referenced in other parts of Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code (BSC).

California Building Code

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission and the code is also known as Title 24 of the California Code of Regulations. The most recent building standard adopted by the legislature and used throughout the state is the 2022 version of the CBC, often with local, more restrictive amendments that are based upon local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and the public welfare by regulating various aspects of the design and construction of buildings. (BSC).

Regional Regulations

There are no regional regulations directly applicable to these Public Services with respect to the proposed Project.

Local Regulations

City of Riverside General Plan 2025

There are no objectives and policies in the City of Riverside General Plan 2025 that pertain to Public Services that are considered applicable to the Project.

City of Riverside General Plan 2025 EIR

There are no applicable mitigation measures from the General Plan 2025 EIR that pertain to Public Services.

City of Riverside Phase I General Plan Update

The City of Riverside Phase I General Plan Update (GPUI) contains objectives and policies that are considered applicable to the proposed Project, as identified below (GPUI, pp.15-16):

Public Safety Element

Policy PS-4 Emergency Services: Provide Responsive police, fire, and emergency services to all residences and businesses in Riverside.

Action Plan PS-4.2-3 (Emergency Preparedness) Through the Development Review Committee and plan check process, require new and redeveloped structures and facilities to

adhere to Riverside Municipal Code Title 16, California Fire Code (as amended), the International Building and Fire Code and other applicable local, state, and national fire safety standards.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the GPUI EIR that pertain to Public Services.

Downtown Specific Plan

There are no City of Riverside Downtown Specific Plan goals or policies that are considered applicable to the proposed Project.

Riverside Municipal Code

Chapter 16.52 – Development Fees for Fire Stations. This Chapter provides for the collection of development fees to be utilized for the purchase of land for and the construction of fire stations and the acquisition of equipment and furnishings to equip fire stations. The fee is required to be paid prior to issuance of a building permit for new development (MC). The RFD is in the process of developing a comprehensive Master Plan to address the impact of new developments on its service delivery model. As of this writing RFD is preparing a Development Impact Fee (DIF) study to implement that fee via resolution. Depending on the timing of the adoption of a DIF for fire services, and when the first implementing project is proposed for the Project, DIF would be collected, or, if no DIF is available, project-specific measures such as individual fee payment directly to RFD may be required.

Measure Z

Measure Z is a one-cent transaction and use tax (similar to a sales tax) approved by Riverside voters on November 8, 2016, to help pay for critical unfunded City programs and services. Measure Z was placed on the ballot at the recommendation of City staff to fund critical needs such as first responder staffing and vehicles, road, tree maintenance, and building repair and maintenance. Measure Z is projected to generate approximately \$48,00,000 in annual revenues through 2036 unless extended by the voters. (MZ).

City of Riverside Fire Department Strategic Goals 2023-2028

The mission of the RFD is to protect life, property, and the environment by providing exceptional and progressive, all-hazard emergency services and community risk reduction programs. The RFD has established the following goals to continuously drive towards the mission of the Fire Department. (RFD-CRA, pp. 22- 23).

- | | |
|--------|---|
| Goal 1 | Enable the City of Riverside to achieve the vision and mission by creating a comprehensive, connected, and sustainable administrative infrastructure. |
| Goal 2 | Provide exceptional public safety and emergency services through continuous program evaluation and process improvement. |
| Goal 3 | Ensure the department has appropriate support functions to meet the evolving needs of our community presently and in the future. |

5.7.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding Public Services in response to the Initial Study/Notice of Preparation (IS/NOP).

5.7.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impact in the following areas and these topics will not be addressed in this Draft EIR:

- 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;
 - Parks;
 - Other Public Facilities

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have potentially significant impacts related to police and fire services and these topics are addressed in this Draft EIR:

- 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 and police protection.

RFD utilizes a Unit Hour Utilization metric to determine a Station’s existing workload and capacity. Unit Hour Utilization accounts for the time a unit is committed to emergency responses. Time reported begins when a unit is notified of an emergency to the time the unit clears the call. The percentage of total busy hours represents the portion of a 24-hour day that a unit spends on incidents. Industry standards state that Unit Hour Utilization above 30 percent may contribute to longer response times, fatigue, and a potentially higher risk of error. The City of Riverside utilizes a 20 percent threshold.¹ **Table 5.7-C – Unit Hour Utilization for Station 1, 4 and 6**, provides a summary of the Unit Hour Utilization for each unit at the three closest Stations over the last five (5) years.

¹ Personal communication with RFD on January 29, 2025.

Table 5.7-C – Unit Hour Utilization for Stations 1, 4 and 6

Identification	2022	2021	2020	2019	2018
Station 1					
Engine 1	18.98%	16.89%	14.43%	13.37%	12.86%
Truck 1	7.35%	7.08%	6.08%	4.74%	4.97%
Squad 1	19.92%	18.94%	13.09%	12.07%	14.23%
Station 4					
Engine 4	19.74%	16.20%	12.38%	11.24%	13.21%
Station 6					
Engine 6	10.87%	10.20%	8.80%	8.22%	8.64%

Source: RFD-CRA, pp. 34, 46, 54.

RFD also utilizes response times as another metric to determine a Station's ability to respond to calls. Response times are measured by three variables, alarm handling, turnout time and travel time. Alarm handling is defined as the time interval from when the alarm is acknowledged at the communication center until response begins via voice or electronic means. Turnout time is defined as time interval that begins when the station and/or units in the field notification process begins. Lastly, travel time is defined as the time interval that begins when a unit is in route to the emergency. (RFD-CRA, p. 158). Therefore, travel time is correlated to the distance from the Project site.

5.7.5 Project Design Features

Design features refer to ways in which the proposed Project will avoid or minimize potential impacts through the design of the Project. The proposed Project has been designed with sensitivity to the adjacent land uses and the existing residential neighborhoods surrounding the site. Pursuant to the CBC and CFC, implementing projects will be required to include building components, such as windows, roof systems, lighting, fire sprinklers and electrical systems, that meet CBC and CFC requirements. Having these features incorporated as part of future development as required by the CBC and CFC could reduce impacts associated with fire risk and reduce response times and service calls by thwarting or preventing fires from occurring on within the Project.

The proposed Project will also include requirements for exterior building lights and pedestrian lighting for safety and security purposes within parking facilities, along pathways, and on buildings as discussed in *Section 3.0 – Project Description* of this Draft EIR. Existing streetlights are located along Third Street, Fifth Street, Market Street and Orange Street within the right-of-way.

5.7.6 Environmental Impacts

Threshold: 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: Fire Service and Police Service.

As discussed in Section 3.0 – Project Description of this Draft EIR, the analysis for the Project 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. No specific development application is currently under consideration. The Project proposes a combination of residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities. The following list provides a breakdown of the maximum densities that will be analyzed as part of the Project.

- 168 residential units including a mix of for-sale and for-rent product;
- 376 hotel rooms;
- 220,000 square feet of Class A office space;
- 61,981 square feet of commercial retail space, including restaurant and personal service uses;
- 189,000 square feet of additional exhibition, reception, back-of-house and support facilities for the Riverside Convention Center;
- A subterranean parking facility with up to five levels; and
- Outdoor pedestrian plaza and flexible outdoor gathering space.

As discussed in the IS/NOP included in Appendix A of this Draft EIR, the Project is expected to increase the City’s population by a maximum of approximately 576 persons using the City’s factor of 3.43 people per dwelling unit and generate a maximum of approximately 1,746 employees using available data from the County of Riverside.² Therefore, the Project is anticipated to generate a total of approximately 2,322 residents and employees onsite. This estimate excludes hotel guests and convention center visitors, which are intermittent and will vary depending upon what is scheduled at the convention center. On average, the Project’s hotel occupancy could be approximately 638 people, and the convention center occupancy could range from 6,300 to 13,500 people for large events.³ This increase in population and employment (and intermittent visitors) has the potential to increase demand for public services such as fire and police.

² 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>)

³ Number of occupants for hotel and convention center uses were calculated using the minimum square feet per occupant set forth in Appendix C, Table C1 of the Riverside County Airport Land Use Compatibility Plan (ALUC) Policy Document, the proposed Project land uses and associated square footage, and applying a 50 percent occupancy adjustment per the Maximum Occupancy methodology described on page C-1 of said Appendix C.
(<https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-PDFGeneral-plan-newplan-23--20Appendix-20C.-20Determining-20Concentrations-20of-20People.pdf>)

Fire Protection Services

Demand for fire protection services, in the form of new service calls, may increase because of Project implementation. As the Project proposes new residential, hotel, office, retail and convention center expansion, it is anticipated the Project would result in an increase of service calls in comparison to the current uses on the site.

As discussed in *Section 5.7.1 – Setting* above, the Project site is currently served by RFD and is expected to continue to receive fire services through RFD. The closest fire station to the Project site is Station 1 – Downtown located 0.5 miles from the Project site. However, based on availability at the time of a call, Station 4 or Station 6 may respond due to the close proximity to the Project site. The RFD utilizes response times as a metric to determine a Station's ability to respond to calls. Since Stations 4 and 6 are located within two (2) miles away from the Project site and response times are correlated to Station distance from emergency location, these stations would be able to adequately respond to the Project site within RFD established performance goal for emergency response of 8 minutes. (GPUI EIR, p. 3.10-3). Locations for these stations in relation to the Project site are identified on **Figure 5.7-1**.

In 2022, Station 1 units responded to 10,039 calls, Station 4 responded to 4,048 calls and Station 6 responded to 4,032 calls. (RFD-CRA, pp. 33, 45, 53) RFD has experienced a steady increase in calls over the past 20 years, resulting in an increase in Unit Hour Utilization for all three Stations. As shown in **Table 5.7-C** above, Station 1 and Station 4 experienced an all-time high Unit Hour Utilization in 2022 of 19.92⁴ percent and 19.74 percent, respectively. Using the City's threshold of 20 percent, Station 1 and Station 4 are reaching capacity. In contrast, Station 6 reported a Unit Hour Utilization of 10.87 percent in 2022, meaning that Station 6 still has capacity to respond to calls within the City's threshold.

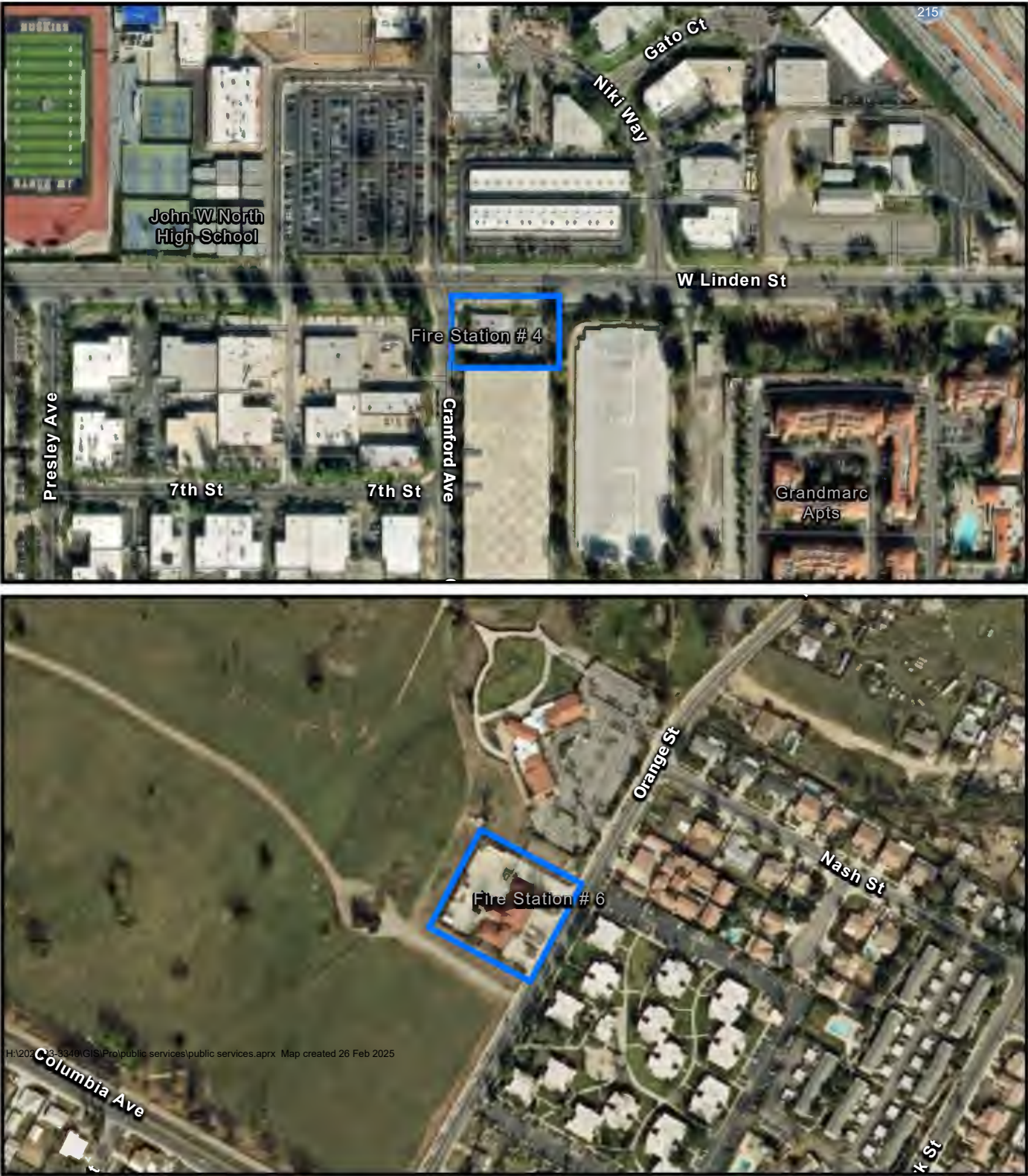
To alleviate RFD Station 1 and Station 4, additional resources, personnel and equipment may be necessary once the Project is implemented. Specifically, an additional unit (e.g., Truck) may potentially be needed in either Station 4 or Station 6 to adequately serve the proposed Project. In 2013 Station 1 was renovated into a three story, 30,000-square-foot firehouse. As mentioned in **Table 5.7-A** above, Station 1 houses Engine 1, Truck 1, Squad 1, Battalion 1, Brush 1 and ATV 1. Therefore, Station 1 does not have any physical space to store any additional equipment. Furthermore, due to the built-out nature of the Downtown Area, Station 1 does not have the ability to expand the existing facility.

Both Station 4 and Station 6 have potential for expansion of physical facilities. Station 4 is equipped with two apparatus bays which currently house Engine 4 and Water Tender 4. (RFD, RFD-CRA). Therefore, any additional equipment would require expansion of facilities. Currently Station 4 has one building that is 4,363 square feet in size on an 8.2-acre parcel (APN 250-180-003). (RFD-CRA, GIS). The parcel has been fully developed and disturbed but there is space to potentially expand the existing building on this parcel. Due to the developed nature of the surrounding areas, Station 4 retrofitting would be constrained to the existing parcel as shown on **Figure 5.7-2 – Aerial Views of Station 4 and Station 6**. However, since the parcel has already been fully disturbed and developed with structures, paved driveways, a paved parking area, and ornamental landscaping, any re-development would not be expected to create any new environmental impacts if new construction on Station 4 was to be determined to be required as the Project is implemented over time.

⁴ **Table 5.7-C** breaks down Unit Hour Utilization by station unit (equipment). For the purposes of this discussion, the station unit with the highest Unit Hour Utilization was used for a conservative approach.

FIGURE 5.7-2

Aerial Views of Station 4 and Station 6



0 0.15 0.3
Miles

Sources: Nearmap 2025



Station 6 is equipped with two apparatus bays which currently house Engine 6 and Engine 836. Since Engine 836 is a reserve unit only used when the front-line engines are in for maintenance and can be moved to other Stations, Station 6 has space for an additional unit to be housed in its apparatus bays. While Station 6 would have space to house an additional unit under its current conditions, an additional unit would result in the need for additional personnel. Currently Station 6 has one 5,364-square-foot building on a 39.09-acre parcel (APN 206-070-003). (RFD-CRA, GIS). Station 6 has limited space for personnel; therefore, the additional unit may require expansion to the living and/or office space.⁵ The portion of the parcel in which Station 6 is located on has also been fully disturbed and developed with a structure, paved driveways, a paved parking area, and ornamental trees, as shown on **Figure 5.7-2**. The remainder of the parcel has been previously disturbed and was previously operated as a golf course. The golf course is no longer in use and no longer maintained. The three adjacent sides of Station 6 to the north, west and south are no longer in operation or maintained by the golf course. These areas are a part of the Northside Specific Plan. The area to the north and west of Station 6 is zoned NSP-OS – Open Spaces, Parks and Trails and the area to the south of Station 6 is zoned NSP-NVC - Northside Village Center. Therefore, any redevelopment or expansion on the existing Station 6 parcel would not be expected to create any new environmental impact.

Development of the Project would increase calls for fire services due to the addition of residents, employees, visitors and conference attendees. As stated above, the City is in the process of studying and establishing a DIF to address the need for additional facilities to adequately serve the increasing population. If a DIF for fire services is not in place at the time an implementing project is proposed, the Project Sponsor would be required to enter into a cost contribution agreement to pay for the incremental increase to fire services which would reduce any impacts resulting from the Project. The Project would be required to comply with mitigation measure **MM PS 1**, which requires that the Project Sponsor collaborate with RFD to determine potential impacts to fire protection services based on the specific characteristics of a proposed implementing project. As outlined in **MM PS 1**, once RFD has determined the impact on existing facilities and resources, funds collected from the Project as part of DIF, if adopted, or the cost contribution agreement would be utilized to offset impacts to fire services by expanding existing facilities and/or purchasing additional equipment and providing additional personnel.

All Project-related development would be constructed in accordance with current building and fire/life/safety ordinances and codes, including all applicable code requirements related to construction, access, water mains, fire flows, and hydrants. Additionally, the Project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or expanded fire protection facilities to meet potential emergency demand.

Hence, any incremental impacts to the provision of fire protection services would be offset from funds identified within either a DIF, if available, or a cost contribution agreement that the Project would be required to enter into with the RFD for fire services. Compliance with mitigation measure **MM PS 1** would ensure that RFD analyzes potential impacts from future development and that funds collected by the Project are properly allocated to avoid impacts to fire protection services. As discussed above, if physical expansion of either Station 4 or Station 6 is determined by RFD to be warranted in order to adequately serve the Project once implementing projects are proposed, **MM PS 1** shall be required. As such, impacts to fire protection services would be **less than significant with incorporation of mitigation**.

⁵ Personal communication with RFD on March 12, 2025.

Police Protection Services

Demand for police protection services, in the form of new service calls, may increase as a result of Project implementation from both the residential and commercial uses. While an incremental increase in law enforcement calls to the Project site may occur, such calls would be consistent to the types of calls RPD responds to at the existing area. GP 2025 policy PS-7.5 strives to provide minimum response times of seven minutes on all Priority One calls and twelve minutes on all Priority Two-Nine calls. The Orange Street Police Station is nearest to the Project site approximately 0.5 mile south of the Project. However, the Orange Street Police Station is an administrative station. Lincoln Station is located 4.84 miles southeast of the Project. Officers are based out of the Lincoln Station; however, as Officers are assigned specific patrol areas, response times would be affected by the distance of the officer from the Project site at the time a call is reported. In order for RPD to continue to meet the recommended police response times (7 minutes for Priority One calls and 12 minutes for Priority Two calls) additional staffing may be required. Additional Officers required for the Project would be based in Lincoln Station, which has existing capacity without requiring any physical alternations or expansions.⁶ Nonetheless, the Project Sponsor would be required to contribute to police services through payment of fees. If a DIF for police services is not in place once an implementing project is proposed, the Project Sponsor would be required to enter into a cost contribution agreement to pay for the incremental increase to police services. Therefore, implementation of the Project would not require the need for new police facilities or the expansion of an existing police station. As such, impacts related to police services would be **less than significant and mitigation is not warranted**.

5.7.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts to fire protection services.

MM PS 1: Fire Protection Services. During the entitlement processes when an implementing project is proposed, the Project Sponsor shall confer with RFD to determine if physical improvements, increased personnel or other types of expansion are necessary at Station 4 or Station 6 in order for the RFD to adequately serve the implementing project. The City will allocate funds collected from the Project Sponsor as part of the DIF fees expected to be in effect once implementing projects are proposed, and, if not, the Project Sponsor shall enter into a Cost Contribution Agreement with RFD to expand facilities, purchase additional equipment and/or fund adequate staffing.

5.7.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

With implementation of mitigation measure **MM PS 1**, the City's General Plan policies, as well as compliance with the City's Municipal Code, potential impacts to fire protection services are less than significant. Impacts related to police protection services were determined to be less than significant, and no mitigation is required.

⁶ Email communications with RPD on February 19, 2025.

5.8 Transportation

The focus of this section is to analyze potential impacts related to transportation. The following discussion addresses the potential adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics*.

A *Vehicle Miles Traveled Screening Assessment Memorandum* (VMT Memo) dated November 7, 2024, was prepared by Albert A. Webb Associates (WEBB-C) and a *Traffic Study* dated March 2025 was prepared by Albert A. Webb Associates (WEBB-D). Both reports are included as Appendix E of this Draft EIR.

5.8.1 Setting

The Project site has frontage along Market Street, Fifth Street, Third Street and Orange Street. The proposed Project consists of an existing fully developed site, amongst an urbanized area and is completely surrounded by existing development. The Project site and surrounding is located within the Downtown Specific Plan which is developed with compatible land uses including commercial, residential, hospitality, restaurants, and office. Existing surrounding land uses are described in **Table 3.0-A** found in *Section 3.0 – Project Description* of this Draft EIR.

Existing Site Access

There are two existing driveways providing access the site, specifically Lot 33; one along Market Street (mainly utilized for during event parking and one along Third Street which is signalized. The adjacent Marriott Hotel has an internal vehicular access road which is connected by two driveways one along Fifth Street and one along Market Street.

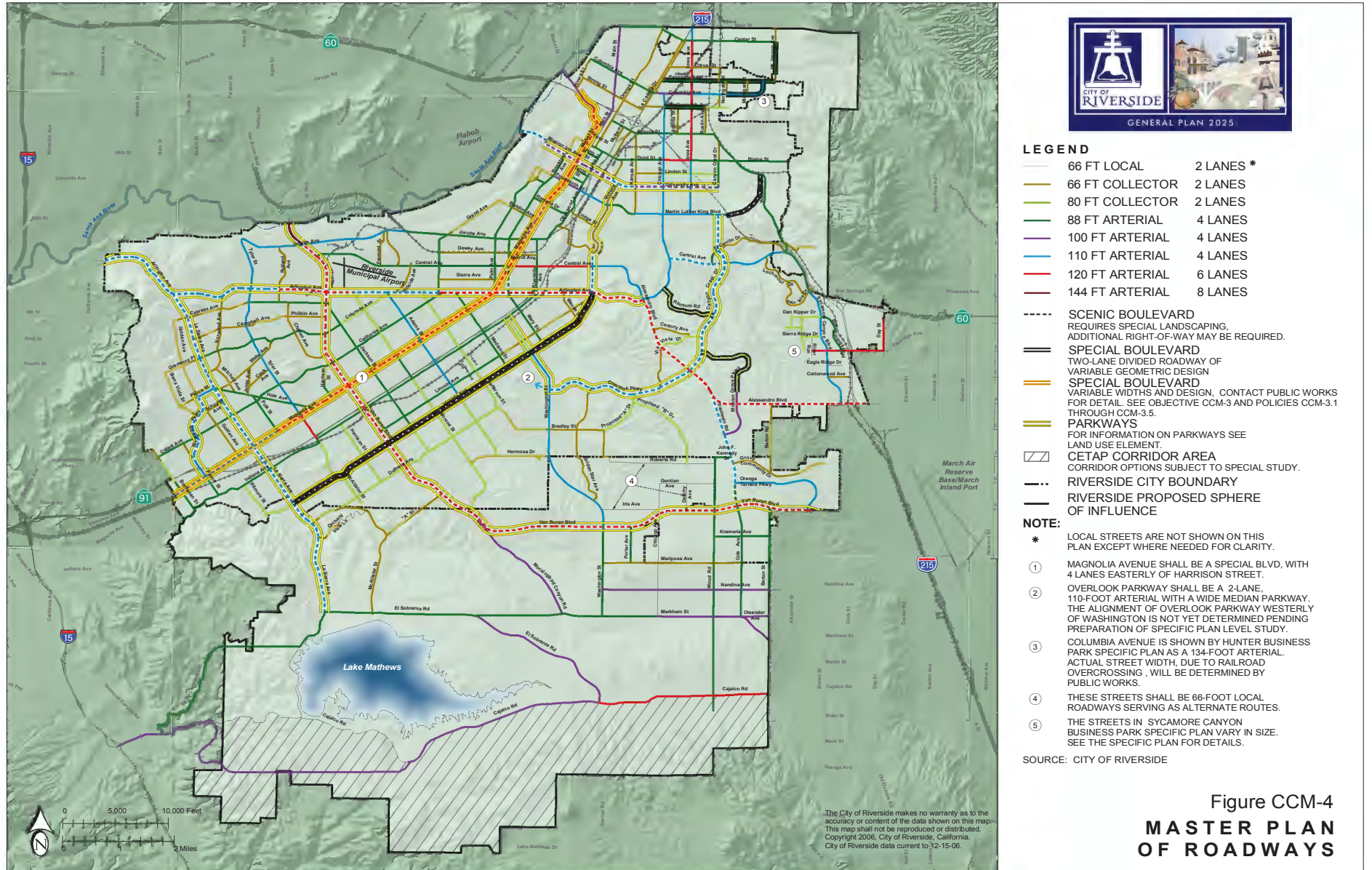
Roadway System and Types

The existing street system in the general vicinity of the Project area consists of roadways designated as Arterial Streets, Collector Streets, and Local Streets as reflected on **Figure 5.8-1 – Master Plan of Roadways**. The Project area includes the following roadway types:

- **Arterial Streets.** These streets carry through traffic and connect to the state highway system with restricted access to abutting properties. They are designed to have the highest traffic carrying capacity in the roadway system with the highest speeds and limited interference with traffic flow by driveways. The City has five arterial classifications that range from 88-feet of right of way (ROW) with four lanes of traffic to 145-feet of ROW with eight lanes of traffic. There are some arterial streets throughout the City that are also classified as a Parkway and or Scenic Boulevard. (GP 2025, p. CCM-10).
- **Collector Streets.** These streets are intended to serve as intermediate routes to handle traffic between Local Streets and streets of higher classification. The City has two types of collector street widths; 40-foot curb-to-curb width within a 66-foot ROW and 40-foot curb-to-curb width with an 80-foot ROW. (GP 2025, p. CCM-10).
- **Local Streets.** These streets provide vehicular, pedestrian, and bicycle access to property directly abutting the public ROW, with movement of through traffic discouraged. Local streets are designated to have a 36-foot curb-to-curb width with 66-foot ROW and two travel lanes (one in each direction). (GP 2025, pp. CCM-9 - CCM-10).

FIGURE 5.8-1

Master Plan of Roadways



C:\Users\juliaa\AppData\Local\Temp\ArcGISProTemp27528\Untitled\Untitled.aprx Map created 21 Nov 2024

Sources: City

Existing Project Roadways

- **Market Street** is classified as an Arterial roadway as well as a Special Boulevard, Parkway and Scenic Boulevard. Market Street ranges in width from a 110-foot roadway to a 120-foot roadway. Market Street is a north-south divided roadway with a striped median allowing for two lanes of travel in each direction. Market Street also provides striped bike lanes on both sides of the roadway.

