

APPENDIX A

DOCUMENTS RELATED TO THE NOTICE OF PREPARATION

NOTICE OF PREPARATION

POSTED OCTOBER 9, 2024



CITY OF
RIVERSIDE

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County of Riverside
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Assessor-County Clerk-Recorder

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Page 1 of 10



Community & Economic Development Department

Planning Division

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov

NOTICE OF PREPARATION

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

DATE: October 09, 2024

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) AND SCOPING MEETING FOR THE RIVERSIDE ALIVE PROJECT

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the Riverside Alive Project (Project). The City is requesting input from you or your agency or organization as to the scope and content of the environmental information that is relevant to your agency or organization's statutory responsibilities or interests in connection with the proposed Project.

This Notice of Preparation (NOP) contains the proposed Project description including Project setting and location, and identifies the potential environmental effects of the proposed Project. A regional and vicinity map is included in this NOP (**Figure1**).

The environmental determination in this Notice of Preparation is subject to a 30-day public review period per Public Resources Code Section 21080.4(a) and State CEQA Guidelines Section 15082. Due to time limits mandated by State law, your response must be received at the earliest possible date, **but not later than 30 days** after receipt of this NOP. The public comment period for this NOP begins on: **Wednesday October 09, 2024 and is set to close at 5:00 pm on Friday November 8, 2024.**

Please send written responses to Paige Montojo at the address shown above or via e-mail PMontojo@riversideca.gov. Please include the name and contact person in your agency.

DOCUMENT AVAILABILITY: The Initial Study is available on the City's website at <https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents> or contact Paige Montojo at 951-826-2308 or via e-mail at to obtain a PDF of the Initial Study.

PROJECT TITLE: Riverside Alive Project – Planning Case PR-2024-001675 (EIR)

PROJECT SPONSOR: City of Riverside, Community & Economic Development Department

PROJECT LOCATION: The Project site includes the Parking Lot (Lot 33), the Riverside Convention Center, and Outdoor Plaza in front of the Riverside Convention Center. The Riverside Convention Center is located at 3637 Fifth Street and Lot 33 is the adjoining boundary on Third Street to the north. The Project site consists of the following Assessor Parcel Numbers (APNs) 213-11-011, 213-111-012, 213-111-014, 213-111-015, 213-111-016 and entails an approximately 10-gross acres in the City of Riverside, Riverside County, CA. (Refer to **Figure 1 – Vicinity Map** and **Figure 2 – Onsite Project Boundary Map** and **Figure 3 – USGS Topographic Map**.) The Project site is located within Riverside East USGS 7.5-minute quad in Sections 23, Township 2 South, Range 5 West, of the San Bernardino Baseline Meridian. The Project also includes potential off-site impacts located within roadway right-of-way along Third Street and Market Street (Refer to **Figure 4 – Offsite Improvement Boundary Map**).

PROJECT SETTING: The Project site is located in Downtown Riverside and is developed with the City-owned Lot 33, the Riverside Convention Center, and Outdoor Plaza in front of the Riverside Convention Center. The area surrounding the Project site is highly developed and urbanized with a variety of land uses, including Hotels, commercial, and residential. Surrounding areas are composed of Hotel and commercial uses to the east and south and residential uses to the north and west of the Project site.

PROJECT GENERAL PLAN AND ZONING DESIGNATIONS: The Project site has a General Plan land use and zoning designation of Downtown Specific Plan.

PROJECT DESCRIPTION: The City of Riverside is considering the development of a new mixed-use entertainment and hospitality Project, referred to as the Riverside Alive Project (Project). The Project proposes to include a combination of residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities in place of the existing Lot 33 and Outdoor Plaza as shown on **Figure 5 – Proposed Project Layout**. No specific development application is currently under consideration. The Project is proposing “development envelopes” based on the maximum areas or densities that could be accommodated on the Project site instead of on specific project details. **Table A – Proposed Project Uses** provides a breakdown of the maximum densities that will be analyzed as part of the Project.

Table A – Proposed Project Uses

	Land Use Type	Maximum Dwelling Units/Rooms	Maximum Square Footage
Residential Units (168 total)	Condominiums	55	
	Multi-Family Residential	113	
Non-Residential	Hotel	376	
	Office		220,000
	Commercial Retail Uses		
	<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

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 include upsizing approximately 1,700 linear feet of sewer line in Market Street from 11th Street to Mission Inn Avenue and upsizing the potable water main in Third Street between Orange Street and Market Street.

The following environmental review and entitlements are requested for implementation of the Project:

- Environmental Impact Report (EIR)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The City of Riverside, as the Lead Agency, has determined based on the analysis in the Initial Study that the Project could have a potentially significant impact in the following topic areas, which will be addressed in the forthcoming EIR:

- | | | |
|--------------------------------------|----------------------------|--------------------------------------|
| ▪ Aesthetics | ▪ Greenhouse Gas Emissions | ▪ Tribal Cultural Resources |
| ▪ Air Quality | ▪ Noise | ▪ Utilities / Service Systems |
| ▪ Cultural/Paleontological Resources | ▪ Public Services | ▪ Mandatory Findings of Significance |
| ▪ Energy | ▪ Transportation | |

The EIR will address the short- and long-term effects of the Project on the environment and will evaluate the potential for the project to cause direct and indirect impacts, as well as cumulative impacts in these topic areas. Alternatives to the proposed Project will be addressed as part of the EIR. Analysis of a “No Project” alternative is required by law. In addition to the “No Project” Alternative, at least one additional alternative will be evaluated. The evaluation of alternatives will provide a comparative analysis to the proposed development.

For those impacts determined to be significant, feasible mitigation measures will be proposed. A Mitigation Monitoring and Reporting Program (MMRP) will be developed as required by State CEQA Guidelines Section 15126.4.

Cumulative Impact Analysis: The EIR will include a discussion of the potentially significant cumulative impacts associated with Aesthetics, Air Quality, Cultural/Paleontological Resources, Energy, Greenhouse Gas Emissions, Noise, Public Services, Transportation, Tribal Cultural Resources, and Utilities/Services Systems of the Riverside Alive Project when considered with other past, present, and reasonably foreseeable future projects in the area. Cumulative impacts of other environmental topics have been addressed in the Initial Study.

Other Required Sections: The EIR will also address other information typically required for an EIR, including the following: Introduction; Project Description; Effects Found Not to Be Significant; Environmental Impact Analysis; Growth-Inducing Impacts; Significant Unavoidable Environmental Effects; Significant Irreversible Changes; Consistency with Regional Plans; Mitigation Measures; References; and List of Preparers.

Based on the analysis in the Initial Study and its supporting technical appendices, the following topics have been determined to have no impacts, a less than significant impact, or a less than significant impact with mitigation incorporated (which mitigation measures would be imposed as conditions of approval on the Project) and will not be addressed in detail in the forthcoming EIR: agriculture and forest resources, biological resources, geology and soils (except paleontological resources), hazards and hazardous materials, hydrology/water quality, land use planning, mineral resources, population/housing, recreation and wildfire.

In addition, an electronic copy of the Notice of Preparation will be made available on the City of Riverside website: <https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents>

Please send your response to Paige Montojo, Senior Planner, at the physical or email address shown above. We will need the name of a contact person in your agency or organization, if applicable.

SCOPING MEETING: A virtual scoping meeting will be held about this project in order to hear from interested parties about issues that might need to be addressed in the forthcoming Environmental Impact Report.

Meeting Information: Wednesday October 23, 2024
6:00 – 7:00 pm (Pacific Standard Time)
Attend the virtual meeting live webcast:

Zoom Webinar Information

Webinar Link:

<https://us02web.zoom.us/j/84472203044>

Webinar ID: 844 7220 3044

Phone: +1(669)444-9171

Note: No pre-registration is required. Entering the web address above will directly take you to the broadcast room sign-in. First name and email address are required to enter the broadcast room to keep track of attendees.

At this meeting, agencies, organizations, and members of the public will be provided a brief presentation on the project and will be able to review the proposed project and provide comments on the scope of the environmental review process for the proposed Riverside Alive Project.

During the Notice of Preparation public review period, public agencies, interested organizations and individuals have the opportunity to identify those environmental issues that have the potential to be affected by the project and that they request be addressed in the EIR. For this project, the public review period is **Wednesday October 9, 2024**, through **Friday November 8, 2024**.

SIGNATURE: 

TITLE; Paige Montojo, Senior Planner – City of Riverside

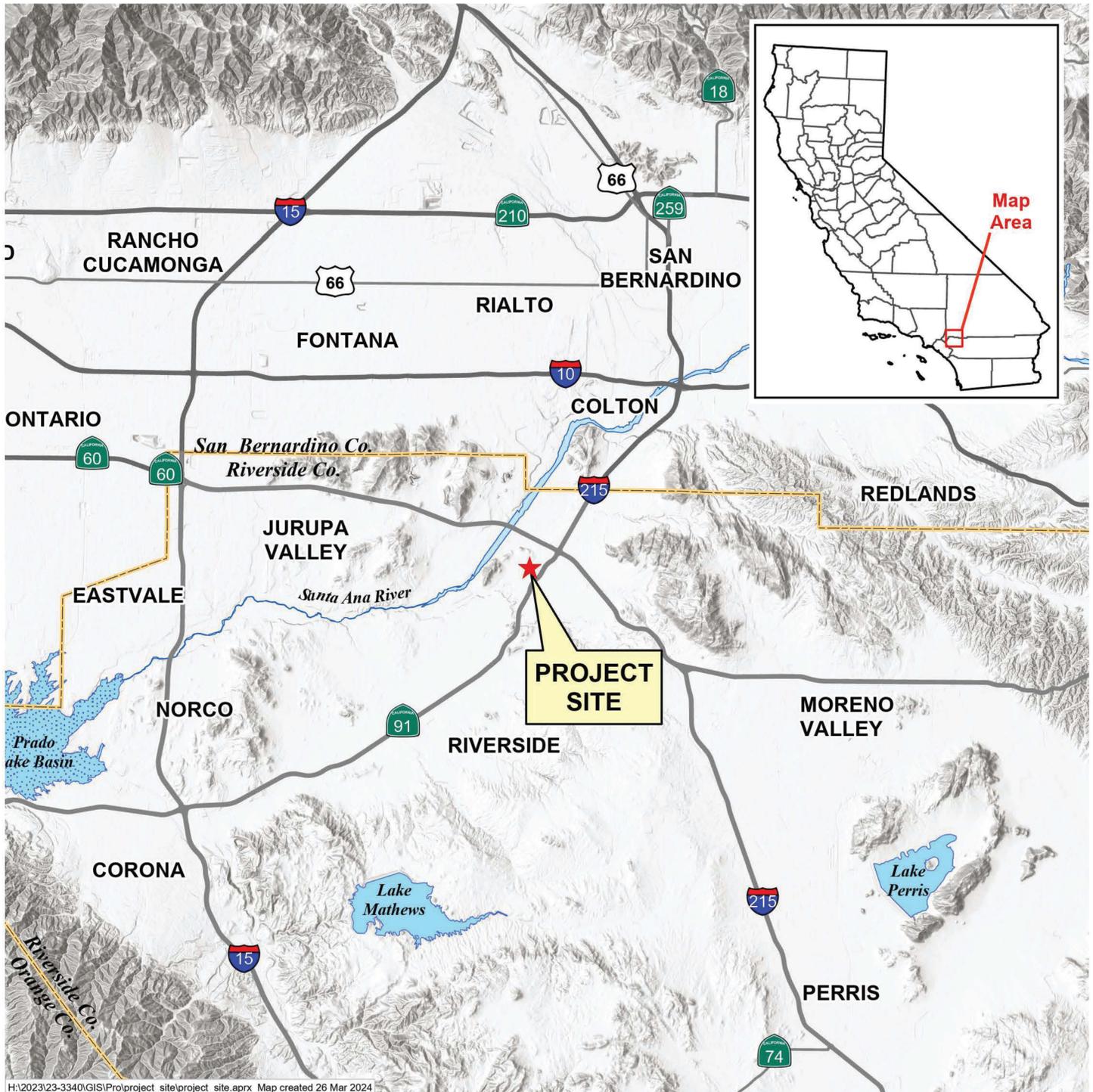
EMAIL: PMontojo@riversideca.gov

TELEPHONE: 951-826-5773

DATE: October 9, 2024

FIGURE 1

Vicinity Map

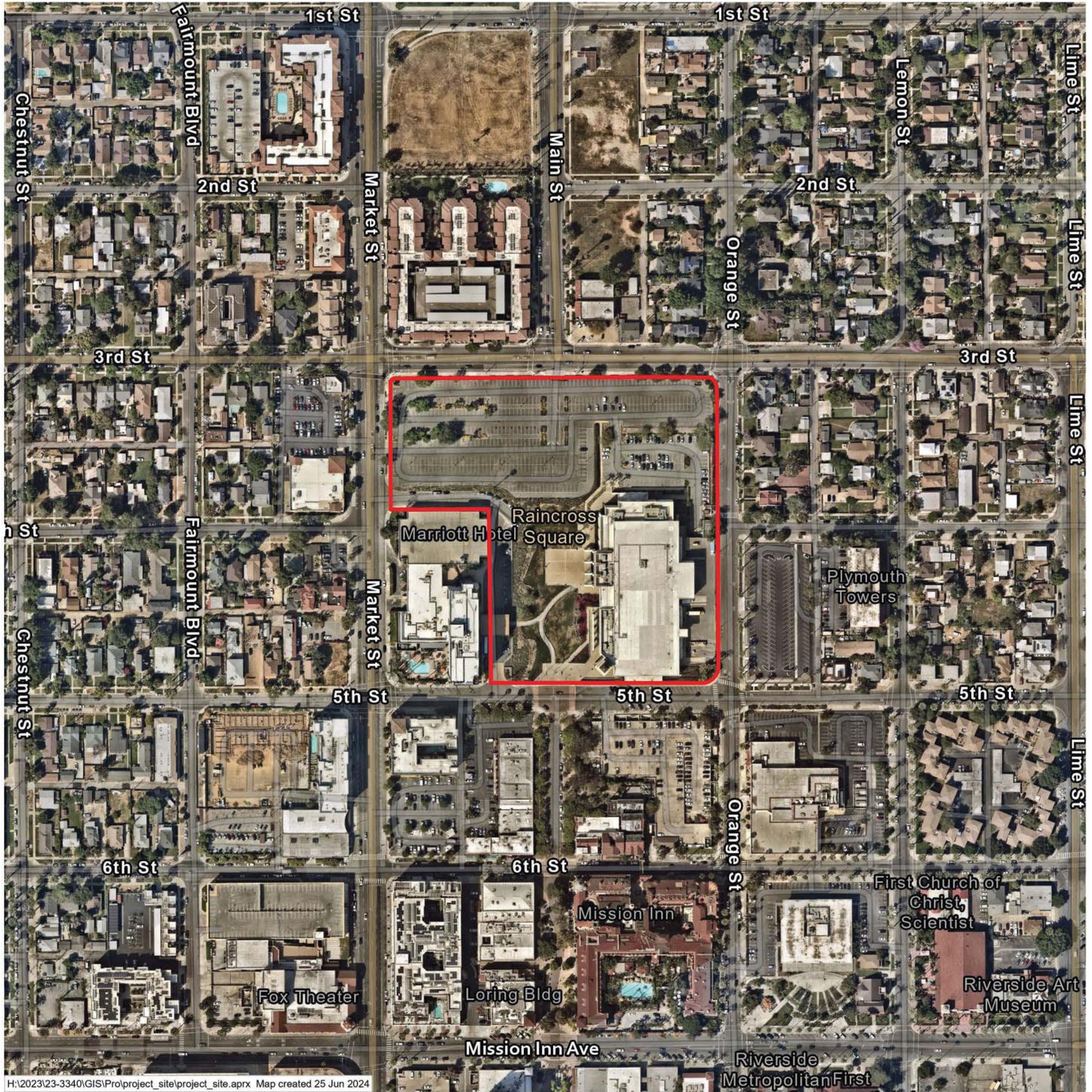


0 10,000 20,000 Feet

Sources: Riverside County GIS, 2020.

FIGURE 2

Onsite Project Boundary



H:\2023\23-3340\GIS\Pro\project_site\project_site.aprx Map created 25 Jun 2024

LEGEND

 Project Boundary

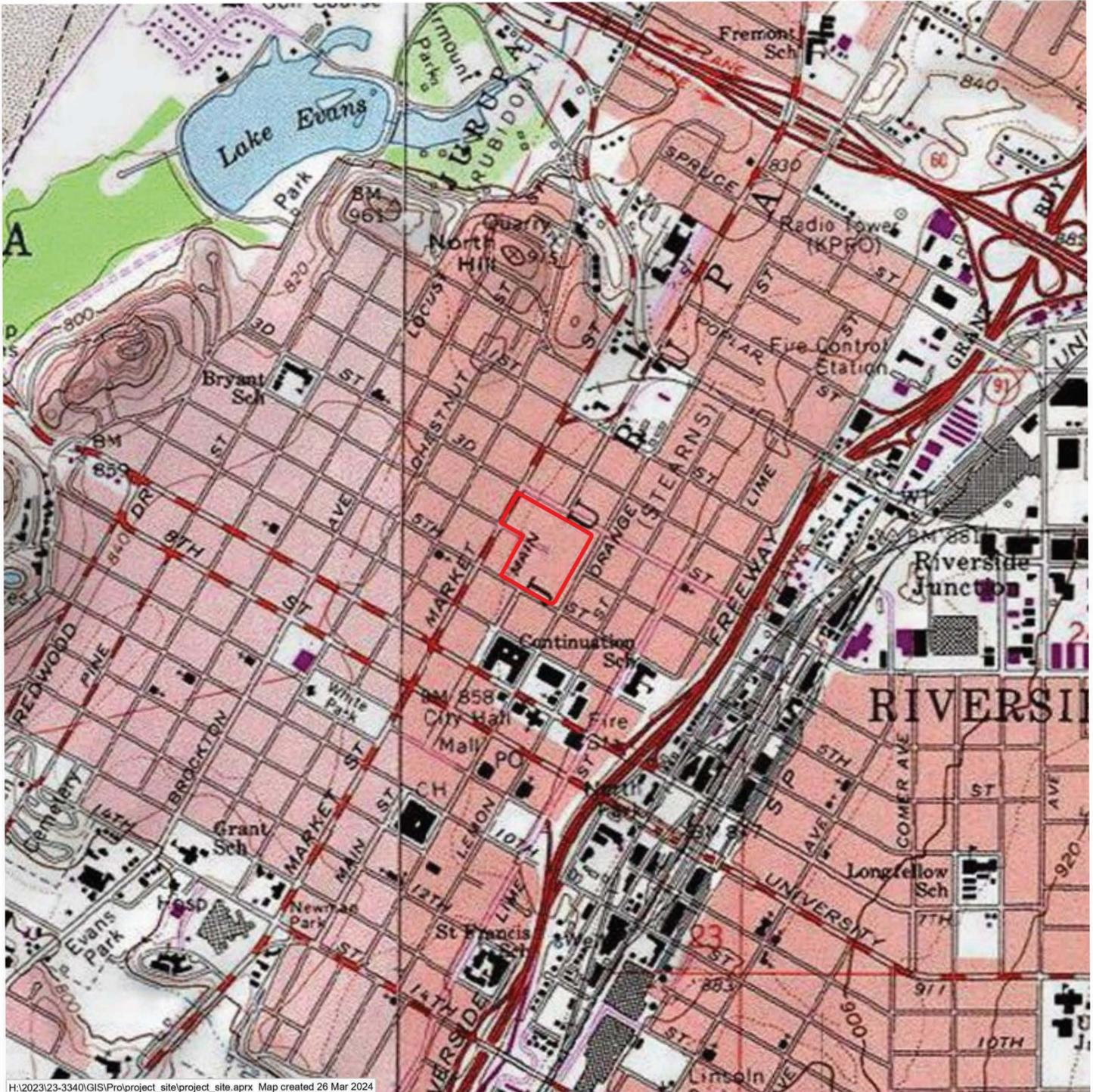


0 175 350 Feet

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

FIGURE 3

USGS Topographic Map



H:\2023\23-3340\GIS\Pro\project_site\project_site.aprx Map created 26 Mar 2024

LEGEND

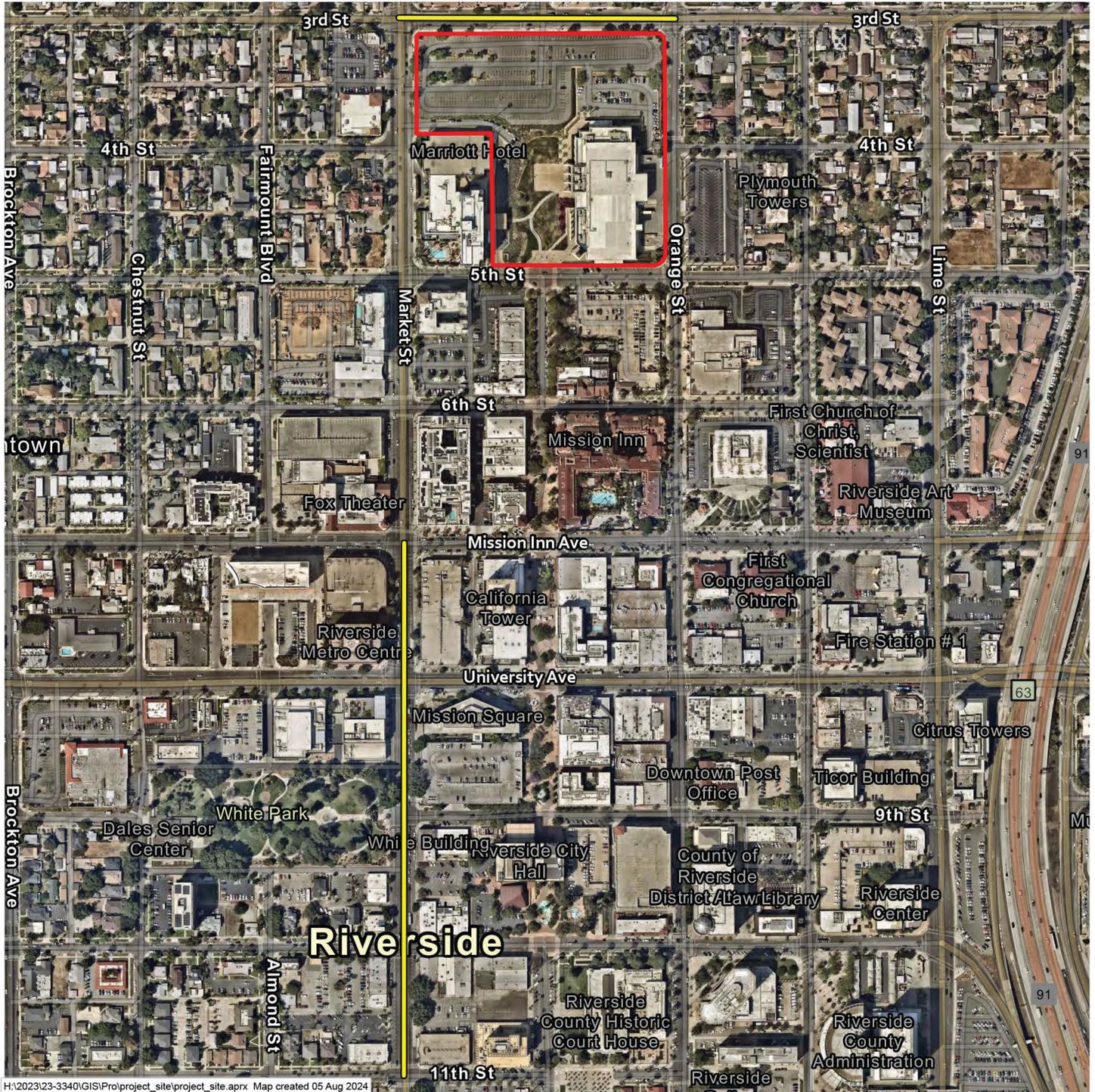
 Project Boundary



0 500 1,000 Feet

Sources: USGS Topographic map, Esri, 2024.