Signalized intersections occur at Fifth Street/Market Street and Third Street/Market Street both at both instances a dedicated left turn lane is provided in each direction of travel.

Market Street provides an existing curb and gutter and road adjacent concrete sidewalk on both sides of the roadway. Signs provide a posted speed limit of 35 miles per hour (mph) and timed hourly street parking restrictions. (GP 2025, p. CCM-16; GE).

As part of a separate City project, the Market Street/Sixth Street intersection will be modified to prohibit through and left turn movements from side streets. As a result, minor streets from both the east and west approaches will be restricted to a right-out only movement.

- **Third Street** is classified as an 88-foot-wide Arterial roadway. Third Street is an east-west roadway with a combination of no median and a striped median allowing for two lanes of travel in each direction.

Along the Third Street Project frontage there are three signalized intersections. A dedicated left turn lane is provided in each direction of travel at the intersections of Main Street/Third Street and Market Street/Third Street. Main Street southbound lane has a dedicated right turn lane. At the Orange Street/Third Street intersection, westbound and northbound lanes have a dedicated left turn lane.

Third Street provides an existing curb and gutter and road adjacent concrete sidewalk on both sides of the roadway. Signs provide a posted speed limit of 30 mph and timed street parking restrictions. (GP 2025, p. CCM-16; GE).

- **Fifth Street** is classified as an 88-foot-wide Arterial roadway. Fifth Street is an east-west roadway. Along the Project frontage, Fifth Street is composed of a two-lane roadway in one in each direction with on-street parking (perpendicular angular) along both sides of the roadway between Main Street and Orange Street. The northern portion of Fifth Street between Market Street and Main Street is composed of perpendicular angular parking while the southern portion is composed of parallel parking.

Fifth Street provides an existing curb and gutter and road adjacent concrete sidewalk on both sides of the roadway. Signs provide timed street parking restrictions. (GP 2025, p. CCM-16; GE).

- **Orange Street** is classified as a local roadway. Orange Street is a north-south roadway, with a mixture of left turn lanes at the intersection of Third Street/Orange Street, Fourth Street/Orange Street and Fifth Street/Orange Street. The intersection of Third Street/ Orange is signalized while intersection at Fifth Street/Orange Street is a control four-way stop. Parallel street parking options are allowed on both sides of the street.

Orange Street provides an existing curb and gutter and road adjacent concrete sidewalk on the west side of the roadway and an existing curb and gutter with concrete sidewalk with road adjacent landscape buffer on the eastern side of the roadway. Signs provide a posted speed limit of 25 mph and timed street parking restrictions. (GP 2025, p. CCM-16; GE).

- **Main Street** is classified as an Arterial with four lanes and a 100-foot right-of-way. It currently has four travel lanes and on-street parking from State Route 60 (SR-60) to Third Street. Main Street is a north-south roadway that leads to the Lot 33 signalized driveway located on the

northern portion of the Project site. The South Main Complete Streets Project, a separate City project planned for completion in 2027, will convert Main Street between Third Street and SR-60 from four to two travel lanes divided by a median with additional parking, landscaping, and pedestrian walkways. Signs provide a posted speed limit of 35 mph. (GP 2025, p. CCM-16; GE; WEBB-D, p. 20).

The Project site is just over a quarter mile west of State-Route 91 (SR-91), which provides local and regional access to the Project area and is under the jurisdiction of the California Department of Transportation.

Public Transit

Riverside Transit Agency

Riverside Transit Agency (RTA) is the Consolidated Transportation Service Agency for western Riverside County and is responsible for coordinating transit services throughout the approximately 2,500-square mile service area. RTA provides both local and regional services throughout the region with 32 fixed routes, three CommuterLink Express routes, on-demand GoMicro microtransit service, and Dial-A-Ride services using 277 vehicles. RTA local bus Routes 1, 10, 12, 13, 14, 15, 16, 20, 21, 22, 27, 29, 49, 51, 59, and CommuterLink Express Route 200 and 204 operate within the City. (RTA-A, RTA-B).

Routes 12, 29 and 204 all travel along Market Street; however, only La Cadena and Interchange – Downtown- Riverside – Corona Hills Plaza Route 12 and Downtown Riverside – Jurupa Valley – Eastvale Route 29 have a stop both north and southbound along Market Street. Route 12 includes stops that can be access by Corona Cruisers (another transit agency). Route 29 includes stops that can be accessed by OmniTran and Metrolink. Route 29 Metrolink stations include Pedley Metrolink Station and Riverside Downtown Metrolink Station.

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-A).

Metrolink

Rail service is provided by Metrolink operated by the Southern California Regional Rail Authority, which serves six counties through 67 stations and 547 miles of tracks throughout Southern California. (Metro-A) Lines traversing the City include the Inland Empire-Orange County Line, which runs between San Bernardino and San Juan Capistrano; the 91/Perris Valley Line, which runs from Riverside to downtown Los Angeles via Fullerton and other points in Orange County; and the Riverside Line, which also runs from Riverside to downtown Los Angeles via Ontario and downtown Pomona. The Riverside-Downtown Metrolink Station is located in close proximity to the Project Site. RTA Route 29 Line has a stop at both the Riverside- Downton Metrolink Station and Pedley Metrolink Station. (Metro-B).

Bicycle and Pedestrian Facilities

The City provides a network of non-vehicular circulation as discussed below.

Bicycle Facilities

The City completed a four part planning process called the *Riverside PACT Plan* which consists of the following plans: Pedestrian Target Safeguarding Plan (PTS), Active Transportation Plan (AT Plan),

Complete Streets Ordinance (CSO), and Trails Master Plan (TMP). The Riverside PACT Plan helps the City create robust, sustainable, and accessible transportation options.

Figure 5-3: Trails, On-Street Facilities, and Destinations of the City's PACT Plan identifies the City's future bicycle and pedestrian network and improvements. This master plan is based upon recommendations of the 2012 Bicycle Master Plan Addendum, current bicycle level of traffic stress, the demand of existing conditions, and public input. (PACT, pp. 1-5, 4-12). In 2020, Caltrans designated four classes of bicycle facilities, which are used in the *AT Plan* and are listed below:

- **Class I – Share Used Paths.** These are paved trails completely separated from the street. They allow two-way travel by people bicycling and walking.
- **Class II – Bike Lanes.** Striped preferential lanes on the roadway for one-way bicycle travel. Some bicycle lanes include a striped buffer on one or both sides to increase separation from the traffic lane or from parked cars where people may open doors into the bicycle lane (buffered bicycle lanes are referred to as Class II Buffered Bike Lane).
- **Class III – Bicycle Routes.** Signed routes where people bicycling share a travel lane with people driving. Because they are shared facilities, bicycle routes are primarily used on select low-speed streets. Some Class III bicycle routes include shared lane markings or “sharrows” that recommend proper bicycle positioning in the center of the travel lane and alert drivers that bicyclists may be present.
- **Class IV – Separated Bikeways.** On-street bicycle facilities that are physically separated from motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle. They can allow for one- or two-way travel on one or both sides of the roadway.

Based on the *AT Plan Figure 4-20, Bikeway Recommendations*, Market Street is designated as Class II Buffered Bike Lane and currently provides striped bike lanes on both sides of the roadway; Third Street is designated as a Class II Bike Lane and currently also provided striped bike lines. Fifth Street is designated as Class III Bike Route and Orange Street is designated as a Class IV Cycle Track on the northern portion of the road towards Third Street, however, no buffer or barrier currently exist.

Pedestrian Facilities

The implementation of enhanced pedestrian linkage with a comprehensive trails system links residential areas, schools, parks, and commercial centers so that residents can travel within the community without driving. Safe and attractive sidewalks and walkways improve the walkability of the City. Citywide, sidewalks are generally provided on both sides of the streets. Additionally, standard paved trails and non-standard unpaved trails are frequently used by bicyclists and pedestrians in the City. Some trails are also available for equestrian riders. The existence of trails and sidewalks provides accessible facilities, provides safety features, and improves walkability in the City of Riverside. (GP 2025, p. CCM-29, CCM-30). The Downtown Specific Plan emphasizes pedestrian use and access in a comfortable, safe, and enjoyable walking environment. (DSP, p. 19-10). The Downtown Specific Plan designates the following streets within the Project Vicinity as pedestrian oriented streets: (DSP, p. 19-11).

- Market Street (Fifth to Eleventh)
- Main Street (Fifth to Fourteenth)
- Orange Street (Third to Fourteenth)
- Fifth Street (Market to Orange)

These streets form the backbone of the pedestrian circulation network in downtown and, in most cases, provide pedestrians with a street environment that will minimize conflict with autos. Currently these streets offer sidewalks, and pathways that connect to greater downtown pedestrian network.

Pedestrian corridor improvements are identified in areas within the City that lack sidewalks and good pedestrian connections and that could benefit from more frequent maintenance. (PACT, p. 4-62). Based on the *AT Plan Figure 4-13, Pedestrian Recommendations*, a spot recommendation¹ is proposed within the Project vicinity (Market Street and University Avenue), however not along the Project frontage.

5.8.2 Related Regulations

Federal Regulations

There are no federal regulations are applicable to the proposed Project.

State Regulations

Complete Streets

In 2008, the state passed the California Complete Streets Act Assembly Bill 1358 (AB 1358), requiring circulation elements to include a “Complete Streets” approach that balances the needs of all users of the street. Complete Streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. The precise definition of a Complete Street can vary depending on the context and primary roadway users, but there are some common elements found in successful Complete Streets policies. These policies consider the needs of all users of the street in the planning, design, construction, operation, and maintenance of transportation networks. This framework allows policymakers to shift the goals, priorities, and vision of local transportation planning efforts by emphasizing a diversity of modes and users.

Senate Bill 375 - Sustainable Communities and Climate Protection Act

The Sustainable Communities and Climate Protection Act, or Senate Bill 375 (SB 375), provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing greenhouse gas emissions set by Assembly Bill 32. SB 375 requires each Metropolitan Planning Organization to add a broader vision for growth to its transportation plan through development of a Sustainable Communities Strategy (SCS). The SCS must lay out a plan to meet the region’s transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions. The SCS should integrate transportation, land use, and housing policies to plan for achievement of the emissions target for each region. The current sustainable community strategy for the City of Riverside is the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is known as *Connect SoCal 2024*. (SB375).

Connect SoCal 2024 includes population, housing, and employment growth projections for 2050. These growth projections are used in SCAG’s transportation modeling and shape SCAG’s regional planning efforts, as outlined in Connect SoCal 2024. Connect SoCal 2024 minimizes increases in regional traffic

¹ Spot recommendations are typically located at intersections and include one more of the following pedestrian infrastructure enhancements: crossing improvement, signal improvement, transit stop improvement, walking environment improvement, sidewalk improvement, lighting improvement. (PACT, p. 4-54) Since University Avenue and Market Street were categorized as a high volume pedestrian area, the following potential spot recommendations were identified: curb extensions, crossing guards or traffic control, high-visibility crosswalks, leading pedestrian intervals, pedestrian-only signal phase, extended crossing time, and pedestrian scramble. (PACT, p. 4-60)

congestion by focusing growth, density, and land use intensity within existing urbanized area as the general land use growth pattern for the region while enhancing the existing transportation system and integrating land use into transportation planning. Connect SoCal 2024 recommends local governments accommodate future growth within existing urbanized areas to reduce VMT, congestion, and greenhouse gas emissions. (Connect SoCal-A).

Vehicle Miles Traveled and Transit Priority Area

Senate Bill 743 (SB 743) was signed into law on September 27, 2013, and went into effect January 2014 (as, seeking to balance the needs of congestion management, infill development, public health, greenhouse gas reductions, and other goals. The Governor's Office of Planning and Research (OPR) was directed to develop new criteria for determining significance of transportation impacts and define alternative metrics to traffic Level of Service (LOS) under CEQA. Specifically, SB 743 mandates that lead agencies can no longer use automobile delay – commonly known as LOS – as a method for conducting transportation analysis under CEQA. In April 2018, OPR released the Technical Advisory on Evaluating Transportation Impacts in CEQA, which set forth guidelines for the use of a broader measure called Vehicle Miles Traveled (VMT). VMT measures the total amount of driving over a given distance and is intended to better align transportation analysis with the State's Greenhouse Gas reduction goals. These changes became mandatory on July 1, 2020, and lead agencies are now required to analyze transportation impacts under VMT, not LOS.

SB 743 also authorized the designation of an infill opportunity zone that is a Transit Priority Area within a sustainable communities strategy or alternative planning strategy adopted by an applicable metropolitan planning organization. Per SB 743, a Transit Priority Area is defined as a half mile area around an existing "major transit stop" or an existing stop along a "high-quality transit corridor." "Major transit stop" is defined in Public Resources Code, Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. "High-quality transit corridor" per Public Resources Code, Section 2155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Congestion Management Program

The Congestion Management Program (CMP) was first established in 1990 under Proposition 111. Proposition 111 established a process for each metropolitan county in California to designate a Congestion Management Agency (CMA) that would be responsible for development and implementation of the CMP within county boundaries. The intent of the CMP is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. Counties within California have developed CMPs with varying methods and strategies to meet the intent of the CMP legislation. The Riverside County Transportation Commission (RCTC) was designated as the CMA in 1990, and therefore, prepares the CMP updates in consultation with the Technical Advisory Committee (TAC), which consists of local agencies, the County of Riverside, transit agencies, and subregional agencies. (CMP).

Regional Regulations

County of Riverside Congestion Management Program

RCTC is designated as the CMA to oversee the CMP. Urbanized areas such as Riverside County are required by State law to adopt a CMP. The goals of the CMP are to reduce traffic congestion and to provide a mechanism for coordinating land use development and transportation improvement decisions. Local agencies are required to establish minimum level of service (LOS) thresholds in their general plans and conduct traffic impact assessments on individual development projects. Deficiency plans must be prepared when a development project would cause LOS "F" on non-exempt CMP roadway segments.

Western Riverside County Transportation Uniform Mitigation Fee

In 2002, the jurisdictions of western Riverside County (including the City), agreed to participate in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program. TUMF is a multi-jurisdictional impact fee program administered by the Western Riverside Council of Governments (WRCOG) that funds transportation improvements on a regional and sub-regional basis associated with new growth. All new development in each of the participating jurisdictions is subject to TUMF, based on the proposed intensity and type of development. (GP 2025, p. CCM-6).

TUMF fees are collected by the City from project applicants and are passed on to WRCOG as the ultimate program administrator. TUMF funds are distributed on a formula basis to the regional, local, and transit components of the program. Of the TUMF funds received by WRCOG, 3.13 percent is allocated to RTA for making regional transit improvements, 45.7 percent is allocated to RCTC for programming improvements to the arterials of regional significance on the Regional System of Highways and Arterials, 1.47 percent is allocated to the Western Riverside County Regional Conservation Authority (RCA) to purchase habitat for the Multiple Species Habitat Conservation Plan (MSHCP), and 45.7 percent is allocated to the five zones for programming improvements to the Regional System of Highways and Arterials (RSHA) as determined by the respective zone committees. (WRCOG, p. 6).

The City participated in the preparation of the *Western Riverside County Transportation Uniform Fee Nexus Study* (dated October 18, 2002) and adopted TUMF fees based on that study. The City also participated in the preparation of an updated nexus study titled *Transportation Uniform Mitigation Fee Nexus Study: 2009 Update* and *Transportation Uniform Mitigation Fee Nexus Study: 2016 Update (2016 Nexus Study)*. The City adopted the 2016 Nexus Study and its findings through the approval of Ordinance 7393 Section 1. Fees owed to TUMF by the Project proponent will be based on the current fees when the certificate of occupancy is issued.

Measure A (Riverside County Half-Cent Sales Tax)

In November 1988, Riverside County voters approved Measure A, a one-half cent increase in sales tax over a 20-year period to be used for transportation purposes. Measure A included a "return to source" concept, which requires the additional sales tax revenue generated in a specific geographic area to be used to finance projects within that same area. In November 2002, Riverside County voters approved a 30-year extension of Measure "A" (2009-2039). Measure A funds go back to each of three geographic areas within Riverside County - Western Riverside County, Coachella Valley, and Palo Verde Valley - in proportion to the sales taxes they contribute. Each of the three geographic areas has its own transportation program.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project as identified below (GP 2025, pp. CCM-15 - CCM-18; CCM-22; CCM-27 – CCM-28; CCM-35 – CCM-36).

Circulation Mobility Element

Objective CCM-2	Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development.
Policy CCM-2.2	Balance the need for free traffic flow with economic realities and environmental and aesthetic considerations, such that streets are designed to handle normal traffic flows with tolerances to allow for potential short-term delays at peak-flow hours.
Policy CCM-2.3	Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.
Policy CCM-2.4	Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.
Policy CCM-2.6	Consider all alternatives for increasing street capacity before widening is recommended for streets within existing neighborhoods.
Policy CCM-2.7	Limit driveway and local street access on Arterial Streets to maintain a desired quality of traffic flow. Wherever possible, consolidate driveways and implement access controls during redevelopment of adjacent parcels.
Objective CCM-3	Design the Magnolia Avenue/Market Street Corridor as a transit- and pedestrian-oriented Mixed-Use boulevard.
Policy CCM-3.2	Consider the implementation of off-street shared parking with parking signage improvements, consolidation of driveways, installation of raised landscaped medians, bus turnouts, traffic signal enhancements, special pavement treatments at pedestrian crossings and intersections, curb extensions, signalized/enhanced crosswalks, wider sidewalks, and other appropriate measures which enhance traffic flow, transit efficiency and pedestrian movements.
Objective CCM-6	Cooperate in the implementation of regional and inter-jurisdictional transportation plans and improvements to the regional transportation system.

Policy CCM-6.1	Encourage the reduction of vehicle miles, reduce the total number of daily peak hour vehicular trips, increase the vehicle occupancy rate, and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD and County of Riverside TDM Guidelines.
Objective CCM-9	Promote and support an efficient public multi-modal transportation network that connects activity centers in Riverside to each other and to the region.
Policy CCM-9.1	Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors.
Policy CCM-9.6	Enhance and encourage the provision of attractive and appropriate transit amenities, including shaded bus stops, to facilitate use of public transportation, through the development process by incorporating the necessary design features as appropriate.
Objective CCM-10	Provide an extensive and regionally linked public bicycle, pedestrian, and equestrian trails system.
Policy CCM-10.3	Provide properly designed pedestrian facilities for the disabled and senior population to ensure their safety and enhanced mobility as users of streets, roads and highways emphasizing “complete streets” principles.
Policy CCM-10.6	Encourage pedestrian travel through the creation of sidewalks and street crossings.
Policy CCM-10.12	Encourage bicycling as a commute mode to school, work, etc.
Objective CCM-12	Facilitate goods movement as a means of economic expansion, while protecting residents and visitors from the negative effects typically associated with truck operations and rail service.
Policy CCM 12.2	Ensure that new development projects provide adequate truck loading and unloading facilities.
Objective CCM-13	Ensure that adequate on- and off-street parking is provided throughout Riverside.
Policy CCM-13.1	Ensure that new development provides adequate parking.
Policy CCM-13.2	Accommodate joint use of parking facilities as part of an area plan or site plan, based on the peak parking demands of permitted uses in the planning area.
Policy CCM-13.4	Provide for the use of shared parking arrangements in areas where parking shortfalls exist, including in Downtown, for mixed-use projects and along the Market/Magnolia corridor.

City of Riverside General Plan 2025 EIR

There are no applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Transportation.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the GPUI EIR that pertain to Transportation.

Downtown Specific Plan

The City of Riverside Downtown Specific Plan contains goals and policies that are considered applicable and pertain to the proposed Project, as identified below (DSP, pp. 3-6 – 3-7, 3-9 - 3-11):

Land Use

- | | |
|-------------|---|
| Goal LU-1 | To provide land use opportunities for Downtown to serve as the region's cultural, governmental, arts, and entertainment center with unique and interrelated districts offering a wide range of opportunities for residential lifestyles, work environments, shopping, entertainment, learning, culture, and the arts. |
| Policy LU-2 | Encourage pedestrian-oriented specialty retail shops offering quality goods and services in the Raincross District, and encourage balance between individually owned businesses and franchise or corporate entities. |
| Policy LU-8 | Strengthen the interrelationship between the Marketplace and Downtown through attractive physical linkages, transit oriented linkages, and complimentary uses. |

Urban Design

- | | |
|---------------|--|
| Goal UD-1 | Strengthen the identity and character of Downtown using the existing historic and architectural urban character of the community, while allowing for new structures that are architecturally compatible with, and complementary to, the existing architectural and historic fabric. |
| Policy UD-1-1 | Through design review, ensure that new development enhances the character of the Downtown Districts by requiring design qualities and elements that contribute to an active pedestrian environment, where appropriate, and ensuring that architectural elements are compatible and in scale with the existing historic structures in the Downtown. |

Circulation

- | | |
|----------|---|
| Goal C-1 | Improve the circulation system in Downtown by maintaining and improving the grid system, providing for convenient access to, and circulation within, Downtown for all modes of transportation, and enhancing walkability in Downtown. |
|----------|---|

Policy C-1-11 Provide for pedestrian circulation at ground level. Do not provide grade-separated pedestrian facilities (except freeway over crossing).

6.5 – Development Standards

The City of Riverside Downtown Specific Plan does not contain any Development Standards that are considered applicable and pertain to the Transportation.

Design Standards

The City of Riverside Downtown Specific Plan contains Design Standards that are considered applicable and pertain to Transportation, as identified below (DSP, p. 6-16):

Section 6.6.2 – Site Planning

Pedestrian Access

1. Primary access to buildings should be from the street or pedestrian walkways, not parking areas.
2. Walkways should be provided to link parking areas with the street wherever feasible.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Transportation:

Chapter 16.64 – Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact

Fees. The City Council hereby finds and determines that new private development in the City of Riverside increases the amount of traffic utilizing the City street system thereby requiring the installation of additional traffic signals, railroad signals including crossing gates and associated work, and street improvements at specified locations to increase or improve transportation capacity, in order to protect the public health, safety and welfare and that such private new development should pay its fair share of such improvements

This local development impact fee (DIF) is comprised of two fees: First, it is to provide for the imposition of fees on each new nonresidential unit, residential dwelling unit and mobile home space, which fees are to be placed in a specially-designed fund to be utilized for the purchase and installation of traffic signals and railroad signals including crossing gates and other protective devices and all costs associated with railroad crossing protection. Secondly, it is to provide for the imposition of fees on each new residential dwelling unit and mobile home space, which fees are to be placed in a specially-designated fund to be utilized for improvements to streets as designated by the City Council in order to increase or improve the carrying capacity of such streets to solve current and proposed traffic congestion.

Chapter 16.68 – Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact

Fees. The purpose of this chapter is to establish TUMF to fund certain improvements to the Regional System as identified in the Riverside County 2016 Nexus Study. Fees are required to be paid at the time a certificate of occupancy is issued for a Development Project or upon final inspection, whichever comes first. The fees are calculated according to fee schedule set forth in this chapter and the calculation methodology set forth in the Fee Calculation Handbook adopted July 14, 2003, as amended from time to time.

Neighborhood Traffic Management Program

As traffic volumes and congestion have increased on the major regional roadways, drivers looking to reduce their travel times begin to look at alternative routes using the local street system to avoid problem areas. This neighborhood intrusion by “cut-through” traffic has become a growing concern for some residential areas. The City has an active Neighborhood Traffic Management Program to minimize and/or prevent intrusion of regional cut-through traffic into residential neighborhoods through traffic management and traffic calming strategies, and to improve the livability of neighborhoods through controlling the impacts of outside traffic. The strategies include speed control methods, parking restrictions, speed humps, pedestrian safety improvements, and sight obstruction elimination. (GP 2025, p. CCM-22).

5.8.3 Comments Received in Response to the Initial Study/Notice of Preparation

One comment letter was received related to Transportation in response to the Initial Study/Notice of Preparation (IS/NOP). The comment letter was received from the RTA and is included in Appendix A of this Draft EIR.

5.8.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impacts in the following areas and these topics are not addressed in this Draft EIR:

- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and
- Result in inadequate emergency access.

As identified in the IS/NOP prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; and
- Conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b).

5.8.5 Project Design Features

The proposed Project site will demolish the existing Lot 33 which would result in the removal of two existing driveway access points (one along Market Street and one at the intersection of Main Street and Third Street). 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. The Project proposes 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 3.0-7**, Buildings A, C, and E, in *Section 3.0 – Project Description* of this Draft EIR) 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.

The proposed transportation improvements listed below modify existing two-way stop-controlled intersections with right-turn only restrictions:

- Market Street at Eleventh Street Intersection
 - Implement a right-turn-only restriction on Eleventh Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.
- Market Street at Thirteenth Street Intersection
 - Implement a right-turn-only restriction on Thirteenth Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.

5.8.6 Environmental Impacts

Threshold: Would the Project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Public transit, bicycles, and pedestrian facilities

The City's 2025 General Plan - Circulation and Community Mobility Element introduces and implements various strategies and approaches to accommodate, improve, enhance, and maintain multiple modes of travel (vehicular and non-vehicular) throughout the City. Mode choice is influenced by sidewalk connectivity and proximity of buildings, bike accommodations, transit stop density and service characteristics, and availability of interconnected low speed routes. Non-vehicular transportation includes pedestrians (sidewalks), bicycles (on-road lanes or off-road paths), bus transit, and train transit.

The City's 2025 GP Objective CCM-2 promotes and supports modes of transportation that offer an alternative to single-occupancy automobile use and help reduce air pollution and road congestion. Emphasizing non-vehicular transportation is a key element of SB 375 and SCAG's Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). (GP 2025, p. CCM-15).

Although there are no current or proposed trails near the Project site the following are existing roadways adjacent to the Project that are designated as pedestrian-oriented streets per the Downtown Specific Plan Chapter 19.5 – Pedestrians (WEBB-D, p. 53, DSP, p.19-11):

- Market Street from Fifth Street to Eleventh Street;
- Main Street from Fifth Street to Fourteenth Street;
- Orange Street from Third Street to Fourteenth Street; and
- Fifth Street from Market Street to Orange Street.

Along all four Project frontages (Market Street, Third Street, Orange Street and Fifth Street) there is existing adjacent sidewalks that will be retained. While there is no specific development proposed at this time, conceptual plans for the Project show the interior plans for an interior pedestrian plaza to serve as a linkage, gathering, and communal space between the Project buildings. The plaza provides opportunities for pedestrian-focused amenities such as pocket park space, picnic space, public art, and

water features to enhance the employee, resident, and visitor experience. (WEBB-D, p. 53). Thus, future implementing development will be required to provide several internal pedestrian pathways to facilitate movement of pedestrians and access to existing public transit stops. These pathways will be lit to ensure security.

Due to the Project's location, the Project is well positioned to provide additional pedestrian connections and facilities as an extension of the Main Street Pedestrian Mall from Sixth Street to 10th Street. Per the *Traffic Study*, future implementing developments shall provide pedestrian facilities and amenities such as walking space, street lighting, crosswalks, accessible curb ramps, benches, and shade should be provided to connect residents, patrons, and employees of the project to nearby parking, attractions, and businesses. (WEBB-D, p. 53). Thus, as part of the Development Application review process for future implementing development, the City will ensure adequate pedestrian pathways are provided per City requirements. As such the Project would facilitate and would not obstruct City goals and policies to provide efficient and safe pedestrian access and no impacts to pedestrian facilities would occur.

As part of the City's Bikeway Network, Class II buffered bike lane exist along Market Street along the Magnolia/Market Corridor additionally Third Street is designated as a Class II Bike Lane; and is currently striped per the PACT Plan. The PACT Plan designates Fifth Street as Class III Bike Route and Orange Street as a Class IV Cycle Track, these designations do not require striped lanes; thus, these roadways currently do not have any striping or buffers for bike lanes. The Project does not propose any improvements to the existing Project frontage roadways. Since the existing bikeway facilities currently exist and are aligned with the PACT Plan, the Project would not conflict with City goals and policies to provide efficient and safe bicycle access and no impacts to bicycle facilities would occur.

With respect to bicycle and pedestrian safety, the Project is required to comply with all design guidelines and regulations to ensure facilities meet City's current standards. The City has prepared a 2022 *Local Roadway Safety Plan* (LRSP). The goal of the City and their safety partners through the LRSP, is to provide safe, sustainable, and efficient mobility choices for their residents and visitors. Through the development and implementation of the LRSP, the City continues its collaboration with safety partners to identify and discuss safety issues within the community and the LRSP identifies a framework to identify, analyze, and develop traffic safety enhancements on the City's roadway network. (LRSP, p. ES-8). The Project will incorporate all pedestrian improvements in accordance with all City standards.

As mentioned in *Section 5.8.1 – Setting*, the Project is currently served by the RTA. Bus Route 12, Bus Route 29 and Bus Route 204 all travel along Market Street. However, only Bus Route 12 and Bus Route 29, have bus stops along Market Street both northbound and southbound. The nearest bus stops and shelter is located on Market Street along the Project frontage approximately 80-feet south of the Market Street and Third Street intersection. This bus stop serves the northbound bus routes. A southbound bus stop and shelter is located along Market Street approximately 50 feet north of the Market Street and Four Street intersection. The existing bus services would continue to serve the Project site, and the future residents and retail patrons would have convenient access to transit. Furthermore, it should be noted that Route 29 provides connections to both the Riverside-Downtown Metrolink Station and the Pedley Metrolink Station which allows for connections to adjacent communities. The proposed Project would not alter or conflict with existing bus stops and schedules, and impacts related to RTA transit services would not occur.

Vehicular Circulation

The City’s 2025 GP Policy CCM-2.3 requires Arterial Streets to maintain an LOS D or better. This policy also provides that at key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, an LOS E at peak hours is acceptable on a case-by-case basis. Additionally, per the Riverside County CMP, the minimum acceptable LOS for segments and intersections within the CMP network is LOS E. The Project *Traffic Study* evaluated the Project’s effects on traffic operations by using methodology from the Transportation Research Board Highway Capacity Manual (HCM 7th Edition, 2022) to analyze traffic operations via Level of Service (LOS) rankings for the following scenarios:

- Existing Conditions (2024)
- Background Conditions (2028): Existing + Cumulative Projects
- Background plus Project (2028): Existing + Cumulative + Project
- Cumulative Conditions (2045): Horizon Year
- Cumulative plus Project (2045): Horizon Year + Project

The Project proposes the expansion of the Riverside Convention Center, since there is no “standard” trip generation for a special event as trip generation study was conducted in June 2024 aligning with existing scheduled convention center events. Traffic counts were taken on a midweek event and on a weekend event that expected at least 200 attendees each day. Traffic volume counts were conducted at Lot 33 and adjacent public parking lot on Orange Street and Fifth Street. Additionally, arrival observations were conducted at Fifth Street at the convention center entrance to count drop-offs, street parking and pedestrian arrivals. Based on the trip generation study the convention center events produced a total of 829 trips during the week and 421 trips on the weekend. The trip generation study found that the typical weekday daily traffic at the convention center is expected to be more intensive than the typical Saturday. (WEBB-D, p. 10).

Using the data collected from the trip generation study and convention center rentable space a trip generation rate was calculated and used to project anticipated traffic volumes for the convention center expansion. For all land uses proposed by the Project, trip generation rates are used as aggregated by the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) as shown in **Table 5.8-A – Project Trip Generation**, below. (WEBB-D, pp. 10-11). Since the Project proposes a mixed-use land use, the following trip credits were used: internal trip capture and pass-by trips. These trip credits account for people who traveling between the various uses within the Project site and those passing by. Utilizing trip credits, the proposed Project is estimated to generate approximately 10,509 trips daily, with 1,064 trips in the AM peak hour and 915 trips in the PM peak hour. (WEBB-D, p. 11). To be conservative, no Project traffic reductions from public transit or active transportation (bicycling or walking) were considered.

Table 5.8-A – Project Trip Generation

Project Portion	Land Use ¹	Size ²	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Project Trip Generation									
Convention Center ³	N/A	100 KSF	1,658	60	290	350	66	56	122
Hotels	310	376 RM	3,004	97	76	173	98	94	192

Table 5.8-A – Project Trip Generation

Project Portion	Land Use ¹	Size ²	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Condos	220	55 DU	371	5	17	22	18	10	28
Multifamily Housing	221	113 DU	513	10	32	42	27	17	44
Office	710	220 KSF	2,385	294	40	334	54	263	317
Commercial	821	62.0 KSF	5,857	136	83	219	269	291	560
Total Project Trips			13,788	602	538	1,140	532	731	1,263
Trip Credits									
Internal Capture ⁴			-1,379	-38	-38	-76	-79	-79	-158
Pass By ⁵			-1,900	-	-	-	-91	-99	-190
Net New Project Trips			10,509	564	500	1,064	362	553	915

Source: WEBB-D, Table 9

Notes:

1. Land Use Rates per ITE Generation Manual, 11th Edition (2021)
2. DU = dwelling unit, RM = rooms, KSF = 1,000 square feet
3. Trip generation for Convention Center expansion based on trip generation study of existing rentable space and traffic volumes.
4. Internal trip capture per NCHRP 684 estimator. 10% lowest peak-hour capture rate applied to daily traffic volumes.
5. Pass-by trip credit applied to commercial trips only. Pass-by rates per ITE Trip Generation Handbook, 3rd Edition. Daily trip credit estimated as 10 times PM pass-by trips.

In 2013, the State of California passed Senate Bill (SB) 743, which mandates that lead agencies can no longer use automobile delay, commonly known as Level of Service (LOS), as a method for conducting transportation analysis under CEQA. The State later issued guidelines for the use of a broader measure called Vehicle Miles Traveled (VMT), which measures the total amount of driving over a given distance and is intended to better align transportation analysis with the State's Greenhouse Gas reduction goals. These changes became mandatory on July 1, 2020, and lead agencies are now required to analyze transportation impacts under VMT, not LOS. Therefore, the LOS data and the relationship of the Project's effect on LOS with General Plan goals concerning LOS are reported for informational purposes and utilized by the City in considering General Plan consistency but are not used to gauge environmental impacts in this Draft EIR.

As reflected in **Table 5.8-B – Intersection LOS - Existing Conditions (2024)**, below, currently two intersections operated below the minimum acceptable LOS during AM peak hour only, Intersection 17 - Market Street at 11th Street and Intersection 19 – Market Street at 13th Street.

Table 5.8-B – Intersection LOS – Existing Conditions (2024)

ID/Intersection	Traffic Control ^a	AM Peak Hour		PM Peak Hour	
		Delay	LOS ^b	Delay	LOS ^b
1. Main St @ SR-60 WB / Oakley Ave	Signal	20.4	C	22.3	C
2. Main St @ SR-60 EB	Signal	24.5	C	21.3	C
3. Main St @ Spruce St	Signal	11	B	13.8	B
4. Main St @ First St	Signal	10.6	B	13.5	B
5. Main St @ Second St	OWSC	9.7	A	13.7	B

Table 5.8-B – Intersection LOS – Existing Conditions (2024)

ID/Intersection	Traffic Control ^a	AM Peak Hour		PM Peak Hour	
		Delay	LOS ^b	Delay	LOS ^b
6. Main St @ Third St	Signal	22.4	C	30.1	C
7. Market St @ First St	Signal	8.3	A	11.2	B
8. Market St @ Second St	OWSC	15.5	C	22	C
9. Market St @ Third St	Signal	16	B	21.4	C
10. Market St @ Fourth St	TWSC	20.7	C	21.7	C
11. Market St @ Fifth St	Signal	9.2	A	9.7	A
12. Market St @ Sixth St	TWSC	11.4	B	12.2	B
13. Market St @ Mission Inn Ave	Signal	22.5	C	28	C
14. Market St @ University Ave	Signal	23.2	C	28.5	C
15. Market St @ Ninth St	Signal	3.1	A	6.5	A
16. Market St @ Tenth St	Signal	7.2	A	8.6	A
17. Market St @ 11th St	TWSC	39.5	E	34.6	D
18. Market St @ 12th St	Signal	6.1	A	9.5	A
19. Market St @ 13th St	TWSC	33.2	D	43	E
20. Market St @ 14th St	Signal	30.2	C	30.7	C
21. Brockton Ave @ Mission Inn Ave	Signal	12.7	B	15.7	B
22. Brockton Ave @ University Ave	Signal	21.5	C	22.3	C
23. Orange St @ Third St	Signal	7.6	A	9.6	A
24. Orange St @ Fourth St	OWSC	9.2	A	9.7	A
25. Orange St @ Fifth St	AWSC	7.9	A	8.3	A
26. Orange St @ Sixth St	AWSC	7.7	A	8.3	A
27. Orange St @ Mission Inn Ave	Signal	7.7	A	10	A
28. Orange St @ University Ave	Signal	10.1	B	9	A
29. Orange St @ Tenth St	Signal	10.3	B	9.2	A
30. Lime St @ Third St	Signal	10.7	B	13.3	B
31. Lime St @ Fourth St	TWSC	10.9	B	11.4	B
32. Lime St @ Fifth St	TWSC	13.8	B	14.3	B
33. Lime St @ Mission Inn Ave	Signal	24.7	C	23.7	C
34. Lime St @ University Ave	Signal	28.2	C	28.3	C
35. Lime St @ Tenth St / SR-91 WB	Signal	16.6	B	21.3	C
36. Mission Inn Ave @ SR-91 WB	Signal	13.9	B	11.5	B
37. Mission Inn Ave @ SR-91 EB / Mulberry St	Signal	17.8	B	26.3	C
38. University Ave @ SR-91 EB / Mulberry St	Signal	16.6	B	17.9	B

Source: WEBB-D, Table 10

Notes:

- (a) OWSC = one-way stop control; TWSC = two-way stop control; AWSC = all-way stop control
- (b) Level of service (LOS) rankings based on average control delay (sec/veh) per Highway Control Manual

The *Traffic Study* determined that under the Background Conditions (2028): Existing plus Cumulative Projects² the same intersections (Intersection 17 and Intersection 19) would operate below the minimum acceptable LOS. However, in contrast to the Existing Conditions scenario under the Background Conditions scenario these intersections would operate below the minimum acceptable LOS during both AM and PM peak hours.

As shown in **Table 5.8-C – Intersection LOS – Background Conditions Plus Project (2028)**, below, implementation of the Project would not change the two intersections that would be operating at below minimum acceptable LOS (Intersection 17 and Intersection 19) under existing conditions and existing plus cumulative project scenarios.

As shown in **Table 5.8-D – Intersection LOS – Cumulative Conditions Plus Project (2045)**, below, implementation of the Project would not change the two intersections that would be operating at below minimum acceptable LOS (Intersection 17 and Intersection 19) under future horizon buildout conditions.

Table 5.8-C – Intersection LOS – Background Conditions Plus Project (2028)

ID/Intersection	Traffic Control ^a	AM Peak Hour		PM Peak Hour	
		Delay	LOS ^b	Delay	LOS ^b
1. Main St @ SR-60 WB / Oakley Ave	Signal	24.3	C	28.7	C
2. Main St @ SR-60 EB	Signal	33.1	C	20.4	C
3. Main St @ Spruce St	Signal	9.5	A	12.8	B
4. Main St @ First St	Signal	14.6	B	29.9	C
5. Main St @ Second St	OWSC	16.1	C	28.5	D
6. Main St @ Third St	Signal	27.0	C	36.1	D
7. Market St @ First St	Signal	14.7	B	13.8	B
8. Market St @ Second St	OWSC	19.1	C	26.9	D
9. Market St @ Third St	Signal	17.1	B	30.6	C
10. Market St @ Fourth St	TWSC	34.9	D	35.9	E
11. Market St @ Fifth St	Signal	12.4	B	12.8	B
12. Market St @ Sixth St	TWSC	13.2	B	14.2	B
13. Market St @ Mission Inn Ave	Signal	26.1	C	34.5	C
14. Market St @ University Ave	Signal	24.6	C	29.7	C
15. Market St @ Ninth St	Signal	4.8	A	7.1	A
16. Market St @ Tenth St	Signal	7.5	A	8.9	A
17. Market St @ 11th St	TWSC	106.7	F	78.1	F
18. Market St @ 12th St	Signal	6.5	A	10	A
19. Market St @ 13th St	TWSC	76.8	F	108.6	F
20. Market St @ 14th St	Signal	32.6	C	31.8	C
21. Brockton Ave @ Mission Inn Ave	Signal	12.2	B	14.9	B
22. Brockton Ave @ University Ave	Signal	21.0	C	22.6	C

² Table 11 of the *Traffic Study* provides a list of upcoming Projects within the Project vicinity. It should be noted that the South Main Complete Street Project, a separate City project, converting Main Street from four lanes to two lanes between Third Street and SR-60 was taken into account.

Table 5.8-C – Intersection LOS – Background Conditions Plus Project (2028)

ID/Intersection	Traffic Control ^a	AM Peak Hour		PM Peak Hour	
		Delay	LOS ^b	Delay	LOS ^b
23. Orange St @ Third St	Signal	15.4	B	15.5	B
24. Orange St @ Fourth St	OWSC	12.2	B	13.6	B
25. Orange St @ Fifth St	AWSC	15	B	25.7	D
26. Orange St @ Sixth St	AWSC	15.6	C	17.6	C
27. Orange St @ Mission Inn Ave	Signal	24.0	C	21.8	C
28. Orange St @ University Ave	Signal	12.4	B	12.1	B
29. Orange St @ Tenth St	Signal	12.7	B	12.2	B
30. Lime St @ Third St	Signal	10.5	B	13.6	B
31. Lime St @ Fourth St	TWSC	11.0	B	11.6	B
32. Lime St @ Fifth St	TWSC	18	C	17.7	C
33. Lime St @ Mission Inn Ave	Signal	47.5	D	25.7	C
34. Lime St @ University Ave	Signal	27.8	C	31.3	C
35. Lime St @ Tenth St / SR-91 WB	Signal	19.3	B	25.6	C
36. Mission Inn Ave @ SR-91 WB	Signal	14.9	B	11.5	B
37. Mission Inn Ave @ SR-91 EB / Mulberry St	Signal	20.5	C	43.5	D
38. University Ave @ SR-91 EB / Mulberry St	Signal	16.9	B	18.1	B

Source: WEBB-D, Table 13

Notes:

- (a) OWSC = one-way stop control; TWSC = two-way stop control; AWSC = all-way stop control
- (b) Level of service (LOS) rankings based on average control delay (sec/veh) per Highway Control Manual

Table 5.8-D – Intersection LOS – Cumulative Conditions Plus Project (2045)

ID/Intersection	Traffic Control ^a	AM Peak Hour		PM Peak Hour	
		Delay	LOS ^b	Delay	LOS ^b
1. Main St @ SR-60 WB / Oakley Ave	Signal	31.6	C	36.7	D
2. Main St @ SR-60 EB	Signal	33.8	C	22.7	C
3. Main St @ Spruce St	Signal	10.2	B	14.3	B
4. Main St @ First St	Signal	9.2	A	13.0	B
5. Main St @ Second St	OWSC	13.5	B	23.8	C
6. Main St @ Third St	Signal	24.6	C	38.5	D
7. Market St @ First St	Signal	8.9	A	13.2	B
8. Market St @ Second St	OWSC	17.8	C	27.7	D
9. Market St @ Third St	Signal	18.2	B	39.6	D
10. Market St @ Fourth St	TWSC	33.2	D	34.4	D
11. Market St @ Fifth St	Signal	13.1	B	13.3	B
12. Market St @ Sixth St	TWSC	12.8	B	13.9	B
13. Market St @ Mission Inn Ave	Signal	26.7	C	36.6	D

Table 5.8-D – Intersection LOS – Cumulative Conditions Plus Project (2045)

ID/Intersection	Traffic Control ^a	AM Peak Hour		PM Peak Hour	
		Delay	LOS ^b	Delay	LOS ^b
14. Market St @ University Ave	Signal	25.7	C	32.1	C
15. Market St @ Ninth St	Signal	3.4	A	7.1	A
16. Market St @ Tenth St	Signal	8.0	A	9.5	A
17. Market St @ 11th St	TWSC	75.6	F	57	F
18. Market St @ 12th St	Signal	6.9	A	11	B
19. Market St @ 13th St	TWSC	55.1	F	79.1	F
20. Market St @ 14th St	Signal	34.2	C	33.5	C
21. Brockton Ave @ Mission Inn Ave	Signal	13.0	B	16.3	B
22. Brockton Ave @ University Ave	Signal	22.5	C	25.2	C
23. Orange St @ Third St	Signal	9.5	A	12.4	B
24. Orange St @ Fourth St	OWSC	10.4	B	10.9	B
25. Orange St @ Fifth St	AWSC	12.6	B	15.0	B
26. Orange St @ Sixth St	AWSC	10.8	B	11.5	B
27. Orange St @ Mission Inn Ave	Signal	15.6	B	16.7	B
28. Orange St @ University Ave	Signal	12.5	B	11.8	B
29. Orange St @ Tenth St	Signal	12.7	B	12	B
30. Lime St @ Third St	Signal	11.1	B	15.3	B
31. Lime St @ Fourth St	TWSC	11.3	B	12.2	B
32. Lime St @ Fifth St	TWSC	20.4	C	20.1	C
33. Lime St @ Mission Inn Ave	Signal	32.4	C	25.9	C
34. Lime St @ University Ave	Signal	31.5	C	34.8	C
35. Lime St @ Tenth St / SR-91 WB	Signal	19.1	B	28.9	C
36. Mission Inn Ave @ SR-91 WB	Signal	15.8	B	11.9	B
37. Mission Inn Ave @ SR-91 EB / Mulberry St	Signal	21.3	C	41.3	D
38. University Ave @ SR-91 EB / Mulberry St	Signal	17.1	B	18.7	B

Source: WEBB-D, Table 17

Notes:

- (a) OWSC = one-way stop control; TWSC = two-way stop control; AWSC = all-way stop control
- (b) Level of service (LOS) rankings based on average control delay (sec/veh) per Highway Control Manual

In order for Intersection 17 and Intersection 19 to operate above the minimum acceptable LOS standards future implementing development would be required to implement the following Project Design Features (PDF) at the existing two-way controlled intersections:

- Market Street at Eleventh Street Intersection
 - Implement a right-turn-only restriction on Eleventh Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.
- Market Street at Thirteenth Street Intersection

- Implement a right-turn-only restriction on Thirteenth Street (eastbound and westbound) during peak AM and PM hours, at a minimum, with clearly indicated pavement markings and signage.

With implementation of these Project Design Features, these intersections are expected to operate above the minimum LOS standard, as shown in **Table 5.8-E – Summary of Intersection LOS With Improvements**, below.

Table 5.8-E – Summary of Intersection LOS With Improvements

Intersection	LOS With Improvements			
	Background plus Project		Cumulative plus Project	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Market St @ 11th St	B	B	B	B
Market St @ 13th St	B	B	B	B

Source: WEBB-D, Table 14, Table 18.

Additionally, sight distance at each access point will be required to be reviewed with respect to standard City of Riverside sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

Additionally, it should be noted that Market Street, Mission Inn Avenue, University Avenue, and portions of Main Street and 14th Street are included in the TUMF network, all TUMF projects within the study area are completed and no TUMF funding is currently earmarked for future improvements in the study area. (WEBB-D, p. 52)

The *Traffic Study* also included an evaluation of LOS on the following roadway segments:

1. Main Street from SR-60 to Third Street
2. Market Street from First Street to Third Street
3. Market Street from Third Street to Fifth Street
4. Market Street from Fifth Street to Sixth Street
5. Market Street from Sixth Street to Mission Inn Avenue

Under existing conditions all five roadway segments were operating at or above the minimum acceptable LOS and will continue to operate above the minimum acceptable LOS under all scenarios analyzed as shown in **Table 5.8-F – Summary of Roadway Segment LOS**. (WEBB-D, pp. 50 – 52).

Table 5.8-F – Summary of Roadway Segment LOS

Roadway Segments	LOS				
	Existing Conditions	Background	Background plus Project	Cumulative	Cumulative plus Project
Main Street ¹					
1. SR-60 – Third Street	A	A	A	A	A

Table 5.8-F – Summary of Roadway Segment LOS

Roadway Segments	LOS				
	Existing Conditions	Background	Background plus Project	Cumulative	Cumulative plus Project
Market Street					
2. First Street – Third Street	C	C	C	D	D
3. Third Street – Fifth Street	D	D	E	E	E
4. Fifth Street – Sixth Street	D	D	E	E	E
5. Sixth Street – Mission Inn Avenue	C	D	E	D	E

Source: WEBB-D, Table 20 - 22

Notes:

1. Per discussion with City staff, the South Main Complete Streets Project will convert Main Street between SR-60 and Third Street from four to two travel lanes.

With incorporation of the PDFs, and payment of City Developer Impact Fees (DIF) to offset traffic related deficiencies, all intersections are expected to operate at a satisfactory LOS. As such, the Project complies with General Plan policies as they relate to LOS. No additional improvements are required.

Program Plans

Congestion Management Program (CMP) and the Long-Range Transportation Study (LRTS)

The CMP is a component of the RCTC's Long Range Transportation Study (LRTS), the first countywide long range transportation study that identifies and evaluates highway, major roadway, and transit projects throughout the Riverside County region. The LRTS identified four roadway improvement projects within the City of Riverside to reduce traffic congestion:

- the Main Street and 60 Interchange project;
- the Tyler Street and 91 Interchange project;
- the Adams Street and 91 Interchange project; and
- the Arlington Avenue from Magnolia Avenue to Alessandro Boulevard project. (LRTS, Appendix A)

The proposed Project would not affect the ability of these improvement projects in the City to be constructed. The Project would ultimately benefit from these roadway improvement projects identified in the CMP. Hence, the Project would not conflict with the RCTC's CMP.

Connect SoCal 2024

As discussed in *Section 6.0 – Consistency with Regional Plans*, the Plan is consistent with all applicable goals of *Connect SoCal 2024*. Hence, the Project would not conflict with this program plan.

Thus, because the proposed Project's vehicular and non-vehicular network would be designed and constructed in compliance with all applicable regulations, would implement PDFs consistent with City requirements, and is consistent with GP policies and all applicable program plans, the Project would not

conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be **less than significant**.

Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The VMT memo utilized the five screening criteria outlined in the City's Traffic Impact Analysis Guidelines for VMT to determine the Projects impact.

1. Based on WRCOG tool, the Project is located within traffic analysis zone (TAZ) 2075 which is located within a designated Transit Priority Area (TPA). Additionally, the Project was evaluated under the four sub-requirements and met the criteria because: 1) the Project exceeds the minimum Floor Area Ratio (FAR) of 0.75; 2) the City will ensure, as part of the Development Application review, that City parking requirements are met and that the site will not be overparked; 3) the Project is consistent with the existing General Plan land use designation thus the Project is consistent with Connect SoCal 2024 SCS (see also *Section 6.0* of this Draft EIR); and 4) the Project will not replace affordable housing units. Thus, this criterion is met.
2. Based on WRCOG tool, the Project is located the Project is located within TAZ 2075 which is not located within a low VMT generating area. Therefore, this criterion is not met.
3. The Project proposes local serving retail uses based on the proposed square footage the retail component of the Project would meet this criterion. However, the Project proposes hotel uses that are not local-serving hotels, residential uses that are not affordable housing, and its residential, office uses and Riverside Convention Center expansion each generates more than 110 daily vehicles trips. Therefore, the Project overall would not meet this criterion for project-type screening.
4. Per the City's guidelines, the Project is analyzed separately for the various mixed land uses under Criterion 3.
5. The Project is not proposing to replace existing VMT generating land uses because the existing Riverside Convention Center is not being demolished. Additionally, as mentioned under Criterion 1, the City will ensure adequate parking is provided during the Development Application review process. Therefore, this criterion is met.

In accordance with the City of Riverside Guidelines screening criteria, the proposed Project is presumed to have a less than significant transportation impact and is screened out from further VMT analysis based on the Project being within a TPA. (WEBB-C, pp. 4-9).

Thus, because the Project is within a TPA, it is consistent with *CEQA Guidelines* Section 15064.3, subdivision (b). Therefore, impacts would be **less than significant**.

5.8.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to since less than significant impacts to transportation are anticipated from implementation of the Project. Therefore, no mitigation measures are required.

5.8.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

The Project does not result in any significant impact to transportation, and no mitigation is required.

5.9 Tribal Cultural Resources

The focus of this section is to analyze potential impacts related to tribal cultural resources. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics*.

Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. By statute, “tribal cultural resources,” are generally described as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are further defined in PRC Section 21074(a)(1)(A)–(B). Tribal cultural resources are generally described as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are further defined in PRC Section 21074(a)(1)(A)–(B).

The analysis for cultural resources in this section is based on the *Cultural Resources Technical Report for Riverside Alive Project, Riverside, California*, prepared by South Environmental (South) dated July 2024 (SE) and is included as Appendix C of this Draft EIR.

5.9.1 Setting

The Project is located in a fully developed area surrounded by residential and commercial businesses within the downtown area of the City of Riverside, California.

Ethnographic Setting

The Project site is located within the ancestral territory of Cahuilla, Gabrielino/Tongva and Luiseño tribes.

Cahuilla

The Project site lies at the far western edge of the ethnographic boundaries of the Cahuilla tribes. The name “Cahuilla” is possibly derived from a native word meaning a “master, boss”. ‘Ivi’lyu’atam is the traditional term for the linguistically and culturally defined Cahuilla cultural nationality, and “refers to persons speaking the Cahuilla language and recognizing a commonly shared cultural heritage”. The Cahuilla, like neighboring groups to the west (Juaneño and Luiseño) and south (Cupeño), spoke dialects that are part of the Cupan group of the Takic branch of the Uto-Aztecan language. It is thought that the Cahuilla migrated to southern California about 2,000 to 3,000 years ago, most likely from southern Sierra Nevada ranges of east-central California with other related socio-linguistic groups (Takic speakers). The Cahuilla settled in a territory that extended west to east from the present-day City of Riverside to the central portion of the Salton Sea in the Colorado Desert, and south to north from the San Jacinto Valley to the San Bernardino Mountains. While 60% of Cahuilla territory was located in the Lower Sonoran Desert environment, 75 percent of their diet from plant resources was acquired in the Upper Sonoran and Transition environmental zones.