FIGURE 4 Offsite Improvements Boundary



H:\2023\23-3340\GIS\Pro\project_site\project_site.aprx Map created 05 Aug 2024

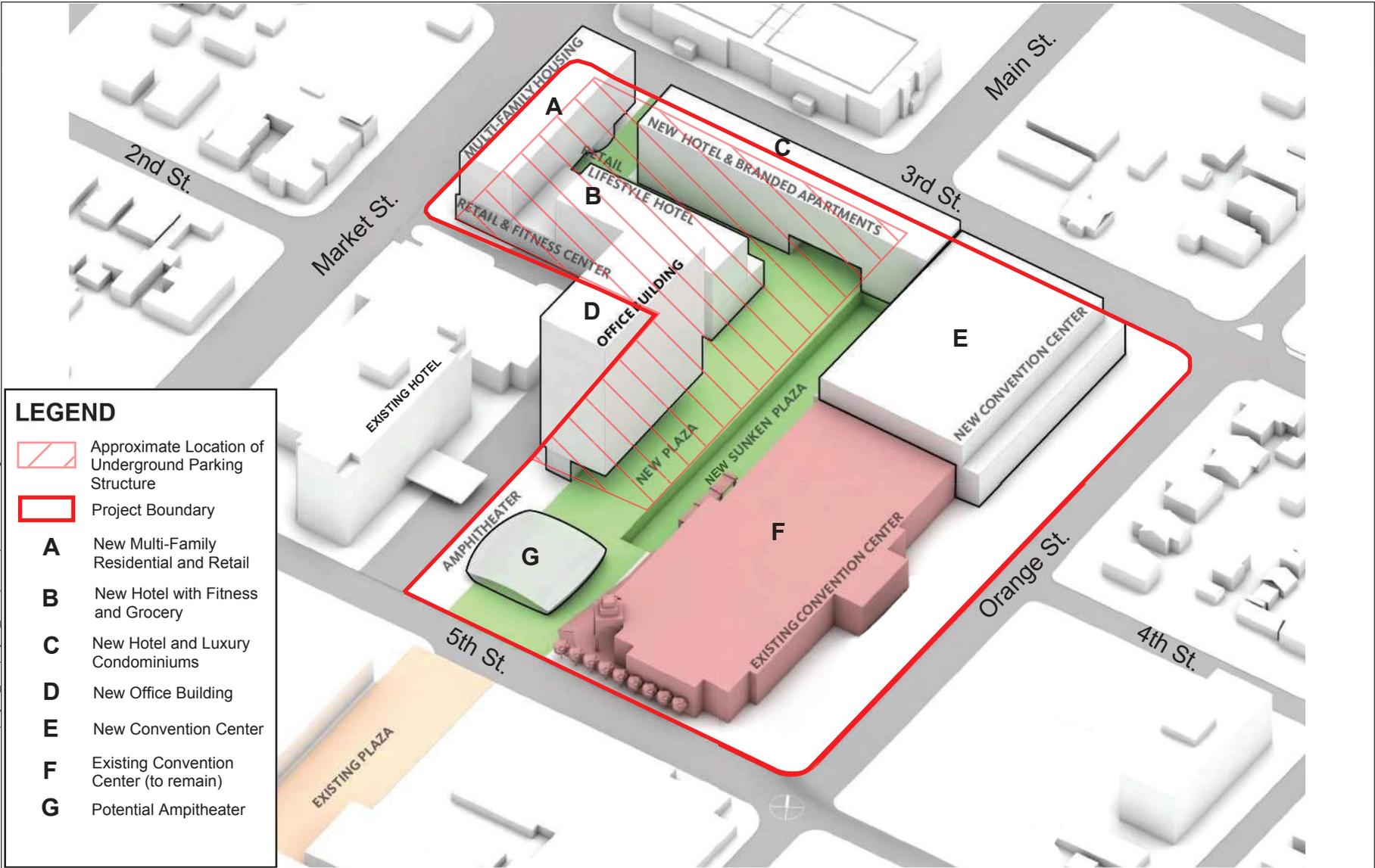
LEGEND

- Project Boundary
- Offsite Boundary



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

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



Source: City

Figure 5 – Proposed Project Layout

Riverside Alive



NTS



NOTICE OF PREPARATION

DISTRIBUTION LIST

Agency	Contact/Owner	Title	Address	City	State	Zip
AT&T California (Substructure Desk)	Susan Blackburn		1265 Van Buren Blvd., Rm 180	Anaheim	CA	92807
California Dept of Fish & Game, Region 6	Carly Beck	Habitat Conservation	3602 Inland Empire Blvd., Ste C-220	Ontario	CA	91764
Charter Communications	Randy Maestas		7337 Central Avenue	Riverside	CA	92504
City of Los Angeles Harbor Department	Chris Cannon	Dir. Of Environmental MGMT	425 S. Palos Verdes Street - P.O. Box 151	San Pedro	CA	90731
City of Perris - Community Development	Clara Miramontes,	Director	135 North D. Street	Perris	CA	92570
City of Rialto	Daniel Case	Dir. of Development Services	150 S. Palm Ave	Rialto	CA	92376
County of Riverside - Executive Office	Jason Farin, Rohini Dasika, and Alex Gann		4080 Lemon St., 4 th Floor	Riverside	CA	92501
Department of Toxic Substances Control	Rafiq Ahmed		5796 Corporate Avenue	Cypress	CA	90630
Department of Transportation (Caltrans)	Philip Crimmins		1120 N. Street, Room 3300	Sacramento	CA	94274
Department of Water Resources	Mark Stuart		P.O. Box 942836	Sacramento	CA	94236
Downtown Area Neighborhood Alliance	Keith Alex		4161 Glenwood Dr.	Riverside	CA	92501
Downtown Association	Janice Penner		3666 University Ave, Ste 100	Riverside	CA	92501
Downtown Renaissance	Ellen McPeters		3324 Brockton Avenue	Riverside	CA	92502
Greater Riverside Chambers of Commerce	Nicholas Adcock	President/CEO	3985 University Avenue	Riverside	CA	92501
Greater Riverside Chambers of Commerce	Brooke Biddle	Business Project Coordinator	3895 University Avenue	Riverside	CA	92501
Law Offices of Mitchell M. Tsai	Mitchell M. Tsai		139 S Hudson Ave Suite 200	Pasadena	CA	91101
Lozeau Drury LLP	Richard Drury Colby Gonzalez Molly Greene		1939 Harrison Street, Ste 150	Oakland	CA	94612
Northside Improvement Association	Erin Snyder		1645 Mattews St	Riverside	CA	92507
Northside Improvement Association			686 Forest Park Dr	Riverside	CA	92501
Old Riverside Foundation			P.O. Box 601	Riverside	CA	92502
Renovators	Bill Kleese		6475 Victoria Avenue	Riverside	CA	92506
Riverside Historical Society	Steve Lech	President	P.O. Box 246	Riverside	CA	92502
Riverside Transit Agency	Mauricio Alvarez		1825 Third Street	Riverside	CA	92507
Riverside Unified School District		Dir. Of Maintenance & Operations Dir of Planning	3070 Washington Street	Riverside	CA	92504
SoCal Edison - 3rd Party Environmental Review	Heather Neely		44 Walnut Grove Avenue, GO-1, Quad 2C	Rosemead	CA	91770
SoCal Edison - Local Public Affairs	Ray Hicks	Region Manager	26100 Menifee Road	Menifee	CA	92585
SoCal Edison - Real Properties	Jeremy Beard		1 Innovation Way, 1st Floor	Pomona	CA	91768
SoCalGas	Lela Paz		4495 Howard Avenue	Riverside	CA	92507

SoCalGas - Transmission	Mike Campisi		9400 Oakdale Ave ML 9314	Chatsworth	CA	91313
South Coast Air Quality - Management District	Sam Wang	Program Supervisor – CEQA IGR	1865 Copley Drive	Diamond Bar	CA	91765
Southern CA Regional Rail Authority	Roderick Diaz	Director of Planning and Development	900 Wilshire Boulevard Suite 1500 Los Angeles, CA 90017	Los Angeles	CA	90012
Southern California Association of Governments			3403 10th Street, Ste. 805	Riverside	CA	92501
Southern California Association of Governments	Anita Au	au@scag.ca.gov	900 Wilshire Boulevard, Suite 1700	Los Angeles	CA	90017
The Metropolitan Water District of So. CA - Environmental Planning Team	Rebecca De Leon		700 N. Alameda Street, US3-230	Los Angeles	CA	90012
Water Quality Control Board - Santa Ana Region (8)	Mark Adelson		3737 Main St., #500	Riverside	CA	92501
	Brian Pearcy		4072 Chestnut Street - P.O. Box 1583	Riverside	CA	92502
	Sonya Alemdar		18905 Gention Avenue	Woodcrest	CA	92508
Tribal Notifications						
Gabrieleno Band of Mission Indians - Kizh Nation	Andrew Salas	Chairman	PO BOX 393	Covina	CA	91723
Soboba Band of Luiseño Indians	Joseph Ontiveros	Cultural Resources	PO BOX 487	San Jacinto	CA	92581
Cahuilla Band of Indians	BobbyRay Esparza	Cultural Coordinator	52701 Highway 371	Anza	CA	92539
Pechanga Cultural Resources Department	Ebru T. Ozdil	Planning Specialist	PO BOX 2183	Temecula	CA	92593
Rincon Band of Luiseño Indians	Cultural Resources Manager		One Government Center Lane	Valley Center	CA	92082
Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians)	Alexandra McCleary	Senior Manager	26569 Community Center Drive	Highland	CA	92346
Morongo Band of Mission Indians	Robert Martin	Tribal Chairman	12700 Pumarra Road	Banning	CA	92220
Agua Caliente Band of Cahuilla Indians	Patricia Garcia	Director of Tribal Hist. Presrv. Office	5401 Dinah Shore Drive	Palm Springs	CA	92264
San Gabriel Band of Mission Indians	Anthony Morales	Chief	PO BOX 693	San Gabriel	CA	91778
Western States Regional Council of Carpenters	David Cordero	Representative of Local 951	6147 River Crest Drive	Riverside	CA	92507

INITIAL STUDY



Draft Initial Study

WARD: 1

1. **Project Number:** PR-2024-001675 (EIR)
2. **Project Title:** Riverside Alive
3. **Scoping Date:** October 23, 2024
4. **Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
5. **Contact Person:** Paige Montojo, Senior Planner
Phone Number: (951) 826-5773
6. **Project Location:** 3637 Fifth Street, Riverside CA 92501

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

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

City of Riverside
Community & Economic Development Department
3900 Main Street, 3rd Floor, Riverside CA 92522
8. **General Plan Designation:** Downtown Specific Plan (see **Figure 5 – General Plan Land
Use**)
9. **Zoning Designation:** Downtown Specific Plan (see **Figure 6 – Zoning**)
10. **Description of Project:**

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

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

Existing Setting and Project Site Conditions

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

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

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

Demolition

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

Project Characteristics

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

Table A – Proposed Project Uses

Land Use Type		Maximum Dwelling Units/Rooms	Maximum Square Footage
Residential Units (168 total)	Condominiums	55	
	Multi-Family Residential	113	
Non-Residential	Hotel	376	
	Office		220,000
	Commercial Retail Uses		
	<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. The multi-family apartment building is expected to be 9 floors and approximately 95-feet tall. (see **Figure 4**, Building A) The multi-family building would also include a ground floor lobby and space for a restaurant. The 55 condominium units are proposed to be located on the top two levels of the full-service hotel building, which is proposed to be located along Third Street. The Hotel building, described below, and the two floors of condominiums would be approximately 95-feet tall. A rooftop pool and deck may also be included to accompany the condominiums.

Hotel

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

Office

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

Commercial Retail Uses

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

Restaurant-Focused Retail

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

Grocery Store

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

Fitness Center

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

Subterranean Parking Facility

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

Convention Center Expansion

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

Vehicular Circulation and Site Access

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

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

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

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

Public Transit

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

Pedestrian Circulation and Site Access

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

Outdoor Plaza

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

Lighting

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

Utilities

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

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

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

Water

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

Wastewater

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

Stormwater Facilities

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

Electricity

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

Natural Gas

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

Construction

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

Offsite Improvements

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

11. Surrounding land uses and setting:

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

Table B – Surrounding Land Uses

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

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

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

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

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

14. Sources Referenced in Preparation of this Initial Study:

- a. City of Riverside, General Plan 2025
- b. City of Riverside, GP 2025 FPEIR
- c. City of Riverside Municipal Code Title 16 – Buildings and Construction
- d. City of Riverside Municipal Code Title 19 – Zoning

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- Appendix B Downtown Specific Plan Consistency Table
- Appendix C Water Letter

18. Acronyms

- AB Assembly Bill
- ADA Americans with Disabilities Act
- APN Assessor’s Parcel Number
- AQMP Air Quality Management Plan
- BMP Best Management Practices
- CalEEMod California Emissions Estimator Model

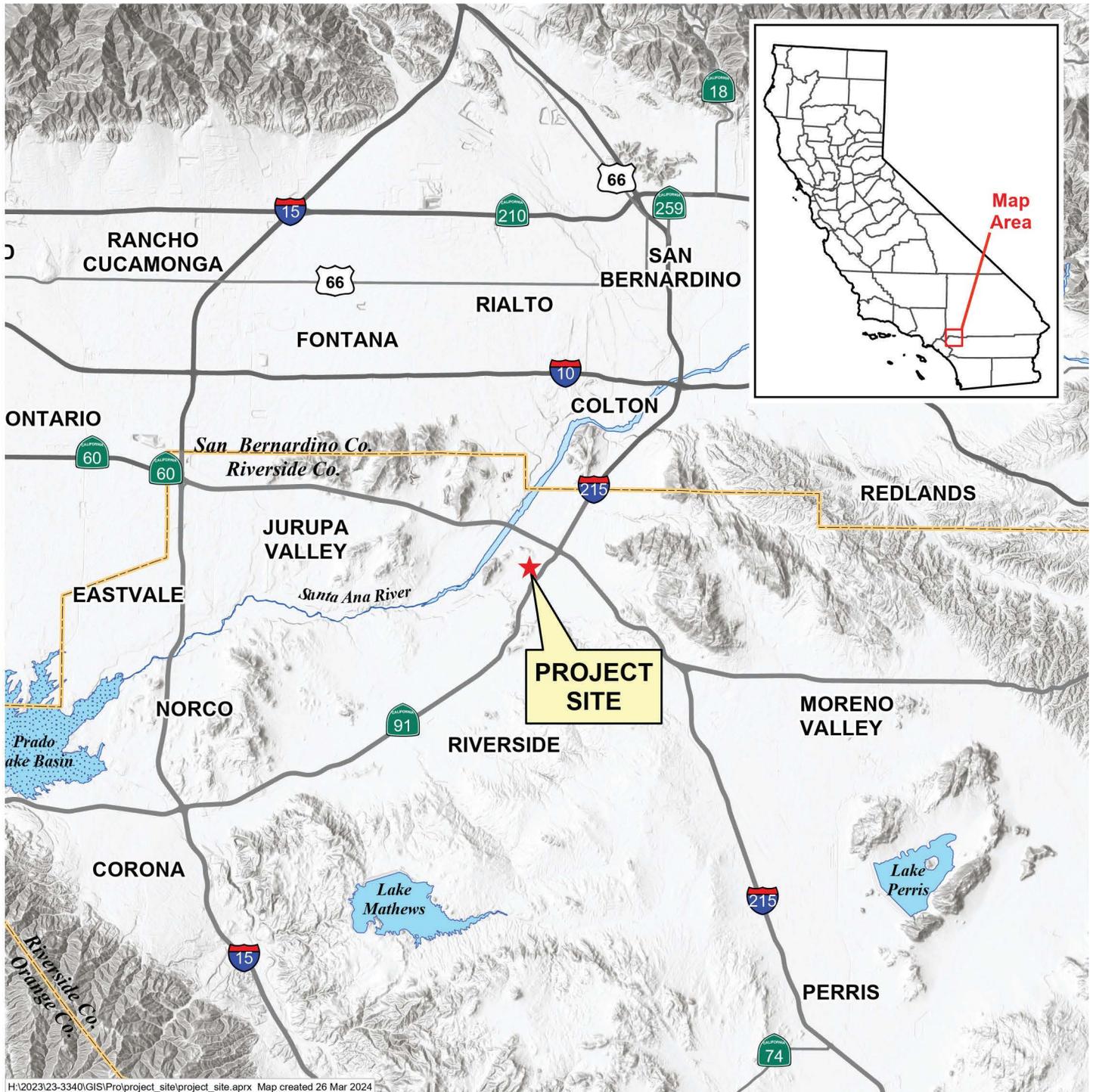
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental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

MRZ	Mineral Resource Zone
MSHCP	Multiple-Species Habitat Conservation Plan
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PM-10	particulate matter less than 10 microns in diameter
PM-2.5	particulate matter less than 2.5 microns in diameter
PRC	Public Resources Code
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RCA	Regional Conservation Authority
RFD	Riverside Fire Department
RPD	Riverside Police Department
RPL	Riverside Public Library
RPU	Riverside Public Utilities
RMC	Riverside Municipal Code
RPW	Riverside Public Works Department
RRWQCP	Riverside Regional Water Quality Control Plant
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
SA-RWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SF	square feet
SFHA	Special Flood Hazard Area
SGMA	Sustainable Groundwater Management Act
SKR	Stephens' Kangaroo Rat
SR	State Route
SRA	State Responsibility Area

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

FIGURE 1

Vicinity Map



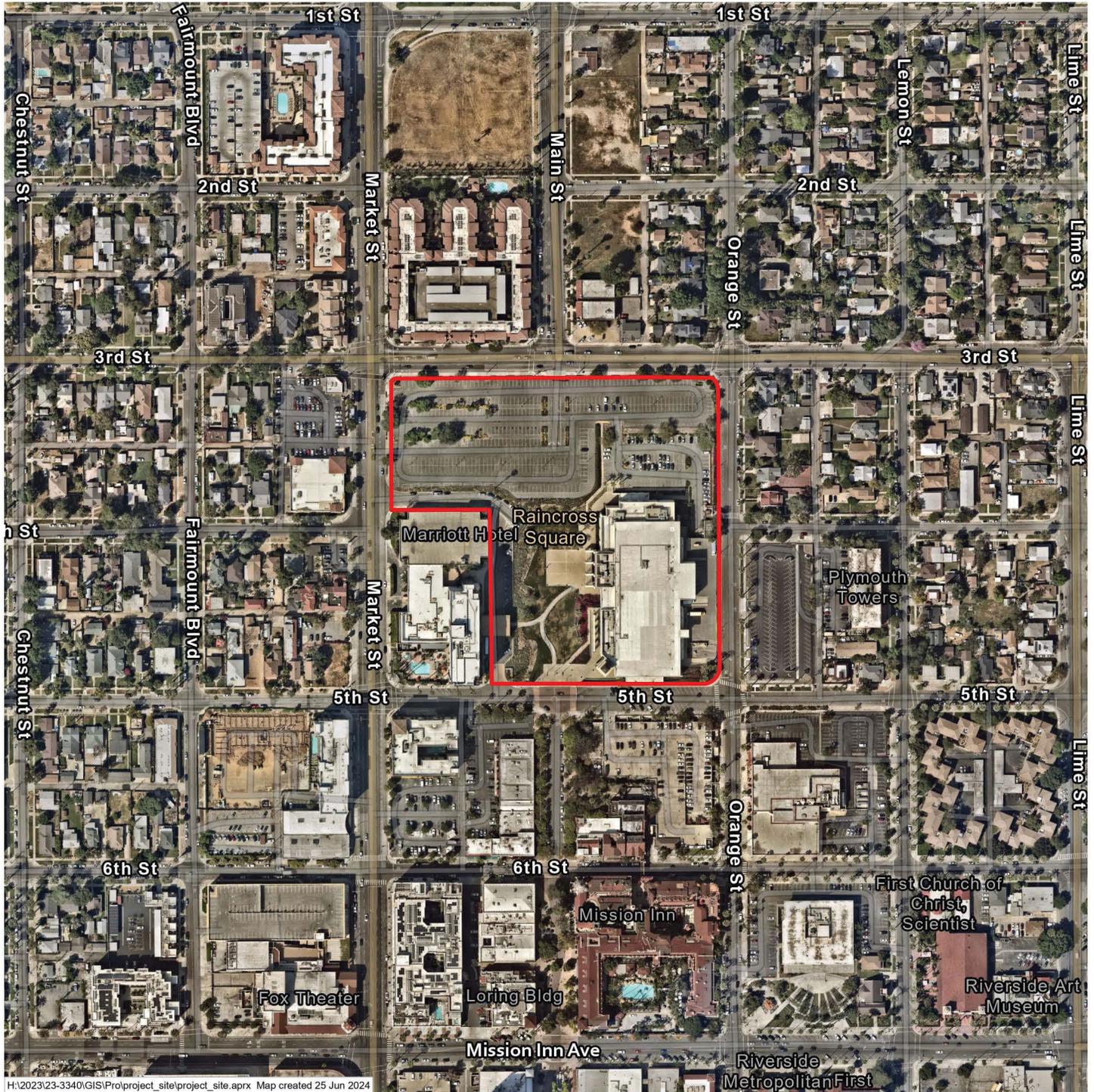
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0 10,000 20,000 Feet

Sources: Riverside County GIS, 2020.

FIGURE 2

Onsite Project Boundary



LEGEND

 Project Boundary

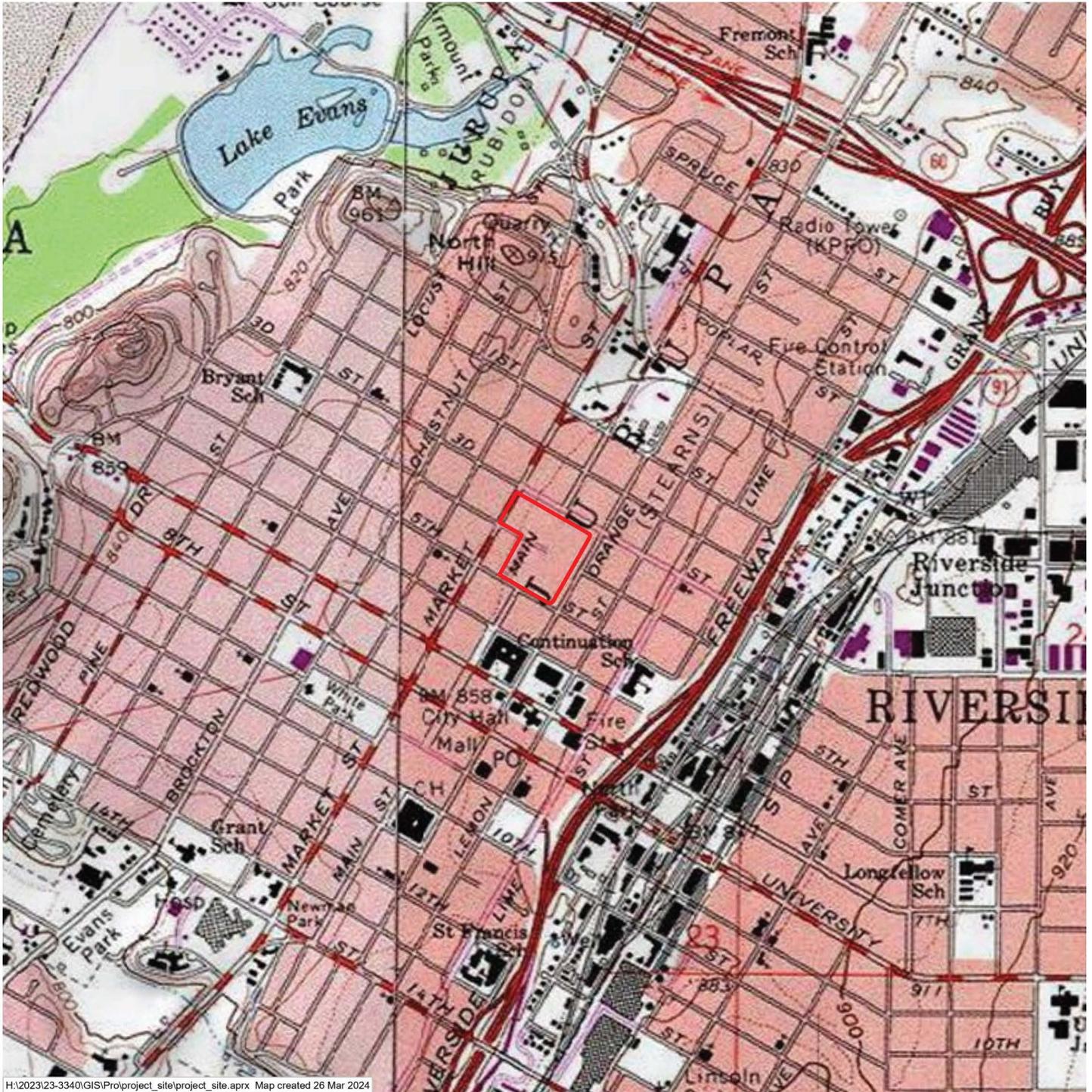


0 175 350 Feet

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

FIGURE 3

USGS Topographic Map



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LEGEND

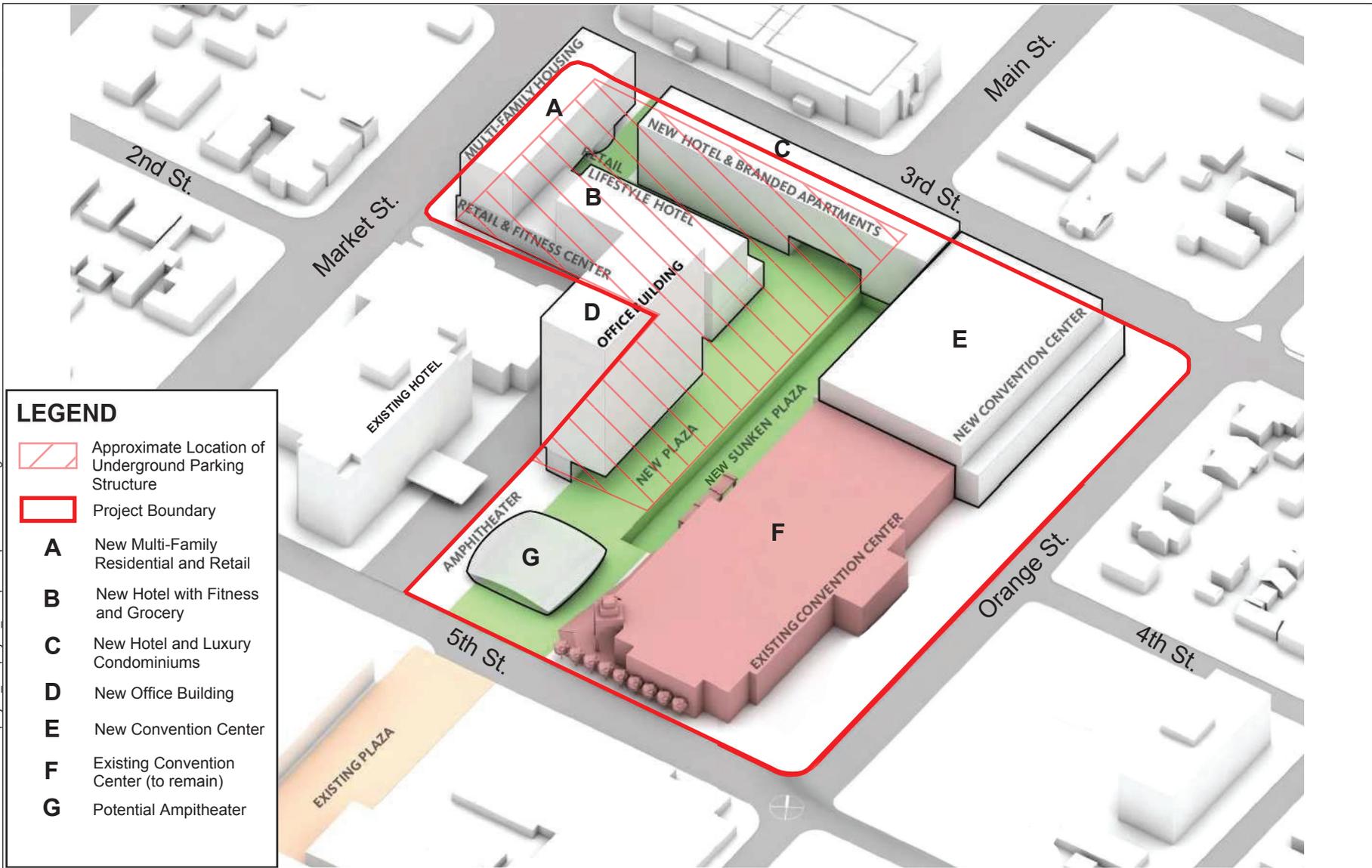
 Project Boundary



0 500 1,000 Feet

Sources: USGS Topographic map, Esri, 2024.

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LEGEND

-  Approximate Location of Underground Parking Structure
-  Project Boundary
- A** New Multi-Family Residential and Retail
- B** New Hotel with Fitness and Grocery
- C** New Hotel and Luxury Condominiums
- D** New Office Building
- E** New Convention Center
- F** Existing Convention Center (to remain)
- G** Potential Amphitheater

Source: City

Figure 4 – Proposed Project Layout

Riverside Alive

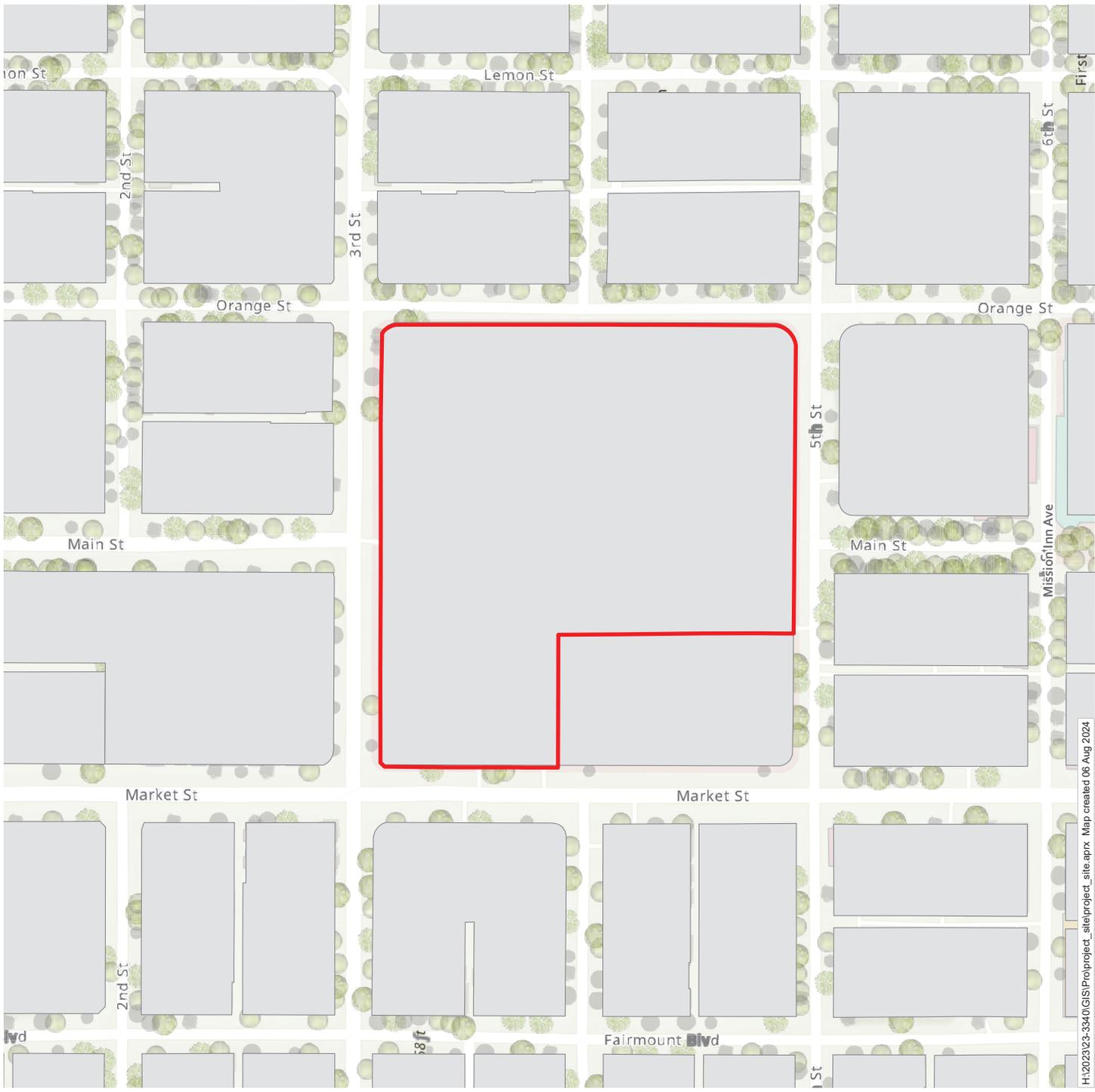


NTS



General Plan Land Use

FIGURE 5



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LEGEND

 Project Boundary

 City of Riverside General Plan Land Use

 Downtown SP

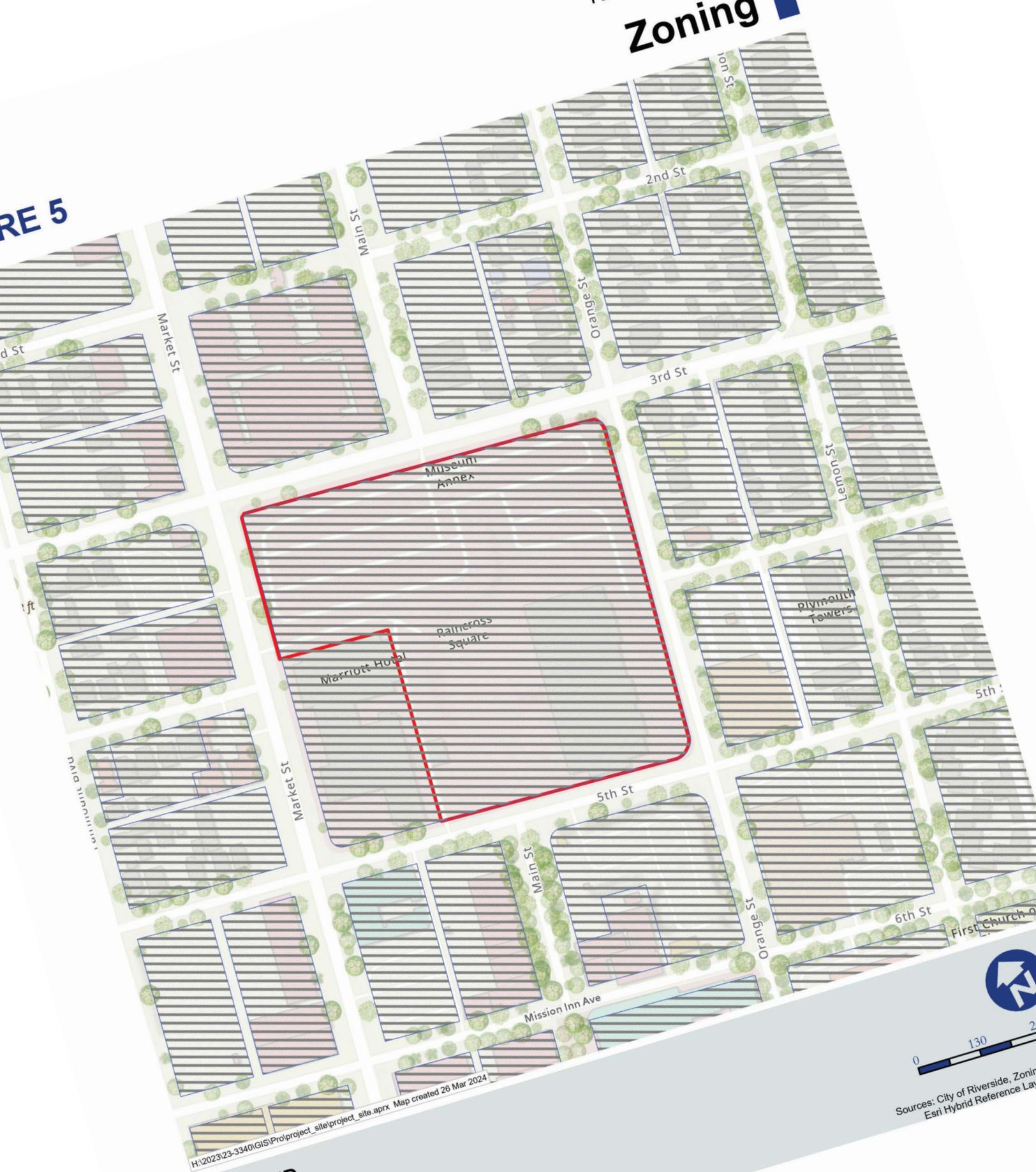


0 130 260 Feet

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

Zoning

RE 5



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- LEGEND**
-  Project Boundary
 - City of Riverside Zoning**
 -  Downtown Specific Plans

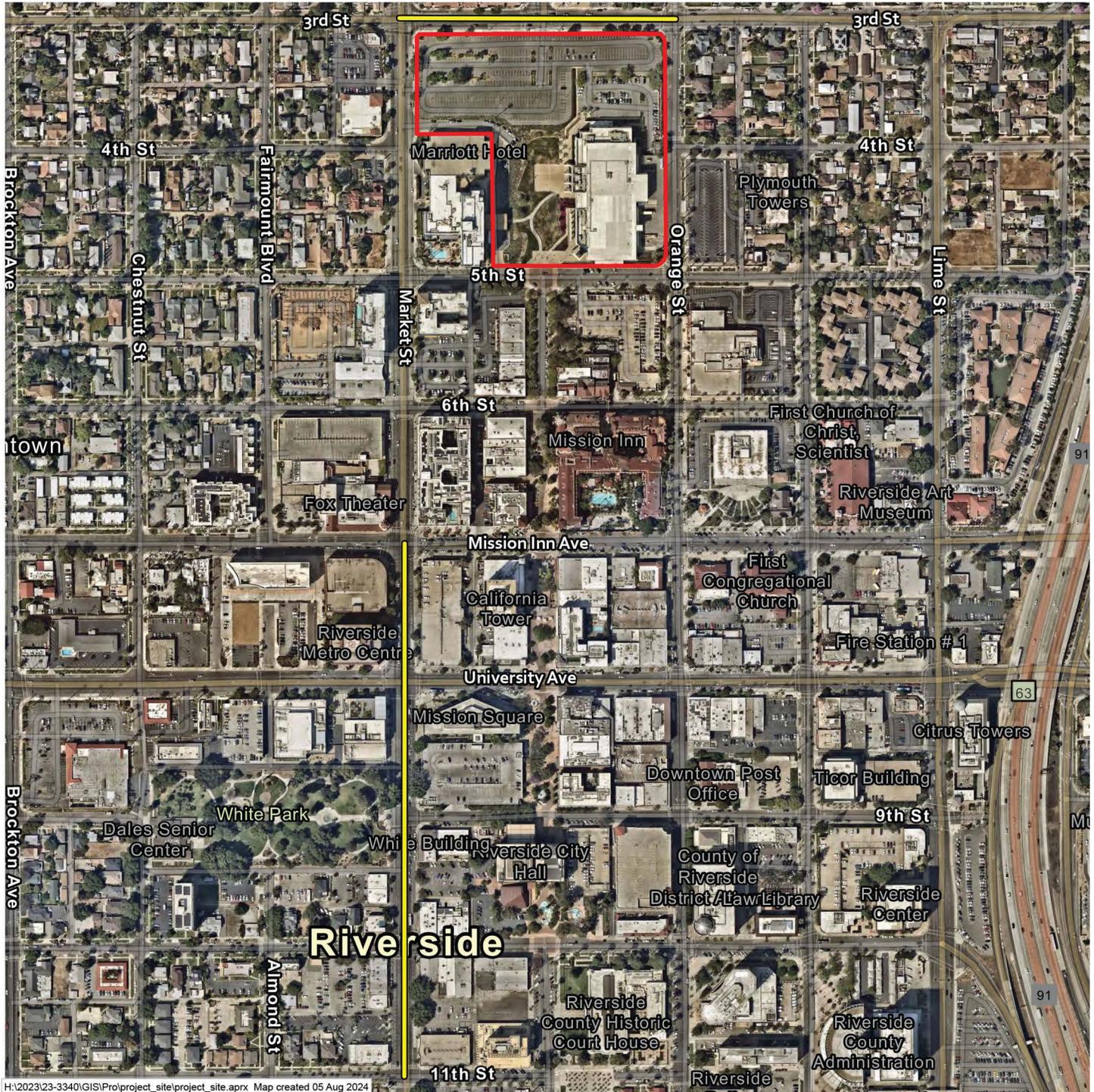
ALBERT A.
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Sources: City of Riverside, Zoning Ordinance
Esri Hybrid Reference Layer

FIGURE 7 Offsite Improvements Boundary



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LEGEND

-  Project Boundary
-  Offsite Boundary



0 235 470 Feet

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forest Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

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

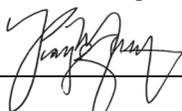
The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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

Signature 

Date 10/2/2024

Printed Name & Title Paige Montojo, Senior Planner

For City of Riverside

Draft Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063©(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>1a. Response: <i>(Source: GP; GP PEIR)</i></p> <p>Potentially Significant Impact. Scenic vistas are the view of an area that is visually or aesthetically pleasing. Development projects may potentially impact scenic vistas in two ways: 1) directly diminishing the scenic quality of the vista, or 2) by blocking the view corridors or “vistas” of scenic resources. The proposed Project site is not a scenic resource. Vista points can be found throughout the City both from urban areas toward the hills and from wilderness areas looking on to Riverside. Long-distance views of natural terrain and vegetation can be found throughout the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Park (GP, p. OS-3). Like most of the development in the City, the proposed Project will be developed within the valley floor. Because the building height of the proposed hotel, residential, and commercial buildings could potentially reach 95-155 feet, these proposed uses may impact the City’s view corridors. Therefore, the Project may have a substantial adverse effect on a scenic vista. Therefore, the Project may result in a potentially significant impact and this topic will be discussed further in the forthcoming EIR.</p>				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1b. Response: <i>(Source; GP PEIR; OHP; RCDG)</i></p> <p>Less Than Significant Impact. The Project site does not contain any rock outcroppings but does contain tree species throughout the existing parking and landscaped areas. The Project proposes to remove the existing tree species to accommodate the proposed Project development. The existing tree species located within the right-of-way may also be removed as part of the Project. However, future applicants proposing development within the Project site will be required to incorporate a landscape plant palette consistent with Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines, amended January 2019 (RCDG).</p> <p>There are no state scenic highways within the City that could potentially be impacted by the proposed Project (GP PEIR, p.5.1-20). However, University Avenue, located 0.20 miles south form the Project site, is designated as a Scenic Parkway (GP PEIR, p. 5.1-19). The Project does not propose changing existing entry points along University Avenue, since improvements to this street are not required or part of the Project. Therefore, implementation of the Project would not increase existing impacts along University Avenue. As mentioned above, the Project would require the removal of existing tree species. Future applicants proposing development within the Project site would replace these trees with new trees and vegetation as approved by the City consistent with special landscape requirements for scenic boulevards. Nonetheless, University Avenue is not designated as a state scenic highway, therefore, impacts to a state scenic highway are not anticipated.</p> <p>According to the State CEQA Guidelines, a cultural resource is considered “historically significant” and therefore is considered a historical resource, if it is included in a local register of historical resources or is listed in or determined eligible for listing on the California Register of Historical Resources (CRHR) under any one of the criteria. (OHP). Since the existing Convention Center building, surface parking, and the Outdoor Plaza are</p>				

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES				
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2a. Response: (Source: CDC; GP)</p> <p>No Impact. As previously stated in Response 1(c), above, the Project is located within an urbanized area. The Project site is developed and contains the Riverside Convention Center, outdoor laze, and subsurface parking (Lot 33). The area surrounding the Project site is also fully developed with a variety of land uses such as commercial, office, public facilities, and residential. Additionally, as shown in the City’s 2025 General Plan, Figure OS-2 Agricultural Suitability map, the Project site is in an area designated as Urban and Built-Up Land (GP, p. OS-11). According to the California Department of Conservation (CDC) California Important Farmland Finder Map, the Project site is also designated as Urban and Built-Up Land and would not support Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, since the surrounding areas do not support farmland, implementation of the proposed Project would not affect off-site farmland. Thus, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2b. Response: (Source: GP)</p> <p>No Impact. The site is currently zoned Downtown Specific Plan. As noted in Response 2a., the Project site is an existing development and does not support farmland or agriculture uses. The Project site is not located in an area designated as a Williamson Act Preserve or Contracted Land (GP, p. OS-12). Thus, the Project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Potentially Significant Impact. The City is located within the South Coast Air Basin. The South Coast Air Quality Management District (SCAQMD) has jurisdiction in the basin (GP PEIR, p. 5.3-3). In order to reduce emissions, the SCAQMD adopted the 2022 Air Quality Management Plan (AQMP), which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and federal air quality standards. The AQMP is a regional and multi-agency effort including the SCAQMD, California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the US Environmental Protection Agency (EPA) (SCAQMD-A).</p> <p>The AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the <i>2020-2045 Regional Transportation Plan/Sustainable Communities Strategy</i> (Connect SoCal 2020), updated emission inventory methodologies for various source categories, and SCAG’s latest growth forecasts. SCAG’s latest growth forecasts were defined in consultation with local governments and with reference to local general plans including the City’s GP. If a project demonstrates compliance with local land use plans and/or population projections from the Connect SoCal 2020, which would have been taken into account by SCAQMD, then the project is consistent with the 2022 AQMP. (SCAQMD-A).</p> <p>The proposed Project does not include a change of zone or a General Plan Amendment (GPA) since the current land use designation of Downtown Specific Plan allows residential and commercial uses onsite with a conditional use permit. While the Project is not expected to conflict with or obstruct implementation of an applicable air quality plan, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a potentially significant impact so an Air Quality Analysis will be prepared and this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>3b. Response: (Source: CARB-A; SCAQMD-B)</p> <p>Potentially Significant Impact. The portion of the Air Basin within which the proposed Project site is located is designated as a non-attainment area for particulate matter less than 10 microns in diameter (PM-10) under state standards, and for ozone and particulate matter less than 2.5 microns in diameter (PM-2.5) under both state and federal standards (CARB-A). The SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same (SCAQMD-B). Hence, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable.</p> <p>Air quality impacts can be described in short-term and long-term perspectives. Short-term impacts occur during site preparation and Project construction, whereas long-term impacts are associated with Project operation. The Project’s short-term and long-term emissions will be evaluated using the latest industry standard air quality modeling software and analyzed for compliance with SCAQMD regional significance thresholds.</p> <p>The proposed Project may result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the Project may result in a potentially significant impact so an Air Quality Analysis will be prepared and this topic will be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>3c. Response: (Source: CARB-B; SCAQMD-C)</p> <p>Potentially Significant Impact. Air Quality impacts to sensitive receptors can be analyzed via Localized Significance Thresholds (LST) analysis, which is recommended, but not required, by SCAQMD. LSTs are applicable to nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter less than 10 microns (PM-10), as well as particulate matter less than 2.5 microns (PM-2.5) and represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard on sensitive receptors (SCAQMD-C, pp. 1-1 – 1-2). Sensitive receptors include residential uses, school playgrounds, childcare facilities, athletic facilities, hospitals, retirement homes, and convalescent homes. (CARB-B, p. 2-1). Demolition and development of the Project site may have the potential to expose nearby sensitive receptors to substantial pollutant concentrations. Therefore, the Project may result in a potentially significant impact so an Air Quality Analysis will be prepared and this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>3d. Response: (Source: CARB-B)</p> <p>Less Than Significant Impact. The California Air Resources Board developed an Air Quality and Land Use Handbook to outline common sources of odor complaints. The sources of odors include sewage treatment plants, landfills, recycling facilities, and petroleum refineries (CARB-B, p. 2-2). Odor impacts during Project operation will be minimal because the land uses proposed on the Project site are not included on CARB’s list of facilities that are known to be prone to generate odors. Potential sources of operational odors generated by the Project would include disposal of miscellaneous refuse. Consistent with City requirements, all Project generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Thus, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>4. BIOLOGICAL RESOURCES Would the project:</p>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>4a. Response: (Source: SE; GP)</p> <p>Less Than Significant Impact with Mitigation Incorporated. The proposed Project will be located on a fully developed site, amongst an urbanized area completely surrounded by existing development. The Project site is designated as Residential/Urban/Exotic which means that the Project site is not expected to support sensitive</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>habitat (GP, p. OS-20). The Project site is within the Multiple Species Habitat Conservation Plan (MSHCP) and specifically within the Cities of Riverside and Norco Area Plan. (SE, p 6). A <i>Biological Resources Assessment and MSHCP Consistency Analysis</i> (BRA) was prepared by South Environmental (South) dated May 2024, included as Appendix A to this Initial Study, to document the existing biological resources at the Project site and within a 500-foot buffer (Study Area). As part of the BRA, a pedestrian-based biological survey and a literature review were conducted and the results are summarized below.</p> <p>A pedestrian-based biological survey of the Study Area was conducted on March 27, 2024. At the time of the survey, the Study Area included developments and ornamental landscaping. The Project site and Study Area are within a dense urban environment within the City. (SE, p. 8). There are no jurisdictional features (i.e. streams, drainages, ponds, lakes) within either the Study Area or the Project site. (SE, p. 14).</p> <p>The results of the literature review and pedestrian-based biological survey indicate that the Study Area, including the Project site, includes one vegetation community type: Developed/Ornamental Landscaped. The developed areas include buildings, driveways, parking lots, and sidewalks. Ornamental landscaping is mixed with the developed areas. All of the observed landscaping plants within the Study Area are located in <i>Table 1. List of Plants Observed on the Study Area</i> of the BRA. The plants species observed consisted of succulents, trees, shrubs, perennials, annuals, and palms and are made up of two native and 40 non-native plants. (SE, p. 10). The trees on the site are not special-status species or conservation species recognized in the MSHCP; therefore, no protected trees occur in the Study Area or the Project site. (SE, p. 14). No sensitive natural communities occur on the Study Area or Project site. (SE, p. 14). Additionally, no special-status plant species were observed during the pedestrian-based biological survey, nor do they have the potential to occur in the Project site due to a lack of native habitat. The Project site is entirely developed and lacks native habitats that are required for special-status plant species to occur. (SE, p. 13).</p> <p>Wildlife that has been previously recorded in the Study Area includes Lincoln Sparrow, Black-headed grosbeak, Audubon’s Warbler, striped skunk, common raccoon, and fox squirrel. However, during the pedestrian-based biological survey no wildlife was observed. (SE, p. 13). Additionally, no special-status animals were observed during the pedestrian-based biological survey, nor do they have the potential to occur in the Project site due to a lack of native habitat. The Project site is entirely developed and lacks native habitats that are required for special-status animal species to occur. (SE, p. 13).</p> <p>Applicants of future implementing projects on the Project site would remove all vegetation (trees, shrubs, herbaceous plants) from the Project site, that could provide potential nesting habitat for birds and raptors protected by the Migratory Bird Treaty Act (MBTA), California Migratory Bird Protect Act (MBPA) and the Fish and Game Code. By removing said vegetation, direct and indirect impacts to, if present, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. Additionally, if present, impacts to nearby nests may also occur during construction activities due to noise or vibration. To avoid impacts mitigation measure MM BIO-1, summarized below, would be required for applicants of future implementing projects within the Project site.</p> <p>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</p>				