Cahuilla socio-political organization included three primary levels. The highest level was the cultural nationality, encompassing everyone speaking a common language. Next were two patrimoieties called the Wildcats (tuktum) and the Coyotes (‘istam); every clan of the Cahuilla belonged to one or the other. The third basic level of socio-political organization was the many political-ritual-corporate units called sibs, or patrilineal clans. Anthropologists have designated groups of Cahuilla clans by their geographical location into Pass, Desert, and Mountain, which though implying dialectical and ceremonial differences,

results from proximity rather than actual differences in social connections. In reality, a continuum of minor differences existed between the clans. Lineages within a clan cooperated in many ways, including defense, communal subsistence activities, and religious ceremonies. While most lineages owned their own village site and particular resource area, much of the territory was open to all Cahuilla people.

Cahuilla villages were usually located in canyons or on alluvial fans near accessible water such as springs or where large wells could be dug. Each family and lineage had houses (kish) and granaries for the storage of food, and ramadas for work and cooking. Sweat houses and song houses (for non-religious music) were typically present within the villages, and each community constructed a separate house for the lineage or clan leader. Major religious ceremonies of the clan were held in a separate ceremonial house. Houses and ancillary structures were often spaced apart, and villages typically spread over a mile or two.

The Cahuilla employed a wide variety of tools and implements to gather and collect food resources. Hunting was achieved using bow and arrow, traps, nets, slings, and blinds for land mammals and birds, and nets for fish when Lake Cahuilla was filled. Throwing sticks were used to procure individual rabbits and hares, whereas clubs and large nets were used during communal rabbit drives. Food processing was achieved using a variety of tools: portable and bedrock mortars, basket hopper mortars, pestles, manos and metates, bedrock grinding slicks, hammerstones and anvils, woven strainers and winnowers, leaching baskets and bowls, woven parching trays, knives, bone saws, and wooden drying racks. Food was consumed from woven, carved wood, and pottery vessels. Ground meal and unprocessed hard seeds were stored in large, finely woven baskets, whereas unprocessed mesquite beans were stored in large granaries woven from willow branches and placed on raised platforms to protect them from vermin.

Ceramic vessels were produced by the Cahuilla and obtained via trade with Yuman-speaking groups across the Colorado River and to the south. Pottery was initially introduced to the Cahuilla during the Late Prehistoric period, and the art of ceramic production was later adopted by the Cahuilla, who used the paddle and anvil technique. Typical culinary wares included jars, cooking vessels, and ladles. Ceramic pipes were also commonly manufactured. Ceramic ollas (large, round pots with small necks) were used for storing seeds, and sealed ollas with foodstuffs were sometimes cached in caves and rock shelters for consumption during hunting and gathering forays. (SE, pp. 27-29).

Gabrielino (Gabrieleño)/Tongva

The Project area is in the far eastern edge of Gabrielino/Tongva territory, who arrived in the Los Angeles Basin around 500 B.C. Gabrielino/Tongva lands encompass the greater Los Angeles Basin and three Channel Islands: San Clemente, San Nicolas, and Santa Catalina. Their mainland territory is bound on the west by the Chumash at Topanga Creek, the Tatavium to the north, the Serrano at the San Gabriel Mountains in the east, the Cahuilla to the east, and the Juaneño on the south at Aliso Creek.

Archaeological, linguistic, and genetic evidence documents interaction between the Gabrielino and their neighbors in the form of intermarriage and trade. The term “Gabrielino” denotes those people who were administered by the Spanish at Mission San Gabriel, which included people from the traditional Gabrielino territory as well as other nearby groups. Many modern Gabrielino identify themselves as descendants of the indigenous people who lived within the Los Angeles Basin and refer to themselves as Tongva. Though the names “Tongva” or “Gabrieleño” are the most common names used by Native American groups today, other groups identify themselves differently, such as the Gabrielino Band of Mission Indians - Kizh Nation. The term “Tongva” is used in the remainder of this section to refer to the

contact period indigenous inhabitants of the Los Angeles Basin and southern Channel Islands and their descendants.

The Tongva language belongs to the Takic branch of the Uto-Aztecan language family, which can be traced to the Great Basin region. This language family includes dialects spoken by the nearby Juaneño and Luiseño but is considerably different from those of the Chumash people living to the north and the Diegueño (including Ipai, Tipai, and Kumeyaay) people living to the south of the Tongva, Juaneño, and Luiseño. Tongva society was organized along patrilineal non-localized clans, a common Takic pattern. Each clan had a ceremonial leader and contained several lineages.

The Tongva established large permanent villages and smaller satellite camps in locations from the San Gabriel Mountains to the southern Channel Islands. Recent ethnohistoric work suggests a total tribal population of nearly 10,000, which is about twice that of earlier estimates of around 5,000 people. As the population expanded, the larger permanent villages established satellite communities that stayed connected via economic, religious, and social ties. Structures within the village were typically large, circular, domed structures made of willow poles thatched with tule, fern, or carrizo. Other structures found in Gabrielino villages included sweathouses, menstrual huts, and a ceremonial enclosure. (SE, p. 29-30).

Luiseño

The Luiseño are a Takic-speaking, Southern California Native American social group. The Luiseño language is derived from the Cupan segment of the Takic language branch, a part of the Uto-Aztecan linguistic family.

Luiseño ancestral territory is situated in the northern half of San Diego County and the western edge of Riverside County. Their lands encompassed the southern Santa Margarita Mountains and the Palomar Mountains, and the foothills to the Pacific Ocean, extending eastward into the San Jacinto Valley and the western foothills of the San Jacinto Mountains. The Luiseño shared boundaries with the Gabrielino/Tongva and Serrano to the west and northwest, the Cahuilla from the deserts to the east, the Cupeño to the southeast, and the Kumeyaay to the south (Ipai-Tipai).

The Luiseño occupied permanent villages and associated seasonal camps. Village population ranged from 50–400 with social structure based on lineages and clans. A single lineage was generally represented in smaller villages, while multiple lineages and a dominant clan presided in larger villages. Each clan/village owned a resource territory and was politically independent, yet maintained ties to others through economic, religious, and social networks in the immediate region. Place names were given to each territory, often associated with local animals, plants, physical landmarks, or cosmological elements that were known to be linked with a specific location.

Luiseño families resided in dome-shaped dwellings made of willow poles covered with interlaced tule reeds. The clan chief (nó t) residence was generally larger in order to accommodate his large family, ceremonial regalia, and ceremonial food processing. Other village structures included a centrally located ceremonial enclosure (wámkiš) and a round semi-subterranean sweat lodge. The ceremonial enclosure and the chief's home were generally located in the center of the village. The nó t was responsible for combining and controlling religious, economic, and warfare powers. The center of the Luiseño religious beliefs and rituals is Chinigchinich, the last of a series of heroic mythological figures. Complex rituals included puberty initiation rites and mourning ceremonies. Like other indigenous California groups, the primary food staple of the Luiseño was the acorn, supplemented by other plant resources, fish, shellfish,

waterfowl, and marine and terrestrial mammals. Villages were situated near reliable sources of water, needed for the daily leaching of milled acorn flour. Acorn mush (wiiwish) was prepared in various ways and was eaten almost daily, along with a variety of fruits, vegetables, and seeds including pine nuts and the seeds from grass, manzanita, sunflower, sage, chia, lemonade berry, wild rose, holly-leaf cherry, prickly pear, lamb's-quarter. Greens included thistle, white sage, and clover, among many others. Meat and seafood were also part of the daily diet, including deer, duck, goose, ground squirrels, quail, rabbit, bird, and woodrat. Fish and marine resources provided some portion of many tribal communities, though most notably those nearest the coast and included abalone, clams, mussels, lobster, and trout. Shellfish would have been procured and transported inland from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. (SE, pp. 30-31).

5.9.2 Related Regulations

Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. 300101 et seq.) is legislation intended to preserve historical and archaeological sites in the United States of America. The act created the National Register of Historic Places, the list of National Historic Landmarks, and the State Historic Preservation Offices (SHPO). Among other things, the act requires federal agencies to evaluate the impact of all federally funded or permitted projects on historic properties (buildings, archaeological sites, etc.) through a process known as "Section 106 Review." (NPS-A).

National Register of Historic Places

Developed in 1981 pursuant to Title 36 CFR Section 60, the National Register of Historic Places (NRHP) provides an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment. It should be noted that the listing of a private property on the NRHP does not prohibit any actions which may otherwise be taken by the property owner with respect to the property. The listing of sites in California to the National Register is initiated through an application submitted to the State Office of Historical Preservation. Applications deemed suitable for potential consideration are handled by the State Historic Preservation Officer. All NRHP listings for sites in California are also automatically added to the California Register of Historical Resources by the State of California. The listing of a site on the NRHP does not generally result in any specific physical protection. Among other things, however, it does create an additional level of CEQA (and NEPA, the National Environmental Protection Act) review to be satisfied prior to the approval of any discretionary action occurring that might adversely affect the resource. (NPS-B).

American Indian Religious Freedom Act

This American Indian Religious Freedom Act became law in 1978 (Public Law 95-341, 42 USC 1996) in order to protect and preserve for American Indians their inherent right of freedom to believe, express and exercise their traditional religions. These religious rights extend to, but are not limited to, access to sites, use and possession of sacred objects and the freedom to worship through ceremonials and traditional rites. Under this regulation, federal agencies and departments are charged with evaluating their policies and procedures in consultation with native traditional religious leaders in order to eliminate interference with the free exercise of native religion. Agencies must determine and make appropriate changes necessary to protect and preserve Native American religious cultural rights and practices, and to accommodate access to and use of religious sites "to the extent that the use is practicable and not

inconsistent with an agency's essential functions." The intent is to protect Native Americans' First Amendment right to "free exercise" of religion. (AIRFA).

Native American Graves Protection and Repatriation Act

Enacted in 1990 under Title 25 U.S. Section 3001, the Native American Graves Protection and Repatriation Act (NAGPRA) describes the rights of Native American lineal descendants, Indian Tribes, and Native Hawaiian organizations with respect to treatment, repatriation, and disposition of Native American cultural items for which they can show a relationship of lineal descent or cultural affiliation. The statute also requires federal agencies and museums receiving federal funds to inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. In an attempt to recognize the religious and cultural significance of such sites and to protect their sacred integrity, it also provides for greater protection of Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on federal and tribal lands. Federal curation regulations are also provided in 36 Code of Federal Regulations 79, which apply to collections that are excavated or removed under the authority of the Antiquities Act (16 United States Code [USC] 431-433), the Reservoir Salvage Act (16 USC 469-469c), Section 110 of the NHPA (16 USC 470h-2), or the Archaeological Resources Protection Act (16 USC 470aa-mm). Such collections generally include those that are the result of a prehistoric or historic resources survey, excavation or other study conducted in connection with a federal action, assistance, license, or permit. (NPS-C).

State Regulations

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires the lead agency to determine whether the proposed development project will have a significant effect on the environment. Sections 21083.2 and 21084.1 of the State *CEQA Guidelines* deal with the definitions of unique and non-unique archaeological resources and historical resources, respectively. Section 21083.2 directs the lead agency to determine whether the project may have a significant effect on unique archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. Section 21084.1 directs the lead agency to determine whether the project may have a significant effect on historical resources, irrespective of the fact that these historical resources may not be listed or determined to be eligible for listing in the California Register of Historical Resources (CRHR), a local register of historical resources, or they are not deemed significant pursuant to criteria set forth in California Public Resource Code (PRC) Section 5024.1(g). A cultural resource is considered "historically significant" under Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852, if it meets any one of the following criteria for:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A tribal cultural resource may be considered significant if it is included in a local or state register of historical resources or determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1; is a geographically defined cultural landscape that meets one or more of these

criteria; or is a historical resource described in PRC Section 21084.1, a unique archaeological resource described in PRC Section 21083.2, or a non-unique archaeological resource if it conforms with the above criteria. (CRHR).

State Historic Preservation Office

The State Historic Preservation Office (SHPO) is a state governmental function created per the NHPA, which called for the creation of a state agency to implement provisions of the law, including the preparation of a comprehensive historic preservation plan and a statewide survey of historical resources (SHPO-A). SHPO administers the National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks, and the California Points of Historical Interest programs. The responsibilities of the SHPO include identifying, evaluating, and registering historic properties; ensuring compliance with federal and state regulatory obligations; encouraging the adoption of economic incentives programs designed to benefit property owners; encouraging economic revitalization by promoting a historic preservation ethic through preservation education and public awareness and, most significantly, by demonstrating leadership and stewardship for historic preservation in California. SHPO maintains the California Historical Resources Information System (CHRIS), which includes the statewide Historical Resources Inventory database. (SHPO-B).

California Register of Historical Resources (Public Resource Code Section 5024.10 et seq.)

State law protects cultural resources by requiring evaluations of the significance of historical resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the State *CEQA Guidelines*. These criteria are similar to those used in federal law. The CRHR is maintained by the state Office of Historic Preservation. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are state historical landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

CRHR Criteria

For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the CRHR (California Public Resources Code [PRC] Section 21084.1). A resource is eligible for listing in the CRHR if it meets any of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Is associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

The California Code of Regulations (CCR) further provides that cultural resources of local significance are CRHR-eligible (Title 14 CCR, Section 4852).

Native American Heritage Commission

The Native American Heritage Commission (NAHC), created in statute in 1976, is a nine-member body, appointed by the Governor, to identify and catalog cultural resources (i.e., places of special religious or social significance to Native Americans, and known graves and cemeteries of Native Americans on

private lands) in California. The NAHC is also charged with ensuring California Native American tribes' accessibility to ancient Native American cultural resources on public lands (i.e. Sacred Lands File), overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the NAGPRA. (NAHC).

Human Remains

According to Section 15064.5 of the State *CEQA Guidelines*, all human remains are assigned special importance and specific procedures are to be used when Native American remains are discovered. These procedures are discussed within Public Resources Code Section 5097.98 (PRC 5097.98). PRC 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains.

California Health & Safety Code (Sections 7050.5, 7051, and 7054)

Sections 7050.5, 7051, and 7054 of the California Health & Safety Code collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), as well as the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, treatment of the remains prior to, during and after evaluation, and reburial procedures. (HSC 7050.5, HSC 7051, and HSC 7054).

Assembly Bill 52

Assembly Bill 52 (AB 52), became effective on July 1, 2015, adding a new requirement to CEQA regarding tribal cultural resources. Public Resource Code (PRC) Section 21084.2 establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. This consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of "tribal cultural resources." In brief, in order to be considered a tribal cultural resource, or TCR, a resource must be either 1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe. Elder testimony, oral, and written accounts are all considered to be examples of substantial evidence for determining the significance of a tribal cultural resource.

Regional Regulations

There are no applicable regional regulations.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project as identified below (GP 2025, pp. HP-25 - HP-27, HP-28):

Historic Preservation Element

Objective HP-1 To use historic preservation principles as an equal component in the planning and development process.

Policy HP-1.1 The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.

Policy HP-1.3 The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Objective HP-2 To continue an active program to identify, interpret and designate the City's cultural resources.

Policy HP-2.1 The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

Policy HP-2.3 The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Objective HP-3 To promote the City's cultural resources as a means to enhance the City's identity as an important center of Southern California history.

Objective HP-4 To fully integrate the consideration of cultural resources as a major aspect of the City's planning, permitting and development activities.

Policy HP-4.3 The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

City of Riverside General Plan 2025 EIR

There are no applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Tribal Cultural Resources.

City of Riverside Phase I General Plan Update

There are no objectives or policies considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

The are no applicable mitigation measures from the General Plan Update Phase 1 (GPU1) EIR that pertain to Tribal Cultural Resources.

Downtown Specific Plan

There are no City of Riverside Downtown Specific Plan goals or policies that are considered applicable to the proposed Project.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Tribal Cultural Resources:

Title 20 – Cultural Resources. The purpose of this title is to promote the public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City for the following reasons:

- To safeguard the City's heritage as embodied and reflected in such resources;
- To encourage public knowledge, understanding and appreciation of the City's past;
- To foster civic and neighborhood pride and a sense of identity based on the recognition and use of cultural resources;
- To promote the enjoyment and use of cultural resources appropriate for the education and recreation of the people of the City;
- To preserve diverse and harmonious architectural styles and design preferences reflecting phases of the City's history and to encourage complementary contemporary design and construction;
- To enhance property values and to increase economic and financial benefits to the City and its inhabitants;
- To protect and enhance the City's attraction to tourists and visitors, thereby stimulating business and industry;
- To identify as early as possible and resolve conflicts between the preservation of cultural resources and alternative land uses;
- To integrate the preservation of cultural resources and the extraction of relevant data from such resources into public and private land management and development processes;
- To conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment;
- To implement the City's General Plan; and
- To work in concert with the City's Zoning Code.

5.9.3 Comments Received in Response to the Initial Study/Notice of Preparation

One comment letter was received related to cultural resources in response to the Initial Study/Notice of Preparation (IS/NOP). The comment letter was received from the Native American Heritage Commission (NAHC) and is included in Appendix A of this Draft EIR.

5.9.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G ("Environmental Checklist") to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A) prepared for this Project, and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- 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:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code Section 5020.1(k); or
 - 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 Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

5.9.5 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through the design. The proposed Project does not include any design features with regard to Tribal Cultural Resources.

5.9.6 Environmental Impacts

Threshold: 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:

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

A *Cultural Resources Technical Report* (CRTR) was prepared by South Environmental (South) in July 2024 (SE) and is attached as Appendix C of this Draft EIR.

On March 7, 2024, South requested a California Historical Resources Information System (CHRIS) records search from the Eastern Information Center (EIC). The EIC completed a records search of the CHRIS database for the Project site plus a one quarter mile radius buffer on April 10, 2024. The search identified and collected the records for any previously recorded cultural resources and cultural resource studies and reviewed the following lists to identify resources meeting the respective criteria for the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. (SE, p. 12). As discussed in *Section 5.3 – Cultural/Paleontological Resources*, there were no cultural resources eligible for listing in the NRHP, CRHR and local register of historical resources.

In addition to the records search, the CRTR also reports that the archaeological survey focused on identifying exposed ground surface for the presence of historic artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), sediment discolorations that might indicate the presence of a cultural midden, depressions, and other features that might indicate the former presence of structures or building (e.g., post holes, foundations). (SE, p. 35). No such features were identified as the site is completely paved over and already developed.

The buildings, structures, and viewsheds within and adjacent to the Project site are not associated with Native American activities or traditional uses. There was one previously identified archaeological site within the one-quarter mile radius of the Project site. The pedestrian survey did not identify any new or previously recorded archaeological resources within the Project site. No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within the Project site. (SE, pp. 15, 35, 44). Thus, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 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 Resource Code Section 5020.1(k) as the structures are not associated with traditional Native American activities. Therefore, **no impacts** are anticipated.

Threshold: 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 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 Resource Code Section 5024.1; in applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?

As part of the CRTR, the Native American Heritage Commission (NAHC) was contacted on March 5, 2024 to request a Sacred Lands File (SLF) and a list of potentially interested Native American Tribes for the purposes of general Native American consultation under CEQA. The NAHC responded to the request on March 19, 2024, and reported negative results. The NAHC recommended contacting several local Native American Tribes pursuant to AB 52. (SE, p. 20).

Pursuant to AB 52, the City notified the following Native American tribes of the proposed Project on April 23, 2024. **Table 5.9-A – Tribal Communications** provides a summary of the consultation efforts.

Table 5.9-A – Tribal Communications

Native American Group (Individual Responding)	Response
Gabrielesño Band of Mission Indians	<ul style="list-style-type: none"> On May 20, 2024, the tribe requested consultation and copies of the cultural report. After further consideration the tribe deferred to local tribes.
Soboba Band of Luiseño Indians	<ul style="list-style-type: none"> On May 20, 2024, the tribe requested formal consultation and copies of all documentation. The City met with the tribe on August 27, 2024 and requested mitigation. The City provided standard mitigation language on December 11, 2024 and updated language on May 19, 2025.
Cahuilla Band of Indians	<ul style="list-style-type: none"> No response was received,
Pechanga Band of Luiseño Indians	<ul style="list-style-type: none"> On May 13, 2024 the tribe requested formal consultation. The tribe requested cultural report and all other documentation associated with the Project site and cultural resources. The City met with the tribe on September 5, 2024 and requested mitigation. The City provided standard mitigation language on December 11, 2024 and updated language on May 19, 2025.
Rincon Band of Luiseño Indians	<ul style="list-style-type: none"> No response was received
Yuhaaviatam of San Manuel Nation (San Manuel Band of Mission Indians)	<ul style="list-style-type: none"> On April 26, 2024, the tribe requested specific mitigation measure language to be included in the cultural and tribal cultural sections. The tribe also requested final copies of the CEQA document. The City provided standard mitigation language on December 11, 2024 and updated language on April 11, 2025. Consultation concluded on May 1, 2025.
Morongo Band of Mission Indians	<ul style="list-style-type: none"> No response was received
Agua Caliente Band of Cahuilla Indians	<ul style="list-style-type: none"> On April 30, 2024, the tribe requested formal consultation as well as survey results and records search documentation. The City met with the tribe on September 4, 2024 and requested mitigation. Mitigation measures were approved by the tribe and consultation concluded on December 13, 2024. .
San Gabriel Band of Mission Indians	<ul style="list-style-type: none"> No response was received.

Source: City of Riverside

Notes: Tribes in **Bold** are consulting with the City.

Of the nine tribes contacted for AB 52 consultation, Soboba Band of Luiseño Indians, Pechanga Band of Luiseño Indians, Yuhaaviatam of San Manuel Nation and Agua Caliente Band of Cahuilla Indians requested consultation with the City. During consultation efforts, mitigation measures were proposed by the City and reviewed by Soboba Band of Luiseño Indians, Pechanga Band of Luiseño Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians. The agreed-upon text of those mitigation measures are included below.

Though the archaeological survey was negative for cultural resources associated with Native American use, the existing development within the Project site provided little to no observable ground surface for inspection; thus, the negative findings of the archaeological survey are an unreliable indicator of the archaeological sensitivity of the Project site since there could be buried unknown resources. Due to the proposed depth of ground disturbances associated with the subterranean parking garage and high-rise buildings, there is a potential for unknown archaeological resources and human remains to be encountered. Although very unlikely given the negative records search results, there is potential for inadvertent discovery of unknown archaeological resources and human remains to occur during Project implementation. Additionally, since there are no specific development plans being proposed at this time, and since it's not known how long before actual projects are proposed, the City will reinitiate Tribal Consultation with the consulting Tribes listed in **Table 5.9-A** prior to construction. Implementation of mitigation measures **MM CR 1** through **MM CR 8** as provided in *Section 5.3* of the Draft EIR (Cultural/Paleontological Resources) would ensure Tribal input, pursuant to AB 52, as well as ensure the proper treatment of any cultural resources and human remains associated with Native Americans encountered during ground disturbing activities (SE, pp. 44-45.)

As a result of the City's consultation efforts, implementation of mitigation measures **MM CR 1** through **MM CR 8** would reduce impacts to any potential tribal cultural resources. Thus, with implementation of mitigation measures **MM CR 1** through **MM CR 8**, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 that is a resource determined significant to a California Native American Tribe. Therefore, impacts are **less than significant with mitigation incorporated**.

5.9.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impact to tribal cultural resources. Although the results of the records search and CRTR determined there were no resources on site, the potential exists for unknown tribal cultural resources to be present and Project construction activities may impact unknown tribal cultural resources within the Project disturbance area. As a result of the Tribal Consultation with the Soboba Band of Luiseño Indians, Pechanga Band of Luiseño Indians, Yuhaaviatam of San Manuel Nation and Agua Caliente Band of Cahuilla Indians, the City's standard mitigation measures related to the disposition of any uncovered artifacts that may be inadvertently discovered during ground disturbance would be incorporated as outlined below to reduce impacts related to tribal cultural resources to less than significant levels.

Mitigation measures **MM CR 1** through **MM CR 8**, as provided in *Section 5.3 - Cultural/Paleontological Resources* of this Draft EIR would be implemented to reduce impacts to unknown tribal cultural resources to less than significant with mitigation incorporated. **MM CR 1** through **MM CR 8** are repeated below for convenience of the reader.

MM CR 1: **Consultation.** Upon submittal of entitlement application and prior to the issuance of the grading permit the Project Sponsor and the City shall contact Consulting Tribes (Soboba Band of Luiseño Indians, Pechanga Band of Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians) to provide an electronic copy of the plans for review. Additional consultation shall occur between the City, Project Sponsor, and Consulting Tribes to discuss any proposed site design changes and review any new impacts to Tribal Cultural Resources and/or potential avoidance/preservation of the Tribal Cultural Resources on the Project site. The City and the Project Sponsor shall make all attempts to avoid and/or preserve in place as many Tribal Cultural Resources as possible that are located on the Project site if the site design and/or proposed grades should be revised.

MM CR 2: **Archaeological Monitoring.** Since no specific development plans have been prepared to date, the future Project Sponsor(s) will retain a qualified archaeologist to review final grading and construction plans along with geotechnical testing results to determine the depth at which native soils exist that would require archaeological monitoring. The areas to be monitored shall be provided to the Planning Department and Consulting Tribes for review prior to the issuance of a grading permit. At least 30 days prior to issuance of a grading permit for private development or before any site grading, excavation and/or initial ground disturbing activities take place, the Project Sponsor shall retain a Secretary of Interior Standards qualified archaeological monitor, with regional experience, to monitor all initial ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project Archaeologist, in consultation with Consulting Tribes the Project Sponsor and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and tribal monitoring activities that will occur on the Project site. Details in the plan shall include:
 - a. Grading and development scheduling;
 - b. The development of a schedule in coordination with the Project Sponsor and the Project Archaeologist for designated Tribal Monitors from the Consulting Tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project Archaeologists;
 - c. The protocols and stipulations that the Project Sponsor, Consulting Tribes, and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered archaeological resources and Tribal Cultural Resource deposits that shall be subject to a resource evaluation; and
 - d. Avoidance, treatment and final disposition of any archaeological or Tribal Cultural Resources, sacred sites, and human remains if discovered on the Project site.

MM CR-3: Tribal Monitor. Prior to issuance of grading permit, the Project Sponsor shall engage each of the Consulting Tribe(s), choosing to monitor, regarding Tribal Monitoring. The Project Sponsor shall provide evidence to the City that they have reached an agreement with each of the Consulting Tribe(s) regarding the following:

1. The treatment of known cultural resources;
2. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and
3. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities.

The Project Sponsor shall provide sufficient evidence that they have made a reasonable effort to reach an agreement with the Consulting Tribes in regard to items 1-3, as listed above.

MM CR 4: Treatment and Disposition of Tribal Cultural Resources. In the event that Tribal Cultural Resources are inadvertently discovered during the course of grading for this Project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. All work shall be halted in the area of the discovery and may be redirected to an alternate area of the Project site, based on the direction of the Project Archaeologist and Tribal Monitor(s). Work may recommence once culturally appropriate treatment has been agreed upon by the City, Project Sponsor, and Consulting Tribes.
2. Notification to City and Consulting Tribes: Within 24 hours of discovery, the City and the Consulting Tribe(s) shall be notified via email and phone by the Project Archaeologist. The Project Sponsor shall provide the City evidence of notification to Consulting Tribes. Consulting Tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
3. Inadvertent Finds Assessment:
 - a. All ground disturbance activities within 100 feet of the discovered Tribal Cultural Resources shall be halted until a meeting is convened between the Project Sponsor, the Project Archaeologist, the Tribal Representative(s), and the Planning Division to discuss the significance of the find.
 - b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the Planning Division, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the Tribal Cultural Resources.
 - c. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.