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) on-site or within proximity to the Project site. Further, the Project site does not contain any wetlands or jurisdictional resources regulated by the US Army Corps of Engineers (USACE), CDFW or Regional Water Quality Control Board (RWQCB). Thus, the proposed Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4d. Response: (Source: SE)</p> <p>No Impact. As discussed in Response 4(a) above, the Study Area, including the Project site is fully developed and surrounded by existing dense urban development that lacks connection to native plant communities or habitats. (SE, pp. 14-15.) The Project site does not represent a regional wildlife movement corridor and provides no cover, food, and no natural unrestricted water courses that would facilitate regional wildlife movement onsite and is not located in a MSHCP designated core, extension of existing core, non-contiguous habitat block, constrained linkage or linkage area intended to protect lands for wildlife movement. Thus, the proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>4e. Response: (Source: SE; RMC)</p> <p>Less Than Significant. The 2025 General Plan includes policies to ensure that future development would not conflict with any local policies or ordinances protecting biological resources. Objectives and policies that relate to biological resources include the following:</p> <p>Objective OS-5: Protect biotic communities and critical habitats for endangered species throughout the General Plan Area.</p> <ul style="list-style-type: none"> ▪ 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. <p>Future applicants proposing development within the Project site would be required to pay the SKR fees in accordance with County of Riverside Ordinance 663.10 (COR 663.10) and City of Riverside MSHCP Local Development Mitigation Fees (LDMF), established by MC Section 16.72.040. Further, because the Project site is fully developed it does not have the potential to contain any SKR habitat. (SE, Appendix B) Through payment of applicable fees, the Project will not conflict with any of the 2025 General Plan policies listed above. Thus, implementation of the proposed Project would not conflict with any local policies or ordinances protecting</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
biological resources. Therefore, impacts would be less than significant so this topic will not be further analyzed in the forthcoming EIR.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>4f. Response: (<i>Source: RCA-A, RCA-B, SE, TLMA</i>)</p> <p>Less Than Significant with Mitigation Incorporated. The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is a comprehensive multi-jurisdictional effort that includes western Riverside County and eighteen (18) cities including the City of Riverside. (TLMA, pp. 1-1, 2-49). Rather than addressing sensitive species on an individual basis, the MSHCP focuses on conservation of 146 species, including those listed at the federal and state levels and those that could become listed in the future. (TLMA, pp. 1-16 - 1-17). The MSHCP proposed a reserve system of approximate 500,000 acres, of which 347,000 acres are currently within public ownership and 153,000 acres will need to be assembled from lands currently in private ownership. (TLMA, pp. 3-11). The MSHCP allows the County and other permittees (including the City of Riverside) to issue take permits for listed species so that applicants do not need to receive endangered species incidental take authorization from the USFWS and CDFW. (RCA-A) On June 17th, 2003, the County of Riverside Board of Supervisors adopted the MSHCP, certified the Environmental Impact Report/Environmental Impact Statement, and authorized the Chairman to sign the Implementing Agreement with the respective wildlife agencies. (TLMA). The Incidental Take Permit was issued by the wildlife agencies on June 22nd, 2004. The City of Riverside is a Permittee under the MSHCP. Regions of the MSHCP have been organized into Area Plans that generally coincide with logical political boundaries, including city limits or long-standing unincorporated communities. The Project site is located within the Cities of Riverside/Norco Area Plan. The Cities of Riverside/Norco Area Plan has a target conservation acreage of 3,465 to 3,615 acres. (TLMA, p. 3-470) The project site is located within the MSHCP and the Stephens Kangaroo Rat (SKR) Fee Area as outlined in the SKR Habitat Conservation Plan. Project compliance with the SKR HCP consists of paying the SKR fee.</p> <p>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.</p> <p><u>Consistency with MSHCP Section 6.1.1</u></p> <p>Section 6.1.1, <i>Property Owner Initiated Habitat Evaluation and Acquisition Negotiation Strategy (HANS)</i>, of the MSHCP applies to property which may be needed for inclusion in the MSHCP Conservation Area or subjected to other MSHCP Criteria and shall be implemented by the County and those Cities that have agreed to implement the HANS process. The HANS process ensures that an early determination will be made of what properties are needed for the MSHCP Conservation Area, that the owners of property needed for the MSHCP Conservation Area are compensated, and that owners of land not needed for the MSHCP Conservation Area shall receive Take Authorization for Covered Species Adequately Conserved through the Permits issued to the County and Cities pursuant to the MSHCP. The Project site is not located in an MSHCP Conservation Area or subjected to other MSHCP Criteria. (SE, p. 16). Since the Project site does not require to be included in an MSHCP Conservation Area or Criteria Cell, then a HANS determination is not required. Thus, the proposed Project is consistent with Section 6.1.1 of the MSHCP.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><u>Consistency with MSHCP Section 6.1.2</u> Section 6.1.2, <i>Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools</i>, of the MSHCP requires that projects develop avoidance alternatives, if feasible, that would allow for full or partial avoidance of riparian/riverine areas. Section 6.1.2 of the MSHCP defines Riparian/Riverine areas as “lands which contain Habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens, which occur close to, or which depend upon soil moisture from a nearby fresh water source; or areas with freshwater flow during all or a portion of the year.” The Project site is not located nearby jurisdictional features- streams, wetlands, drainage, ponds, or lakes. (SE, p 14). The proposed Project site has already been developed and does not support riparian, riverine, fairy shrimp and vernal pool habitats and no species associated with these habitat types are present on the site. (SE, Appendix B). As such, no focused surveys are required nor a MSHCP Determination of Biologically Equivalent or Superior Preservation (DBESP) report. Thus, the proposed Project is consistent with Section 6.1.2 of the MSHCP.</p> <p><u>Consistency with MSHCP Section 6.1.3</u> Section 6.1.3, <i>Protection of Narrow Endemic Plant Species</i>, of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site does not occur within an MSHCP predetermined Survey Area for narrow endemic plant species. (RCA-B). Since the Project site is not within the NEPSSA then the Project would not impact Narrow Endemic Plant Species. Thus, the Project is consistent with Section 6.1.3 of the MSHCP.</p> <p><u>Consistency with MSHCP Section 6.1.4</u> Section 6.1.4, <i>Guidelines Pertaining to the Urban/Wildlife Interface</i>, outlines the minimization of indirect effects associated with locating development in proximity to a MSHCP Conservation Area. The Project site is not located adjacent to an existing or proposed MSHCP Conservation Area. SE, p. 16). Thus, the Project is consistent with Section 6.1.4 of the MSHCP.</p> <p><u>Consistency with MSHCP Section 6.3.2</u> Section 6.3.2, <i>Additional Survey Needs and Procedures</i>, requires additional surveys for certain species if a project is located within criteria areas shown on <i>Figure 6-2 (Criteria Area Species Survey Area)</i>, <i>Figure 6-3 (Amphibian Species Survey Areas with Critical Area)</i>, <i>Figure 6-4 (Burrowing Owl Survey Areas with Criteria Area)</i> and <i>Figure 6-5 (Mammal Species Survey Areas with Criteria Area)</i> of the MSHCP. The Project site does not occur within the Amphibian Species Survey Area, Mammal Species Survey Area, Narrow Endemic Plant Survey Area, Burrowing Owl Area, Criteria Area Species, or Invertebrate Survey Area. The Project Site is not located within an Amphibian Species Survey Area, Mammal Species Survey Area, Narrow Endemic Plant Survey Area, Burrowing Owl Area, Criteria Area Species, or Invertebrate Survey Area. (RCA-B). Thus, no focused surveys are required so the Project is consistent with Section 6.3.2 of the MSHCP.</p> <p><u>Consistency with MSHCP Section 6.4</u> Section 6.4, <i>Fuels Management</i>, of the MSHCP provides guidelines to address brush management activities around new development within, or adjacent to, MSHCP Conservation Areas. The Project Site is not located adjacent to an existing or proposed MSHCP Conservation Area. (SE, p. 16). So, this section is not applicable to the proposed Project. Therefore, the Project is consistent with MSHCP Section 6.4.</p> <p><u>MSHCP Appendix C and Section 7.5.3</u> The MSHCP’s Appendix C, <i>Standard Best Management Practices</i> and Section 7.5.3, <i>Construction Guidelines</i>, lists standard best management practices and guidelines to be implemented during project construction that will</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>minimize potential impacts to sensitive habitats in the vicinity of a project. The guidelines relate to water pollution and erosion control, equipment storage, fueling, and staging, dust control, exotic plant control and timing of construction. Although the Project does not propose development, applicants of future development would be required to implement mitigation measure MM BIO-1 to address potential construction impacts to nesting birds. Thus, with mitigation the proposed Project is consistent with Appendix C and Section 7.5.3 of the MSHCP.</p> <p>Hence, with implementation of mitigation measure MM BIO-1, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, impacts are less than significant with mitigation incorporated so this topic will not be further analyzed in the forthcoming EIR.</p>				
<p>5. CULTURAL RESOURCES Would the project:</p>				
<p>a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>5a. Response: <i>(Source: DSP, PRC, Project Description)</i></p> <p>Potentially Significant Impact. Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. By statute, CEQA is primarily concerned with two classes of cultural resources: “historical resources,” which are defined in Public Resources Code (PRC) Section 21084.1 and CEQA Guidelines Section 15064.5; and “unique archaeological resources,” which are defined in PRC Section 21083.2. This section addresses the proposed project’s potential impacts in relation to historical and archaeological resources. Project impacts to tribal cultural resources are evaluated in <i>Section 18, Tribal Cultural Resources</i>, of this Initial Study.</p> <p>As mentioned in the Project Description above, the Project includes the demolition of the existing surface parking lot (Lot 33) and the Outdoor Plaza and construction of a mixed-use entertainment development in its place. Additionally, the Project includes the Convention Center expansion that will include minor modification to adjoin the existing Convention Center structure with the proposed building.</p> <p>The Project site is located in the Downtown Specific Plan, specifically within the Raincross District. The Raincross District is the cultural, historic, and social center of both Riverside and the region beyond. The quality of Downtown Riverside’s historic buildings and the relationship between these buildings creates an historic urban fabric unparalleled in the region. (DSP, p. 6-10). Various national historic landmarks and historic districts are located within the Raincross District. While the Project is not expected to result in direct impacts to historical resources pursuant to § 15064.5, nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a potentially significant impact related to historic resources so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>5b. Response: <i>(Source: Project Description)</i></p> <p>Potentially Significant Impact. As stated in Response 5(a), above the Project proposes to demolish the existing surface parking lot (Lot 33) and the Outdoor Plaza and construct a mixed-use entertainment development in its place. The proposed mixed-use entertainment development includes a subterranean parking facility that could include up to five levels and extend to a maximum depth of 53-feet below ground surface the Project involves</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ground disturbing activities. Therefore, construction of the Project could result in accidental discovery of archaeological resources below the surface. Thus, the Project may have the potential to cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>5c. Response: <i>(Source: Project Description)</i></p> <p>Less than Significant Impact with Mitigation Incorporated. As mentioned in Response 5(b), above the Project proposes demolition of an existing parking lot and the Outdoor Plaza and construction of a mixed-use entertainment development. Since the proposed mixed-use entertainment development includes a subterranean parking facility at a maximum depth of 53-feet below ground surface the Project involves ground disturbing activities. While the Project site is currently developed and no known cemeteries are located on the Project site excavation as a result of the Project site may result in inadvertent findings.</p> <p>Pursuant to California Health and Safety Code regulations Sections 57051 and 7054, and California Public Resources Code Section 5097.98, in the unlikely event that suspected human remains are uncovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the proper authorities and standard procedures for the respectful handling of human remains will be adhered to. Future applicants proposing development within the Project site would be required to comply with regulatory requirements for treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 as well as California Public Resource Code (PRC) Section 5097. These regulations prohibit the interference with any human remains or “cause severe irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site or sacred shrine.” If human remains are found during construction, all work must halt and a qualified archaeologist must contact the city and shall ensure reasonable protection measures are taken to protect the discovery from disturbance. Implementation of mitigation measures MM CR-1 will further ensure impacts to human remain are less than significant.</p> <p>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).</p> <p>Through compliance with existing regulations and implementation of mitigation measure CR-1, impacts with regard to disturbing human remains, including those interred outside of dedicated cemeteries will be less than significant. Therefore, impacts are less than significant with mitigation incorporated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
6a. Response: <i>(Source: Project Description)</i> Potentially Significant Impact. As previously mentioned, the Project includes demolition of existing surface parking lot (Lot 33) and the Outdoor Plaza, and the construction of the Project site with mixed-use entertainment development that includes residential, hotel, and commercial uses. Implementation of the Project would incorporate a residential use which would result in an increase in population density. An increase in population may have the potential to increase energy consumed by the Project site. Thus, implementation of the proposed Project may have the potential to result in significant impacts. To determine the severity of Project-related impacts regarding wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation an Energy Analysis will need to be prepared. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐
6b. Response: <i>(Source: Project Description)</i> Potentially Significant Impact. The Project's compliance with state and local plans for renewable energy or energy efficiency cannot be determined without an analysis of the Project's energy consumption, which is not yet available. Thus, pending this analysis, the Project may conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
7. GEOLOGY AND SOILS Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
7i. Response: <i>(Source: GP; GPUI FEIR;RMC; PSE-TR)</i> Less Than Significant Impact. As outlined in the 2025 General Plan <i>Public Safety Element Technical Background Report</i> there are no known active faults that traverse the City and there are no Alquist-Priolo Fault Zones mapped within the City. As shown in <i>Figure CP-1: Regional Fault Zones</i> , the Project is located within a Seismic Hazard Zone III and is surrounded by three are active faults in the region; the San Andres fault, the San Jacinto fault and the Elsinore fault. The closest point of the San Andres fault zone is located approximately 11-miles east from the Downtown Area. The closest point of the San Jacinto fault is located approximately 7-miles east from the Downtown Area. The closest point of the Elsinore fault is located approximately 13-miles southwest				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>from the Downtown Area. (PSE-TR, p. 4). Pursuant to Policy PS-1.1 of the 2025 General Plan ensures that all new residential and mixed-use development in the City abides by the most recently adopted City and state seismic and geotechnical requirements. As such, any future development facilitated by the Project would require a geotechnical investigation and compliance with the California Building Code (CBC), which would address the risk of fault rupture. Therefore, development facilitated by the Project would be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Riverside Municipal Code (RMC) Section 16.08.185 for any property identified as being subject to the potential of liquefaction or within a seismic hazard zone disclosing the site-specific risk of fault rupture at a future development site. (GPUI FEIR, p. 3.15-12). Applicants of future development shall be required to prepare and comply with all the recommendations outlined in the geotechnical investigation report. Additionally, the Project would be required to comply with all CBC regulations. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of known earthquake fault. Therefore, impacts are less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>ii. Strong seismic ground shaking?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7ii. Response: (Source: GP; GPUI FEIR;RMC; PSE-TR)</p> <p>Less Than Significant Impact. As discussed above in Response 7(a)(i), the Project site is located approximately 7 to 13 miles away from fault zones. Southern California is a seismically active region furthermore, three active faults were identified within the region. The previously identified faults (the San Andres fault, the San Jacinto fault and the Elsinore fault) were estimated with having the potential to produce earthquakes between 8.3-6.0 magnitude. Due to the proximity to the faults and the potential earthquake magnitude that these faults could produce, the Project site may be exposed to seismic ground shaking. (PSE-TR, p. 4). Thus, applicants of future development will be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Policy PS-1.1 of the 2025 General Plan and the RMC Section16.08.185. (GPUI FEIR, p. 3.15-12). Future development shall be required to comply with all the recommendations outlined in the geotechnical investigation report and all applicable RMC standards. Additionally, the Project would be required to comply with all CBC regulations. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, impacts are less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>iii. Seismic-related ground failure, including liquefaction?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7iii. Response: (Source: GP;GP PEIR; GPUI FEIR;RMC; PSE-TR)</p> <p>Less Than Significant Impact. Liquefaction is a process whereby strong seismic ground shaking causes sediment layers that are saturated with groundwater to lose solidity and behave as a liquid. Factors influencing a site’s potential for liquefaction include area seismicity, on-site soil type and consistency, and groundwater level. When a load such as a structure is placed on ground that is subject to liquefaction, ground failure can result in the structure sinking and soil being displaced. Ground failure can take on many forms, including flow failures, lateral spreading, lowering of the ground surface, ground settlement, loss of bearing strength, ground fissures, and sand boils. (GPUI FEIR, p. 3.15-13). Based on the Phase 1 General Plan Update <i>Public Safety Element Technical Background Report Figure CPC-2: Liquefaction Zone</i>, the Project site is located in an area designated with a low potential for liquefaction (PSE -TR, p. 7). Within a low liquefaction zone, groundwater depths are greater than 30 feet (GP PEIR, p. 5.6-6) According to the City of Riverside 2025 General Plan EIR <i>Figure 5.6-4, Soils</i> the Project site is composed of Buren soils. Low liquefaction. Nevertheless, applicants of future development will be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Policy PS-1.1 of the 2025 General Plan and the RMC Section16.08.185. (GPUI FEIR, p. 3.15-12). The recommendations outlined in the geotechnical</p>				

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>700 feet above mean sea level near the Santa Ana River to almost 1,400 feet above mean sea level west of La Sierra Avenue. Land within the City is mostly flat and generally underlain with subsurface deposits dating from the Mesozoic period, consisting of granite, adamellite, Mesozoic granitic rock, granodiorite, and Mesozoic basic intrusive rock. (GPUI FEIR, p. 3.15-6).</p> <p>Lateral spreading is the lateral displacement of surficial blocks of sediment because of liquefaction in a subsurface layer. Lateral Spreading can occur on sites with gently sloping (1 percent or more) ground, as found on the Project site. Soil type and groundwater depth vary across the City, but it is assumed that the risk of lateral spreading is highest near the Santa Ana River and along arroyos and watercourses, areas where the risk for liquefaction is higher than it is in the rest of the City. (GPUI FEIR, p. 3.15-16). Congruent with the Project site’s liquefaction potential lateral spreading is considered low.</p> <p>As discussed above, the Project site is located in an urbanized area that is not prone to landslides, lateral spreading, flow failure, and loss of bearings. Nonetheless, applicants of future development shall prepare a geotechnical investigation prior to issuance of permits pursuant to Policy PS-1.1 of the 2025 General Plan and the RMC Section 16.08.185. (GPUI FEIR, p. 3.15-12). The recommendations outlined in the geotechnical investigation report would be incorporated in future development. These recommendations typically include general standards of care related to site preparation, unsuitable soil removal, over-excavation, backfill placement, compaction, and structural design.</p> <p>Because the Project site is not located on a geologic unit or soil that is unstable, or that would become unstable, and applicants of future development shall prepare and adhere to recommendations of a geotechnical investigation report, implementation of the Project would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7d. Response: (Source: GP PEIR; GPUI FEIR; RMC; PSE-TR)</p> <p>Less Than Significant Impact. The City is underlain by soils with a high shrink-swell potential in various locations. (GPUI FEIR, p. 3.15-14). The soil type underlying the Project site is Buren fine sandy loam which has a moderate shrink-swell potential (GP PEIR, pp. 5.6-8-5.6-9). Furthermore, the Project site is not identified as having high shrink-swell potential per the 2025 General Plan <i>Figure 5.6-5 Soils With High Shrink-Swell Potential</i> (GP PEIR, p. 5.6-13) As part of the construction permitting process, reflected in the Municipal Code Section 18.090.050, a geotechnical investigation shall be prepared. Future development’s design and construction shall comply with the recommendations outlined in the Geotechnical Reports. Thus, through compliance with the recommendations of the Geotechnical Investigation report, applicable provisions of the City’s Subdivision Code Title 18, and the CBC with regard to expansive soils, the Project would not create substantial direct or indirect risks to life or property. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>7e. Response: (Source: Project Description)</p> <p>No Impact. As previously mentioned in Response 7(c), the Project site has been previously developed located within an urbanized area. Thus, future development at the Project site will connect to and be served by existing sewer infrastructure. The Project does not propose the use of a septic system. Thus, soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater is not applicable to the proposed Project. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>7f. Response: (Source: Project Description)</p> <p>Potential Significant Impact. The Project site has been previously developed however, the Project does propose the demolition of the existing surface parking lot (Lot 33) and Outdoor Plaza and construction of a mixed-use entertainment development in its place. The proposed mixed use entertainment development includes a subterranean parking facility at a maximum depth of 53-feet below ground surface the Project involves ground disturbing activities. Therefore, construction of the Project could result in accidental discovery of archaeological resources below the surface. Thus, the Project may have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>8. GREENHOUSE GAS EMISSIONS Would the project:</p>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>8a. Response: (Source: Project Description)</p> <p>Potentially Significant Impact. The Project includes demolition of existing surface parking lot (Lot 33) and the Outdoor Plaza, to facilitate construction of the mixed-use entertainment Project. Implementation of the Project would incorporate residential use which would result in an increase in population density. This increased density may have the potential to increase greenhouse gas emissions above SCAQMD thresholds. As such, a Greenhouse Gas Analysis will be prepared. The Greenhouse Gas Analysis will address the GHG generated from the proposed construction and operation activities using the CalEEMod software. Thus, the Project may have the potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8b. Response: <i>(Source: Project Description)</i>				
<p>Potentially Significant Impact. As discussed in Response 8(a) above, the Project may have the potential to increase GHG emissions to levels that may impact the environment. The preparation of the Greenhouse Gas Analysis will determine the Project’s operational GHG emissions and whether those emissions exceed applicable GHG plans, policies, or regulations. Thus, the proposed Project may have the potential to conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project may result in a potentially significant impact so topic will be further analyzed and addressed in the forthcoming EIR.</p>				
9. HAZARDS & HAZARDOUS MATERIALS				
<p>Would the project:</p> <p>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p>				
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9a. Response: <i>(Source: CCR; CFR; GPUI FEIR; HMBP; RMC)</i>				
<p>Less Than Significant Impact. The routine transport, use, and disposal of hazardous materials can result in potential hazards to the public through accidental release. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities.</p>				
<p><u><i>Demolition and Construction</i></u></p> <p>The Project entails demolition of the existing Lot 33 and the Outdoor Plaza and construction of mixed-use entertainment development in its place. Construction and demolition of the Project site would involve the transport of fuels, lubricants, and various other liquids for operation of construction equipment. These materials will be transported to the Project site by equipment service trucks. In addition, workers will commute to the Project via private vehicles and will operate construction vehicles and equipment on public streets. Hence, the potential exists for direct impacts to human health and the environment from accidental spills of small amounts of hazardous materials during Project construction through the transport, use, and disposal of construction-related hazardous materials such as fuels, lubricants, and solvents. However, several federal and state agencies prescribe strict regulations for the safe transportation of hazardous materials. Hazardous material transport, storage and response to upsets or accidents are primarily subject to federal regulation by the United States DOT Office of Hazardous Materials Safety in accordance with Title 49 Part 171-180 of the CFR. Title 49 Part 171-180 regulates the safe transportation of hazardous materials and appropriate documentation for all hazardous waste that is transported is required. OSHA protects workers from being killed or seriously harmed at work, specifically 29 CFR §§1910 and 1926 address the handling of toxic materials. Cal OSHA, under 8 CCR §§337-340, specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings. Management of Hazardous Waste, under CCR Title 22 Division 4.5, establishes permits for the storage and disposal of hazardous material that cannot be disposed of in landfills. The California Hazardous Waste Control Law, under Chapter 6.95 of the Health and Safety Code, describes strict regulations for the safe transportation and storage of hazardous materials. Compliance with all applicable laws and regulations will reduce potential impacts associated with routine transport, use, or disposal of hazardous materials.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion. Further, it is possible that licensed vendors may bring some hazardous materials to and from the Project site as a result of the proposed Project. However, appropriate documentation for all hazardous waste that is transported in connection with specific Project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the CHSC. In addition, future users would be required to comply with all applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to the United States Department of Transportation (DOT) Office of Hazardous Materials Safety Title 49 of the CFR, and implemented by Title 13 of the CCR which prescribes strict regulations for the safe transportation of hazardous materials. Compliance with the applicable federal and state laws related to the transportation of hazardous materials, would reduce the likelihood and severity of accidents during transit.</p> <p><u>Operation</u></p> <p>Residential uses have a limited use of potentially hazardous materials during their operations (typical materials include household cleaners and household waste). As such, generation of hazardous materials for residential units would be low. Non-residential uses allowable as identified by RMC Title 19, <i>Table 19.150.020.A-Permitted Uses</i>, pose a minor potential for household hazardous products to be stored or transported to the site during operation. However, any hazardous materials utilized during operation would not be manufactured at the Project site. All uses would be required comply with the regulations, standards, and guidelines established by the Environmental Protection Agency (EPA), the State and City of Riverside related to storage, use, and disposal of hazardous materials. Additionally, both Federal and State governments require all businesses that handle more than a specified number of hazardous materials to submit a business plan to regulating agency. Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted; and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. (GPUI FEIR, pp. 3.15-17 – 3.15-18).</p> <p>Additionally, the City’s Municipal Code Chapter 9.48 – Unified Hazardous Materials Program, requires any business that utilizes, stores, and or handles a hazardous materials to submit a Hazardous Material Business Plan (HMBP) (RMC). Should any implementing use utilize, store, and or handle a hazardous material as part of operations, they will be required to submit a HMBP.</p> <p>Thus, because the Project would be required to comply with all applicable federal and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials, it would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>9b. Response: (Source: CCR; CFR; GPUI FEIR; RMC)</p> <p>Less than Significant Impact. All tenants of the proposed buildings are not yet known at this time. As such, there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be stored and transported during construction and operation but, these</p>				

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9d. Response: (Source: DTSC)</p> <p>No Impact. The Project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.25 (DTSC). The nearest hazardous material site is Alark Hard Chrome and is categorized as an active Federal Superfund Site located at 2777 Main St approximately 0.45 miles from the Project site. The soil at the site was contaminated as a result of spills, drips, and possible discharge of plating bath solutions. Thus, the Project would not result in a significant hazard to the public or the environment. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>9e. Response: (Source: ALUC-A; GE)</p> <p>Less Than Significant Impact. The Project site is not located within any airport influence area. The nearest airport is Flabob Airport located approximately 1.8 miles from the Project site. According to <i>Figure Map FL-1, Map of Flabob Airport</i> of the Riverside County Airport Land Use Commission Compatibility Plans, the Project site lies outside of the land use compatibility zone boundaries of the Flabob Airport. (ALUC-A, p. 3-21). Because the Project site is located outside an airport land use plan area, then the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>9f. Response: (Source: GP; LHMP, RMC, PSE-TR)</p> <p>Less Than Significant Impact. The Project site is located off of Market Street, Fifth Street, Third Street and Orange Street. Market Street has been identified by the <i>Public Safety Element Figure CP-8: Evacuation Routes</i> as a Minor/Principal Arterial road for evacuation. (PSE -TR, p. 38). The proposed Project will be required to comply with the City’s Local Hazard Mitigation Plan adopted July 30, 2018² (LHMP). This plan provides the planned response to extraordinary emergency situations associated with natural disasters, national security emergencies, and technological incidents affecting the City. Construction activities will be generally confined within the Project site. Any construction activities that may temporarily restrict vehicular traffic will be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures in accordance with the City’s LHMP.</p>				

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>with annual reporting and monitoring requirements and enforcement by the RWQCB. The SWPPP addresses on-site areas of land disturbance by listing Best Management Practices (BMPs) for erosion and sediment control to minimize to the extent practicable the release of construction-related stormwater and non-stormwater discharges into off-site areas and storm drains. Said BMPs are expected to include silt fencing, gravel bags, stockpile covers, stabilized entrance/exit, secondary containment around hazardous materials, temporary sediment basins, and housekeeping measures to keep construction materials from leaving the boundaries of the project due to rain or wind. Additionally, the SWPPP would contain a visual monitoring program, a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment (CWA Section 303(d) requires states to identify “impaired” water bodies as those which do not meet water quality standards and states are required to compile this information in a list and submit the list to the US Environmental Protection Agency (EPA) for review and approval). Therefore, through future applicant’s compliance with the NPDES permit and implementation of standard required BMPs, Project impacts to surface and ground water quality would be less than significant.</p>				
<p>Operations</p> <p>Potential pollutants discharged to storm drains and downstream water bodies resulting from long-term occupancy and operations of the proposed project include litter, trash, and debris; oil, grease, metals, vehicle hydrocarbons; and sediments, nutrients, pesticides, and fertilizers from landscaped areas. The Project site is tributary to Santa Ana River Reach 3. This receiving water’s list of impairments includes copper, indicator bacteria, and lead. Designated beneficial uses include agricultural supply, groundwater recharge, water contact recreation, noncontact water recreation, warm freshwater habitat, wildlife habitat, and for preservation of rare and endangered species (located approximately just over one mile downstream).</p> <p>The proposed Project will include impervious and pervious surfaces in the form of commercial and residential buildings and an Outdoor Plaza located within the same footprint of the Project site that currently contains impervious surfaces (parking lot) and pervious surfaces (an Outdoor Plaza). Like the current development, the proposed Project would be required to adhere to DSP development standards that include a landscape courtyard, with a minimum are of 600 continuous square feet with a minimum dimension of 20 feet that is landscaped with greenery, statuary, water features, seating, or combination of the four. (DSP, p. 6-7). So, the potential to substantially increase surfaces that would lead to surface runoff would be low. Nevertheless, future applicants proposing development within the Project site, pursuant to SARWQCB’s Water Quality Management Plan Guidance document, would be required to prepare a project-specific water quality management plan (WQMP) which is a plan for post-construction BMPs to prevent and manage stormwater quality for the life of a project during use. The Water Quality Management Plan Guidance document indicates that new development or redevelopment projects shall control stormwater runoff and the preparation of a water quality management plan is required for new development (adding 10,000 or more square feet of impervious surfaces) and significant redevelopment (adding 5,000 or more square feet of impervious surfaces) to control stormwater runoff to prevent any deterioration of water quality. (RIV-WQMP, p. 5). The Water Quality Management Plan Guidance document also indicates that implementation of Low Impact Development (LID) to site designs to infiltrate, evapotranspire, harvest and use, or treat runoff from impervious surfaces is a sustainable approach to land development. LID focuses on stormwater management, wastewater treatment, circulation and site design. (RIV-WQMP, pp 25. -28). Per RMC Chapter 14.12.316, new development or redevelopment projects shall control stormwater runoff to prevent any deterioration of water quality that would impair subsequent or competing uses of the water. This section further indicates that the City Engineer shall identify the BMPs that may be implemented to prevent such deterioration and shall identify the manner of implementation. Finally, each future implementing development would be required to go through the City’s development review process to ensure each project adheres to the above regulations as per existing conditions. Compliance with said regulations would ensure that development within the Project site does not violate any water quality standards or discharge requirements, or</p>				

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>10civ Response: (Source: FEMA, RMC)</p> <p>Less Than Significant Impact. According to the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) (Panel No. 06065C0726G, effective Aug. 28, 2008), the Project site is located in “Zone X – Other Flood Areas.” These are defined as “areas of 0.2 percent annual chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood.” The City of Riverside Municipal Code Section 16.18 does not include Zone X (as shown on said FIRM map) as a Special Flood Hazard Area (SFHA), and it is therefore not subject to the City’s requirements pertaining to SFHAs. The property is not required to pay flood insurance within this flood zone designation.</p> <p>Future implementing development within the Project site will incorporate an internal drainage system that would connect to existing storm drains within the public right-of-way along Market Street, Fifth Street, Orange Street, or Third Street. Also, the Project will not alter the course of a stream or river. Thus, the Project is not expected to impede or redirect flood flows because of such actions. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>10d. Response: (Source: FEMA; GP, RMC)</p> <p>Less Than Significant Impact. The Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) (Panel No. 06065C0726G, effective Aug. 28, 2008), shows the Project site is located in “Zone X – Other Flood Areas.” This is defined as “areas of 0.2 percent annual chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood.” The City of Riverside Municipal Code Section 16.18 does not include Zone X (as shown on said FIRM map) as a Special Flood Hazard Area (SFHA), and it is therefore not subject to the City’s requirements pertaining to SFHAs. The property is not required to pay flood insurance within this flood zone designation.</p> <p>The Project will not substantially change the overall drainage pattern of the Project site. In the event of inundation, the Project would not risk a pollutant release any more than the risk from surrounding properties.</p> <p>The Project is not located within an identified seiche zone. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Because of the distance from the proposed Project site to surrounding large water bodies and reservoirs, inundation due to seiche is unlikely.</p> <p>The Project is not located within an identified tsunami zone. Tsunamis are a type of earthquake-induced flooding that is produced by large-scale sudden disturbances of the sea floor and can result in an increased wave height and a destructive wave surge into low-lying coastal areas. Because tsunamis occur in coastal areas and the project is located approximately 40 miles east of the Pacific Ocean, inundation due to tsunami is unlikely.</p>				

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>11b. Response: <i>(Source: DSP; GP)</i></p> <p>Less Than Significant Impact. The Project would not conflict with any land use plan, policy, or regulation primarily because the Project is consistent with the City’s zoning and General Plan land use designations. The Project site is in the Downtown area of the City and is within the Downtown Specific Plan (DSP). Specifically, the Project site is located within the Raincross District of the DSP. The DSP is consistent with the 2025 General Plan and Zoning Code. (DSP, p. 3-5). Where land use regulations and/or development standards of the Zoning Code are inconsistent with DSP, the standards and regulations of the DSP shall prevail. (DSP, p. 3-5). Because the DSP is consistent with both the 2025 General Plan and Zoning Code, the analysis below only analyzed the proposed Project’s consistency with the DSP.</p> <p>The DSP identified seven goals and their associated policies to aid the framework to realize the DSP vision. These goals include Land Use Goals (Goal LU-1), Housing Goals (Goal H-1), Economic Development Goals (ED-1), Urban Design Goals (Goal UD-1), Historic Preservation Goals (Goal HP-1), Circulation Goals (Goal C-1), and Parking Goals (Goal P-1). (DSP, pp. 3-5 - 3-11). Appendix B contains the DSP Consistency Table, which includes all goals and policies and consistency with the proposed Project.</p> <p>As shown in Appendix B, the proposed Project is consistent with the DSP, which is consistent with the 2025 General Plan and the Municipal Code. Therefore, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant, and this topic will not be further analyzed in the EIR.</p>				
<p>12. MINERAL RESOURCES</p>				
<p>Would the project:</p>				
a. Result in the loss of availability of a known mineral resource that would be of value to the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>12a. Response: <i>(Source: GP PEIR)</i></p> <p>No Impact. Portions of the City are located in Mineral Resource Zone (MRZ)-2 and MRZ-4. MRZ-2 is defined as Mineral Resource Zone where adequate information indicates that significant mineral deposits are present or there is a high likelihood for their presence and development should be controlled. MRZ-4 is defined as a Mineral Resource Zone where there is insufficient data to assign any other MRZ designation. (GP PEIR, p. 5.10-4).</p> <p>The Project site is in MRZ-4. As such, there is no sufficient data to determine the existence of mineral resources on-site. Additionally, the Project site is developed and is fully paved. Moreover, the Project does not involve extraction of mineral resources. No mineral resources have been identified on the Project site and there is no historical use of the site or surrounding area for mineral extraction purposes. The Project site is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the 2025 General Plan, or other land use plan.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
For the reasons stated above, the Project is not anticipated to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12b. Response: <i>(Source: GP PEIR)</i> No Impact. As mentioned in Response 12(a), above, the Project site is in an area with no known mineral resources of local or state importance. Since the Project does not propose mineral extraction at the currently developed site, implementation of proposed Project would not result in the loss of available resources. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.				
13. NOISE Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13a. Response: <i>(Source: GP)</i> Potentially Significant Impact. The proposed Project will include demolition of the existing surface parking lot (Lot 33) and the Outdoor Plaza to develop the proposed Project. An increase in construction and operational noise levels associated with construction and traffic related noise levels due to proposed residential and commercial uses may occur. This may result in the Project generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.				
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13b. Response: <i>(Source: Project Description)</i> Potentially Significant Impact. Groundborne vibration and groundborne noise levels are not typically associated with operational activities from residential and commercial uses. However, demolition, excavation and construction activities associated may result in vibration depending on the equipment and methods employed. Thus, the Project may generate excessive groundborne vibration or groundborne noise levels. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>13c. Response: (<i>Source: ALUC-A</i>)</p> <p>Less than Significant Impact. As mentioned in Response 9(c) above, the Project site is not located within any airport influence area. The nearest airport is Flabob Airport located approximately 1.8 miles from the Project site. According to <i>Figure Map FL-1, Map of Flabob Airport</i> of the Riverside County Airport Land Use Commission Compatibility Plans, the Project site lies outside of the land use compatibility zone boundaries of the Flabob Airport. (ALUC-A, p. 3-21). Because the Project site is located outside the land use plan area for Flabob Airport, the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>14. POPULATION AND HOUSING Would the project:</p>				
<p>a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>14a. Response: (<i>Source: DOF;DSP; GP PEIR; HE-TBR</i>)</p> <p>Less Than Significant Impact. The Project site is developed and contains the Riverside Convention Center, Outdoor Plaza, and surface parking (Lot 33). The Project proposes a maximum of 168 residential units and a maximum of 376 rooms through hotel development, as well as other commercial uses. The City of Riverside Phase I General Plan Update Housing Element Technical Background report found that the City’s household size increased from 3.26 to 3.43 people per dwelling unit from 2011 to 2019. (HE-TBR, p. 11) However, it should be noted the 2024 Department of Finance’s (DOF) the City’s household generation factor is 3.06 people per dwelling unit (DOF). As a conservative approach, a range was calculated using the 2024 DOF factor of 3.06 people per dwelling unit and the City of Riverside Phase I General Plan Update Housing Element Technical Background factor of 3.43 people per dwelling unit; thus, the Project may introduce between approximately 514³ to 576⁴ additional residents to the City of Riverside. The Project’s uses are consistent with the Downtown Specific Plan (DSP) designation, which allows for high-density residential and mixed-use development within the Raincross District. The DSP allows a maximum dwelling unit density of 60 units per acre and can be increased with the approval of conditional use permit (DSP, p. 6-10). The Project’s residential density results in approximately 16 dwelling units per acre, which is well below the maximum allowable density. As such, the Project does not induce unplanned growth. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, impacts would be less than significant and this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14b. Response: (Source: Project Description)</p> <p>No Impact. The Project site is developed and contains the Riverside Convention Center, Outdoor Plaza, and surface parking (Lot 33). Hence, no housing units would be displaced because of Project construction. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impacts are anticipated and this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
15. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>15a. Response: (Source: GE; PSE-TR)</p> <p>Potentially Significant Impact. The City of Riverside Fire Department (RFD) has 14 fire stations throughout the City of Riverside (PSE-TR, p. 16). The Project site is located approximately 0.32 miles north of the City of Riverside Fire Department Downtown Station No. 1 located at 3401 University Avenue and approximately 1.64 miles west of the Eastside Station No. 4 at 1496 W Linden Street #1436 (GE). -the Project proposes to introduce residential and non-residential uses to the Project site. Based on the maximum residential area proposed of 168 units, the maximum anticipated number of new residents would be 576.⁵ The Project’s proposed development may result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, the Project may result in potentially significant impacts so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>15b. Response: (Source: GE; GP; GPUI FEIR)</p> <p>Potentially Significant Impact. Police protection services for the Project area are provided by the Riverside Police Department (RPD) through four (4) RPD stations (GPUI FEIR, p. 3.10-4). The nearest police station to the Project site is located approximately half a mile to the north at 4102 Orange Street (GE). As mentioned in Response 15(a) above the Project proposes to introduce residential and non-residential uses to the Project site. Based on the maximum residential area proposed of 168 units the anticipated number of new residents would be 576⁶. Based on the maximum non-residential area proposed and the distinct uses, the number of employees may</p>				

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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be approximately 1,746⁷. Thus, the Project is anticipated to generate a total of approximately 2,322 people onsite. Thus, the Project may result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, the Project may result in **potentially significant impacts** so this topic will be further analyzed and addressed in the forthcoming EIR.

c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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15c. Response: (Source: RUSD-A; RUSD-B)

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

Table C – Student Generation

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

Source: RUSD-B Table 16

Notes:

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

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

⁷ Number of employees were calculated using the Riverside County General Plan Appendix E, Table E-5 - Commercial Employment Factors and the proposed Project land use and associated square footage.

(<https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-Plan-2017-appendices-Appendix-E-2-April-2017.pdf>)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>development fee is established by the RUSD prior to the issuance of building permits. As per AB 2926 and SB 50, the school development fee is charged to developers to mitigate the impact of development on school facilities which may result from increased enrollment and is deemed to provide full and complete school facilities mitigation for impacts to school facilities. (RUSD-B, pp. 10, 19).</p> <p>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.</p> <p>Therefore, through compliance with City policy and payment of development impact fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>15d. Response: <i>(Source: GE; GP; GPUI FEIR;RMC)</i></p> <p>Less than Significant Impact. The City has 68 public parks and open space areas encompassing more than 2,940.61 acres of City owned parkland (GPUI FEIR, p. 3.11-1). The City of Riverside has adopted a standard for developed park acreage of three (3) acres per 1,000 residents. The standard is further broken down to favor neighborhood parks, with two (2) acres of neighborhood park provided per 1,000, and one (1) acre of community park land per 1,000 persons, for a 2:1 ratio. Currently the City does not meet this standard. Based on adopted classifications and standards, neighborhood parks should be located within a one-half-mile (0.5) radius of every residence and community parks within a two-mile (2) radius. (GP, p. PR-15). The Project is located within 0.32-miles northeast of White Park which is categorized as “Special Use Facility,” within 0.74 miles southwest of Fairmount Park which is categorized as a Regional Park and within 1.14 miles north east of Bobby Bonds Park which is categorized as a Community Park. (GE) The Project proposes to introduce new residential uses to the Project site. Utilizing the City’s park land ratio and calculating the anticipated residents, the Project would create a demand for approximately 1.55 acres of parkland. As mentioned in the Project Description, the Project proposes an Outdoor Plaza that may be partially covered or wholly uncovered and is intended to be fully programmable for outdoor events on an intermittent basis. The Outdoor Plaza would contain flexible outdoor gathering spaces, such as an amphitheater. The Project is consistent with the land uses envisioned in the DSP, zoning and General Plan land use designations. Thus, the City’s recreational budget projections should have included the Project’s land uses in their projections to plan for parkland ration within this area of the City. Moreover, once specific projects are proposed, project-specific fees would be generated and paid into Local Park Development Fees per RMC Chapter 16.60 – Local Park Development Fees for their fair share contribution. Local park fees are collected by the City as part of the development review process and are used for the purpose of supporting the City’s recreational budget for past and present facilities to serve the community. Thus, through integration of the Outdoor Plaza amenities and payment of Local Park Development Fees for future implementing projects, there would not be a substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>15e. Response: (Source: GPUI FEIR)</p> <p>Less than Significant Impact. The City of Riverside Public Library (RPL) consists of one Main Library and seven branch libraries. Four university and college libraries also serve the City (GPUI FIER, p. 3.10-7). The Project site is located approximately 0.28 miles southwest to the City’s Main Library located at 3900 Mission Inn Avenue. The City’s new main Library expanded in 2021 covering 42,000 square feet and providing more than 60,000 items. (GPUI FEIR, p. 3.10-8). While the Project proposes an increase in population the incremental increase in the use of libraries but is not expected to substantially increase the demand of these services such that construction of new or expanded facilities would be required. While there are no development impact fees that would fund the RPL system, the Project would be required to comply with GP 2025 Education Element Objective ED-5 and Policy ED-5.1, which states that the City is required help to provide ample and convenient library facilities. Compliance with these policies would ensure that the Project would not affect the City’s ability to provide adequate libraries. Further, City Council may approve funds as necessary for library services. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
16. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>16a. Response: (Source: Project Description, RMC)</p> <p>Less than Significant Impact. The Project proposes to introduce new residential and commercial uses to the area. With residential development, the Outdoor Plaza will be included as part of the Project to serve residents. However, the Project may result in an increase in the use of existing neighborhood and regional parks or other recreational facilities but it is not anticipated that substantial physical deterioration of the facility would occur or be accelerated. The City requires a park development fee to enable the acquisition and/or development and/or improvement of neighborhood and community parks to provide both passive and active recreational opportunities to the residents of the City. RMC Section 16.60 outlines the park development fees and in lieu dedication or improvements imposed on construction or replacement of nonresidential units and new dwelling units. Applicants of future development within the Project site would be required to pay said fee. With payment of the park development fee, impacts to parks would not result in physical or accelerated deterioration. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>16b. Response: (Source: Project Description, RMC)</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Less than Significant Impact. The Project proposes a mixed-use entertainment development to the area. The Project proposes outdoor spaces and an Outdoor Plaza. The Project would bring approximately 576⁸ residents to the area. There are multiple parks surrounding the Project site. Fairmount Park is approximately 0.74 miles from the Project site and is designated as a Regional Park. White Park is approximately 0.32 miles from the Project site and is designated as a Special Use Park. The Project does not include recreational facilities or require the construction of recreational facilities which might have an adverse physical effect on the environment. Additionally, as describe in Response 16(a) above, future applicants would be required to pay park development fees pursuant to RMC 16.60. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>17. TRANSPORTATION Would the project:</p>				
<p>a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</p>	☒	☐	☐	☐
<p>17a. Response: (Source: GP, Project Description) Potentially Significant Impact. The Project proposes a mixed-use entertainment development to the area which may increase traffic volumes on the surrounding roadways. While the Project is not expected to result in conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</p>	☒	☐	☐	☐
<p>17b. Response: (Source: Project Description) Potentially Significant Impact. The Project proposes a mixed-use entertainment development which may increase traffic volumes on the surrounding roadways. While the Project is not expected to result in conflicts with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	☐	☐	☒	☐
<p>17c. Response: (Source: GP; Project Description) Less than Significant Impact. No sharp curves or other hazardous traffic conditions currently exist within the Project site or within the Project vicinity. As described in the Project Description above, the Project site and Project vicinity are currently fully developed. The nearby roadways that currently provide access to the Project site, Market Street, Third Street, Fifth Street, and Orange Street, are built out to their ultimate width per the City's</p>				

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

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>to unearth tribal cultural resources during construction activities that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k). Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	☒	☐	☐	☐
<p>18b. Response: <i>(Source: Project Description)</i></p> <p>Potentially Significant Impact. As of July 1, 2015, AB52, signed into law in 2014, amends CEQA and establishes new requirements for tribal consultation. The law applies to all projects that have a notice of preparation or notice of negative declaration/mitigated negative declaration. It also broadly defines a new resource category of "tribal cultural resource" and establishes a more robust process for meaningful consultation between the lead agency and Native American Tribes that includes: prescribed notification and response timelines, consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures, and documentation of all consultation efforts to support CEQA findings. The City as lead agency, is required to coordinate with Native American Tribes through the AB52 consultation process. As these processes have yet to be concluded, knowledge and significance of potential tribal cultural resources, if any, has yet to be determined.</p> <p>Thus, the Project may cause a substantial adverse change in the significance of a tribal cultural resource determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Therefore, the Project may result in a potentially significant impact so this topic will be further analyzed and addressed in the forthcoming EIR.</p>				
<p>19. UTILITIES AND SYSTEM SERVICES. Would the project:</p>				
<p>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?</p>	☒	☐	☐	☐
<p>19a. Response: <i>(Source: RMC; Project Description)</i></p> <p>Potentially Significant Impact. The Project site is currently developed and is currently served by the existing utilities within and around the site. The Riverside Public Utilities (RPU) provides water and electric services and the Southern California Gas provides natural gas services for the Project site, and Charter and AT&T provide</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>telecommunications services. No utility upgrades on site are needed to serve the Project, since all of these utilities are already providing service to the site. One segment of existing offsite sewer main line located in Market Street will most likely need to be upsized to 15 inches and one segment of water line in Third Street along the Project frontage that will need to be upsized to 18 inches. The exact timing of this upgrade is not known at this time, and will be further evaluated in the forthcoming EIR.</p> <p>Therefore, the Project may result in a potentially significant impact related to water and wastewater services so only this utility will be further analyzed and addressed in the forthcoming EIR. All other services related to water, storm drain, electrical, natural gas and telecommunications will not be addressed in the forthcoming EIR.</p>				
<p>b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>19b. Response: (Source: GP PEIR; Project Description; WSA Letter)</p> <p>Less than Significant Impact. The Project site is located within the Riverside Public Utilities (RPU) Service Area (GP PEIR, p. 5.16-8). Water service would be provided by RPU via connections on Third Street. In order to serve this Project, upgrades to the existing water main will be upsized to an 18-inch diameter water main located between Orange Street and Market Street.</p> <p>Assembly Bill 610 (AB610) effective January 1, 2002, requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, a Water Supply Assessment (WSA) must be prepared in conjunction with the land use approval process associated with a project and is required for any “project” that is subject to CEQA and meets certain criteria relative to size. Proposed development of more than 500 dwelling units require a water supply assessment by the water supplier. Since the proposed Project will facilitate the development of more than 500 dwelling units, or proposed hotel with more than 500 rooms, or a project that would demand an amount of water equivalent to , or greater, than the amount of water required by a 500 dwelling unit project, then a WSA is required. According to the <i>Future Water Demand Estimates for the Riverside Alive Project</i> letter (WSA Letter) prepared for the Project by RPU and is included as Appendix C, the net increase in water demand from the proposed Project does not meet nor exceed any of the requirements listed in Water Code section 10912(a); thus, a WSA is not required for the proposed Project. As such, the City’s existing water supplies would be sufficient to support the development of the proposed Project. Therefore, impacts would be less than significant and this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
<p>c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>19c. Response: (Source: GP PEIR; Project Description; SSMP)</p> <p>Less than Significant Impact. Wastewater treatment for the Project would be provided by the City Public Works Department at the Riverside Regional Water Quality Control Plant (RRWQCP). The land uses associated with the Project are consistent with the zoning code, General Plan land use designations and the DSP. Per the Sewer System Management Plan, the RRWQCP has capacity to treat approximately 46 million gallons per day (mgd). (SSMP, p. 1) Currently, the RRWQCP receives an average daily flow of 26 mgd; therefore, the RRWQCP has a</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
remaining capacity of 20 mgd. The generation of wastewater from buildout of the Project site consistent with the DSP was accounted for in the master planning of the RRWQCP. Thus, RRWQCP has adequate capacity to serve the Project's increased demand in addition to RRWQCP's existing commitments. Therefore, the impacts would be less than significant and this topic will not be further analyzed and addressed in the forthcoming EIR.				
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19d. Response: (Source: CAL-A, CAL-B, CAL-C; GP PEIR; Project Description)				
<p>Less Than Significant. The proposed Project includes the demolition of the existing surface parking lot and Outdoor Plaza. Anything with salvage value will be segregated and recycled. The Project may reuse crushed concrete and asphaltic concrete materials from demolition in Project construction; therefore, some solid waste from demolition will be diverted from landfills.</p> <p>Construction of the Project would result in the generation of construction-related solid waste. The Project area is currently served by three landfills: Badlands Landfill, Lamb Canyon, and El Sobrante Landfill. Badlands accepts up to 5,000 tons of solid waste per day and is not anticipated to close until 2059. Lamb Canyon accepts up to 5,000 tons of solid waste per day and is not anticipated to close in 2032. El Sobrante accepts 16,054 tons of solid waste per day and is not anticipated to close in 2051. (CAL-A, CAL-B, CAL-C). The Project's contribution from construction to the disposal facilities would not exceed the capacity of any of the three landfills and is therefore negligible.</p> <p>The Project proposes a mixed-use development which in its operational state would result in commercial and residential solid waste generation. The yearly in-take capacities for Badlands, Lamb Canyon, and El Sobrante Landfill are 1,825,000 tons/yr, 1,825,000 tons/yr, 5,859,710 tons/yr⁹ respectively. The Project's operational solid waste contribution would represent a nominal amount of the yearly in-take capacities and therefore impacts to any of the three landfills during operation will be negligible. Athens provides solid waste collection services to the existing site and provides sustainable waste and recycling services in addition to having an extensive network of processing facilities that would manage the Project site's waste stream to include solid waste, recyclables, green waste, food waste, construction and demolition waste, and electronic waste.</p> <p>Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills. Non-recyclable solid waste generated during long-term operation of the Project would be disposed of at the El Sobrante, Badlands Landfill, and/or the Lamb Canyon Landfills. All of these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume (CAL-A, CAL-B, CAL-C). Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.</p> <p>Federal, state, and local statutes and regulations regarding solid waste reductions are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to</p>				