- d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the Consulting Tribes. This may include avoidance of the cultural resources through project design, in-place preservation of Tribal Cultural Resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.
 - e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribes, and shall be submitted to the City for their review and approval prior to implementation of the said plan.
4. Temporary Curation and Storage: During the course of construction, all discovered Tribal Cultural Resources that cannot be avoided and are not subject to relocation shall be temporarily curated in a secure location on site. The removal of any artifacts from the Project site will need to be approved by the Consulting Tribes and thoroughly inventoried with Tribal Monitor oversight of the process. Historical archaeological resources, which are not of Native American cultural patrimony may be stored at the offices of the Project Archaeologist.
5. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all Tribal Cultural Resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to Tribal Cultural Resources. The Project Sponsor shall relinquish the artifacts through one or more of the following methods, in order of preference, and provide the City of Riverside Community and Economic Development Department with evidence of same:
- a. Preservation in Place of the Tribal Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
 - b. Accommodate the process for on-site reburial of the discovered items with the Consulting Tribes. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all cataloguing and basic recordation, that has been approved by the Consulting Tribes has been completed.
 - c. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation.

- MM CR 5: Phase IV Report.** At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City and Consulting Tribes documenting monitoring activities conducted by the Project Archaeologist and Tribal Monitors within 60 days of completion of ground disturbing activities. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the Project Archaeologist and Tribal Monitors. All reports produced will be submitted to the City of Riverside, the applicable California Historical Resources Information System (CHRIS) Information Center, and Consulting Tribes.
- MM CR 6: Human Remains.** If human remains are discovered, 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). (GP Objective 23.3, CEQA). *This mitigation measure was identified as MM CR-1 in the Initial Study. This mitigation measure has been renumbered to MM CR 6 for purposes of inclusion in the Project’s Mitigation Monitoring and Reporting Program.*
- MM CR 7: Non-Disclosure.** It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.
- MM CR 8: Cultural Sensitivity Awareness.** The Secretary of Interior qualified Project Archaeologist and Tribal Monitor(s) shall attend the pre-grading meeting with the Project Sponsor’s contractors to provide a briefing regarding the potential inadvertent cultural discoveries prior to the start of construction activities. This shall include the description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. Neither Project Archaeologist nor Consulting Tribe shall be allowed to bring any samples of the cultural and archeological artifacts to this meeting. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

5.9.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

As a result of the City's Tribal Consultation efforts, **MM CR 1** through **MM CR 8** would be incorporated in order to address the unlikely discovery of unknown tribal cultural artifacts during construction. Mitigation measures **MM CR 1** through **MM CR 8** provide the process of how any artifacts would be handled. Implementation of these mitigation measures would not result in residual environmental impacts.

5.10 Utilities and Service Systems

The focus of this section is to analyze potential impacts related to utilities and service systems, specifically water and wastewater facilities. It was determined in the Initial Study, attached as Appendix A to this Draft EIR, that the Project would not result in significant impacts to water supply, solid waste, stormwater drainage, electric power, natural gas, and telecommunication facilities. The following discussion addresses the potential for adverse impacts that could result from relocation or construction of new or expanded water and wastewater facilities as a result of the Project. Cumulative impacts are discussed in *Section 7.0 – Other CEQA Topics*.

5.10.1 Setting

The Project site is currently developed and located in an urbanized area with generally flat topography. Existing water and wastewater service infrastructure is present within or adjacent to the Project site. Riverside Public Utilities Department (RPU) serves the Project site for potable water service. Riverside Public Works (RPW) provides the Project site with wastewater (sewer) service.

Existing Potable Water Facilities

The City of Riverside established its own water utility, the Riverside Public Utilities Department (RPU), in 1913 (GP 2025 EIR, p. 5.16-5). RPU's primary source of supply is ground water. RPU has facilities to extract groundwater from four groundwater basins: Bunker Hill, Rialto-Colton, Riverside North, Riverside South, and rights to extracts from these basins along with the Arlington Basins.¹ The Riverside Basin is divided into Riverside North and Riverside South by the San Bernardino County/Riverside County boundary. The Riverside North and South sub-basins are hydro geologically connected but separated for administrative purposes. RPU's service area is approximately 75 square miles, 70 of which are located within the City of Riverside. In addition to retail potable water service, RPU delivers water to two wholesale customer agencies: Western Municipal Water District and City of Norco. Most of RPU's current retail customers are residential (mostly single family). All other customers consist of commercial/institutional, landscape, agricultural irrigation uses, as well as other land uses such as fire and temporary special needs. (UWMP, pp. 3-5, 4-4, 6-2).

RPU currently has 51 active wells (45 producing potable water). RPU has 12 inactive wells that are being used as monitoring wells and 14 other monitoring wells, for a total of 26 dedicated monitoring wells. Raw groundwater from many of RPU's wells receives treatment prior to entering the potable distribution system. (UWMP, p. 6-2).²

If additional water supply is needed RPU has an agreement with the Western Municipal Water District (WMWD) to access imported water when needed. This agreement can provide RPU with up to 21,700 acre feet per year (AFY) of imported water. RPU also has an exchange agreement with the City of Norco for the sale of up to 1,000 AFY and the exchange of water during emergencies. Existing potable water supply and demands are 74,262 AFY and 69,347 AFY, respectively. (UWMP, pp. 6-2).

¹ Personal communication with RPU on December 9, 2024.

² *Ibid.*

The Project site lies within the service area of the RPU (GP 2025, p. PF-3). The existing Convention Center and development on the Project site is connected to an existing 18-inch diameter potable water pipeline in Orange Street.

Existing Wastewater (Sewer) Facilities

The City's Public Works Department (RPW) provides for the collection, treatment, and disposal of all wastewater through its Riverside Regional Water Quality Control Plant (RWQCP) and complies with state and federal requirements governing the treatment and discharge of wastewater. The City's service area comprises approximately 81.5 square miles broken into five sewer basins: Arlanza, Northside, Phoenix, Spruce, and Tequesquite. The collection system conveys wastewater flows through these basins to the RWQCP through four major sewers: Acorn/Arlanza Trunk Sewer (A/A Trunk Sewer), Santa Ana Trunk Sewer (Riverside/Hillside), Jurupa Force Main, and Rubidoux Force Main. The Jurupa and Rubidoux force mains bring flows from the Jurupa and Rubidoux Community Service Districts (CSDs), respectively and exclusively. The Edgemont CSD and Highgrove Community, which have individual agreements with the City, both route their wastewater flows through the Santa Ana Trunk Sewer (Riverside/Hillside). (WIMPU, p. ES-10).

The existing wastewater collection system includes approximately 16,000 manholes; 20 lift stations; 19 wastewater pump stations that range in size from less than 100 gallons per minute (gpm) to over 2,000 gpm; 10.4 miles of force mains, more than 830 miles of gravity public sewer pipes ranging in size from 4-inches to 51-inches in diameter, and 412 miles of City-owned laterals. Almost 82 percent of the system consists of 8-inch diameter and smaller pipes and over 90 percent of the collection system is comprised of vitrified clay pipe. The firm capacity of the lift stations range in size from 80 gpm to the largest lift station Pierce Street Lift Station, with 11,100 gpm of firm pumping capacity. (SSMP, p. 1; WIMPU, p. ES-14).

As identified in **Table 5.10-A – Existing and Projected Wastewater Capacity**, below, the RWQCP currently treats approximately 28 million gallons per day (mgd) of average annual flow (AAF) and primary, secondary, and tertiary treatment of wastewater for a rated hydraulic capacity of approximately 46 mgd AAF. The RWQCP provides treatment for the Jurupa, Rubidoux, and Edgemont Community Services Districts in addition to treating wastewater generated in the community of Highgrove, serving a population of more than 300,000. A daily influent flow of approximately 39 mgd has been projected through the year 2037. (RIV-A; WIMPU p, ES-1).

Table 5.10-A – Existing and Projected Wastewater Capacity

Daily Influent Flow	Capacity (mgd)
Existing ¹	28
Maximum Capacity ¹	46
Projected 2037 Daily Inflow ²	39

Notes:

1. Source: WIMPU, pp. ES-1
2. Source: WIMPU, pp. ES-6

The existing Convention Center and development on the Project site is connected to an existing 12-inch diameter sewer pipeline in Market Street.

5.10.2 Related Regulations

Federal Regulations

Clean Water Act

The United States Environmental Protection Agency (USEPA) has delegated responsibility for compliance with the federal Clean Water Act to the State of California, which is discussed under “State Regulations.”

State Regulations

Urban Water Management Planning Act

The Urban Water Management Planning Act (1983), which was codified into Sections 10610 to 10656 of the California Water Code, requires urban water suppliers to develop water management plans to actively plan ahead for future water supplies to meet future anticipated water demands. Every five years, water suppliers are required to develop Urban Water Management Plans (UWMPs) for approval by the California Department of Water Resources (DWR). UWMPs can be used as the main source of information for WSAs and WSVs.

Clean Water Act

The Clean Water Act prohibits the discharge of pollutants to waters of the United States unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Applicable NPDES permits are those managed on a statewide basis by the State Water Resources Control Board (i.e., General Permits), such as the General Industrial Activities Storm Water Permit and the General Construction Activity Storm Water Permit. Both of these permits require a Storm Water Pollution Prevention Plan (SWPPP); the industrial permit requires an industrial SWPPP used in perpetuity based on the SIC code, and the construction permit requires a SWPPP for construction phase only. In addition, the State Board issues statewide municipal permits for Municipal Separate Storm Sewer Systems (MS4) owned by municipalities. (MS4).

The MS4 permit program regulates all stormwater discharges from municipal storm drains. The Santa Ana RWQCB regulates the Riverside County MS4 permit (Order No. R8-2010-0033), which requires the principal permittee Riverside County Flood Control and Water Conservation District (RCFC&WCD) and co-permittees (County of Riverside and cities, including the City of Riverside) to develop several items designed to reduce pollutants in urban runoff to the Maximum Extent Practicable (MEP). Specifically for qualifying new developments and redevelopments, this includes a Water Quality Management Plan (WQMP). All future development within the Project site would be required to prepare a project specific WQMP.

Water Conservation Act

The Water Conservation Act of 2009, or Senate Bill X7-7, set a requirement for water agencies to reduce their per capita water use by the year 2020. The overall goal was a statewide reduction of per capita urban water use of 20 percent by December 31, 2020, with an intermediate 10 percent reduction by December 31, 2015. Demand reduction can be achieved through both conservation and the use of recycled water as a potable demand offset.

The City of Riverside has codified landscaping and irrigation requirements under Water Efficient Landscaping and Irrigation in Title 19, Chapter 19.570 of the City Municipal Code.

Making Conservation a California Way of Life

The State Water Resources Control Board adopted this regulation on July 3, 2024, which became effective in January 2025. The regulation implements Assembly Bill 1668 and Senate Bill 606, which were signed into law in 2018, to develop a regulatory framework to achieve long-term water use efficiency with the purpose of adapting to climate change and more intense and frequent droughts in California. Urban retail water suppliers must comply with a unique urban water use objective; commercial, industrial and institutional (CII) performance measures; and annual reporting. Beginning January 1, 2025, and by January 1 every year thereafter, each urban retail water supplier is required to calculate its urban water use objective for the previous year. Each year, the objective will be based on dynamic data such as weather and population. Beginning January 1, 2027, each urban retail water supplier must demonstrate compliance with its urban water use objective. (SWRCB RWQCB-A, SWRCB RWQCB-B).

California Water Code

Sections 13550–13556 of the State Water Code provide that local, regional, or state agencies shall not use water from any source of quality for non-potable uses if suitable recycled water is available as provided in Section 13550 of the Water Code.

Regional Regulations

There are no regional regulations that are considered applicable to the proposed Project.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside General Plan 2025 contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. PF-12 – PF-13, PF-16, PF-19, OS-57 – OS-58):

Public Facilities and Infrastructure Element

Objective PF-1	Provide superior water service to customers.
Policy PF-1.1	Coordinate the demands of new development with the capacity of the water system.
Policy PF-1.2	Support the efforts of the Riverside Public Utilities Department, Eastern Municipal Water District and Western Municipal Water District to work together for coordination of water services.
Policy PF-1.3	Continue to require that new development fund fair-share costs associated with the provision of water service.
Policy PF-1.4	Ensure the provision of water services consistent with the growth planned for the General Plan area, including the Sphere of Influence, working with other providers.
Policy PF-1.5	Implement water conservation programs aimed at reducing demands from new and existing development.
Objective PF-3	Maintain sufficient levels of wastewater service throughout the community.

- | | |
|---------------|--|
| Policy PF-3.1 | Coordinate the demands of new development with the capacity of the wastewater system. |
| Policy PF-3.2 | Continue to require that new development fund fair-share costs associated with the provision of wastewater service. |
| Policy PF-3.3 | Pursue improvements and upgrades to the City's wastewater collection facilities consistent with current master plans and the City's Capital Improvement Program. |

Open Space and Conservation Element

Objective OS-10 Preserve the quantity and quality of all water resources throughout Riverside.

Policy OS-10.1 Support the development and promotion of water conservation programs.

City of Riverside General Plan 2025 EIR

There are no applicable mitigation measures from the City of Riverside General Plan 2025 EIR that pertain to Utilities and Service Systems.

City of Riverside Phase I General Plan Update

There are no objectives or policies within the City of Riverside Phase I General Plan Update (GPUI) that are considered applicable to the proposed Project.

City of Riverside Phase I General Plan Update EIR

There are no applicable mitigation measures from the GPUI EIR that pertain to Utilities and Service Systems.

Downtown Specific Plan

There are no City of Riverside Downtown Specific Plan goals or policies that are considered applicable to the proposed Project.

City of Riverside Municipal Code

The following sections of the City's Municipal Code are applicable and pertain to Utilities and Service Systems.

Chapter 14.22 – Water Conservation. This chapter establishes a Water Conservation Program which uses five stages to address conditions and needs. The Water Conservation Stage shall be set by City Council action. All normal water efficiency programs and water conservation regulations shall remain in force during any stage unless the City Council directs otherwise.

- A. Stage One represents normal conditions; Stages Two, Three, Four, and Five represent potential and actual shortages. Stages Two, Three, Four, and Five may be triggered by a local or regional water supply shortage; production, treatment, transmission, or delivery infrastructure problems; limited or unavailable alternative water supplies; or other circumstances.
- B. Stage one conservation measures are voluntary, and will be encouraged through public outreach, education, and awareness measures by the City.
- C. Stages Two, Three, Four, and Five conservation measures are mandatory, and violations may be subject to criminal, civil, and administrative enforcement.

Urban Water Management Plan

The 2020 Urban Water Management Plan (UWMP) provides an overview of the RPU's long-term water supplies and demands and reports on the City's progress towards meeting the water use efficiency targets. The plan includes demand management measures that the RPU has agreed to implement to achieve water supply savings. In accordance with Water Code 10632 requirements, RPU is responsible for conserving the available water supply, protecting the integrity of water supply facilities, and implementing a contingency plan in times of drought, supply reductions, failure of water distribution systems, or emergencies. As such, RPU adopted Water Shortage Contingency Plan (WSCP) to regulate the delivery and consumption of water use during water shortages. The WSCP defines five shortage stages and outlines the actions that will be required of customers during each stage. (UWMP, pp. iii, 8-1-3).

Sewer System Management Plan

On May 2, 2006, the State Water Resources Control Board adopted the California State Water Resources Control Board (CSWRCB) Order No. 2006-0003-DWQ -- Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDRs). WDRs require owners and operators of collection systems to apply for coverage and abide by its provisions and prohibitions. Its purpose is to prevent sanitary sewer overflows (SSOs) and establish uniform procedures for monitoring and reporting. On October 13, 2006, the City applied for coverage under this order by submitting a Notice of Intent (NOI) to the State Water Board. On January 18, 2007, the City obtained an account on the State of California SSO Database California Integrated Water Quality System. This provided the City with a mechanism to report SSOs in accordance with the WDRs. The WDRs also require the development and implementation of a Sewer System Management Plan (SSMP). A SSMP must include provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Additionally, a SSMP must contain a spill response plan that establishes standard procedures for immediate response to an SSO in a manner designed to minimize water quality impacts and potential nuisance conditions. The City's SSMP was adopted in July 2009 and revised in June 2022. The SSMP was developed by the City's Public Works Department to comply with CSWRCB Order No. 2006-0003-DWQ. (SSMP, p. 1). Per the State's WDR requirements, the City's Public Works Department completes an audit, covering a three-year period, of the adopted SSMP to identify and address any deficiencies. The Public Works Department completed its audit in November 2024, covering a period from May 2021 to May 2024, and will finalize revisions to the SSMP in May 2025.

5.10.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding Utilities and Service Systems in response to the Initial Study/Notice of Preparation (IS/NOP).

5.10.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G ("Environmental Checklist") to the State *CEQA Guidelines*.

As identified in the IS/NOP (Appendix A), and as outlined in *Section 4.0* of this Draft EIR, implementation of the proposed Project would have a less than significant impact in the following areas and these topics will not be addressed in this Draft EIR:

- Require or result in the relocation or construction of new or expanded stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- 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?
- 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?
- Comply with federal, state, and local management and reduction statute and regulations related to solid waste?

As identified in the IS/NOP prepared for this Project, implementation of the proposed Project would have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

5.10.5 Project Design Features

The Project includes the following design features that would provide water conservation measures that use potable water more efficiently:

- Future implementing Projects would be conditioned to landscape with a plant palette consistent with Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines.
- Future implementing Projects would be conditioned to design buildings to be water-efficient. Installation of water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11 would be required by the City.

In addition, the proposed Project includes the following potential off-site improvements shown on **Figure 3.0-4** of this Draft EIR:

Water

- Approximately 850 feet of the existing 6-inch water main within Third Street will be upsized to an 18-inch diameter water main between Orange Street and Market Street in order to accommodate the Project.

Sewer

- Approximately 1,700 feet of the existing 12-inch diameter sewer line located on Market Street may need to be upsized to 15-inch diameter from 11th Street to Mission Inn Avenue.

5.10.6 Environmental Impacts

Threshold: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment the construction or relocation of which could cause significant environmental effects?

As outlined in the IS/NOP and described in *Section 3.0 – Project Description* of this Draft EIR, **Figure 3.0-4** shows that one segment of a sewer main pipeline may need to be upsized, and one segment of a water main pipeline would need to be upsized as result of the Project being implemented to the maximums contemplated in this Draft EIR.

RPU has determined that if the maximum land uses and intensities outlined in the Project Description are constructed, then the water main located in Third Street that already supplies potable water to the site would be required to be upsized from 6-inches to 18-inches in diameter.

Should the maximum land uses and intensities come to fruition, then the City Public Works Department anticipates that the existing sewer pipeline in Market Street that currently serves the Project site, may need to be upsized in a location off-site. **Figure 3.0-4** shows the location of the area where the sewer line needs to be upsized. This section of off-site sewer main pipeline may need to be upsized from 12-inch to 15-inch diameter.

No relocations or expanded capacity in service from the City's water and wastewater treatment plants are needed as a result of Project implementation. Upsizing of the off-site water and sewer pipeline connections as proposed by the Project would include the disturbance of the existing pavement of the affected roadways as well as the trenching, pipeline removal and replacement, recompact and repaving of the streets. The effects of constructing these facilities are described, analyzed, and where necessary, mitigated within this Draft EIR (e.g., air quality impacts, cultural resources, etc.). Impacts regarding the relocation or construction of new or expanded water or wastewater treatment facilities are **less than significant and no mitigation is necessary**.

5.10.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to reduce or eliminate impacts. Because all Project impacts related to Utilities and Service Systems are less than significant, no mitigation measures are necessary.

5.10.8 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

There are no mitigation measures required to reduce impacts to Utilities and Service Systems.

6.0 Consistency with Regional Plans

California Environmental Quality Act, Section 15125(d), requires an EIR to discuss any inconsistencies between the proposed Project and applicable general, specific, and regional plans. The purpose of this section is to discuss the proposed Project's consistency with the regional and local growth forecasts, the Southern California Association of Governments (SCAG) *Connect SoCal (the 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS))*, and to provide an analysis of the Project's impacts on the population, housing, and job projections for the region. SCAG is the designated Metropolitan Planning Organization for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties, and as such, is mandated by the federal government to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, a discussion of the Project's impacts upon the growth forecasts and its compliance with SCAG's regional goals is discussed below.

A discussion of the proposed Project's consistency with the applicable Air Quality Management Plan and Connect SoCal RTP/SCS is addressed in *Section 5.2 – Air Quality* and *Section 5.5 – Greenhouse Gas Emissions*, respectively.

6.1 Setting

6.1.1 SCAG Regional Growth Factors

Population forecasts for the City and surrounding area are provided by SCAG's Connect SoCal, in the *2024-2050 RTP/SCS Demographics and Demographics and Growth Forecast-Technical Report Appendix* (Connect SoCal-B). The SCAG Connect SoCal growth forecast is updated every four years, and it was recently updated in April 2024. The SCAG Growth Forecast is broken down into separate growth forecasts for individual cities and unincorporated county areas. **Table 6.0-A – SCAG Growth Forecasts (Riverside)** depicts the SCAG population forecasts for the City, which includes the proposed Project site.

Table 6.0-A – SCAG Growth Forecasts (Riverside)

	2019	2035	2050
Households	94,200	126,300	137,200
Employment	158,600	190,800	204,500
Jobs-to-Housing Ratio ¹	1.68:1	1.51:1	1.49:1

Source: Connect SoCal, Table 13

Notes:

1. Total number of jobs relative to the total number of households – calculated
2. 2020 and 2040 data not available.

Jobs-to-housing ratio is used as an indicator of how jobs-rich or jobs-poor a community is. SCAG's April 2001 report titled, *The New Economy and Jobs/Housing Balance in Southern California*, states that a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion)

(SCAG 2001, p. 15). Alternately, a jobs/housing balance can be defined as an adequate provision of employment in a defined area that generates enough local workers to fill the housing supply.” Generally, a ratio of less than 1 to 1 indicates a jobs-poor area, and a ratio of more than 1 to 1 indicates a jobs-rich area (SCAG 2001, p. 15). Currently, the City of Riverside has an unemployment rate of 4.8 percent. (EDD). As reflected in **Table 6.0-A**, above, the 2024-2050 SCAG growth forecast indicates that in the year 2019 the jobs to housing ratio for the City was 1.68:1, which is by definition indicates a jobs-rich area and anticipated to decrease over the years to 1.51:1 by 2035 and to 1.49:1 by 2050. Nonetheless, the City will remain a job-rich area.

6.2 Related Regulations

6.2.1 Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is the largest Metropolitan Planning Organization (MPO) in the nation. The region covers more than 38,000 square miles and includes six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial and 191 cities (SCAG 2024). As the designated MPO, SCAG is mandated by federal law to research and develop a Regional Transportation Plan (RTP), which incorporates a Sustainable Communities Strategy (SCS) per California state law (SCAG 2019, p. 1). The SCAG region is a major hub of global economic activity, representing the 16th largest economy in the world, and is considered the nation’s gateway for international trade, with two of the largest ports in the nation (SCAG 2019, p. 1).

6.2.2 Connect SoCal, the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG regional council adopted the Connect SoCal, the *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*, on April 3, 2024 (Connect SoCal-A, p. 1). Connect SoCal is a long-term plan for the Southern California region that details investment in our transportation system and development in our communities to meet the needs of the region both today and tomorrow (Connect SoCal-A, p. 7). The goals for Connect SoCal are designed to achieve the vision of a healthy, prosperous, accessible and connected Southern California region. (Connect SoCal-A, pp.7-8). The four core categories of Connect SoCal are: mobility, communities, environment and economy. This plan stays committed to the safe and fluid movement of goods through the deployment of zero and near-zero emission technologies (Connect SoCal-A, p. 12). It outlines more than \$715.7 billion in transportation system investments over the next 25 years (Connect SoCal-A, p. 12). The plan was prepared through a collaborative, continuous, and comprehensive process with input wide range of constituents and stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, including public agencies, community organizations, elected officials, tribal governments, the business community, and the general public (Connect SoCal-A, p. 13). The goals included in Connect SoCal are meant to provide guidance for considering projects within the context of regional goals.

The Connect SoCal provides an opportunity to identify transportation strategies today that address mobility needs for the future. Connect SoCal outlines growth strategies for land use and transportation and help reduce the state’s greenhouse gas emissions from cars and light duty trucks, a requirement put in place by the passage of Senate Bill (SB) 375 with the goal of ensuring that the SCAG region can meet its regional greenhouse gas reduction targets set by California Air Resources Board (CARB) (Connect SoCal-A, p. 7).

CARBs targets for the SCAG region, which were updated in 2018, are 8 percent below 2005 per capita emissions level by 2020 and 19 percent below 2005 per capita emissions level by 2035 (Connect SoCal-A, p. 225). SCAG did achieve the 2020 per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, thereby meeting the GHG reduction targets established by CARB for the SCAG region (Connect SoCal-A, p. 186).

6.3 Consistency Analysis

In March 2021, SCAG adopted the Regional Housing Needs Assessment (RHNA) 6th Cycle for the planning period of October 2021 through October 2029. The RHNA identified new housing units needed by income category for the region, including the City of Riverside. The City has been allocated to provide 18,458 new housing units by the RHNA. However, as part of the City Phase I General Plan Update (GPUI) which includes the 6th Cycle Housing Element for the planning period of 2021-2029, adopted in October 2021, the City added a self-prescribed buffer of new dwelling units to provide during this planning period to ensure the City meets the minimum recommended by State Department of Housing and Community Development to account for the “No Net Loss” requirements as mandated by Senate Bill 166 (SB 166). The City elected to provide an approximately 13 percent “No Net Loss” buffer and so will target providing 20,995 new homes. (GPUI EIR, p. 3.9-12). The vacancy rate in the City has been steadily decreasing each year since 2020 and currently sits at 4.0 percent. (DOF).

In October 2021, the City adopted Phase I General Plan Update (GPUI) which consisted of the 6th Cycle Housing Element (2021-2029). The GPUI identified that according to SCAG, the population of the City is projected to increase to 395,800 by 2045, which represents an increase of 20.61 percent from the 2020 population of 328,155 (GPUI EIR, p. 3.9-17). However, based on DOF population and housing estimates, the City’s average household size was 3.06 persons. The GPUI utilized a more conservative person per household generation rate of 3.28 persons which projected an increase of 103,530 persons resulting in a total population projection of 431,685 persons by 2045, 67,645 persons more than the SCAG projection. The GPUI utilized the more conservative population estimate of 431,685 persons in its analysis and determined that no mitigation was available to reduce the impact of unplanned population growth to a less than significant level so the impacts would be significant and unavoidable. As mentioned in *Section 4.0 – Environmental Effects Found Not to be Significant*, specifically *Section 4.1.12 – Population and Housing* of this Draft EIR, the Project would allow future implementing developments to introduce a mixture of residential uses and hotel uses which may introduce between approximately 514 to 576 additional residents to the City of Riverside. This increase represents growth that is less than one percent of the more conservative population projections analyzed by the GPUI that projected 67,645 more persons than SCAG projections. Since the proposed Project uses are consistent with the Downtown Specific Plan designation, which allows for high-density residential and mixed-use development within the Raincross District, the Project does not induce unplanned growth. Additionally, the Project will provide the City more opportunities to help reach the RHNA allocation of 18,458 new housing units for the planning period for 2021-2029 and the City’s self-prescribed target of 24,000 units. (RHNA).

Table 6.0.-B – Proposed Project Consistency with the Connect SoCal 2024-2050 RTP/SCS Goals, presents a side-by-side comparison of the Connect SoCal 2024-2050 RTP/SCS Goals and a discussion regarding the Project’s consistency, non-consistency, or non-applicability with each goal.

**Table 6.0-B – Proposed Project Consistency with the Connect SoCal
2024-2050 Goals**

Goal	Analysis
<p>Goal 1: Mobility. Build and maintain and integrated multimodal transportation network.</p> <p><u>Subgoals:</u></p> <ul style="list-style-type: none"> ▪ Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions ▪ Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities ▪ Support planning for people of all ages, abilities and background 	<p>Consistent. The Project proposes redevelopment of an existing site and does not propose the add or alter the existing roadway network. The Project would leave in place the existing RTA bus stops along the Project frontage and would ensure onsite pedestrian pathways connect to the surrounding pedestrian network. The two existing RTA bus routes serving the Project site (Route 12 and Route 29) offer connection points with Metrolink trains and other transit agencies providing connectivity to adjacent jurisdictions. Additionally, the Project would introduce mixed uses to the Project site that would allow residents and visitors to shop and dine within walking distance that would reduce vehicle miles traveled and associated emissions. Through compliance with existing regulations regarding pedestrian pathways, the Project site would be accessible by people of all ages, abilities and backgrounds.</p>
<p>Goal 2: Communities. Develop, connect and sustain livable and thriving communities.</p> <p><u>Subgoals:</u></p> <ul style="list-style-type: none"> • Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. • Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households. 	<p>Consistent. Future implementing development would introduce mixed uses to the Project site that would provide pedestrian connectivity to the existing surrounding pedestrian network. Due to the urban setting, a mixed-use development at the Project site would provide a connected, human-centered and sustainable thriving community that increases mobility options and would reduce travel distances. This Project aims to increase the variety of housing options within the Downtown area by providing a mix of for-sale and for-rent housing products.</p>
<p>Goal 3: Environment. Create a healthy region for the people of today and tomorrow.</p> <p><u>Subgoals:</u></p> <ul style="list-style-type: none"> • Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. • Integrate the region's development pattern and 	<p>Consistent. The Project proposes redevelopment of an existing site consistent with the Raincross District of the Downtown Specific Plan. Thus, the Project would conserve the regions resources because it would not result in a greenfield development and would not contribute to urban sprawl or reduce the resiliency of the community. The Project is located in proximity to existing transit which can reduce greenhouse gas emissions and improve air quality by reducing vehicles miles traveled. Mixed use development would also reduce water consumption compared to traditional greenfield development and be energy-efficient through compliance with the provisions of the California Building and Energy Efficiency Standards (Title 24, Part 6 of the California Code of Regulations) and the California Green Building Standards Code (CALGreen; Part 11 of Title 24).</p>

**Table 6.0-B – Proposed Project Consistency with the Connect SoCal
2024-2050 Goals**

Goal	Analysis
<p>transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.</p> <ul style="list-style-type: none"> • Conserve the region's resources. 	
<p>Goal 4: Economy. Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.</p> <p><u>Subgoals:</u></p> <ul style="list-style-type: none"> • Improve access to jobs and educational resources. • Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. 	<p>Consistent. Due to the mixed-use nature of the site and the various land use types proposed, the Project would provide a new economic and employment opportunities at local business, grocery-retail chains and hotel-chains to an existing urban area. Expansion of the Convention Center facilities may be used for conferences, or other educational purposes. With a Convention Center expansion, a greater influx of visitors are anticipated that would also provide new economic opportunities for existing local shops, restaurants, entertainment located in the Downtown Area. Furthermore, redevelopment of the Project site would promote alternative modes of transportation that would reduce greenhouse gas emissions and improve air quality.</p>

Source: Goals are identified in Connect SoCal-A, pp. 84-85

The table above identifies that the proposed Project would be consistent with all applicable SCAG's Connect SoCal goals. Consistency or inconsistency with SCAG regional goals does not result in physical changes to the environment and therefore, no significant effects on the environment.

7.0 Other CEQA Topics

The State *California Environmental Quality Act (CEQA) Guidelines* set forth several general content requirements for Environmental Impact Reports (EIRs). Those applicable to this Project include cumulative impacts (Section 15130), unavoidable adverse impacts (Section 15126(b)), growth inducing impacts (Section 15126(d)), and significant irreversible impacts (Section 15126.2(c)). This section addresses each of those general requirements.

7.1 Cumulative Impact Analysis

7.1.1 Introduction

CEQA requires that an EIR examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (State *CEQA Guidelines* Section 15130(b)).

As stated in the State *CEQA Guidelines*, an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable (Section 15130(a)). “Cumulatively considerable” means that “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130” (Section 15065(c)). Section 15355 of the State *CEQA Guidelines* states that “cumulative impacts” occur from “...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine “reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project” (State *CEQA Guidelines* Sections 15130(a)(3) and 15130(b)(5)).

State *CEQA Guidelines* Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Section 15130(d) of the State *CEQA Guidelines* states that, “Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.” Additionally, if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then

an EIR for such a project should not further analyze that cumulative impact. (Section 15130(e) of the State *CEQA Guidelines*).

The “summary of projections method” is utilized as the cumulative impact analysis is based on information contained in the City of Riverside General Plan (GP 2025) and Draft Environmental Impact Report, SCH No. 2004021108 (GP 2025 EIR), certified by the City Council in 2007 Resolution No. 21535 as well as the Phase I General Plan Update (GPUI) which included an updated 6th Cycle Housing Element (2021-2029), updated Public Safety Element, and Environmental Justice Policies and Draft Environmental Impact Report, SCH No. 2021040089 (GPUI EIR), certified by the Riverside City Council on October 5, 2021. These documents are hereby incorporated by reference. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiered and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.” Additionally, if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact (State *CEQA Guidelines* Section 15130(e)).

The geographic scope (or cumulative impact area) used for each environmental issue is different depending upon the potential area of effect. For example, the geographic scope for air quality would be the South Coast Air Basin (Basin), while the geographic scope for cumulative aesthetics impacts would be the viewshed, and the geographic scope for public services would be the City. The appropriate geographic scope is explained below in connection with each impact area.

7.1.2 Aesthetics

Cumulative aesthetic impacts could result from development of a prominent hillside or ridgeline that may impact views of that hillside or ridgeline from a scenic highway or public place; development that blocks views of a scenic vista; a substantial increase in light pollution that could directly affect an observatory or significantly affect the views of the night sky; or adversely impact the views along City-designated Scenic Boulevards, Special Boulevards and/or Scenic Parkways. The Citywide Design and Sign Guidelines limit impacts to aesthetic resources by reducing interruptions of scenic vistas, maintaining and enhancing scenic resources and visual character, and reducing light and glare in the Project Area. (GP 2025 EIR, p. 6-3.) The City General Plan policies aim to preserve scenic vistas, enhance visual character and reduce light and glare impacts. Additionally, the Downtown Specific Plan (DSP) provides development standards for the Project site to comply with to ensure compatible development with the neighboring districts. Specifically, the DSP outlines maximum height requirements, setbacks minimums, pedestrian connectivity, architecture requirements and landscape requirements.

Because aesthetic impacts are localized, the geographic scope for impacts related to aesthetics consists of the viewshed surrounding the Project site. The area immediately surrounding the Project site has a General Plan Land Use Designation of Downtown Specific Plan (DSP) The DSP allows for a hotel, commercial, residential uses, all of which are permitted or conditional permitted uses and are currently established in the area. The Project does not propose specific development at this time; however, conceptual plans provide an idea of future types of development, the maximum allowable density/intensity for each type of development, and maximum building heights allowed on the Project site as shown in **Table 3.0-B – Proposed Project Uses** of *Section 3.0 – Project Description*, lists maximum intensities and building heights uses allowed for each land use type. The Project proposes uses that are currently

present within the DSP. Therefore, the Project would continue the development pattern that is represented in the surrounding area.

As discussed in *Section 3.0 – Project Description*, the Project proposes one residential building, two hotel buildings both with a maximum height of 95 feet, one office building with a maximum height of 155 feet and the Riverside Convention Center expansion with a vertical height of 75 feet.¹ Since this Project does not include a specific development application, future development will undergo the Development Application process with the City and may be subject to a Conditional Use Permit (CUP) or other permitting process in order to comply with the DSP and local regulations. At the time a future development is proposed, the City of Riverside, as the Lead Agency would consider entitlement actions based on the specific uses proposed. The Project may introduce a taller building to the Project site than what currently exists. However, there are several existing multi-story buildings in the Downtown area. Therefore, the Project would not drastically change the skyline of the Downtown area. Furthermore, as noted in *Section 5.1 – Aesthetics*, the proposed Project would not drastically change views along Market Street which is designated as a Scenic Boulevard, Special Boulevard and Scenic Parkway. Views of Mount Rubidoux from Downtown are partially obstructed by existing multi-story buildings. Although implementation of the proposed Project may contribute to these partially obstructed views to scenic vistas, specifically Mount Rubidoux, would remain visible from certain public areas surrounding the Project site.

Thus, the proposed Project's incremental effect on aesthetics is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

7.1.3 Air Quality

The cumulative area for air quality impacts is the South Coast Air Basin (Basin). As previously stated in *Section 5.2 – Air Quality* of this Draft EIR (see **Table 5.2-D**), the portion of the Basin within which the Project is located is designated as a non-attainment area for ozone (O₃) and particulate matter less than 2.5 microns in size (PM-2.5) under both State and federal standards and for particulate matter less than 10 microns in size (PM-10) under State standards. Ozone is not directly emitted into the atmosphere; rather, it forms via a reaction of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) in the atmosphere. Therefore, it is also important to consider these emissions and their potential to contribute to ozone pollution in the region.

The South Coast Air Quality Management District (SCAQMD) considers the thresholds for project-specific impacts and cumulative impacts to be the same (see page 5.2-24). Consequently, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Project emissions within the context of SCAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts within the Basin. Cumulative localized impacts for pollutants are also considered and reflect Project air pollutant emissions in the context of ambient conditions in the Project vicinity.

¹ The DSP requires buildings within 100 feet of a Residential District to not exceed 50 feet. Due to the proximity of the proposed Riverside Convention Center building to the existing Heritage Square Neighborhood (identified as a Residential District) future development will be reviewed by City staff to assess consistency with the DSP and Title 19. If building heights exceed the DSP height requirements, such buildings will be evaluated once details are known, as the Project does not propose any specific development at this time. It should be noted that City owned buildings are exempt from Title 19. Nonetheless, the Project does not propose any specific development at this time.

As discussed in *Section 5.2 – Air Quality* of this Draft EIR, the Project's operational emissions exceed regional SCAQMD thresholds for VOC, NO_x, and carbon monoxide (CO) emissions. The Project would implement mitigation measures **MM AQ 1** and **MM AQ 9**, which reduce the Project's operational emissions of VOC, NO_x and CO by encouraging the use of alternative transportation and telecommuting and encouraging the use of solar energy and energy efficient appliances. However, implementation of mitigation measures **MM AQ 1** and **MM AQ 9** would not reduce emissions below applicable SCAQMD thresholds.

Thus, the proposed Project's cumulative contribution to air quality impacts is cumulatively considerable. Therefore, cumulative impacts are **significant and unavoidable**.

7.1.4 Cultural Resources/Paleontological Resources

A significant cumulative impact on cultural resources would result if the Project, in combination with the effects of past, present, and reasonably foreseeable future projects in the City and the larger region, would contribute to cumulative impacts on significant built historical resources, archaeological resources, and/or inadvertently discovered human remains. (GPUI EIR, p. 3.16-5.) The geographic scope for cumulative impacts to cultural resources varies for archaeological and historical and archaeological resources. For archaeological resources, the geographic scope includes the City, the larger region encompassing the City, and several surrounding cities and communities that compose the settled area of the various Native American tribes that inhabited this region. Western Riverside County was part of the territory of the Cahuilla and perhaps Luiseño people. Cumulative projects in the Project area and other development in western Riverside County could result in the progressive loss of as-yet unrecorded archaeological resources. This loss, without proper mitigation, would result in an adverse cumulative impact. The geographic context for analysis of built historical resources depends on the type of resource but generally includes the City because built historical resources are present all throughout the City, particularly in the downtown area. (GPUI EIR, 3.16-5). As discussed in the City's General Plan EIR, cumulative development projects within the City will have a less than significant impact to archaeological resources.

Cumulative projects within the City have the potential to impact cultural resources. If there was no documentation, consultation, or preservation being implemented throughout the region there would be cumulative impacts to cultural resources. All regional and local jurisdictions, including Riverside, are subject to local, State and Federal laws designed to protect cultural resources, including CEQA, and consultation pursuant to Assembly Bill 52 (AB 52) requirements. To reduce impacts to historical and archaeological resources, cumulative development projects within the City will be required to comply with applicable resource protection requirements of the City's General Plan Historic Preservation Element, such as ensuring compliance with all applicable State and federal cultural resources protection and management laws in the planning and project review process, as well as Native American consultation for projects subject to the provisions of AB 52 as part of the development review process. In addition, the Project, and any future development within the DSP, will be required to comply with applicable DSP goals and policies such as thorough design review for compatibility with historic districts and maintaining the character of the Downtown District. Pursuant to GP 2025 Mitigation Measure MM Cultural 1, the City shall require that all areas slated for development or other ground disturbing activities be surveyed for archaeological resources by qualified individuals who meet the Secretary of the Interior's Standards and Guidelines regarding archaeological activities and methods prior to the City's approval of project plans. (GP 2025 EIR, p. 5.5-28). Therefore, cultural resource reports will be required for each development project within the Project site to assess the potential for significant impacts to these resources and to

identify mitigation measures, if needed. As discussed in *Section 5.3 – Cultural Resources*, with implementation of mitigation measures **MM CR 1** through **MM CR 8**, the proposed Project would result in less than significant impacts to archaeological resources and historic resources. Therefore, the Project's incremental effect on cumulative cultural resources is not considerable and cumulative impacts would be **less than significant**.

Unlike archaeological resources, which are site specific, paleontological resources can occur throughout a sensitive geologic unit, regardless of location. Therefore, the geographic context for paleontological resources encompasses the complete extent of geologic units with high or undetermined paleontological sensitivity that underlie the Project site. It is likely that significant paleontological resources in these geologic units have been and could in future be destroyed by development. (GPUI EIR, p. 3.16-7). If there was no documentation, consultation, or preservation being implemented throughout the region there would be cumulative impacts to paleontological resources.

Development in the geographic context has removed the upper layers of geologic units in many areas and replaced it with artificial fill. However, this fill is underlain in many areas by geologic units of high or undetermined paleontological sensitivity at varying depths below ground surface. (GPUI EIR, p. 3.16-7). New private and public development and construction projects within the City could encroach on areas with paleontological resources, which could be lost if not identified and avoided or monitored properly. All future public and private development projects in the City are required to comply with the resource protection policies and requirements of the City's General Plan. These include protection of sites of archaeological and paleontological significance, compliance with the Federal Native American Graves Protection and Repatriation Act as part of the City's planning and project review process, and ensuring paleontological resources would be subject to scientific recovery and evaluation. (GP 2025 EIR, p. 5.5-27). With implementation of mitigation measure **MM CR 9**, the proposed Project would result in less than significant impacts to paleontological resources. As discussed in the City's General Plan EIR, cumulative development projects within the City will have a less than significant impact to paleontological resources. Since all local jurisdictions, including Riverside, are subject to local, State and Federal laws, including CEQA, cumulative impacts to such resources should not occur. Utilizing the site development permit process and the CEQA process for individual projects, along with implementing the General Plan's objectives and policies, and mitigation measures identified in the GP 2025 EIR, potential cumulative impacts to paleontological resources will be reduced to a less than significant level.

Therefore, the proposed Project's incremental effect on cumulative paleontological resources is not considerable and cumulative impacts would be **less than significant**.

7.1.5 Energy

The geographic scope for cumulative impacts to energy is defined by the boundaries of Riverside Public Utilities (RPU) for electricity and Southern California Gas (SCG) for natural gas. The Project's energy use includes electricity and natural gas usage as well as transportation-related energy (fuel). Energy impacts are cumulative in nature. RPU's service area encompasses most of the City. SCG's service area encompasses most of central and southern California.

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted building standards consistent with Title 24.

Fuel consumption from cars and trucks on the roadway network are also regulated at the State level. Pavley, Low Carbon Fuel Standards (LCFS), and Advanced Clean Cars reduce emissions and increase fuel efficiency. Assembly Bill (AB) 1493 ("the Pavley Standard") requires reduction in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. Executive Order S-01-07 went into effect in 2010 and required a reduction in the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. It imposes fuel requirements on fuel that will be sold in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars I and II program, first introduced in 2012, combines the control of smog, soot causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2035. Residents, employees of, and deliveries to the proposed Project site will utilize these vehicles as they become available. The cumulative development projects are also subject to these same regulations.

The proposed Project will be designed and constructed to meet with Title 24 standards and with the California Green Building Standards Code (CALGreen), which implements sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Through compliance with Title 24 standards, the proposed Project will be consistent with the State's energy conservation standards and, therefore would not conflict with an adopted energy conservation plan.

The analysis presented in *Section 5.4 – Energy* of this Draft EIR, is cumulative in nature. Thus, if an individual project does not result in wasteful or indifferent energy use, potential cumulative impacts of that project are not cumulatively considerable. As described in the analyses, the Project would not result in the unnecessary, inefficient, or wasteful use of energy resources nor would it conflict with or obstruct a state or local plan for increasing renewable energy or energy efficiency.

Thus, the proposed Project's contribution to energy is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

7.1.6 Greenhouse Gas Emissions

GHGs are those gases that will contribute to global climate change; therefore, the cumulative impact area for GHG emissions is the earth's atmosphere. Implementation of the proposed Project along with the cumulative development projects will contribute GHG emissions to the atmosphere.

It is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions including, for example: transportation policy, fuel consumption, and energy generation, which the State has determined are necessary to meet all of its GHG reduction goals. Further, some of the GHG emissions associated with the Project can be reduced only by measures to be implemented by other governmental agencies.

As discussed in *Section 5.5 – Greenhouse Gas Emissions* of this Draft EIR, the Project would contribute GHG emissions to the cumulative condition. Equipment and vehicles used during construction (e.g., on-road motor vehicles and heavy-duty construction equipment) and operations (i.e., vehicle trips, electricity consumption, and waste generation) would result in a net increase in GHG emissions over existing conditions and over the numeric threshold used by the City. Implementation of the Project would result in approximately 23,455.20 metric tons of carbon dioxide equivalents per year (MTCO₂E/yr), which exceeds

the 3,000 MTCO₂E/yr draft threshold for non-industrial projects utilized by the City for the purpose of evaluating the GHG impacts associated with proposed general development projects. As such, the Project will generate a substantial amount of GHG emissions even after implementation of mitigation measures **MM AQ 1** through **MM AQ 9**. However, the Project will comply with existing regulations that reduce GHG emissions (i.e., Title 24, CALGreen code) and would not conflict with or obstruct implementation with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

Thus, the proposed Project's contribution to greenhouse gas emissions is cumulatively considerable. Therefore, cumulative impacts are **significant and unavoidable**.

7.1.7 Noise

The geographic scope for construction and operational noise and vibration impacts is the immediate vicinity of the Project site because noise and vibration by definition are a localized phenomenon, which drastically reduces in magnitude as the distance from the sources increases. Consequently, only those cumulative projects within the immediate vicinity of the Project will be likely to contribute to cumulative noise and vibration impacts resulting from construction or operation.

Noise and vibration generated by stationary sources, such as construction equipment or Project operations has the potential to be substantial and exceed the Federal Transit Administration criteria for human annoyance and structural damage, if the noise or vibration source occurred in close proximity to other noise generators or vulnerable structures. Construction activities could expose sensitive receptors to excessive noise or groundborne vibration as could noise from heating, ventilating, air conditioning (HVAC), and other equipment on new residential or non-residential structures. These sources could contribute to a significant noise impact. (GPUI EIR, p. 3.16-10).

Future development would be required to comply with City requirements for both construction and operational noise, and vibration, including those within the Riverside Municipal Code, and General Plan as listed in *Section 5.6.2 – Related Regulations*. Furthermore, the Project would implement mitigation measures **MM NOI 1** through **MM NOI 3**, referenced in *Section 5.6*. Mitigation measure **MM NOI 1** identifies placement criteria for mechanical equipment and sets forth a process to be followed if the placement criteria cannot be achieved. Mitigation measures **MM NOI 2** and **MM NOI 3** require acoustical analysis to confirm future development on the Project site meets the noise standards set forth in the Municipal Code. Through compliance with local regulations and **MM NOI 1** through **MM NOI 3**, the proposed Project's incremental effect on cumulative stationary-sourced noise and vibration is not considerable. Cumulative impacts would be reduced to less than significant.

A cumulative noise impact from Project-generated vehicular traffic would occur if Project-generated trips (ADT) would substantially increase traffic noise above the cumulative (without project) noise levels. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA and that a change of 5 dBA is readily perceptible (CT-A, pp. 6-5; dBF, p. 3). Therefore, for purposes of this analysis, an increase of 5 dBA attributable to the addition of Project-generated trips to the expected number of trips in the cumulative without Project condition, would be considered an adverse cumulative impact.

Because decibels, the unit of measurement used for sound level, are measured on a logarithmic scale, the doubling of energy of a noise source, such as a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3 dBA decrease. (CT-A, pp. 2-15, 6-5) This means, the number of Project-generated trips would have to exceed the number of trips in the cumulative

condition or, to put it another way, the percent change in cumulative plus Project ADTs would have to at least 100 percent greater than the cumulative without Project ADTs. **Table 7.0- A – Percent Change in Cumulative Average Daily Trips with Project** presents the Project ADTs at buildout, Cumulative ADTs without Project ADT, Cumulative ADTs plus Project ADTs, and the percent change attributable to the Project ADTs.

Table 7.0-A – Percent Change in Cumulative Average Daily Trips with Project

Road Segment	Cumulative (2045) Without Project (ADTs)	Project ADTs	Cumulative Plus Project ADTs	Change Due to Project ADTs
Main St: north of Third St.	10,683	2,207	12,890	21%
Market St: north of Third St.	20,457	315	20,772	2%
Market St: Third St. – Fifth St.	23,351	3,678	27,029	16%
Market St: Fifth St. – Sixth St.	23,446	2,522	25,968	11%
Market St: south of Sixth St.	21,683	2,522	24,205	12%

Source: ADTs from *Riverside Alive! Traffic Study*, December 18, 2024 (included as Appendix E), Table 22

As shown in the above table, the percent change attributable to the Project-generated trips is substantially less than 100 percent; therefore, the change in noise along the affected roadways would be substantially less than 3 dBA and the increase in traffic noise would not be perceptible. Thus, the implementation of the Project would not contribute to cumulative noise.

For the reasons set forth above, the incremental contribution to cumulative noise from Project construction and operation is not cumulatively considerable. Cumulative noise impacts are **less than significant**.

7.1.8 Public Services

The geographic scope for fire and police protection is the City.

Riverside Fire Department (RFD) provides fire protection for the City. RFD's major facilities include 14 fire stations throughout the City, administration and prevention offices, an Emergency Operations Center, and a training center. Riverside County Fire Department provides service to the unincorporated territory within the City's Sphere of Influence. The Riverside Police Department (RPD) provides police protection services to the City from four stations. (GPUI EIR, p. 3.16-13).

As additional development occurs within the City, there would be an overall increase in the demand for public services, which could cause physical deterioration of existing facilities. The proposed Project may increase the City's population however since the Project is consistent with the Downtown Specific Plan (DSP) designation, which allows for high-density residential and mixed-use development within the Raincross District, the Project would not induce unplanned population growth in the area. (IS, p. 51).

Additionally, implementation of the Project would be consistent with the Public Safety Element of the City's GPUI by being designed and constructed to meet the Riverside Municipal Code Title 16, California Fire Code, and the International Building and Fire Code. Increases in demand are routinely assessed by

fire and law enforcement agencies as part of the budgeting processes to access if facility/staffing are needed to adequately accommodate future growth in the City. (GPUI EIR, p. 3.16-13). During the entitlement processes the Project Sponsor will be required to comply with mitigation measure **MM PS 1**, which requires additional review with RFD to determine if additional physical improvements are needed. Other development projects in the City would be subject to similar requirements, and the impacts of such development would be analyzed and mitigated, as feasible, at a project-specific level.

Therefore, the Project's incremental effect on cumulative public services is not considerable and cumulative impacts would be **less than significant**.

7.1.9 Transportation

The geographic context for an analysis of cumulative transportation impacts considers total development within the City of Riverside (per General Plan 2025 and GPUI) plus regional growth consistent with the SCAG RTP/SCS as represented in the Riverside County Traffic Analysis Model forecasting model. The City is connected regionally by California State Route 91 (SR-91) and SR-60, Interstate 215 (I-215) and I-15. Both SR-91 and SR-60 are major east-west interregional facilities that extend from the beach cities in Los Angeles County to the Inland Empire. Both I-215 and I-15 are north-south interstate routes that provide access to Temecula and San Diego County.

Implementation of the Project along with buildout per the General Plan 2025 and GPUI would not conflict with adopted policies, plans, or programs. The General Plan 2025 and GPUI policies include focusing future development near existing transportation corridors, ensuring land uses are supported by an efficient local roadway network, and supporting alternative modes of transportation such as walking, biking, and transit. These policies support, rather than conflict with, policies, plans, and programs concerning alternative transportation, thereby limiting impact of the proposed Project and other projects within the City. The Project does not propose demolition of the existing sidewalks along Third Street, Orange Street, Fifth Street, and Market Street. Furthermore, the Project would incorporate internal pedestrian connectivity through pathways and walkways within the Project site which will connect to the existing sidewalks in the surrounding area. Thus, the Project would provide new connections to the existing pedestrian network in the Downtown area.

Because the Project's land uses are consistent with those identified in the General Plan 2025 and the Project is promoting pedestrian connectivity, the Project's incremental effect to a cumulative impact regarding conflicts with a program, plan, ordinance, or policy addressing the circulation system is not considerable and cumulative impacts are less than significant.

CEQA Guidelines Section 15064.3 requires that the determination of significance for transportation impacts be based on VMT instead of a congestion metric such as LOS. The change in the focus of transportation analysis is the result of SB 743, as outlined in *Section 5.8 – Transportation* of this Draft EIR. Regarding cumulative VMT impacts, the City's TIA/VMT guidelines state, "...if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence."

As stated in the *Vehicle Miles Traveled Screening Assessment Memorandum* (VMT Memo), which is included as Appendix E to this Draft EIR, the Project site is in Traffic Analysis Zone (TAZ) 2075 and within a Transit Priority Area (TPA), as discussed in *Section 5.8 – Transportation*. The Project is consistent with the existing General Plan land use designation; thus, the Project is consistent with Connect SoCal 2024 SCS. Furthermore, the Project proposes a floor to area ratio (FAR) of 2.25, which is greater than 0.75.

The Project proposes a subterranean parking structure in order to provide adequate parking consistent with City requirements and, as such, the Project site would not be considered “overparked.” The Project site is currently developed with non-residential uses; therefore, the Project implementation would not require the demolition of affordable housing. Because the Project site is located within a TPA and the Project is consistent with the regional RTP/SCS, the Project’s incremental contribution to a cumulative VMT impact is not considerable and cumulative impacts are not significant. (WEBB-C, pp. 4-9).