⁹ Daily disposal capacity multiplied by 365 days per year.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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.</p> <p>Thus, the proposed Project’s estimated solid waste generation during demolition, construction, and operation will not generate solid waste in excess of State or local standards, or in excess of infrastructure capacity because estimated waste will constitute an extremely small proportion of the daily available disposal capacity of any of the landfills. Further, the proposed Project will be required to comply with all existing regulations. Therefore, impacts would be less than significant so this topic will not be further analyzed in the EIR.</p>				
<p>e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>19e. Response: (Source: GP PEIR; Project Description)</p> <p>Less Than Significant. The Project would generate solid waste during construction and operation activities, thus requiring consideration of waste reduction and recycling measures. The 1989 California Integrated Waste Management Act (AB 939) requires that specific waste diversion goals be achieved for all California cities and counties, including an overall reduction in solid waste produced by 50 percent by the year 2000. In addition, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the proposed design. Additionally, AB 341 (2011) established a state goal to reduce, recycle, or compost no less than 75 percent of waste generated by the year 2020. The City is currently achieving a 60 percent diversion rate, well above AB 939 requirements. (GP PEIR, p. 5.16-18) CALGreen also requires all developments to divert 65 percent of non-hazardous construction and demolition debris for all projects and 100 percent of excavated soil and land clearing debris for all nonresidential projects. Hence, the proposed Project will be required to comply with the City’s waste disposal requirements as well as CALGreen. Thus, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the impacts would be less than significant so this topic will not be further analyzed in the EIR.</p>				
<p>20. WILDFIRE</p> <p>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</p>				
<p>a. Substantially impair an adopted emergency response plan or emergency evacuation plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>20a. Response: (Source: CALFIRE; GP)</p> <p>Less Than Significant Impact. The Project site is not located in a State Responsibility Area (SRA) or in an area that is identified as being in a very high fire hazard severity zone according to the Fire Hazard Severity Zones in the SRA Map produced by the California Department of Forestry and Fire Protection (CALFIRE). Further, the City of Riverside has not designated the site as a very high, high, or moderate wildfire rating (GP, p. PS-30). As discussed in response to 9(f) above, the Project will not impair an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>20b. Response: (Source: Initial Study Checklist)</p> <p>Less Than Significant Impact. As discussed in Responses 7(a)(iv) and 20(a), above, the Project site is not located within a SRA very high fire, high or moderate hazard severity zone and the Project site is generally flat with no steep slopes located on or adjacent to the affected lands that would exacerbate wildfire risk (i.e., from upslope winds). No other natural features are present on-site that would exacerbate wildfire risks. Thus, the Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, impacts would be less than significant and this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>20c. Response: (Source: Initial Study Checklist)</p> <p>No Impact. As discussed in Response 20(b), above, the Project site is generally flat with no steep slopes located on or adjacent to the landsite and the site is not located in or adjacent to a very high fire, high or moderate hazard severity zone. The Project site is fully served by existing roads and utilities. As such, the Project will not need to construct any new roads, fuel breaks, power lines or other utilities. Thus, the Project would not require the installation or maintenance of new associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>20d. Response: (Source: Initial Study Checklist)</p> <p>No Impact. As discussed in Response 20(b), above, the Project site and surrounding lands are relatively flat and the Project site is not located in or adjacent to a very high fire, high or moderate hazard severity zone. As such, the risk of downslope or downstream flooding or landslide hazards is considered to be low to nonexistent. Thus, the Project would not expose people or structures to significant risks including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts are anticipated so this topic will not be further analyzed and addressed in the forthcoming EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
<p>a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>21a. Response: <i>(Source: Initial Study Checklist)</i></p> <p>Potentially Significant Impact. The Project site is currently developed and is surrounded by existing development. As discussed in <i>Section 4 – Biological Resources</i> of this Initial Study, the Project site is fully developed and is not located within an area designated for nor does it contain suitable habitat for an endangered species, candidate, sensitive, or special-status species. Nonetheless, the Project would be required to comply with Mitigation Measure MM BIO-1, which requires a pre-construction bird survey during nesting season. Through compliance with MM BIO-1 as described in <i>Section 4 – Biological Resources</i> of this Initial Study, the proposed Project would have less than significant impacts with mitigation incorporated on biological resources.</p> <p>As discussed in <i>Section 5 – Cultural Resources</i> of this Initial Study, the Project site is located within the Downtown Specific Plan specifically within the Raincross District. Since the Raincross District is the cultural, historic, and social center of both Riverside and the region beyond, the quality of Downtown Riverside’s historic buildings and the relationship between these buildings creates an historic urban fabric unparalleled in the region. While the Project is not expected to result in direct impacts to historical resources pursuant to § 15064.5, nonetheless, the forthcoming EIR will provide a more detailed analysis of the potential impacts related to this issue. Therefore, the Project may result in a potentially significant impacts related to historic resources so this topic will be further analyzed and addressed in the forthcoming EIR. Last, as discussed in <i>Section 18 – Tribal Cultural Resources</i> of this Initial Study, the Project is subject to AB52 which will be further analyzed and discussed in the forthcoming EIR.</p> <p>Therefore, the Project may result in potentially significant impacts related to California history or prehistory.</p>				
<p>b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>21b. Response: <i>(Source: Initial Study Checklist)</i></p> <p>Potentially Significant Impact. The following topics will not be addressed in the forthcoming EIR, as they do not have the potential to result in significant impacts and will not result in cumulatively considerable impacts.</p> <p>Agriculture: The Project site does not contain Prime Farmland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and does not contain Williamson Act contracts.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Furthermore, the City of Riverside does not contain any lands designated for forestland or timberland. Additionally, the Project site is zoned as DSP – Downtown Specific Plan, as such the Project will not convert existing agricultural or forest land to non-agricultural or non-forest use. Thus, the Project will not create cumulatively considerable impacts.</p> <p>Biological Resources: The Project site is an existing developed site that does not contain suitable habitat or existing habitat. Implementation of mitigation measure MM BIO-1 ensures Project would not result substantial impacts to biological resources. Thus, the Project will not create cumulatively considerable impacts.</p> <p>Geological Resources: The Project will not result in direct or indirect substantial adverse effects, including the risk of loss, injury, or death related to geological resources. It was determined that future development will be required to prepare a Geotechnical Investigation prior to issuance of permits. Therefore, the Project would be required to comply with all recommendations outlined in geotechnical investigation report, RMC standards and CBC regulations. Thus, the Project will not create cumulative considerable impacts in relation to geological resources. It should be noted that Project proposes a subterranean parking facility thus due to proposed depth disturbance paleontological resources may be impacted. Thus, cumulative considerable impacts in relation to paleontological resources will be further analyzed and addressed in the forthcoming EIR.</p> <p>Hazards and Hazardous Materials: Project construction activities would occur in accordance with all applicable local standards adopted by the City of Riverside, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code. Stormwater runoff from the site, under both construction and post-construction development conditions, would be avoided through compliance with National Pollutant Discharge Elimination System (NPDES) regulations administered by the Santa Ana Regional Water Quality Control Board (RWQCB). Thus, the Project will not create cumulatively considerable impacts.</p> <p>Hydrology: The Project will not violate any water quality standards, waste discharge requirements, degrade ground water quality or result in substantial erosion or flooding. Stormwater runoff from the site, under both construction and post-construction development conditions, would be avoided through compliance with National Pollutant Discharge Elimination System (NPDES) regulations administered by the Santa Ana Regional Water Quality Control Board (RWQCB). Further, the drainage facilities would be required to be sized to capture the onsite water volumes. Future implementing development within the Project site proposed Project will incorporate an internal drainage system that would still connect to existing storm drains within the public right-of-way along Market Street, Fifth Street, Orange Street, or Third Street. Thus, the Project will not create cumulatively considerable impacts.</p> <p>Land Use: The Project does not propose any changes to the existing general plan land use designation, general plan land use and urban design element or zoning designation. Additionally, the Project site has been previously developed and surrounding by development; therefore, the Project will not create cumulatively considerable impacts.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Mineral Resources: The Project site is located in MRZ-4, therefore there isn't sufficient data to determine mineral resources on-site, therefore, development of the proposed Project will not have a cumulatively considerable impact on mineral resources.</p> <p>Population/Housing: The Project site is located within the Downtown Specific Plan which allows for high-density residential and mixed-use development. Thus, the Project would not induce substantial unplanned growth in the area. The Project site does not currently contain residential uses and thus the Project would not displace people or housing. Therefore, the Project will not create cumulatively considerable impacts.</p> <p>Public Services: The Project site has been previously developed and has previously received public services from the City. While the proposed Project would increase the population the future developments would be required to pay development impact fees for schools, parks, and other facilities like libraries per the City's municipal code standards and general plan policies. Through payment of fees, the Project would result in less than significant impacts to these services. Thus, the Project will not create cumulatively considerable impacts to these services.</p> <p>Recreation: The proposed Project would be required to pay park development fees pursuant to City's municipal code Section 16.60 at the time of development. Through payment of said fees, the Project would result in less than significant impacts to parks. Thus, the Project will not cause cumulatively considerable impacts.</p> <p>Wildfire: There is no significant risk of wildfire and wildfire impacts due to the Project's location. Since the Project site has been previously developed and is located within an urbanized area, the Project site is not located on lands classified with very high fire hazard severity zone. Additionally, the Project would be required to adhere to City and CBC buildings codes and California Fire Code standards. The proposed Project will not cause cumulatively considerable impacts.</p> <p>The potential cumulative impacts related to the potentially significant impacts of the proposed Project will be addressed in the forthcoming EIR.</p>				
<p>c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	☒	☐	☐	☐
<p>21c. Response: (Source: Initial Study Checklist)</p> <p>Potentially Significant Impact. The Project may potentially contribute to an exceedance of SCAQMD thresholds for air quality and greenhouse gases, which may pose a threat to human health. Likewise, noise impacts associated with construction and operation of the proposed Project may impact human health and comfort. Project-specific air quality and noise will be prepared to assess these impacts. Therefore, the Project may have a potentially significant impact so this topic will be considered in the forthcoming EIR.</p>				

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INITIAL STUDY – APPENDIX A

BIOLOGICAL RESOURCE ASSESSMENT AND MSHCP CONSISTENCY ANALYSIS

Biological Resources Assessment and MSHCP Consistency Analysis

Riverside Alive Project,
City of Riverside, Riverside County, California

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May 2024

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Appendices

- Appendix A: Photograph Log
- Appendix B: Special-Status Species Analysis
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Executive Summary

Introduction: This report includes the findings of a Biological Resources Assessment (BRA) and Western Riverside County (WRC) Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis conducted by South Environmental for new developments for the Riverside Alive Project (project) in the City of Riverside, California.

Proposed Development: The Project proposes to include a combination of residential, office, retail, hotel, Convention Center expansion, and new parking facilities. No specific development is being proposed currently. The Project is being analyzed on the maximum areas or densities that could be placed within the Project site. The analysis for the Project described below is being conducted on “development envelopes” instead of on specific project details.

The proposed Project would include the demolition of the existing surface parking lot (Lot 33) and Outdoor Plaza. The area being demolished would be fenced with windscreen material to obscure views of the site. The existing Riverside Convention Center building would not be demolished; instead, the expansion of the Convention Center is proposed in a new adjacent building that is approximately 189,000 gross square feet. The existing Convention Center building 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.

Plant Communities/ Land Cover: The project would be constructed on developed / ornamentally landscaped land cover where it has been proposed to expand the existing Riverside Convention Center, develop new hotels, develop new residential units, develop new commercial space, develop new office space, develop new parking spaces, and develop new outdoor community venues (10.3-acres). This land cover for the proposed development does not have the potential to support special-status species because it lacks native habitats and the project site and study area are dense urban development currently. The nearest undeveloped native habitats are 1-mile to the west within the Santa Ana River and surrounding open spaces. However, the project site is separated from these areas by 1-mile of dense urban development and no indirect impacts would result. Because the entirety of the project site is already developed and currently lacks habitat due to urbanization, no direct or indirect impacts to sensitive natural communities, plant communities, or native habitats would result from the project development.

MSHCP Consistency Analysis: Based on the analysis in this report, the project would not impact any resources protected under the MSHCP, including special-status plants or wildlife, burrowing owls, narrow endemic or criteria area plants, water features, or habitat corridors. This is because none of these resources are found within the project site (or study area). The project would redevelop an existing development and no impacts to habitat or undeveloped areas would result. Also, the proposed development would not affect MSHCP habitat or MSHCP undeveloped areas; none occur within 500-feet of the project site. Therefore, the project is consistent with the WRC MSHCP.



Nesting Birds and Raptors: The proposed development would require removal of trees, shrubs, and herbaceous plants in the landscaping and parking lots that could provide potential nesting habitat for birds and raptors protected by the MBTA, MBPA, and the California Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration has the potential to disturb an active bird nest that may occur in adjacent landscaping to the point of failure if the nest is within immediate proximity to project activities, and this would also be a violation of the MBTA and Fish and Game Code. To comply with the MBTA and Fish and Game Code nesting bird surveys and nest avoidance will be implemented as described in BIO-1.

Special-Status Plants: No special-status plants were found during the survey, and none would occur on the site due to a lack of habitat resulting from urban development. Therefore, the project would not have any impact on special-status plants.

Special-Status Wildlife: No special-status wildlife was found during the survey, and none would occur on the site due to a lack of habitat resulting from urban development.

Protected Trees: There are no protected trees on the project site, and therefore none would be impacted by the project.

Water Resources: There are no water resources on the project site, and therefore none would be impacted by the project.

Wildlife Movement Corridors and Habitat Linkages: The project site and study area are entirely developed and do not contain a wildlife movement area. The study area is dense urban development and has not connection to wildlands or undeveloped areas. The nearest open space and wildlife movement areas are approximately 1-mile to the west and include the Santa Ana River and surrounding Lake Evans, Mount Rubidoux Park, and Fairmount Park. These areas are separated from the project site by 1-mile of dense urban development. The proposed project would not construct any new barriers such as fences, walls, or lighting that might deter wildlife from movement areas in the region. The proposed development will not alter any movement areas or have any new affects to the urban/wildlands interface because the resultant development is 1.) distal to wildlife movement areas and 2.) will be similar in scope to the existing development.

Cumulative Impacts: The project is not expected to result in impacts to sensitive or protected biological resources and with the implementation of the nesting bird preconstruction surveys described in this report, the project would have no effect on biological resources. There will be no cumulative impacts to biological resources from the project.

1 Introduction

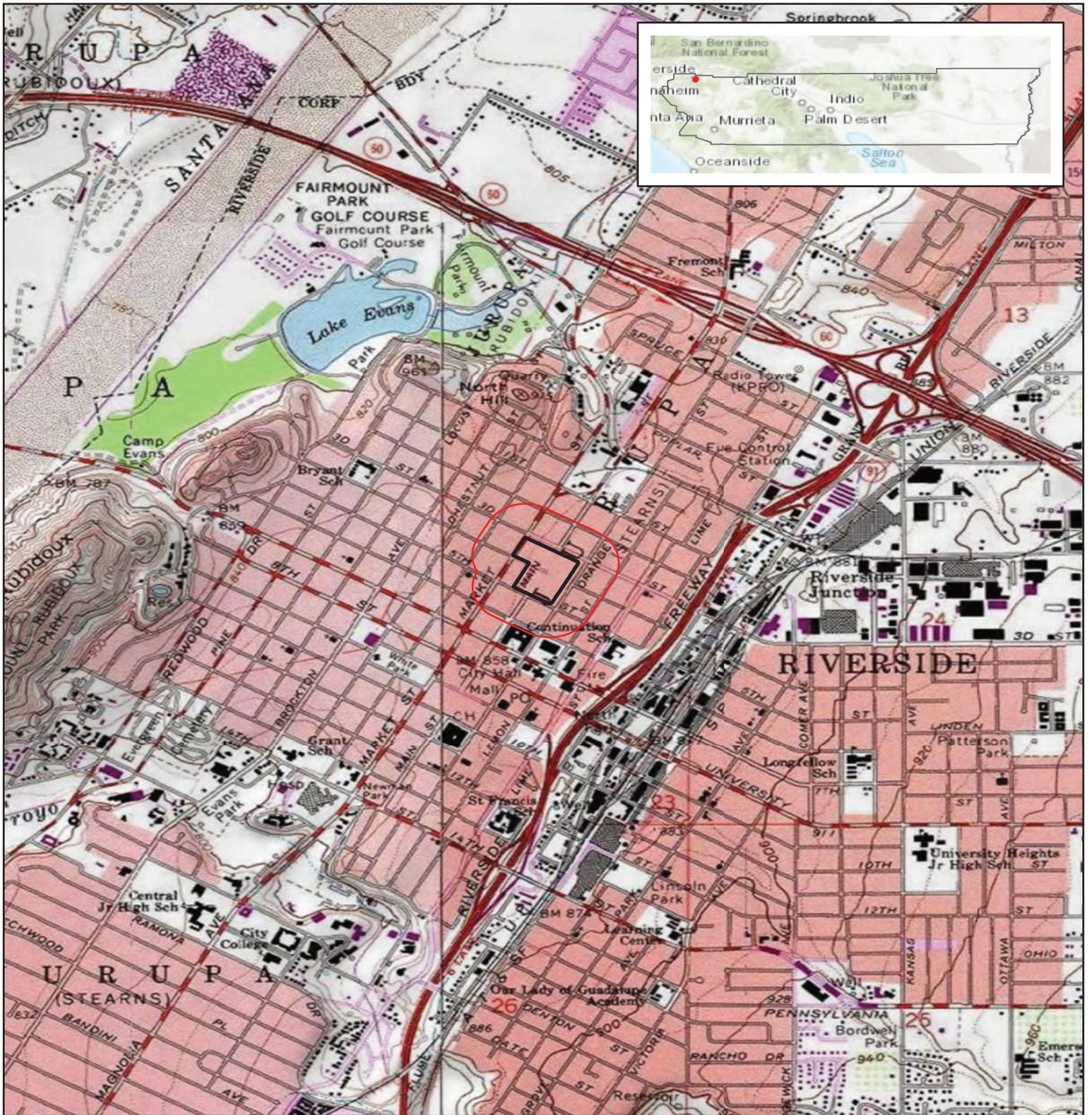
This report includes the findings of a Biological Resources Assessment (BRA) and Western Riverside County (WRC) Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis conducted by South Environmental for new developments for the Riverside Alive Project (project) in the City of Riverside, California. The purpose of this report is to identify and characterize biological resources that occur on the project site and surrounding 500 feet (study area), quantify and assess potential impacts to protected biological resources, and propose measures to reduce impacts to a less than significant level. The scope of this report includes a description of the proposed development, methods used to assess the biological resources, the environmental setting including technical characterizations and maps of vegetation communities, an assessment of the potential for special-status plants and animals to occur on the study area, a description of the regulatory setting, an analysis of the potential for the project to impact biological resources according to the thresholds of the California Environmental Quality Act (CEQA), and detailed recommendations for avoiding or mitigating impacts. The project is within the WRC MSHCP area and the report includes a consistency analysis with the MSHCP requirements. Representative photographs of the study area are in Appendix A.

1.1 Project Description

1.1.1 Location and Setting

The Project site is located in the City of Riverside, California on approximately 10.3 acres and consists the following APNs 213-111-011, 213-111-012, 213-111-014, 213-111-015, 213-111-016. The project site is on the Riverside East USGS 7.5-minute quad in Section 23 of Township 02 South and Range 05 West. The Project site includes the Lot 33 parking lot, the Riverside Convention Center, and Outdoor Plaza in front of the Riverside Convention Center. The Riverside Convention Center is located at 3637 Fifth Street and Lot 33 is the adjoining boundary on Third Street to the north. Local access to the Project site is provided via Main Street, Third Street, Fifth Street, Market Street and Orange Street. (Figure 1 and Figure 2)

The existing Riverside Convention Center offers both indoor and outdoor meeting space. The existing Riverside Convention Center is a 108,000 square-foot building that offers an approximately 50,000 square-foot exhibit hall, ballroom, and meeting areas, and the remaining area is pre-function and concourse space. The building also includes storage space, service corridors, administration area, kitchen, and includes a loading dock. The Outdoor Plaza includes both outdoor meeting space and relaxation area.



Source: ESRI USA Topo Maps and World Topo Map 2024

BRA/MSHCP Report for Riverside Alive Project

Figure 1. Project Location

- Project Site
- Study Area (500-Foot Buffer)

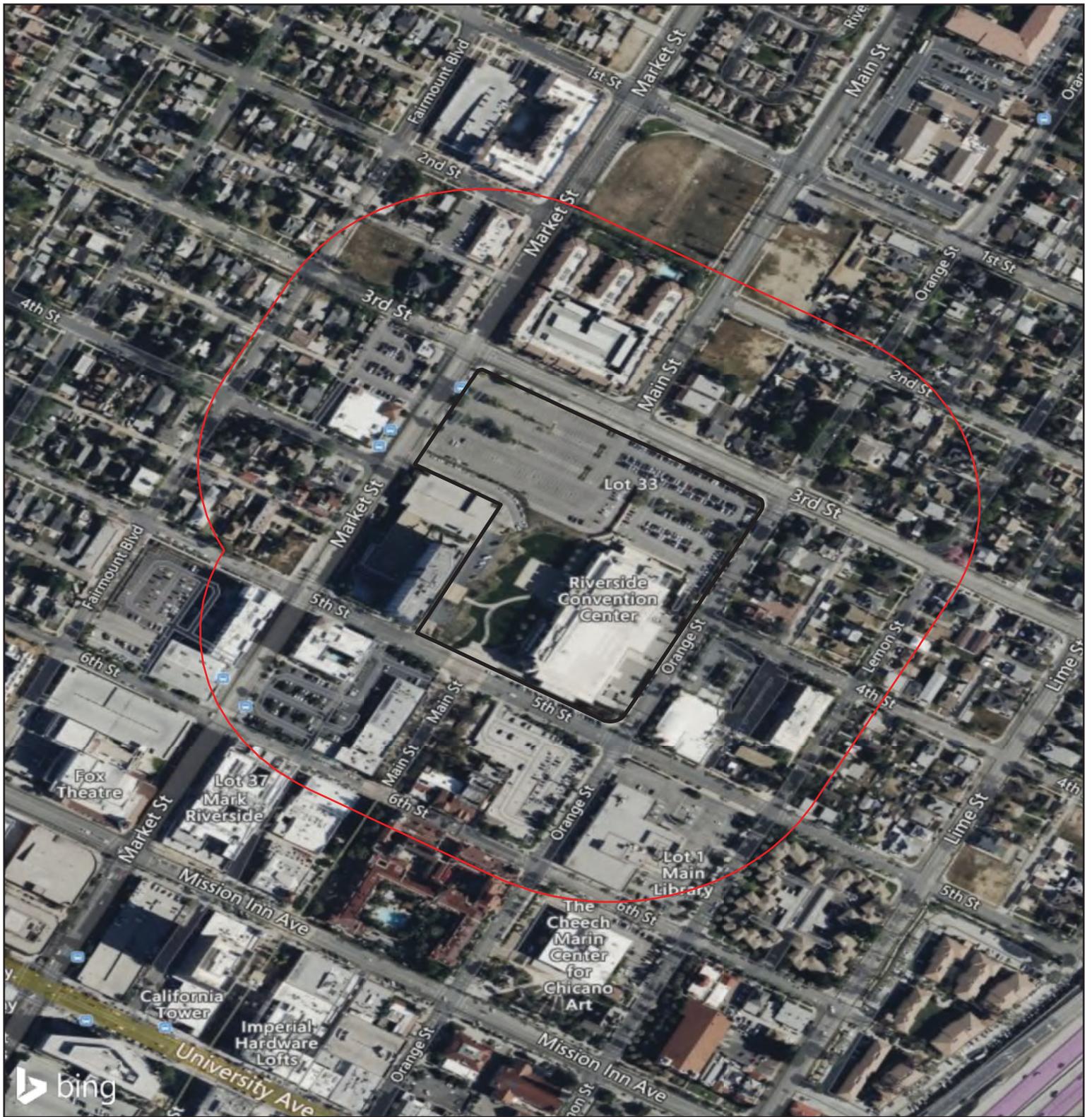
Project Location is within Riverside, California, in Riverside County on the USGS Riverside East 7.5-minute quadrangle map in Section 23 of Township 02 South and Range 05 West

Center Coordinate (Decimal Degrees):
 Latitude: 33.9862125N Longitude: -117.3716836W



0 1,000 2,000 Feet
 Scale: 1:24,000



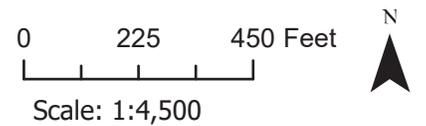


Source: Bing Aerial Imagery 2024

BRA/MSHCP Report for Riverside Alive Project

Figure 2. Project Vicinity

- Project Site
- Study Area (500-Foot Buffer)



1.1.2 Proposed Development

The Project proposes to include a combination of residential, office, retail, hotel, Convention Center expansion, and new parking facilities. No specific development application is currently under consideration. The Project is being analyzed on the maximum areas or densities that could be placed with the Project site. The analysis for the Project described below is being conducted on “development envelopes” instead of on specific project details.

The proposed Project would include the demolition of the existing surface parking lot (Lot 33) and Outdoor Plaza. The area being demolished would be fenced with windscreen material to obscure views of the site. The existing Riverside Convention Center building would not be demolished; instead, the expansion of the Convention Center is proposed in a new adjacent building that is approximately 189,000 gross square feet. The existing Convention Center building 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.

The Project proposes a maximum development envelope consisting of residential and non-residential uses. Residential uses proposed are condominiums and a multi-family residential building which would not exceed 95-feet-tall. Non-residential uses proposed would include hotel, office, commercial retail uses, restaurant focused retail, underground parking facility and convention center expansion. Non-residential buildings would not exceed 155-feet tall and the underground parking structure would not exceed a depth of 53-feet below ground surface.

As the Project is an existing developed site, existing utilities are provided within and around the site. Existing utility facilities on-site may be removed, replaced or relocated to provide connection to existing facilities within the roadway rights-of-way. No new services are expected; rather, infrastructure improvements to existing facilities are expected and would be determined as specific buildings and facilities undergo specific entitlement and engineering processing in the future. At present, it is anticipated upgrades would be required to the existing water main (upsized to an 18-inch diameter pipeline) in Third Street between Orange Street and Market Street, and the sewer pipeline in Market Street may need to be upsized to a 15-inch diameter pipeline between Mission Inn Avenue and 11th Street.

1.2 Methodology

This biological resource assessment is based on information compiled through a reconnaissance survey and a literature review involving an assessment of appropriate reference materials and literature regarding the biological resources of the region.

1.2.1 Literature Review

The assessment of the project began with a review of literature relating to the natural resources — flora, fauna, and water resources — that were targeted for study as part of the MSHCP area assessment. To better understand these resources including the occurrence of the aforementioned plants and animals, the following were consulted:

Flora and Fauna

- The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) was reviewed to identify special-status plants and animals that have previously recorded in the United States Geological Survey (USGS) Riverside East 7.5" quad in which the project site is located, and the eight surrounding USGS 7.5" quads: Fontana, San Bernardino South, Redlands, Sunnymead, Perris, Steele Peak, Lake Matthews, and Riverside West (CDFW 2024a).
- CDFW California Wildlife Habitat Relationships (CWHR) life history accounts and range maps (CDFW 2024b)
- United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) (USFWS 2024a)
- USFWS Designated and Proposed Critical Habitat GIS data (USFWS 2024b)
- California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (CNPS 2024a)
- Resource Conservation Authority (RCA) MSHCP Information Map online (RCA 2024).

Water Resources

- National Hydrography Dataset (USGS 2024a)
- National Wetlands Inventory (USFWS 2024c)
- California Protected Areas Database (CPAD 2024)
- WRC MSHCP GIS Data (Riverside County 2024)

Soil Resources

- US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soils Database (USDA 2024)

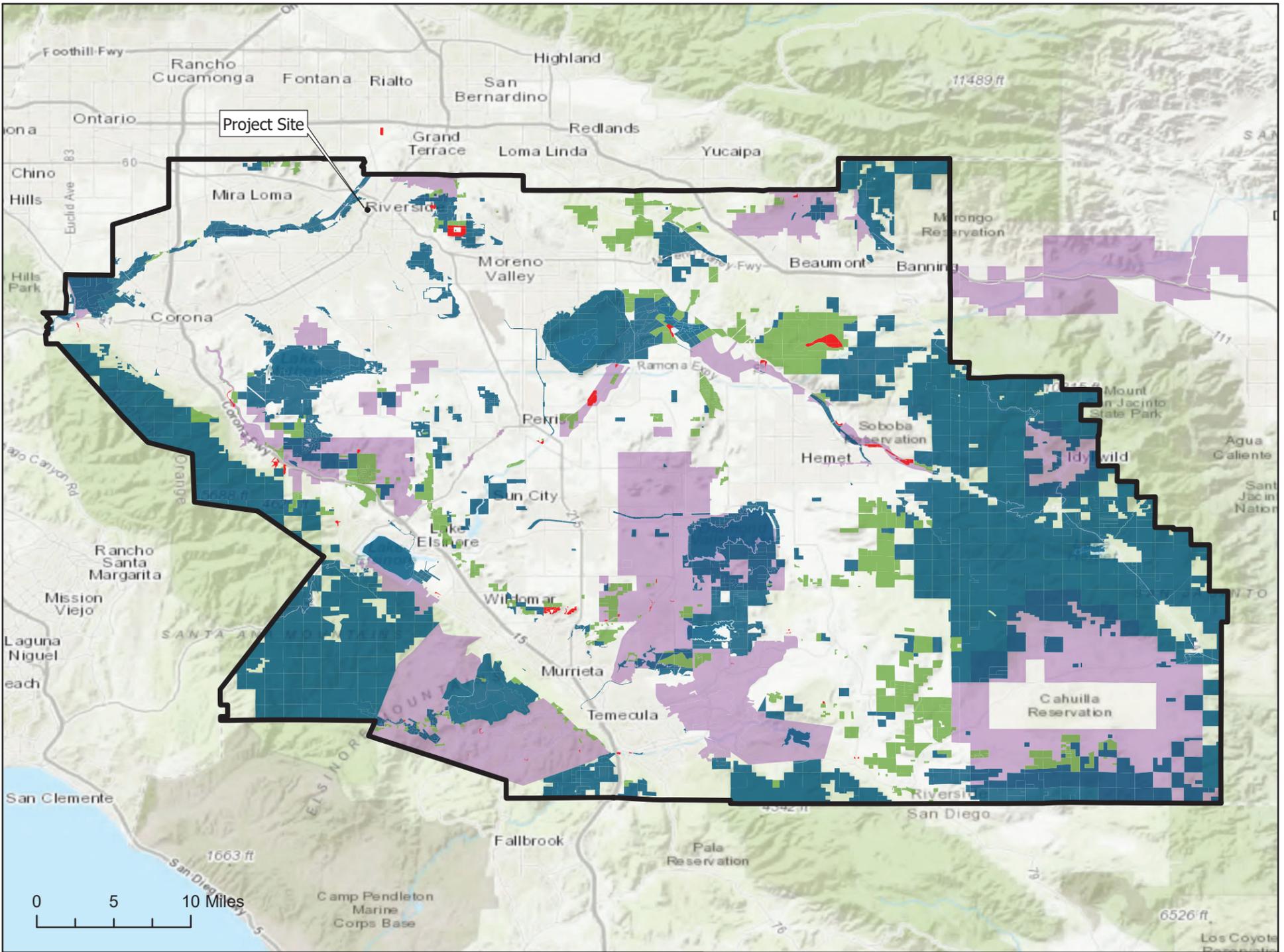
1.2.2 Field Reconnaissance

South Environmental biologist James McNutt conducted a field reconnaissance on March 27, 2024, to record plants and animals observed on the site, characterize and map plant communities according to the WRC MSHCP, and assess the potential for special-status species to occur. The findings described

in the reports are cited in the Literature Review, and results are referenced throughout the analysis in this report.