For the reasons set forth above, the proposed Project’s incremental contribution to cumulative transportation impacts is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

7.1.10 Tribal Cultural Resources

The geographic scope for cumulative impacts to tribal cultural resources (TCRs) is defined by the cultural setting and territory of the prehistoric and historic people who occupied the area of southern California in which the City is located. The Project area is situated within Western Riverside County as part of the territory of the Cahuilla and perhaps Luiseño people. Development projects in the City and other development in western Riverside County may result in the progressive loss of as-yet unrecorded TCRs. This loss, without proper mitigation, would result in an adverse cumulative impact.

As discussed in *Section 5.9 – Tribal Cultural Resources* of this Draft EIR, no known significant Native American historic or archaeological resources are located on the Project site or in the surrounding area and the Project is not located on any known cemetery so is not expected to disturb any human remains. Site preparation and construction activities associated with future development may result in cumulative impacts to TCRs if any of these resources are present and no documentation, consultation, or preservation were being implemented throughout the region. However, implementation of mitigation measures **MM CR 1** through **MM CR 8** will reduce potential impacts to Native American resources during ground disturbing activities by requiring archaeological monitoring, consultation procedures through AB 52, establishing a Treatment and Disposition Agreement with the consulting tribe, providing cultural sensitivity training for all construction personnel, and complying with CCR 5097.98 for human remain discovery. Compliance with the General Plan Historic Preservation Element policies HP-1.3, -2.1, -2.3, -4.3 will also reduce impacts to TCRs. Further, in the unlikely event of the discovery of human remains on the Project site, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately, pursuant to California Health & Safety Code Section 7050.5 (HSC 7050.5) and California Public Resource Code Section 5097.98 (PRC 5097.98).

Since all local jurisdictions, including the City, are subject to local and federal laws, as well as State laws, which include the AB 52 consultation process between the Lead Agency and interested tribes to address potential impacts to TCRs, cumulative impacts to TCRs are less than significant. Potentially significant impacts are also reduced by utilizing the site development permit process, the CEQA process for individual projects, and the notification and consultation requirements of AB 52.

Thus, the proposed Project’s contribution to TCR’s is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

7.1.11 Utilities and Service Systems

The geographic scope for cumulative impacts to utilities and service systems are the service areas of each utility provider as discussed in *Section 5.10 – Utilities and Service Systems* of this Draft EIR. Potable and non-potable water services will be provided by Riverside Public Utilities (RPU). Riverside Public Works (RPW) provides for the collection, treatment, and disposal of all wastewater through its Riverside Regional Water Quality Control Plant (RWQCP).

Cumulative impacts to water and wastewater conveyance and treatment capacity could be significant if the providers of these utilities had not accounted for development of the Project site and its effect on their projections to meet customer demands. These cumulative effects include insufficient water or wastewater treatment capacity that would cause significant environmental effects. The proposed Project, including the other future developments will be conditioned to construct the off-site and on-site infrastructure consistent with the overall development envisioned by the City's General Plan and in consultation with the utility providers to ensure each future development project can receive service. The utility providers for the Project area have accounted for development of the Project site in their respective planning documents, including the RPU's 2020 UWMP, RPU's Wastewater Integrated Master Plan Update, Sewer System Management Plan. At such time that these providers undertake expansion projects, they will make their own CEQA determinations.

Therefore, the Project will not have cumulatively considerable impacts related to the construction of water and wastewater facilities.

Thus, the proposed Project's contribution to utilities and service systems is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

7.2 Significant Unavoidable Adverse Impacts

This topic is intended to address any significant impacts that cannot be mitigated to below a level of significance (State *CEQA Guidelines* Section 15126.2). Specific impacts which cannot be avoided or eliminated if the Project is implemented have been discussed in detail throughout *Section 5.0 – Environmental Analysis* and *Section 7.1 – Cumulative Impact Analysis*. A summary of the areas in which impacts could not be reduced to a level below significance are summarized below.

Air Quality

As outlined in *Section 5.2 – Air Quality* of this Draft EIR and *Section 7.1.3 – Air Quality* above, implementation of the Project would result in significant and unavoidable impacts because operational emissions exceed SCAQMD thresholds.

Greenhouse Gas Emissions

As outlined in *Section 5.5 – Greenhouse Gas Emissions* of this Draft EIR and *Section 7.1.6 – Greenhouse Gas Emissions* above, implementation of the Project would result in significant and unavoidable impacts to greenhouse gas emissions because its emissions exceed the numeric threshold used by the City.

7.3 Growth Inducing Impacts

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without implementation of a proposed project. Typically, the growth inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. (GPUI EIR, p. 5-1).

According to State *CEQA Guidelines* Section 15126.2 (e), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

Removing Obstacles to Population Growth

As discussed in *Section 3.0 – Project Description* of this Draft EIR, the Project would foster population growth since it would allow for higher density residential uses. The Project site is located in an area that has been fully developed; thus, regional infrastructure has already been built-out providing service to the site and surrounding areas. As mentioned in *Section 3.0 – Project Description*, the Project proposes off-site improvements for water and sewer facility upgrades within the roadway right-of-way. One segment of existing offsite sewer main line located in Market Street would most likely need to be upsized to a 15-inch diameter pipeline and one segment of water line in Third Street along the Project frontage would be upsized to an 18 inch-diameter pipeline. Upsizing these facilities may be required based on the type of development proposed, in order to continue to provide adequate service to the area. The proposed upsizing of the existing sewer main and existing water line are intended to serve the proposed Project, and as such does not extend utilities into an undeveloped area.

The Project site is located in a highly developed area that is fully served with all utilities. The Project does not propose or require utility infrastructure facilities that would remove an obstacle to growth or accommodate growth beyond what is proposed. Additionally, the Project does not open any large undeveloped areas for new uses. Therefore, direct and indirect growth-inducing impacts would be less than significant.

Increases in Population that May Tax Existing Community Services

The Project does not propose specific development at this time; however, the Project does propose mixed uses that are consistent with the Downtown Specific Plan (DSP). Under the maximum development envelope, the Project proposes a maximum of 168 residential units. 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 DSP's maximum allowable density. The Project's uses are consistent with the DSP designation, which allows for high-density residential and mixed-use development within the Raincross District. Since the Project is consistent with the DSP, the Project is also consistent with the General Plan 2025 and the GPUI which projects the population growth based on the land use designations per the DSP.

As discussed in *Section 5.7 – Public Services* of this Draft EIR, the Project would not have a significant impact upon public services such as police and fire. Police and fire services are based upon response times and Unit Hour Utilization, respectively. The Project would be required to contribute development impact fees, if available or a cost contribution agreement which would be used to support these services. Because the increase in population was identified as part of the rate of growth projected under GP 2025 and GPU1 buildout projections and GP 2025 and the GPU1 contain policies for the provision of public serves, Project implementation would not tax existing service systems.

Encourage and Facilitate Activities that Significantly Affect the Environment

Implementation of the proposed Project would include population growth. As discussed in *Section 4.0 – Environmental Effects Found Not to be Significant* of this Draft EIR, specifically *Section 4.1.12 – Population and Housing*, the Project may introduce between approximately 514 to 576 additional residents to the City. As identified in the GPU1, SCAG projected the population of the City to increase to 395,800 by 2045, which represents an increase of 20.61 percent from the 2020 population of 328,155 (GPU1, p. 3.9-17). Implementation of the Project would account for less than one percent of the projected SCAG population growth by 2045.

Additionally, the City adopted the Regional Housing Needs Assessment (RHNA) 6th Cycle for the planning period of October 2021 through October 2029. The RHNA identified new housing units needed by income category for the region, including the City of Riverside. The City's RHNA allocation is 18,458 new housing units. The Project proposes a maximum of 168 residential units which would account for less than one percent of the City's allocated RHNA housing units.

Given the development planned and projected under the City's GP 2025, GPU1, and DSP, it is not anticipated that the Project's potential to foster growth would lead to development not otherwise anticipated by the buildout of these general plans.

7.4 Significant Irreversible Environmental Changes

The intent of this section of this Draft EIR is to discuss primary and secondary impacts of the proposed Project that result in significant irreversible changes in the environment. State *CEQA Guidelines* Section 15126.2(d) identifies, as examples, such things as use of nonrenewable natural resources, irreversible changes in land use, and irreversible damage to the environment resulting from environmental accidents associated with a project.

Construction of the Project site would consist of development of the City-owned Parking Lot 33 (Lot 33) and Outdoor Plaza in front of the Riverside Convention Center. Project-related construction activities would entail the commitment of non-renewable and/or slowly renewable energy resources, and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water. The energy commitments would be long-term obligations. Construction activities may include the temporary use of some hazardous agents, such as paints, oils, solvents, and cleansers, as well as temporary storage of these materials and fuel on site. However, the amounts of chemical agents typically used during construction would be limited. In addition, the residential and nonresidential development that would be facilitated by the Project is not anticipated to create hazards related to the release of hazardous materials. Given the financial and material investments that would be required of the Project applicant and the City, it is unlikely that the Project site would be returned to its existing condition once it has been developed and the resources used during implementation of the Project would be permanently committed to the Project. Therefore, their use would be irreversible. See Initial Study

Section 9b – Hazards and Hazardous Materials, Sections 5.4 – Energy, 5.7 – Public Services, and 5.10 – Utilities and Service Systems of this Draft EIR for details.

7.5 Consistency with Regional Plans

Section 15125(d) of the State *CEQA Guidelines* also requires an EIR to “to discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” The regional plans applicable to the proposed Project area: the), the SCAG RTP/SCS, Regional Water Quality Control Board (RWQCB), and the Air Quality Management Plan (AQMP). General and specific plans applicable to the proposed Project are: City’s GP 2025, GPUl, and the Downtown Specific Plan (DSP).

Table 7.0-B – Location in the Draft EIR in which Consistency with Regional Plans is Discussed, identifies the location in which each of these plans are discussed in this Draft EIR.

Table 7.0-B – Location in the Draft EIR in which Consistency with Regional Plans is Discussed

Plan	Discussion Location
AQMP	Section 5.2 – Air Quality (Related Regulations)
GP 2025, GPUl, and DSP	Sections 5.0 through 5.10 (Environmental impact analysis section for each environmental issue under the heading “Related Regulations”)
	▪ 5.1 – Aesthetics
	▪ 5.2 – Air Quality
	▪ 5.3 – Cultural Resources
	▪ 5.4 – Energy
	▪ 5.5 – Greenhouse Gas Emissions
	▪ 5.6 – Noise
	▪ 5.7 – Public Services
	▪ 5.8 – Transportation
	▪ 5.9 – Tribal Cultural Resources
	▪ 5.10 – Utilities/Service Systems
MSHCP	Initial Study included as Appendix A
CMP	Section 5.8 – Transportation (Related Regulations)
RWQCB	Section 5.10 – Utilities and Service Systems (National Pollutant Discharge Elimination System Construction Permit)
<i>Connect SoCal</i> (2024-2050 SCAG RTP/SCS)	Section 6.0 – Regional Consistency

8.0 Alternatives to the Proposed Project

An EIR must identify ways to mitigate or avoid the **significant effects** that a proposed project may have on the environment. For this Project, the only significant effects determined herein are related to air quality and greenhouse gas emissions. The City, acting as the CEQA Lead Agency, is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives addressed in an EIR is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

Of the alternatives considered, the EIR needs to examine in detail only those that the Lead Agency determines could feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any of the significant effects of the proposed project. Per State *CEQA Guidelines* Section 15364, “feasible” has been defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

The following discussion considers alternatives to implementation of the Project. The discussion examines the potential environmental impacts resulting from each alternative. Through comparisons of these alternatives to the Project, the relative advantage(s) of each can be weighed and analyzed. State *CEQA Guidelines* Section 15126.6 identifies the parameters within which consideration and discussion of alternatives to the proposed Project should occur. As stated in this section of the *Guidelines*, alternatives must focus on those that are potentially feasible and which attain most of the basic objectives of the Project.

The Initial Study prepared for this Project determined the following topics to be less than significant and were therefore, not addressed in this Draft EIR: Agriculture and Forestry Resources, Biological Resources, Hazardous and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Recreation, and Wildfire. Of the topics that were addressed in this Draft EIR, *Section 5.0* of this Draft EIR determined the following environmental topics to be less than significant:

- Aesthetics
- Cultural Resources
- Energy
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

For the purposes of the alternative analysis, since none of these topics were determined to be significant, they are not included in the detailed analysis of the alternatives below to compare to the proposed Project.

8.1 Project Objectives

Per State *CEQA Guidelines* Section 15124 (b), an EIR needs to include a statement of the objectives of a project which helps the City develop a reasonable range of alternatives. The Objectives need to outline the general purpose of the Project. The Project Objectives are identified by the City as follows:

1. Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown.
2. Expand the Convention Center to improve the City's ability to attract larger conferences and group meeting business and be more competitive.
3. Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.
4. Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation for Riverside residents.
5. Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers.
6. Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.
7. Place housing near existing employment center downtown to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.

8.2 Summary of the Project's Significant Unavoidable Impacts

The analysis in *Section 5.0* of this Draft EIR determined that even with implementation of mitigation measures, significant environmental impacts would result from the operation of the proposed Project. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce any of the following Project-related significant unavoidable impacts:

- Air Quality: Project and Cumulative Impacts
- Greenhouse Gas Emissions: Project and Cumulative Impacts

8.3 Rationale for Alternative Selection

State *CEQA Guidelines* Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." According to this section of the State *CEQA Guidelines*, "...an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. The City, as lead agency, is responsible for selecting a range of Project alternatives for examination, and there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the "rule of reason" (*CEQA Guidelines* Section 15126.6 (a)). Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the

proponent can reasonably acquire, control, or otherwise have access to an alternative site. (*CEQA Guidelines* Section 15126.6 (f)(1)).

With respect to the selection of alternatives to be considered in an EIR, State *CEQA Guidelines* Section 15126.6(b) states "...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the Project Objectives or would be more costly." That is, each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed Project. For this Project, those significant effects are related to Air Quality (operations) and Greenhouse Gas Emissions.

The rationale for selecting the alternatives to be evaluated, and a discussion of the "no project" alternative are also required (State *CEQA Guidelines* Section 15126.6(e)). The "no project" alternative in this case, means no development would take place within the Project site limits and the existing Riverside Convention Center would remain. The other alternatives evaluated in this Draft EIR were selected based on their ability to reduce or avoid impacts to Air Quality (operations) and Greenhouse Gas Emissions.

8.4 Alternatives Rejected From Further Consideration

Section 15126.6(c) of the *CEQA Guidelines* specifies that an EIR should identify alternatives that were considered by the lead agency but were rejected during the scoping process and identify the reasons for eliminating the alternatives from further consideration. Section 15126.6(c) further indicates that a lead agency may eliminate an alternative from detailed consideration in an EIR if it fails to meet the basic Project Objectives, is infeasible, or does not avoid significant environmental impacts.

1. Alternative Location
2. No Parking Structure Alternative
3. Convention Center Expansion Only

8.4.1 Alternative Location

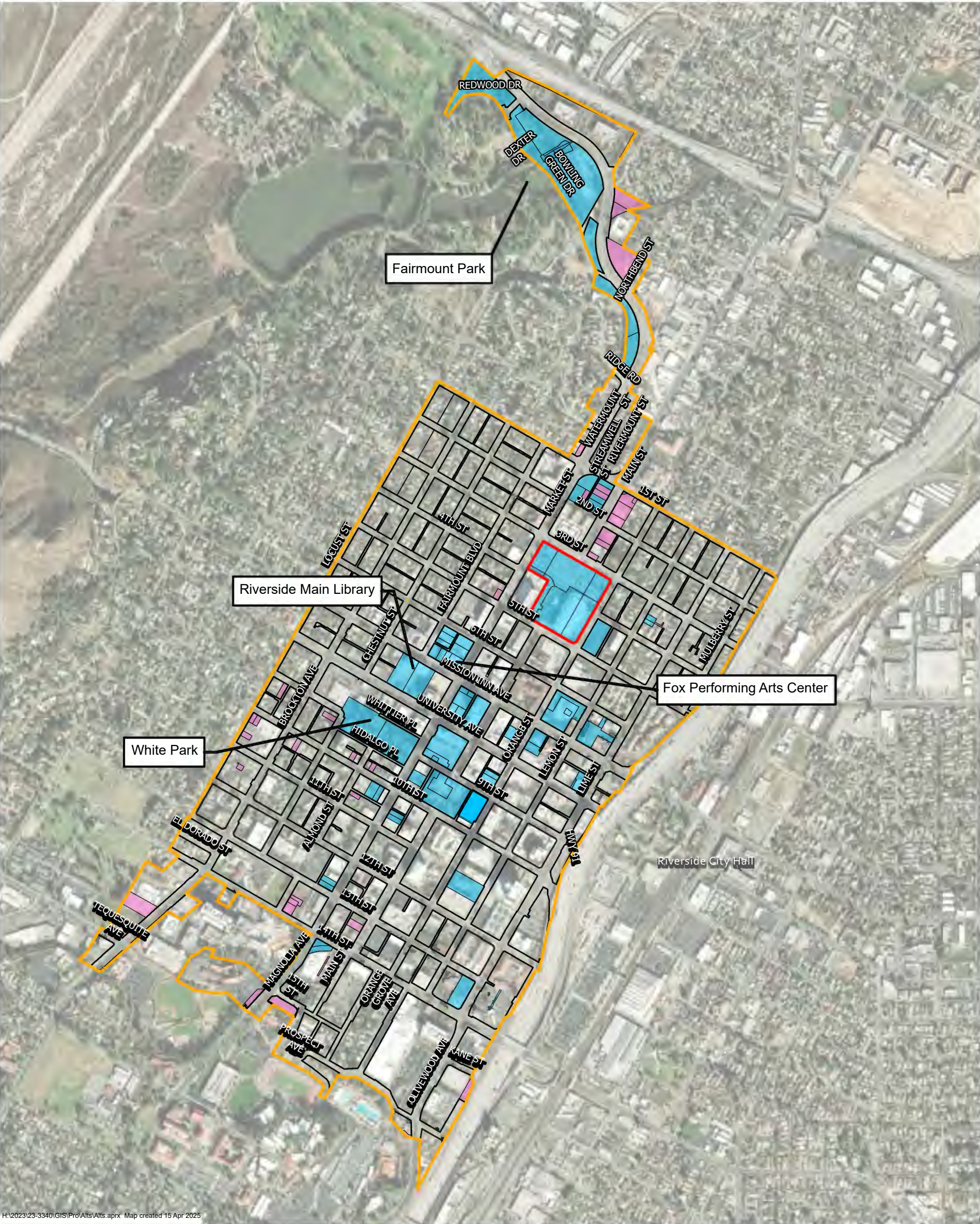
CEQA requires alternative site(s) be evaluated if any feasible sites exist where significant impacts can be lessened. **Figure 8.0-1 – Alternative Sites Evaluated**, shows the alternative sites evaluated in the Draft EIR. The proposed Project site is a 10-acre City-owned property located in the Downtown Area, within a Transit Priority Area¹ (as discussed in *Section 5.8 – Transportation* of this Draft EIR), which includes the Riverside Convention Center. The sites shown on **Figure 8.0-1** were selected for analysis due to sharing similar characteristics as the Project, including being located within the Downtown Specific Plan (DSP), vacant sites, and sites 10 acres or larger. Most of the sites are City-owned.

¹ Transit Priority Area is defined as a half mile area around an existing major transit stop or an existing stop along a high quality transit corridor per the definitions below.

Pub. Resources Code, Section 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Pub. Resources Code, Section 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

FIGURE 8.0-1 Alternative Sites Evaluated



LEGEND


Project Site

Vacant Parcels

City-Owned Parcels

Downtown Specific Plan Boundary

Parcel Boundaries



0

500

1,000

Ft

Sources:City of Riverside GIS, ESRI Imagery 2025

Currently, there are no vacant lots located within the DSP, that could potentially support the same uses as the proposed Project. Of the vacant sites within the DSP, none are 10 acres in size, City-owned, or are already developed with an existing Convention Center.

City-owned parcels were also evaluated and their locations are shown on **Figure 8.0-1**. The majority of these parcels are developed, and the largest parcels are developed with key City facilities like Riverside City Hall, Riverside Main Library, and White Park. Other alternative sites shown on **Figure 8.0-1** would require demolition of existing structures or operating businesses to support the proposed uses of the Project. Furthermore, the environmental impacts of development on any other site in the City are expected to be similar to those of the proposed Project. Moving the Project to another site would not avoid the Project's significant impacts to Air Quality and Greenhouse Gas Emissions since these impacts are resulting from the increased vehicle emissions associated with the Project uses, which would be similar regardless of the Project location. Furthermore, if an alternate location was to be chosen, depending on the location and distance from transit facilities, the new location may not be within a TPA, thus new transportation impacts associated with vehicle miles traveled (VMT) could arise.

Given that the Project proposes a Convention Center expansion and there are no other locations within the City, including the Downtown Area, that have an existing Convention Center, there appears to be no compatible sites available. Construction of a remote expansion to the Convention Center on a non-contiguous site would render the efficient operation of convention business infeasible and would not improve the existing Convention Center's competitiveness or ability to attract business in support of the Project objectives. Therefore, an alternative location was considered but rejected as a viable Project Alternative.

8.4.2 No Parking Structure Alternative

A No Parking Structure Alternative was analyzed as a result of a written comment letter received from Californians Allied for a Responsible Economy (CARE CA) in response to the Initial Study/Notice of Preparation (NOP) requesting analysis of a Project with fewer parking spaces than what is proposed. This comment letter is included in Appendix A of the Draft EIR. Under the No Parking Structure Alternative, this alternative would include elimination of the proposed subterranean parking structure that could be up to five levels. Under this Alternative, Lot 33 would still be utilized for development of the proposed Project uses, but the only difference would be the 498 parking spaces offered by Lot 33 currently would not be replaced or supplemented by the Project. Under this Alternative, Riverside Convention Center visitors, Downtown visitors, Downtown residents, businesses, and employees would lose 498 parking spaces. As a result of the loss of parking stalls, it is expected that more of the visitors and residents would use public transportation or other forms of transportation to attend events at the Convention Center. Nonetheless, some visitors may still choose to drive, which could result in new vehicle trips to adjacent residential areas and other nearby City-owned parking structures. An influx of cars seeking to park in nearby residential areas and parking structures may cause annoyance for existing residents, business owners, employees and visitors, who may now experience a parking deficit. However, parking deficits are a social impact, making an inconvenient condition for drivers but this inconvenience would not cause a significant adverse impact on the environment.

This Alternative would eliminate existing parking and, by doing so, create a new social impact to surrounding residential areas and parking structures which may be utilized regularly by other Downtown employees, businesses, hotel guests, and customers. Although not a significant impact under CEQA, for these reasons this Alternative was rejected from further consideration.

8.4.3 Convention Center Expansion Only (without Hotel and Residential)

Under this Alternative, only the Convention Center expansion would take place. It is assumed no off-site improvements would be needed. Typically, convention events have itineraries that extend over a couple of days requiring the need for surrounding hospitality accommodations. Currently, one hotel abuts the Project site boundary, as well as other hotels that are located in close proximity to the Convention Center/Project site, which all support Convention Center attendees. By not constructing commensurate hotel rooms with the Convention Center expansion, as is envisioned by this Alternative, there could be more vehicle trips to and from the Convention Center as visitors would need to seek lodging farther away. These additional trips would create more air quality impacts. Therefore, the expansion of the Convention Center only, which would create additional vehicle trips and corresponding air and GHG emissions, would not provide an Alternative to reduce impacts created by the Project. Therefore, this Alternative was rejected from further consideration.

8.5 Alternatives Under Consideration

This section of the Draft EIR presents the analysis of three alternatives intended to address ways to reduce the significant environmental effects associated with the proposed Project. In accordance with State *CEQA Guidelines* Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the proposed Project.

This section of the Draft EIR presents the analysis of three alternatives in comparison to the potential environmental effects associated with the proposed Project. In accordance with State *CEQA Guidelines* Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the proposed Project. The following Project Alternatives have been identified for their potential to reduce impacts related to the proposed Project:

- Alternative 1: No Project/Status Quo
- Alternative 2: 30-Percent Reduced Project Density/Intensity
- Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only

Each Alternative is described below and followed by:

- Alternative's Impact Analysis: a discussion of environmental topics evaluated in this Draft EIR that were found to be potentially significant as a result of the proposed Project and the Alternative's ability to reduce impacts over the proposed Project;
- Relationship of Alternative to Project Objectives: the Alternative's ability to achieve the proposed Project's objectives; and
- Alternative Conclusion: the Alternative's feasibility.

A comparison of Alternatives is presented in a matrix in *Section 8.6*, below.

8.5.1 Alternative 1: No Project/Status Quo

Alternative 1 is the No Project/Status Quo Alternative. Under this alternative, no development or demolition would take place within the Project site limits. No ground-disturbing activities would take place, nor would any new structures be constructed. The No Project/Status Quo Alternative would retain the existing Riverside Convention Center (composed of approximately 50,000 square-feet of exhibition/meeting space with additional indoor pre-function area and 40,000 square feet of back-of-house area), 48,000 square feet of Outdoor Plaza, and Lot 33. Thus, under this Alternative all Project site components would remain in existing condition and operation, and no off-site improvements would be needed.

No Project/Status Quo Alternative Impact Analysis

Air Quality

This Alternative would not result in demolition of the existing structures or any new construction; therefore, Alternative 1 would not generate any short-term construction emissions. Additionally, since there would be no change from existing operation, no new long-term emissions would result from increased traffic or building-related energy use. Due to the avoidance of short-term and new long-term criteria pollutant emissions, Alternative 1's air quality impact would be avoided compared to the proposed Project. Therefore, impacts associated with air quality emissions from Alternative 1 would be less than that of the proposed Project.

Greenhouse Gas Emissions

This Alternative would not result in demolition of the existing structures or any new construction; therefore, Alternative 1 would not generate any short-term construction emissions on-site. Additionally, since there would be no change from existing operation, no new long-term emissions would result from increased traffic or building-related energy use on the Project site. Due to the avoidance of short-term and new long-term greenhouse gas emissions, Alternative 1's greenhouse gas emissions impact would be avoided compared to the proposed Project. Therefore, impacts associated with greenhouse gas emissions from Alternative 1 would be less than that of the proposed Project.

Relationship of Alternative 1 to Project Objectives

Alternative 1 assumes that the site would remain in its existing condition and no demolition or new construction would occur. An analysis of whether the No Project/Status Quo Alternative meets each Project Objective is provided in **Table 8.0-A –Alternative 1 (No Project/ Status Quo) Ability to Meet Project Objectives**, below.

Table 8.0-A – Alternative 1 (No Project/Status Quo) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown.	No. Alternative 1 would leave the existing structures in place and current operations would remain in place. Thus, Alternative 1, would not contribute to creating a dynamic employment, hospitality, entertainment, retail and residential district.

Table 8.0-A – Alternative 1 (No Project/Status Quo) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Expand the Convention Center to improve the City's ability to attract larger conferences and group meeting business and be more competitive.	No. Alternative 1 would not expand the Convention Center. Thus, Alternative 1 would not help the City attract larger conferences and group meeting business and be more competitive.
Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.	No. Alternative 1 would not expand the Convention Center nor would it introduce any hotel, entertainment or retail uses on the Project site. Thus, Alternative 1 would not be able to host larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.
Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation for Riverside residents.	No. Alternative 1 would not introduce hotel uses or retail uses to the Project site. Therefore, Alternative 1 would not contribute to an increase in sales tax or provide new employment opportunities for Riverside residents. Furthermore, Alternative 1 would not expand the Convention Center. Thus, Alternative 1 would not be able to host larger events that bring in more out-of-town attendees which would contribute to the TOT generation. Therefore, Alternative 1 would not improve the overall economics of downtown as it would not increase TOT generation, sales tax generation or provide new employment opportunities for Riverside residents.
Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers.	No. Alternative 1 does not have a residential component. Therefore, Alternative 1 would not help with the City's RHNA designated housing numbers.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	No. Alternative 1 does not have a residential component.
Place housing near existing employment center downtown to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.	No. Alternative 1 does not have a residential component and would not improve pedestrian connectivity in the Project area as the Project would.