1.2.3 MSHCP Consistency Analysis

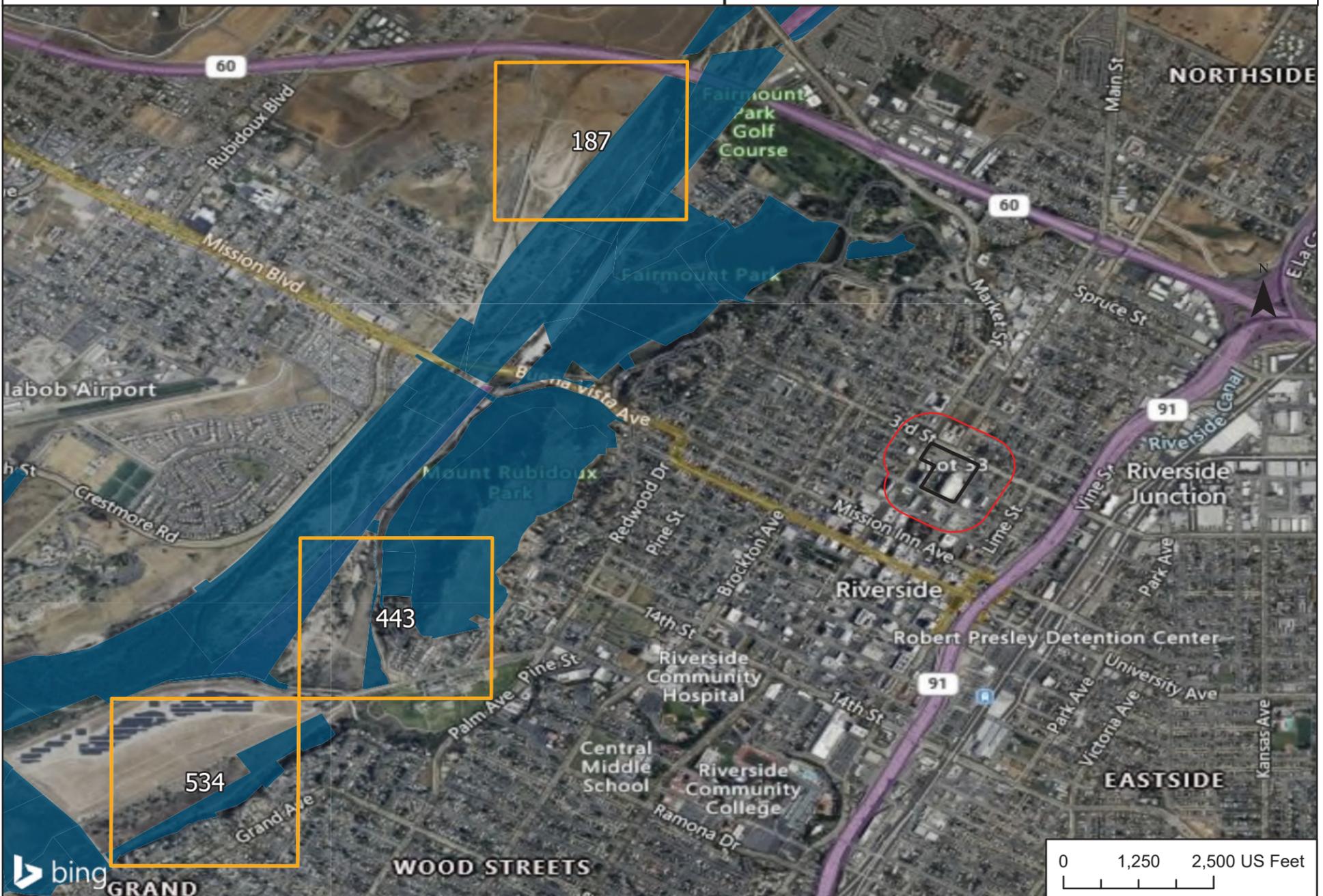
As shown in Figure 3 below, the project site is not within an MSHCP Plan Area Criteria Cell; however, it is within the Cities of Riverside and Norco Area Plan for the MSHCP. This report analyzes the proposed redevelopment project in relation to the goals of the MSHCP and assesses the potential impacts to MSHCP covered species and resources.



- Project Site
- WRCMSHCP Boundary
- Multiple Species Habitat Conserved Lands
- Public/Quasi-Public Lands
- RCA Conservation Easements
- Policy Areas

Figure 3. WRC MSHCP Overview

Sources:
 -ESRI USA Topo Maps 2024
 -BING Aerial Basemap 2024
 -Riverside County Mapping Portal Data



2 Environmental Setting

The project site is located northeast of 5th Street, southwest of 3rd Street, southeast of Market Street, and northwest of Orange Street. 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 developments and ornamental landscaping. The areas surrounding the project site include developments and ornamental landscaping in all directions. The project site and study area are within a dense urban environment within the City of Riverside.

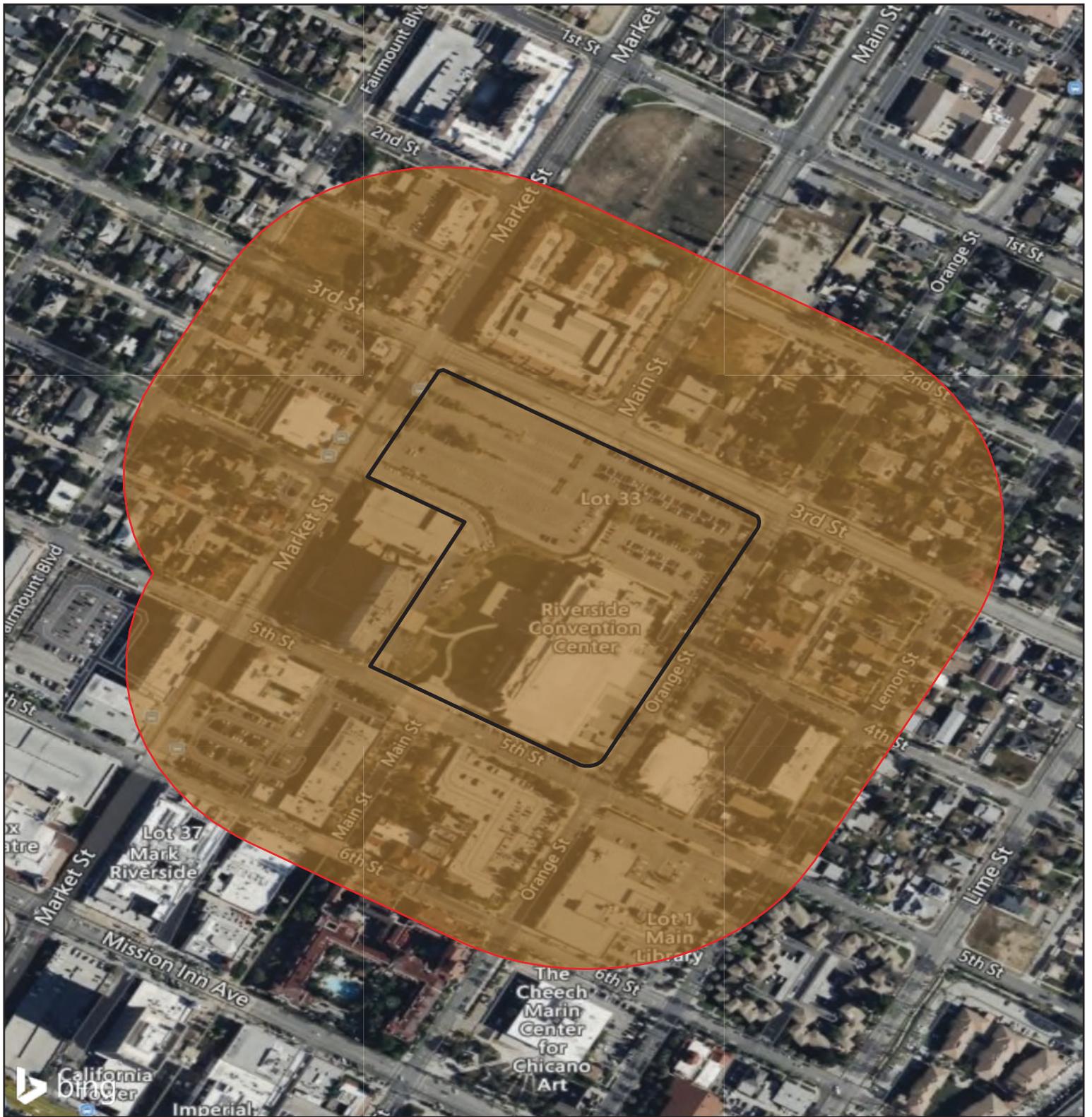
2.1 Topography and Climate

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 842 ft amsl just to the west of the existing convention center (USGS 2024). The climate in the region is hot and dry, with average summer high temperatures in the low to mid-90s and average winter lows in the low 40s. Average yearly rainfall is approximately 10-inches, and the wettest months are December – March. There is almost no precipitation between June-September.

2.2 Soils

One soil type occurs on the project site/ study area as shown in Figure 4 (USDA/NRCS 2024):

- **Buren fine sandy loam, 2 to 8 percent slopes, eroded** occurs throughout the entire study area and project site. This is an alluvial fan and tread soil and is moderately well drained.

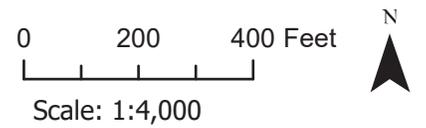


Source: Bing Aerial Imagery 2024

BRA/MSHCP Report for Riverside Alive Project

Figure 4. Soils

-  Project Site
-  Study Area (500-Foot Buffer)
-  Buren fine sandy loam, 2 to 8 percent slopes, eroded



2.3 Plants

A total of 42 plant species were identified on the study area. Two are native to this region of California and 40 are non-native due to the ornamental landscaping and disturbed regions throughout the study area. The habit of the species consisted of succulents, trees, shrubs, perennials, annuals, and palms. A list of the species observed on the site is presented below in Table 1.

Table 1. List of Plants Observed on the Study Area

<u>Scientific name</u>	<u>Common name</u>	<u>Habit</u>	<u>MSHCP Narrow Endemic</u>	<u>MSHCP Criteria Plant</u>	<u>CRPR*</u>
<i>Acacia confusa</i>	small Philippine acacia	Tree*	--	--	NR
<i>Agapanthus praecox</i>	African lily	Perennial herb*	--	--	NR
<i>Agave americana variegata</i>	variated American aloe	Succulent Perennial*	--	--	NR
<i>Aloe maculata</i>	soap aloe	Succulent Perennial*	--	--	NR
<i>Bromus diandrus</i>	Ripgut brome	Annual herb*	--	--	NR
<i>Bromus madritensis</i>	foxtail brome	Annual herb*	--	--	NR
<i>Bougainvillea glabra</i>	paperflower	Shrub*	--	--	NR
<i>Callistemon citrinus</i>	crimson bottlebrush	Shrub*	--	--	NR
<i>Carpobrotus edulis</i>	iceplant	Perennial herb*	--	--	NR
<i>Chenopodium murale</i>	nettle leaf goosefoot	Annual herb*	--	--	NR
<i>Cordyline australis</i>	New Zealand cabbage tree	Tree*	--	--	NR
<i>Cupressus sempervirens</i>	Italian cypress	Tree*	--	--	NR
<i>Dietes grandiflora</i>	fortnight lily	Perennial herb*	--	--	NR
<i>Ehrharta erecta</i>	upright veldt grass	Perennial herb*	--	--	NR
<i>Erigeron bonariensis</i>	hairy fleabane	Annual herb*	--	--	NR
<i>Erodium cicutarium</i>	Red stem filaree	Annual herb*	--	--	NR
<i>Euonymus japonicus</i>	Japanese euonymus	Shrub*	--	--	NR
<i>Euphorbia tirucalli</i>	pencil tree	Succulent Perennial*	--	--	NR
<i>Ficus benjamina</i>	Weeping fig	Tree*	--	--	NR
<i>Ficus macrocarpa</i>	Chinese banyan	Tree*	--	--	NR
<i>Fraxinus uhdei</i>	tropical ash	Tree*	--	--	NR
<i>Fraxinus velutina</i>	velvet ash	Tree*	--	--	NR
<i>Grevillea robusta</i>	silky oak	Tree*	--	--	NR
<i>Hordeum murinum</i>	mouse barley	Annual herb*	--	--	NR
<i>Koelreuteria paniculata</i>	golden raintree	Tree*	--	--	NR
<i>Lagerstroemia indica</i>	crepe myrtle	Tree*	--	--	NR
<i>Malva parviflora</i>	cheeseweed	Annual herb*	--	--	NR
<i>Muhlenbergia rigens</i>	deergrass	Perennial herb*	--	--	NR
<i>Nassella cernua</i>	Nodding needlegrass	Perennial herb*	--	--	NR

<u>Scientific name</u>	<u>Common name</u>	<u>Habit</u>	<u>MSHCP Narrow Endemic</u>	<u>MSHCP Criteria Plant</u>	<u>CRPR*</u>
<i>Pachycereus schottii</i>	Senita cactus	Succulent Perennial*	--	--	NR
<i>Parkinsonia aculeata</i>	Jerusalem thorn	Tree*	--	--	NR
<i>Philodendron bipinnatifidum</i>	tree philodendron	Shrub*	--	--	NR
<i>Phoenix roebelenii</i>	pygmy date palm	Tree*	--	--	NR
<i>Phormium tenax</i>	New Zealand flax	Perennial herb*	--	--	NR
<i>Platanus racemosa</i>	western sycamore	Tree	--	--	NR
<i>Raphiolepis indica</i>	Indian hawthorn	Shrub*	--	--	NR
<i>Sonchus oleraceus</i>	common sowthistle	Annual herb*	--	--	NR
<i>Stenotaphrum secundatum</i>	St. Augustine grass	Perennial herb*	--	--	NR
<i>Strelitzia reginae</i>	bird of paradise	Perennial herb*	--	--	NR
<i>Taraxacum officinale</i>	dandelion	Perennial herb*	--	--	NR
<i>Tulbaghia violacea</i>	society garlic	Perennial herb*	--	--	NR
<i>Washingtonia filifera</i>	California fan palm	Tree	--	--	NR

*Non-native, NR = Not ranked

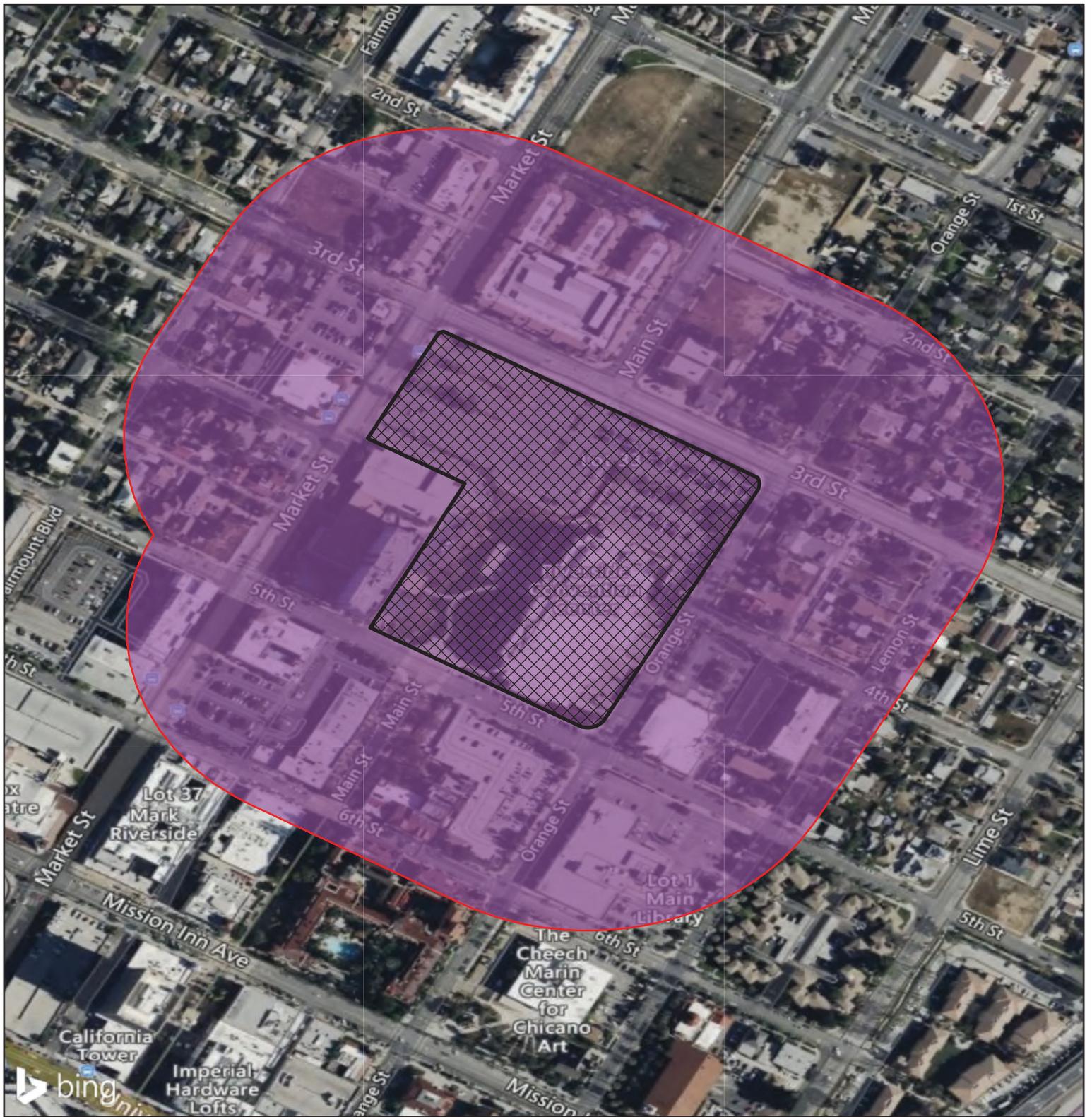
2.4 Plant Communities and Land Cover

The entire study area and project site is characterized by developed areas and ornamental landscaping as shown in Figure 5 and summarized in Table 2 below. There are no undeveloped areas or native plant communities or habitats found within the study area.

Table 2. Summary of Plant Communities on the Study Area and Project Site

Community or Cover Type	Acres on Study Area	Acres on Project Site	Acres Permanently Impacted by Project
Developed / Ornamental Landscaped	60.62	10.28	10.28
Total	60.62	10.28	10.28

- **Developed / Ornamental Landscaped** areas are found on all of the study area and on all of the project site. The developed areas include buildings, driveways, parking lots, and sidewalks. Ornamental landscaping is mixed with the developed areas. All of the observed plants occur on this land cover.

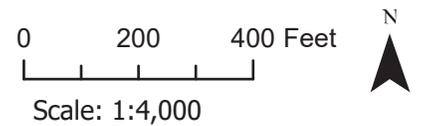


Source: Bing Aerial Imagery 2024

BRA/MSHCP Report for Riverside Alive Project

Figure 5. Plant Communities and Land Cover

-  Project Site
-  Study Area (500-Foot Buffer)
-  Proposed Development Footprint



Plant Communities and Land Cover

-  Developed / Ornamentally Landscaped



2.5 Wildlife

No wildlife was observed during the site visit, but species commonly found in parks are expected to occur. Table 3 below shows records for wildlife occurrences on the project site from iNaturalist (iNaturalist, 2024).

Table 3. Summary of Wildlife Recorded to iNaturalist on the Study Area

Scientific name	Common name	Status
Birds		
<i>Melospiza lincolnii</i>	Lincoln' s sparrow	None
<i>Pheucticus melanocephalus</i>	black-headed grosbeak	None
<i>Setophaga coronata ssp. auduboni</i>	Audubon's Warbler	None
Mammals		
<i>Mephitis mephitis</i>	striped skunk	None
<i>Procyon lotor</i>	common racoon	None
<i>Sciurus niger</i>	fox squirrel	None

2.6 Special-Status Species

The literature analysis of the CNDDDB, CNPS, and IPAC databases for special-status species known to occur within a 9-quad search surrounding the project site resulted in 125 special-status species, including 65 animals and 60 plants. The list includes rare, threatened, endangered species at a federal and state level. In the case of plants, it also includes California Rare Plant Rank (CRPR) species with a classification of 1-4.

Special-Status Plants

The 60 special-status plant species that CNDDDB, CNPS, and IPAC identify as occurring in the region of the project and an assessment of their likelihood to inhabit the project site are presented in Appendix B. No special-status plant species were observed during the survey. Based on the analysis in Appendix B, none of the special-status plants have the potential to occur in the project site due to a lack of native habitat. The site is entirely developed and lacks native habitats that are required for special-status plant species to occur.

Special-Status Wildlife

The 65 special-status animal species that CNDDDB, CNPS, and IPAC identify as occurring in the region of the project and an assessment of their likelihood to inhabit the project site are presented in Appendix B. No special-status animal species were observed during the survey. Based on the analysis in Appendix B, none of the special-status animals have the potential to occur on the project site due to a lack of habitat. The site is entirely developed and lacks native habitats that are required for special-status animal species to occur.

2.7 Sensitive Natural Communities

CDFW 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* defines sensitive natural communities as those that are “of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects.” CDFW considers a natural community sensitive if it has a Global or State rarity rank of 1-3, which includes communities that are vulnerable (G3/S3), imperiled (G2/S2), and critically imperiled (G1/S1). CDFW uses the alliances and groups described in the California Natural Community List (CDFW 2024c) and the California Natural Communities List from A Manual of California Vegetation Online (CNPS 2024b) to characterize California’s natural communities. The current global and state rarity rank for natural communities of California are listed in these resources. The entire study area and project site is developed / ornamentally landscaped and does not have a Global or State rarity rank and lacks native habitats; therefore, no sensitive natural communities occur on the study area or project site.

2.8 Protected Trees

“The Riverside County “Code of Ordinances” protects native trees on private and public property that are at an elevation of >5,000-ft and are “at least thirty (30) feet and are not less than twelve (12) inches in diameter when measured four and one-half feet above the ground.”

The “Open Space and Conservation Element” is a general vision document that discusses protection of different plant communities and native tree species primarily in relation to the MSHCP. The trees on the site are not special-status species or conservation species recognized in the MSHCP (e.g., covered, narrow endemic).

No protected trees occur in the study area or the project site.

2.9 Hydrology Features

The project site is located within the Santa Ana watershed (HUC8) and within the Tequesquite Arroyo sub-watershed (HUC12). Based on the literature review and results of the reconnaissance survey there are no jurisdictional features (i.e. streams, wetlands, drainages, ponds, lakes) within either the study area or the project site.

2.10 Habitat Linkages and Wildlife Migration Corridors

The project site is in the Cities of Riverside and Norco Area Plan for the MSHCP. There are habitat linkages (i.e., wildlife migration corridors) addressing wildlife that are established in the MSHCP (Riverside County 2003) for the Cities of Riverside and Norco Area Plan. From the MSHCP, Table 3-18 “Criteria for Cities of Riverside/Norco” indicates how the Criteria Cells contributes specifically to an established habitat linkage (Riverside County, 2003). The project site is not within a Criteria Cell; therefore, criteria for habitat linkages and wildlife mitigation corridors within the Cities of Riverside and Norco Area Plan do not apply to the project. The study area and project site would not be considered a habitat linkage or wildlife migration

corridor because it is fully developed and surrounded by existing dense urban development and lacks connection to native plant communities or habitats.

3 MSHCP Consistency Analysis

3.1 MSHCP Literature Review

Based on the RCA MSHCP map the project site has the following attributes:

- The project site is within the Cities of Riverside and Norco Area Plan, but not a subunit subject to a Proposed Constrained Linkage;
- The project site is not within a Cell Groups or a Criteria Cell;
- The project is not within an amphibian, burrowing owl, mammal, narrow endemic plant, or criteria area species study area;
- The project is not within a Delhi Sands Flower-loving Fly study area,
- The project site is not within any RCA Conserved Lands
- An analysis of the urban/wildlands interface is required by the MSHCP but the project does not interface with any wildlands and is surrounded by dense urban development.
- The project site is in the Cities of Riverside and Norco Area Plan, the area for which there are several wildlife of conservation concern as follows:
 - Wildlife: black-crowned night heron, burrowing owl, Cooper’s hawk, double-crested cormorant, downy woodpecker, least Bell’s vireo, loggerhead shrike, osprey, peregrine falcon, southwestern willow flycatcher, tree swallow, western yellow-billed cuckoo, white-faced ibis, white-tailed kite, yellow-breasted chat, yellow warbler, arroyo chub, Santa Ana sucker, bobcat, and western pond turtle.
 - Plants: Santa Ana River woollystar.
- Within the Cities of Riverside and Norco Area Plan, there are several “biological issues and considerations” in the MSHCP (Riverside County, 2003). Several of these are directed toward preserving habitat linkages or corridors and were already mentioned above. Other “biological issues and considerations” address preserving wetlands, or other habitat types for the benefit of special-status plant and animal species. None of these features occur on the project site or study area.