Alternative 1 Conclusion

Alternative 1 would result in no increase in short-term or long-term air quality or greenhouse gas emissions since no demolition or new construction would occur. Alternative 1 would reduce air quality and greenhouse gas emissions related to vehicles compared to that of the proposed Project.

Although Alternative 1 – No Project/Status Quo would eliminate the significant and unavoidable impacts to air quality and greenhouse gas emissions, Alternative 1 fails to meet any of the Project Objectives and is therefore considered infeasible.

8.5.2 Alternative 2: 30-Percent Reduced Project Density/Intensity

Alternative 2 proposes to reduce overall proposed Project land use densities/intensities by 30 percent to reduce air quality and greenhouse impacts. Alternative 2 would still require off-site improvements for both roadway improvements and water and sewer facility upgrades to support the proposed land uses. By reducing Project land use densities/intensities by 30 percent, a similar reduction in traffic trips is expected. A 30-percent reduction was chosen as this is a typical reduction size to still allow for development that makes market sense so it would be realistic, but also allows for a reduction in the vehicle trips that would use the site that would also result in a valuable reduction of emissions. The proposed 30-percent reduction is reflected in **Table 8.0-B – Alternative 2 Density/Intensities** below.

Table 8.0-B – Alternative 2 Density/Intensities

Land Use Type		Maximum Dwelling Units/Rooms or Square Feet (SF)		Reduction from Alternative 2
		Project	Alternative 2 ¹	
Residential Units	Condominiums	55 units	39 units	16 units
	Multi-Family Residential	113 units	79 units	34 units
Non-Residential	Hotel	376 rooms	263 rooms	113 rooms
	Office	220,000 SF	154,000 SF	66,000 SF
	Commercial Retail Uses			
	<i>Restaurant-Focused Retail</i>	12,875 SF	9,013 SF	3,862 SF
	<i>Grocery Store</i>	20,690 SF	14,483 SF	6,207 SF
	<i>Fitness Center</i>	28,416 SF	19,891 SF	8,525 SF
	Parking Facilities	Up to 5 levels	Up to 3.5 levels	1.5 levels
	Convention Center Expansion	189,000 SF	132,300 SF	56,700 SF

Notes:

1. Values reduced by 30% from proposed Project; rounded to nearest whole number

30-Percent Reduced Project Density/Intensity Alternative Impact Analysis

Air Quality

Alternative 2 would develop approximately 30 percent less building square footage and 30 percent fewer units and hotel rooms as shown in **Table 8.0-B**. This reduction in density/intensity would also reduce vehicle traffic by roughly 30 percent as well, which in turn reduces air quality emissions by a similar amount. Air quality impacts related to construction would be similar to the proposed Project and would not exceed SCAQMD thresholds because the daily construction activity would be similar. Assuming a 30 percent reduction in overall operation emissions, **Table 8.0-C – Summary of Alternative 2 Operation Emissions**, below, shows Alternative 2 would still result in VOC emissions that exceed the SCAQMD regional daily thresholds for this criteria pollutant during summer. However, criteria pollutant emissions of VOC and NO_x during winter and NO_x and CO emissions during summer would be reduced below applicable thresholds. Although air quality emissions would be less than the proposed Project, Alternative 2 would still result in significant and unavoidable air quality impacts due to the long-term exceedance of VOC emissions from operations.

Table 8.0-C – Summary of Alternative 2 Operation Emissions

	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Summer						
Alternative 2 Total ¹	61.92	41.13	411.13	0.97	86.55	22.68
Exceeds Threshold?	Yes	No	No	No	No	No
Proposed Project Total ²	88.46	58.76	587.33	1.38	123.64	32.40
Winter						
Alternative 2 Total ¹	50.65	43.23	295.56	0.91	86.45	22.61
Exceeds Threshold?	No	No	No	No	No	No
Proposed Project Total ²	72.36	61.75	422.23	1.30	123.50	32.30

Notes:

1. Alternative 2 emissions assume a 30 percent reduction in emissions from the proposed Project.
2. Proposed Project emissions per **Table 5.2-K** and **Table 5.2-L** in *Section 5.2 – Air Quality*, of this Draft EIR.

Greenhouse Gas Emissions

Development of Alternative 2 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 2 were assumed to be the same as the Project. Alternative 2 would also comply with all present and future regulatory measures developed in accordance with SB 32 and CARB's Scoping Plan, that would further minimize GHG emissions. Alternative 2 would result in approximately 30 percent fewer vehicle trips than the proposed Project, and with 30 percent less building square footage, units and rooms, would likely generate approximately 30 percent less GHG emissions from building energy use, solid waste, and indoor water demand. However, it is expected that Alternative 2 would still generate total GHG emissions which exceed the 3,000 metric tons of carbon dioxide equivalents per year (MTCO₂E/yr) threshold. The proposed Project results in 23,455.20 MTCO₂E/yr of total GHG emissions, and a 30 percent reduction of that number, approximately 7,037 MTCO₂E/yr, would still exceed the 3,000 MTCO₂E/yr threshold. Therefore, impacts regarding GHG emissions under Alternative 2 would be less than the proposed Project but remain significant and unavoidable.

Relationship of Alternative 2 to Project Objectives

The 30-Percent Reduced Density/Intensity Alternative would develop the site as a smaller mixed-use project by reducing residential units, hotel rooms, office space, parking facilities, commercial-retail square footage and the Riverside Convention Center Expansion area by approximately 30 percent as shown in **Table 8.0-B – Alternative 2 Density/Intensities**. Alternative 2 would require the same off-site improvements to existing water and sewer facilities located on Third Street and Market Street Avenue as the proposed Project. An analysis of whether Alternative 2 meets each Project objective is provided in **Table 8.0-D – Alternative 2 (Reduced Density/Intensity) Ability to Meet Project Objectives**.

Table 8.0-D – Alternative 2 (Reduced Density/Intensity) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown.	Yes, but to a lesser degree. Alternative 2 would still provide dynamic employment, hospitality, entertainment, retail and residential uses; however, the quantity of these uses would be less than that proposed by the Project.
Expand the Convention Center to improve the City's ability to attract larger conferences and group meeting business and be more competitive.	Yes, but to a lesser degree. Alternative 2 proposes to expand the Convention Center, however the expansion square footage would be smaller than that of the proposed Project. However, the Project would accommodate larger events than the existing conditions.
Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.	Yes, but to a lesser degree. Alternative 2 proposes to expand the Convention Center, however the expansion square footage would be smaller than that of the proposed Project. Additionally, Alternative 2 would propose a 30 percent reduction in the following land uses: hotel, commercial retail, and entertainment. Nonetheless, since all uses are being reduced proportionately, larger events would still be supported by existing and potential future hotels and entertainment and retail uses.
Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation for Riverside residents.	Yes, but to a lesser degree. Alternative 2 proposes new hotel beds, new commercial-retail uses, and Convention Center expansion on the Project site, just reduced by 30 percent. As such Alternative 2 would still improve downtown economics through generation of new TOT, increased sales tax, and job creation for residents, however at a 30 percent reduction compared to the Project. Thus, although Alternative 2 satisfies this objective it does so to a lesser degree than the proposed Project.
Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers.	Yes, but to a lesser degree. Alternative 2 proposes new quality multi-family housing Downtown, just reduced by 30 percent. Thus, although Alternative 2 satisfies this objective it does so to a lesser degree than the proposed Project.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	Yes. Alternative 2 proposes housing near a transit corridor.
Place housing near existing employment center downtown to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.	Yes. Alternative 2 proposes housing near the existing employment center downtown. Alternative 2 would not alter existing sidewalks that provide pedestrian connectivity to the surrounding area. Alternative 2 would provide internal pedestrian walkways that would connect to the existing pedestrian network.

Alternative 2 Conclusion

Alternative 2 – 30-Percent Reduced Project Density/Intensity would include the same types of land uses as the Project but reduce development density/intensity by approximately 30 percent for each type in comparison to the proposed Project. As a result of the reduction in density/intensity, the number of

vehicular trips and associated trip-related air quality and greenhouse gas emissions would be reduced. The resulting air quality emissions from NO_x and CO during summer and VOCs during winter would be reduced and would no longer exceed the applicable SCAQMD thresholds. However, air quality and GHG emissions would remain significant and unavoidable because air quality emissions from VOCs would still exceed the SCAQMD threshold during summer and GHG emissions would still exceed the SCAQMD threshold.

Alternative 2 meets all seven of the Project Objectives, however, five of the Project Objectives are met to a lesser degree than the proposed Project. Alternative 2 does not reduce the significant impacts to less than significant levels or substantially lessen all of the Project's significant impacts. For these reasons, Alternative 2 is rejected as infeasible.

8.5.3 Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only (No Office and Retail)

Alternative 3 – Convention Center Expansion with Hotel and Residential Uses (No Office and Retail) would consist of demolishing the existing Outdoor Plaza and Lot 33 to expand the existing 108,000-gross square-foot Riverside Convention Center building with a new 189,000 gross square foot expansion to increase rentable function space such as exhibit, ballroom and meeting areas. Alternative 3 would include the same hotel component as proposed by the Project, two full-service hotel buildings for a total of 376 guest rooms and extended stay accommodation as shown in **Table 8.0-E – Alternative 3 Convention Center Expansion with Hotel and Residential Uses Only**. Alternative 3 includes the two new residential buildings proposed by the Project as well as the subterranean parking structure. Alternative 3 would require the same off-site roadway improvements and water and sewer upgrades as the Project. Alternative 3 does not include the 220,000 square feet of office uses or 61,981 square feet of commercial-retail uses proposed by the Project.

Table 8.0-E – Alternative 3 Convention Center Expansion with Hotel and Residential Uses Only

Land Use Type		Maximum Dwelling Units/Rooms or Square Feet (SF)		Reduction from Alternative 3
		Project	Alternative 3 ¹	
Residential Units	Condominiums	55 units	55 units	None
	Multi-Family Residential	113 units	113 units	None
Non-Residential	Hotel	376 rooms	376 rooms	None
	Office	220,000 SF	N/A	220,000 SF
	Commercial Retail Uses			
	<i>Restaurant-Focused Retail</i>	12,875 SF	N/A	12,875 SF
	<i>Grocery Store</i>	20,690 SF	N/A	20,690 SF
	<i>Fitness Center</i>	28,416 SF	N/A	28,416 SF
	Parking Facilities	Up to 5 levels	Up to 5 levels	None
	Convention Center Expansion	189,000 SF	189,000 SF	None

Notes:

1. Proposed uses under Alternative 3

As identified in *Section 5.8 – Transportation* of this Draft EIR and evaluated in the Project-specific *Traffic Study* (included in Appendix E of the Draft EIR), the Project would result in approximately 10,509 trips daily, which includes a reduction of approximately 3,279 daily trips from pass-by trips and internal capture—that is, people that would travel between the various uses within the Project. (WEBB-D, Table 9). Because Alternative 3 does not propose office uses or commercial-retail uses and those uses generate a substantial number of vehicle trips, it is anticipated that Alternative 3 would result in approximately 5,546 total trips as shown in **Table 8.0-F – Alternative 3 Estimated Trips**.

Table 8.0-F – Alternative 3 Estimated Trips

Land Use Type		Maximum Dwelling Units (DU)/Rooms or Square Feet (SF)	Trip Generation Rates		Total Trips ¹
			Units	Daily Trip Rate	
Residential Units	Condominiums	55 units	1 unit	6.74	371
	Multi-Family Residential	113 units	1 unit	4.54	513
Non-Residential	Hotel	376 rooms	1 Room	7.99	3,004
	Convention Center Expansion	100 KSF	1 KSF	16.58	1,658 ²
Total					5,546³

Source: WEBB-D Table 7 and Table 8

Notes:

1. Values rounded up to nearest whole number
2. Trip Generation Study utilized 100 KSF (thousand square feet) based on the calculated gross rentable space
3. Alternative 3 total trips exclude trip credits for internal capture and pass-by trips, which would further reduce total trips.

Convention Center Expansion with Hotel and Residential Uses Only (No Office and Retail) Alternative Impact Analysis

Air Quality

Alternative 3 would still include demolition of the existing Outdoor Plaza and Lot 33, thus daily construction activities and the resulting emissions would be similar to those proposed by the Project, which would not exceed SCAQMD thresholds. Under Alternative 3, the long-term air quality impacts resulting from all emissions sources (such as mobile and energy) would be reduced since Alternative 3 does not propose office uses or commercial-retail uses and those uses generate a substantial number of vehicle trips in addition to the emissions reductions from operation of the office and retail buildings. As shown above in **Table 8.0- F – Alternative 3 Estimated Trips**, Alternative 3 is anticipated to generate approximately 5,546 daily trips (before any discounts for pass-by or internal trip capture), which is approximately 52 percent fewer trips than the proposed Project.

The pollutants for which the proposed Project exceeds the SCAQMD regional daily thresholds are VOC, NO_x, and CO during summer and VOC and NO_x during winter. The long-term operation emissions from Alternative 3 were estimated using the modeling output from the proposed Project (Appendix B of this Draft EIR) for the applicable land uses. As shown below in **Table 8.0-G – Summary of Alternative 3 Operation Emissions**, Alternative 3 would reduce the VOC, NO_x, and CO emissions below the SCAQMD regional daily thresholds and the resulting air quality impacts would be less than significant compared to the proposed Project. Therefore, under Alternative 3, air quality impacts would be less than the proposed Project.

Table 8.0-G – Summary of Alternative 3 Operation Emissions

Source	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Summer						
Area ¹	28.26	0.71	83.1	0.00	0.14	0.10
Energy	0.23	4.11	3.18	0.02	0.32	0.32
Mobile	19.76	19.07	184.60	0.5	45.51	11.76
Alternative 3 Total	48.25	23.89	270.88	0.52	45.97	12.18
Exceeds Threshold?	No	No	No	No	No	No
Proposed Project Total ²	88.46	58.76	587.33	1.38	123.64	32.40
Winter						
Area ¹	15.36	0.00	0.00	0.00	0.00	0.00
Energy	0.23	4.11	3.18	0.02	0.31	0.32
Mobile	18.62	20.40	154.10	0.47	45.51	11.76
Alternative 3 Total	34.21	24.51	157.28	1.38	123.64	32.4
Exceeds Threshold?	No	No	No	No	No	No
Proposed Project Total ²	72.36	61.75	422.23	1.30	123.50	32.30

Notes:

1. Summer and winter emissions from VOC exclude consumer products from the office and retail uses removed. The remaining pollutant emissions for the other types of area sources (such as landscape emissions) were assumed to be the same as proposed Project because they are not reported separately for each individual land use.
2. Proposed Project emissions per **Table 5.2-K** and **Table 5.2-L** in *Section 5.2 – Air Quality*, of this Draft EIR.

Greenhouse Gas Emissions

Development of Alternative 3 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 3 were assumed to be the same as the Project. Alternative 3 would also comply with all present and future regulatory measures developed in accordance with SB 32 and CARB's Scoping Plan, that would further minimize GHG emissions. Alternative 3 would provide new residential development, hotel uses and the convention center expansion, which would still generate GHG emissions. However, as noted in **Table 8.0-F** above, Alternative 3 is anticipated to generated 5,546 daily trips, which is about 52 percent fewer trips than the proposed Project. Additionally, GHG emissions from operating the office and retail space would be avoided. The GHG emissions from Alternative 3 were estimated using the modeling output from the proposed Project (Appendix B of this Draft EIR) for the applicable land uses.

As shown below in **Table 8.0-H – Summary of Alternative 3 Annual GHG Emissions**, the GHG emissions from Alternative 3 are approximately 51 percent lower than that of the Project, but still exceed the GHG significance threshold of 3,000 MTCO₂E/yr. Although GHG emissions from Alternative 3 would be substantially reduced compared to the proposed Project's emissions, the impact would remain significant.

Table 8.0-H – Summary of Alternative 3 Annual GHG Emissions

Source	Metric Tons per year (MT/yr)	
	Proposed Project Total CO ₂ E ¹	Alternative 3 Total CO ₂ E ²
Amortized Construction	312.90	312.90
Area	37.30	37.30
Energy	4,680.00	3,170.40
Mobile	17,085.00	7,822.00
Solid Waste	359.00	160.40
Water	201.00	180.00
Refrigerants	780.00	66.29
Total	23,455.20	11,436.39

Notes:

1. Proposed Project emissions per **Table 5.5-F** in *Section 5.5 – Greenhouse Gas Emissions*, of this Draft EIR.
2. GHG emission from area sources result from landscape maintenance equipment emissions) and were assumed to be the same as the proposed Project because the total Project site remains the same and these emissions are reported for the total site rather than separately for each individual land use.

Relationship of Alternative 3 to Project Objectives

Under Alternative 3, the Project site would be developed with the same convention center expansion, hotel, and residential uses as the proposed Project. Alternative 3 does not include the office building or the retail uses proposed by the Project (see **Table 8.0-E**). An analysis of whether Alternative 3 meets each Project objective is provided in **Table 8.0-I – Alternative 3 (Convention Center Expansion with Hotel and Residential Uses Only) Ability to Meet Project Objectives**.

Table 8.0-I – Alternative 3 (Convention Center Expansion with Hotel and Residential Uses Only) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown.	No. Alternative 3 would create new employment opportunities still at the Convention Center and hotels but without the office and retail uses. Without these two uses in the Project, this Alternative would not provide a dynamic environment in the Downtown area, as it eliminates a key job center in the office space, which its inhabitants would contribute to the daytime vibrancy of downtown, and provides no commercial or retail uses for the benefit and enjoyment of Project users or Downtown residents and visitors.
Expand the Convention Center to improve the City's ability to attract larger conferences and group meeting business and be more competitive.	Yes. Alternative 3 proposes to expand the Convention Center.
Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses.	Yes, but to a lesser degree. Alternative 3 proposes to expand the Convention Center as well as hotel uses. Together these two uses would facilitate larger events that bring in more patrons. While Alternative 3 does not propose retail uses, the Riverside Downtown Area provides other retail uses within close proximity. Therefore, although Alternative 3 satisfies this Project objective it does so to a lesser degree than the

Table 8.0-I – Alternative 3 (Convention Center Expansion with Hotel and Residential Uses Only) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
	proposed Project because it lacks the supportive retail uses.
Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation for Riverside residents.	Yes, but to a lesser degree. Alternative 3 proposes a hotel component that would generate new TOT, new sales tax revenues, and create new employment opportunities for Riverside residents. However, because this Alternative does not include commercial uses such as retail stores and restaurants, it would generate less sales tax revenue and create fewer employment opportunities than the Project. Thus, although Alternative 3 satisfies this Project objective, it does so to a lesser degree than the proposed Project.
Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers.	Yes. Alternative 3 proposes the same number of residential units as the Project. Therefore, Alternative 3 would contribute to the State's allocated 2021-2029 RHNA housing unit numbers.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	Yes. Alternative 3 proposes the same number of residential units along a transit corridor as the Project.
Place housing near existing employment center downtown to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts	Yes. Alternative 3 proposes the same number of residential units within the downtown area as the Project.

Alternative 3 Conclusion

Alternative 3 – Convention Center Expansion with Hotel and Residential Uses Only (No Office and Retail), would include the same Convention Center expansion, hotel, and residential density/intensity as the proposed Project, but would eliminate the office and retail components. As a result of the elimination of office and retail uses, Alternative 3 would result in approximately 52 percent fewer vehicular trips than the proposed Project and the associated trip-related air quality and greenhouse gas emissions would be reduced. This Alternative would reduce air quality emissions below applicable SCAQMD thresholds; however, GHG emissions would still exceed the GHG thresholds. Thus, impacts to GHG emissions would remain significant and unavoidable.

Alternative 3 fully meets four of the seven Project Objectives and meets two of the seven of the Project Objectives to a lesser degree than the proposed Project. However, Alternative 3 does not significantly reduce greenhouse gas emissions, or reduce them to less than significant levels. For these reasons, Alternative 3 is rejected as infeasible.

8.6 Comparison of Alternatives

The matrix approach to comparing the alternatives is used for ease of directly comparing the proposed Project's significant effects with those of the alternatives, per State *CEQA Guidelines* Section 15126.6(d). The potential environmental impacts of each alternative are ranked as greater, similar, or less than the proposed Project with respect to air quality and greenhouse gas emissions, as shown in **Table 8.0-J – Comparison of Impacts from Project Alternatives**

Table 8.0-J – Comparison of Impacts from Project Alternatives

Environmental Issue	Alternative 1: No Project Status Quo	Alternative 2: 30-Percent Reduced Project Density/Intensity	Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only (No Office or Retail)
Air Quality <i>Project and Cumulative</i>	Less – Alternative 1 would not require the demolition of the Outdoor Plaza or Lot 33. Additionally, since there would be no change from existing operations, no new long-term emissions would result from increased traffic or building-related energy use. Therefore, impacts related to air quality would be less than that of the proposed Project and less than significant.	Similar – Construction-related air quality impacts would be similar to the proposed Project. However, Alternative 2 would reduce long-term air quality impacts, since impacts from mobile sources correlate to the proposed building size. Alternative 2 anticipates a 30-percent reduction of mobile sources than the proposed Project. However, a 30 percent reduction would not avoid impacts resulting from VOC emissions exceeding the SCAQMD daily threshold. Therefore, under Alternative 2, air quality impacts would be similar to the proposed Project, and would remain significant and unavoidable.	Less – Construction-related air quality impacts would be similar to the proposed Project. However, under Alternative 3 long-term air quality impacts resulting from mobile sources would be reduced by approximately 52 percent of the proposed Project and would be less than the SCAQMD thresholds. Air quality emissions would also be reduced as a result of the reduced building sizes in this Alternative. Therefore, under Alternative 3 air quality impacts would be less than the proposed Project and less than significant.

Table 8.0-J – Comparison of Impacts from Project Alternatives

Environmental Issue	Alternative 1: No Project Status Quo	Alternative 2: 30-Percent Reduced Project Density/Intensity	Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only (No Office or Retail)
Greenhouse Gas Emissions <i>Project and Cumulative</i>	Less – Alternative 1 would not require the demolition of the Outdoor Plaza or Lot 33. Additionally, since there would be no change from existing operations, no new long-term emissions would result from increased traffic or building-related energy use. Therefore, impacts related to GHG emissions would be less than that of the proposed Project and less than significant.	Similar – Construction-related greenhouse gas emissions would be similar to the proposed Project. Under Alternative 2, a 30-percent reduction of mobile sources, building space, solid waste, and indoor water demand is anticipated. However, a 30 percent reduction in GHG emissions would still result in an exceedance of the 3,000 MTCO ₂ E/yr threshold. Therefore, this Alternative would have similar impacts as the Project and impacts regarding GHG emissions would remain significant and unavoidable.	Similar – Construction-related greenhouse gas emissions would be similar to the proposed Project. Alternative 3 would still result in residential development, hotel uses and convention center expansion which would still generate GHG emissions. Although Alternative 3 would result in a 52 percent reduction in mobile sources and reduced building sizes, it would still result in GHG emissions that exceed standards. Therefore, this Alternative would have similar impacts as the Project and impacts regarding GHG emissions would remain significant and unavoidable.
Environmentally Superior to Proposed Project?	No	Yes, but to a lesser degree	Yes, but to a lesser degree
Meets Most of the Project Objectives?	No (0 of 7 Objectives Met)	Yes, but to a lesser degree (7 of 7 Objectives Met)	Yes, but to a lesser degree (6 of 7 Objectives Met)

8.6.1 Environmentally Superior Alternative

State *CEQA Guidelines*, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, Alternative 1 (No Project/Status Quo) is the environmentally superior alternative because the Project site would remain in its existing condition with no change in operations and therefore no impacts to air quality or greenhouse gases. Since no new development would occur, Alternative 1 would eliminate the significant and unavoidable impacts to air quality and greenhouse gas emissions. However, none of the Project Objectives would be realized. The State *CEQA Guidelines* also require the identification of another environmentally superior alternative if the No Project alternative is selected as the environmentally superior alternative.

Alternative 3, the No Office or Retail uses would be considered the environmentally superior alternative.

Alternative 3 would result in less impacts related to air quality and greenhouse gas emissions because it has fewer vehicle trips compared to the proposed Project. This reduction in trips results from eliminating the office and retail uses proposed by the Project. Alternative 3 reduces air quality impacts to a less than significant level. Alternative 3 also meets six of the seven Project Objectives even though two of the objectives are met to a lesser degree than the proposed Project. Hence, Alternative 3 is the environmentally superior alternative.

9.0 References

As discussed in *Section 2.0 – Introduction* of this Draft EIR, Section 15150 of the State *CEQA Guidelines* permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized throughout this Draft EIR, where that information is relevant to the analysis of potential impacts of the Project. All documents incorporated by reference are available for review at, or can be obtained through, the City of Riverside Planning Department.

DSP	City of Riverside, <i>Downtown Specific Plan</i> , Adopted December 2002, last amended October 2021. (Available at https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/spec-plans/2024/Downtown_SP.pdf , accessed October 4, 2024.)
GP 2025	City of Riverside, <i>General Plan 2025</i> , Approved November 2007. (Available at https://riversideca.gov/cedd/planning/general-plan , accessed October 2, 2024.)
GP 2025 EIR	City of Riverside, <i>City of Riverside General Plan 2025 Program Recirculated Draft Program Environmental Impact Report</i> (SCH No. 2004021108), certified November 2007. (Available at https://riversideca.gov/cedd/planning/general-plan , accessed October 2, 2024)
GPUI	City of Riverside, <i>Phase I General Plan Update</i> , Approved October 5, 2021. (Available at https://riversideca.gov/cedd/planning/city-plans/general-plan-0 , accessed October 2, 2024.)
GPUI EIR	City of Riverside, <i>Phase I General Plan Update Environmental Impact Report</i> (SCH No. 2021040089), certified October 5, 2021. (Available at the City of Riverside Planning Department.)
RMC	City of Riverside, <i>Municipal Code</i> , updated November 13, 2024. (Available at http://www.riversideca.gov/municode/ , accessed December 3, 2024.)

Additional reference materials that were used in the preparation of this Draft EIR include the following:

Section 1.0 – Executive Summary

RTA-A	Riverside Transit Authority, <i>Maps and Schedules</i> , May 14, 2023. (Available at https://www.riversidetransit.com/index.php/route-info , accessed June 30, 2023.)
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Section 2.0 – Introduction

None.

Section 3.0 – Project Description

RTA-A	Riverside Transit Authority, <i>Maps and Schedules</i> , May 14, 2023. (Available at https://www.riversidetransit.com/index.php/route-info , accessed June 30, 2023.)
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Section 5.2 – Air Quality

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- CARB 2022b California Air Resources Board, *Community Nominations*. (Available at <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/community-selection/community-nominations>, accessed December 9, 2024.)
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- Rule 403 South Coast Air Quality Management District, *Rule 403 Fugitive Dust*, June 3, 2005. (Available at <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>, accessed December 10, 2024.)
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