3.2 Criteria Cell

The project site is not within a Criteria Cell. Notably, the project site is currently developed and would not contribute to the biological or habitat value of a Criteria Cell. The conservation area plan of the MSHCP (Riverside County, 2003) indicates that there are no narrow endemic or criteria area plant species present on the project site.

3.3 Urban/Wildlands Interface

Section 6.0 of the MSHCP requires an Urban/Wildlands Interface analysis be conducted in order to address the indirect effects associated with locating proposed development in proximity of MSHCP

Conservation Areas. The project site and study area are entirely developed and do not contain a wildlife movement area. The area is dense urban development and has not connection to wildlands or undeveloped areas. The nearest open space and wildlife movement areas are approximately 1-mile to the west and include the Santa Ana River and surrounding Lake Evans, Mount Rubidoux Park, and Fairmount Park. These areas are separated from the project site by 1-mile of dense urban development. The proposed project would not construct any new barriers such as fences, walls, or lighting that might deter wildlife from movement areas in the region. The proposed development will not alter any movement areas or have any new affects to the urban/wildlands interface because the resultant development is 1.) distal to wildlife movement areas and 2.) will be similar in scope to the existing development.

3.4 MSHCP Consistency Analysis

Based on the analysis in this report, the project would not impact any resources protected under the MSHCP, including special-status plants or wildlife, burrowing owls, narrow endemic or criteria area plants, water features, or habitat corridors. This is because none of these resources are found within the project site (or study area). The project would redevelop an existing development and no impacts to habitat or undeveloped areas would result. Also, the proposed development would not affect MSHCP habitat or MSHCP undeveloped areas; none occur within 500-feet of the project site. Therefore, the project is consistent with the WRC MSHCP.

4 Impacts Analysis

For the purposes of this report, impacts to protected biological resources are analyzed within the context of the regulatory setting. Below is an overview of the federal, state, and local regulations pertaining to protected biological resources in the study area, and an analysis of impacts to those resources that may occur as a result of the proposed development follows.

4.1 Regulatory Setting

4.1.1 Federal Regulations

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) protects individuals as well as any part, nest, or eggs of any bird listed as migratory. In practice, federal permits issued for activities that potentially impact migratory birds typically have conditions that require pre-disturbance surveys for nesting birds. In the event nesting is observed, a buffer area with a specified radius must be established, within which no disturbance or intrusion is allowed until the young have fledged and left the nest, or it has been determined that the nest has failed. If not otherwise specified in the permit, the size of the buffer area varies with species and local circumstances (e.g., presence of busy roads, intervening topography, etc.), and is based on the professional judgment of a monitoring biologist. A list of migratory bird species protected under the MBTA is published by USFWS.

4.1.2 California Regulations

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. CEQA applies to certain activities of state and local public agencies. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a “project.” A project is an activity undertaken by a public agency or a private activity which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency which may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

An Initial Study (IS) is prepared when a proposed action is determined to be a “project” under CEQA. The IS is a checklist that asks specific questions about the project’s level of environmental impacts in many categories, including biological resources. The checklist includes a series of questions to determine the projects level of potential impacts in each of the categories. The CEQA Checklist includes the following questions regarding biological resources:

- *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?*
 - *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*
 - *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
 - *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?*
 - *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance*
 - *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Potential level of impact choices includes: No Impacts, Less Than Significant Impact, Less Than Significant with Mitigation Incorporated, and Potentially Significant Impact. For projects that have no impact or less than significant impact a Negative Declaration is prepared, for those with Less Than Significant with Mitigation Incorporated prepare a Mitigated Negative Declaration, and for those with a Potentially Significant Impact prepare an Environmental Impact Report (EIR).

State of California Fish and Game Code Section 3500

Section 3503.5 of the California Fish and Game Code states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Activities that result in the abandonment of an active bird of prey nest may also be considered in violation of this code. In addition, California Fish and Game Code, Section 3511 prohibits the taking of any bird listed as fully protected, and California Fish and Game Code, Section 3515 states that it is unlawful to take any non-game migratory bird protected under the MBTA.

California Migratory Bird Protection Act

The California Migratory Bird Protect Act (MBPA) was enacted in September 2019 to reinforce the MBTA at the state level. The Act states:

- “It is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.) before January 1, 2017, any additional migratory nongame bird that may be designated in that federal act after that date, or any part

of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act before January 1, 2017, or subsequent rules or regulations adopted pursuant to that federal act, unless those rules or regulations are inconsistent with this code.” This section is inactive on January 20, 2025 and the following language below will be adopted.

- “It is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.), or any part of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act.” This section is operative starting on January 20, 2025.

4.1.3 Local Regulations

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The MSHCP is an overarching, regional, multi-jurisdictional plan centered on the conservation of species with conservation problems (i.e., special-status species) and their associated habitats in western Riverside County. The MSHCP identified 146 species, termed “Covered Species,” and then was given authority to grant federal and California ESA “take” authorizations to regional jurisdictions under the plan when they follow the state and federal ESAs and MSHCP regulations. Of the 146 Covered Species, 118 are considered to be “adequately conserved” and 28 Covered Species will be adequately conserved when certain conservation goals are met in accordance with the MSHCP. The MSHCP was designed to focus on core habitat and linkages in the region in relation to the species designated for protection. Its overall goal is to conserve the biological and ecological diversity in a rapidly developing region while at the same time promoting economic development of western Riverside County.

The approval of the MSHCP and execution of the Implementing Agreement (IA) by the wildlife agencies allows signatories of the IA to issue “take” authorizations for all species covered by the MSHCP, including state- and federally listed species, as well as other identified sensitive species and/or their habitats. Each city of local jurisdiction will impose a Development Mitigation Fee for projects within their jurisdiction. With payment of the mitigation fee to the county and compliance with the survey requirements of the MSHCP where required, full mitigation in compliance with CEQA, National Environmental Policy Act (NEPA), the California ESA, and the ESA will be granted. The Development Mitigation Fee varies according to project size and project description and is dependent on development density (Riverside County Ordinance No. 810.2). Payment of the mitigation fee and compliance with the requirements of Section 6.0 of the MSHCP are intended to provide full mitigation under CEQA, NEPA, and the California and federal ESAs for impacts to the species and habitats covered by the MSHCP, pursuant to agreements with USFWS, CDFW, and/or any other appropriate participating regulatory agencies as set forth in the IA for the MSHCP.

4.2 Project Impacts

4.2.1 Impacts to Plant Communities/Habitat/Sensitive Natural Communities

The project would be constructed on developed / ornamentally landscaped land cover where it has been proposed to expand the existing Riverside Convention Center, develop new hotels, develop new residential units, develop new commercial space, develop new office space, develop new parking spaces, and develop new outdoor community venues (10.3-acres). This land cover for the proposed development does not have the potential to support special-status species because it lacks native habitats and the project site and study area are dense urban development currently. The nearest undeveloped native habitats are 1-mile to the west within the Santa Ana River and surrounding open spaces. However, the project site is separated from these areas by 1-mile of dense urban development and no indirect impacts would result. Because the entirety of the project site is already developed and currently lacks habitat due to urbanization, no direct or indirect impacts to sensitive natural communities, plant communities, or native habitats would result from the project development.

4.2.2 Impacts to Nesting Birds and Raptors

The proposed development would require removal of trees, shrubs, and herbaceous plants in the landscaping and parking lots that could provide potential nesting habitat for birds and raptors protected by the MBTA, MBPA, and the California Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration has the potential to disturb an active bird nest that may occur in adjacent landscaping to the point of failure if the nest is within immediate proximity to project activities, and this would also be a violation of the MBTA and Fish and Game Code. To comply with the MBTA and Fish and Game Code nesting bird surveys and nest avoidance will be implemented as described in BIO-1.

BIO-1: Preconstruction Nesting Bird and Raptor Survey

- If possible, ground disturbing activities and vegetation removal should be timed to occur between September 1 – January 31, which is outside the bird and raptor nesting season.
- If ground disturbing activities or vegetation removal (including tree trimming) are scheduled between February 1 – August 31, which is the bird nesting season, a preconstruction survey for nesting birds should be conducted within 72 hours prior to construction activities. The survey should be conducted by a qualified biologist with prior experience conducting nesting bird surveys for construction projects. The study area should include the affected area and suitable habitat within a 500-foot buffer, or a buffer size determined by the qualified biologist based on level of proposed disturbance and access. If no active nests are found, no additional measures are required.

- If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist and based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities shall occur within the no-work buffer until the biologist has determined the nest is no longer active.

4.2.3 Impacts to Special-Status Species

No special-status plants were found during the survey, and none would occur on the site due to a lack of habitat resulting from urban development. No special-status wildlife was found during the survey, and none would occur on the site due to a lack of habitat resulting from urban development. Cumulatively, no impacts (direct or indirect) to special-status species would be expected from the project because the study area and project site are fully developed areas that lack native habitats where special-status species would not occur.

4.2.4 Impacts to Water Resources

No jurisdictional waters are on the study area or project site; therefore, the proposed project will have no impact on jurisdictional waters.

4.2.5 Impacts to Protected Trees

There are no protected trees on the project site, and none would be impacted by the project.

4.2.6 Impacts to Wildlife Movement Corridors and Habitat Linkages

The project site and study area are entirely developed and do not contain a wildlife movement area. The study area is dense urban development and has no connection to wildlands or undeveloped areas. The nearest open space and wildlife movement areas are approximately 1-mile to the west and include the Santa Ana River and surrounding Lake Evans, Mount Rubidoux Park, and Fairmount Park. These areas are separated from the project site by 1-mile of dense urban development. The proposed project would not construct any new barriers such as fences, walls, or lighting that might deter wildlife from movement areas in the region. The proposed development will not alter any movement areas or have any new effects to the urban/wildlands interface because the resultant development is 1.) distal to wildlife movement areas and 2.) will be similar in scope to the existing development.

4.2.7 Impacts to WRC MSHCP Areas

Based on the analysis in this report, the project would not impact any resources protected under the MSHCP, including special-status plants or wildlife, burrowing owls, narrow endemic or criteria area plants, water features, or habitat corridors. This is because none of these resources are found within the project site (or study area). The project would redevelop an existing development and no impacts to

habitat or undeveloped areas would result. Also, the proposed development would not affect MSHCP habitat or MSHCP undeveloped areas; none occur within 500-feet of the project site. Therefore, the project is consistent with the WRC MSHCP.

4.2.8 Cumulative Impacts

The project is not expected to result in impacts to sensitive or protected biological resources and with the implementation of the nesting bird preconstruction surveys described in this report, the project would have no effect on biological resources. There will be no cumulative impacts to biological resources from the project.

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Appendix A

Photograph Log



Photo 1. View of project site southeastern boundary, facing northeast.

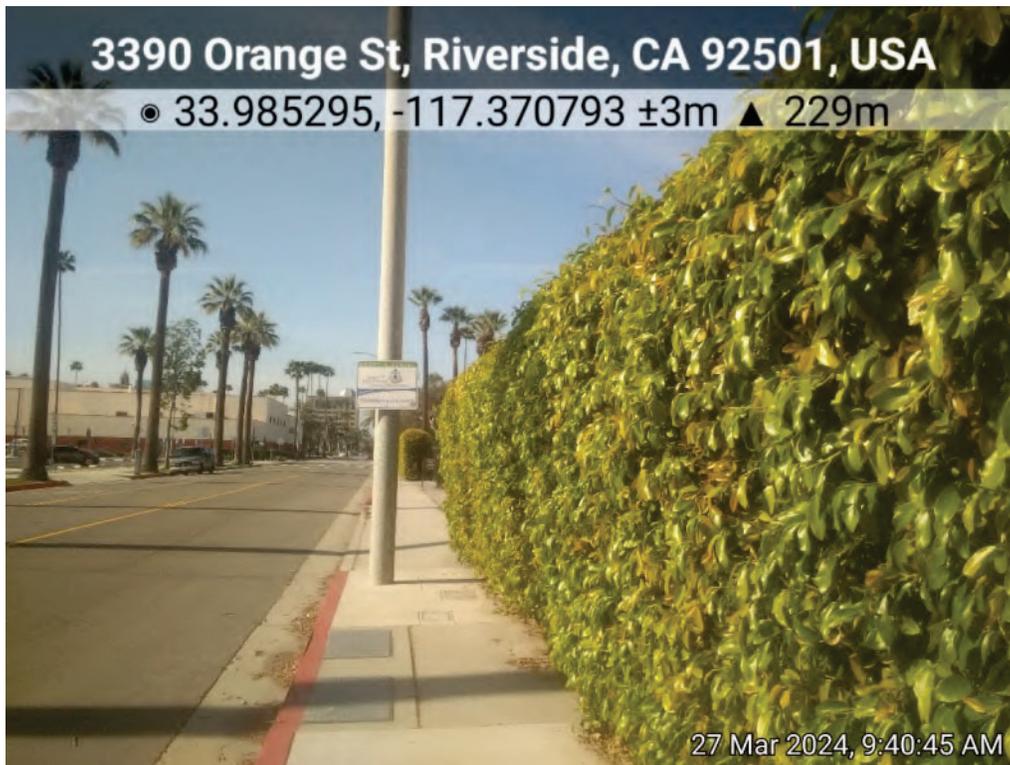


Photo 2. View of project site southeastern boundary, facing southwest.



Photo 3. View of project site southeastern boundary from southeastern corner, facing northeast.



Photo 4. View of project site southwestern boundary from southeastern corner, facing northwest.



Photo 5. View of project site southwestern boundary, facing southeast.



Photo 6. View of Convention Center entrance from 5th Street along southwestern border, facing northwest.



Photo 7. View of courtyard area on the project site, facing northeast.



Photo 8. View of courtyard area and Marriot hotel parking area on the project site, facing northwest.



Photo 9. View of Marriot hotel parking area on the project site, facing northeast.



Photo 10. View of courtyard area on the project site, facing northeast.

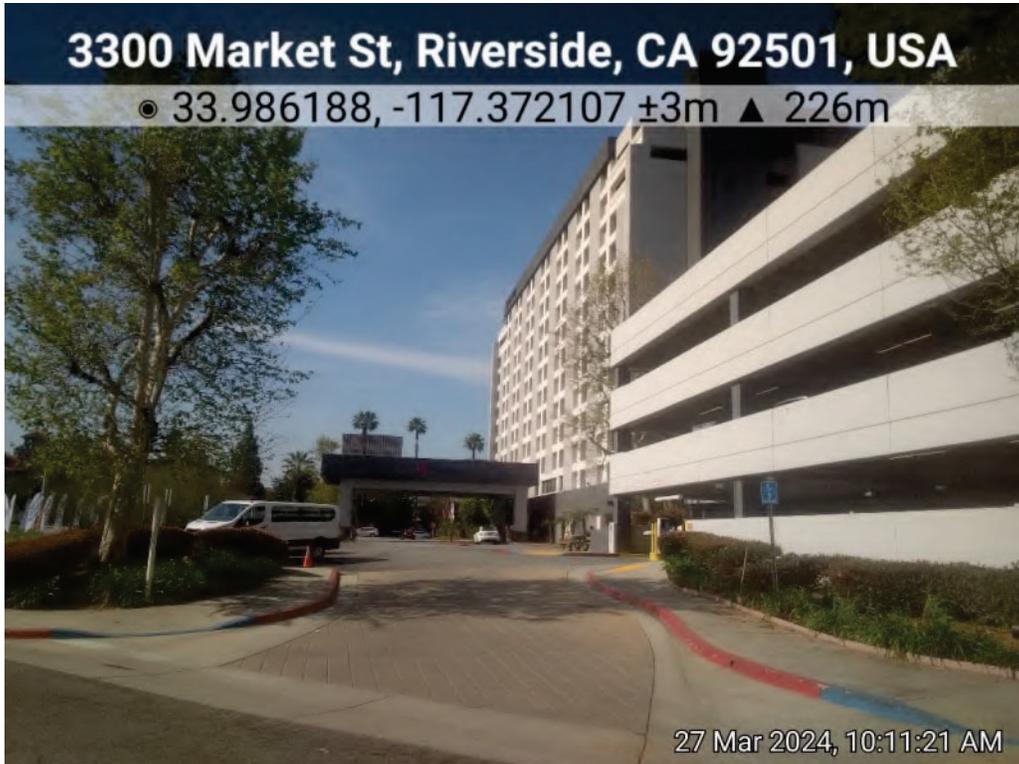


Photo 11. View of project site boundary, facing southwest.



Photo 12. View of project site boundary, facing northwest.

3300 Market St, Riverside, CA 92501, USA

● 33.986648, -117.371908 ±10m ▲ 229m



Photo 13. View of parking lot on the project site, facing southeast.

3637 5th St, Riverside, CA 92501, USA

● 33.986266, -117.371075 ±3m ▲ 229m



Photo 14. View of employees parking lot on the project site, facing southwest.



Photo 15. View of project site northeastern boundary from northeastern corner, facing northwest.

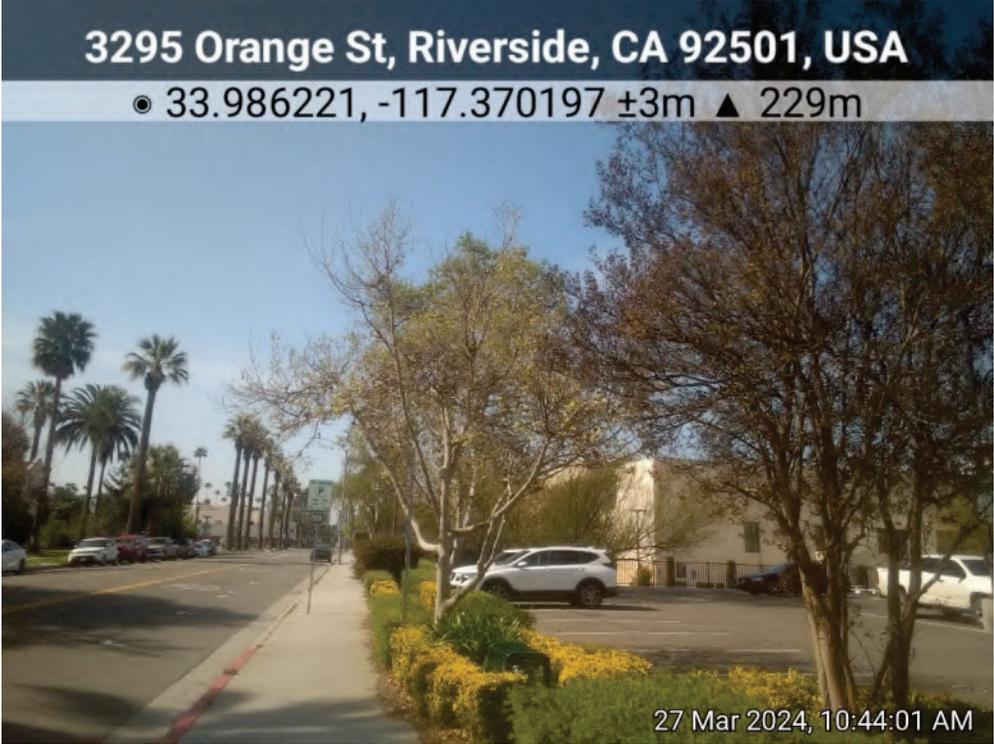


Photo 16. View of project site southeastern boundary from northeastern corner, facing southwest.



Photo 17. View of project site northeastern boundary from northwestern corner, facing southeast.



Photo 18. View of project site northwestern boundary from northwestern corner, facing southwest.

Appendix B

Special-Status Species Analysis

Special-Status Species

Special-status species are those plants and animals that, because of their recognized rarity or vulnerability to various causes of habitat loss or population decline, are recognized by federal, state, or other agencies as under threat from human-associated developments. Some of these species receive specific protection that is defined by federal or state endangered species legislation. Others have been designated as special-status based on adopted policies and expertise of state resource agencies or organizations with acknowledged expertise, or policies adopted by local governmental agencies such as counties, cities, and special districts to meet local conservation objectives. Special-status species include:

- Plants or wildlife listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under the federal Endangered Species Act or the California Endangered Species Act;
- Plants or wildlife that meet the definitions of rare or endangered under CEQA Guidelines Section 15380.
- Plants or wildlife covered under an adopted NCCP/HCP;
- Plants considered by the California Native Plant Society (CNPS) to be rare, threatened, or endangered (List 1A, 1B and 2 plants) in California;
- Plants listed by the CNPS as plants in which there is limited information about distribution (List 3);
- Plants listed as rare under the California Native Plant Protection Act (Fish and Game Code 1900 et seq.);
- Wildlife designated by CDFW as species of special concern;
- Wildlife "fully protected" in California (California Fish and Game Code Sections 3511, 4700, and 5050); and
- Wildlife protected by the Migratory Bird Treaty Act (MTBA).

Federally-Protected Status

All references to Federally-protected species in this BRA include the most current published status or candidate category to which each species has been assigned by USFWS. For purposes of this assessment the following acronyms are used for Federal status species, as applicable:

FE Federally-listed as Endangered

FT	Federally-listed as Threatened
FPE	Federally proposed for listing as Endangered
FPT	Federally proposed for listing as Threatened
FPD	Federally proposed for delisting
FC	Federal candidate species (former C1 species)

State-Protected Status

For the purposes of this BRA, the following acronyms are used for State status species, as applicable:

SE	State-listed as Endangered
ST	State-listed as Threatened
SR	State-listed as Rare
SCE	State candidate for listing as Endangered
SCT	State candidate for listing as Threatened
SFP	State Fully Protected
SSC	California Species of Special Concern

California Rare Plant Rank

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of special-status species in California. CNPS has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California (CNPS 2018). The list serves as the candidate list for listing as Threatened and Endangered by CDFW. CNPS has developed six categories of rarity known as the California Rare Plant Rank (CRPR), of which Ranks 1A, 1B, 2A, and 2B are particularly considered sensitive:

Rank 1A	Presumed extinct in California.
Rank 1B	Plants Rare, Threatened, or Endangered in California and elsewhere.
Rank 2A	Presumed extinct in California, but more common elsewhere.
Rank 2B	Plants Rare, Threatened, or Endangered in California, but more common elsewhere.
Rank 3	Plants about which we need more information – a review list.
Rank 4	Plants of limited distribution – a watch list.

The CNPS recently added “threat ranks” which parallel the ranks used by the CNDDDB. These ranks are added as a decimal code after the CNPS List (e.g., Rank 1B.1). The threat codes are as follows:

- .1** Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat);
- .2** Moderately threatened in California (20-80% occurrences threatened);

.3 Not very threatened in California (<20% of occurrences threatened or no current threats known).

Potential to Occur Assessment

Special-status species that **present** or are **likely** (high or medium potential) to occur within the parcel are based on one or more of the following:

- the direct observation of the species within the parcel during any field surveys;
- a record reported in the CNDDDB, CNPS, or IPAC; and
- the parcel is within known distribution of a species and contains appropriate habitat.

Special-status species that are **unlikely** (low potential) to occur are based on one of the following:

- the parcel has the general habitat types but lacks necessary habitat elements such as suitable microhabitat or soils; or
- the parcel is outside the known elevation range or distribution of the species, and has otherwise suitable habitats;

Special-status species that have no potential to occur on the parcel are labeled as **none** due to the absence of suitable habitat.

Special-Status Animals

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Accipiter cooperii</i>	Coopers hawk	Birds	None	None	CDFW_WL-Watch List	Woodlands and forests, or suburban areas with mature trees	Requires tall trees for nesting and open areas such as meadows or forest edges for hunting	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Actinemys pallida</i>	southwestern pond turtle	Reptiles	Proposed Threatened	None		Found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches, with abundant vegetation, and either rocky or muddy bottoms, in woodland, forest, and grassland. In streams, prefers pools to shallower areas. Logs, rocks, cattail mats, and exposed banks are required for basking. May enter brackish water and even seawater.		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Agelaius tricolor</i>	Tricolored Blackbird	Birds	None	Threatened	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_EN-Endangered NABCL_RWL-Red Watch List USFWS_BCC-Birds of Conservation Concern	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California.	Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Aimophila ruficeps canescens</i>	southern California rufous-crowned sparrow	Birds	None	None	CDFW_WL-Watch List	Resident in Southern California coastal sage scrub and sparse mixed chaparral.	Frequents relatively steep, often rocky hillsides with grass and forb patches.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Anniella stebbinsi</i>	Southern California legless lizard	Reptiles	None	None	CDFW_SSC-Species of Special Concern USFS_S-Sensitive	Generally, south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County.	Variety of habitats; generally, in moist, loose soil. They prefer soils with a high moisture content.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Antrozous pallidus</i>	pallid bat	Mammals	None	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFS_S-Sensitive WBWG_H-High Priority	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Aquila chrysaetos</i>	golden eagle	Birds	None	None	BLM_S-Sensitive CDF_S-Sensitive CDFW_FP-Fully Protected CDFW_WL-Watch List IUCN_LC-Least Concern USFWS_BCC-Birds of Conservation Concern	Rolling foothills, mountain areas, sage-juniper flats, and desert.	Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Arizona elegans occidentalis</i>	California glossy snake	Reptiles	None	None	CDFW_SSC-Species of Special Concern	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges,	Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Artemisiospiza belli belli</i>	Bell's sparrow	Birds	None	None	CDFW_WL-Watch List	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range.	Nest located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yds apart.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Asio otus</i>	long-eared owl	Birds	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFWS_BCC-Birds of Conservation Concern	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses.	Require adjacent open land, productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Aspidoscelis hyperythra</i>	orange-throated whiptail	Reptiles	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFS_S-Sensitive	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats.	Prefers washes and other sandy areas with patches of brush and rocks. Perennial plants necessary for its major food: termites.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Aspidoscelis tigris stejnegeri</i>	coastal whiptail	Reptiles	None	None	CDFW_SSC-Species of Special Concern	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas.	Ground may be firm soil, sandy, or rocky.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Athene cunicularia</i>	burrowing owl	Birds	None	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFWS_BCC-Birds of Conservation Concern	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation.	Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Bombus crotchii</i>	Crotch Bumble Bee	Insects	None	Candidate Endangered	IUCN_EN-Endangered	Coastal California east to the Sierra-Cascade crest and south into Mexico.	Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	None. The project site lacks habitat and food resources for the species.
<i>Buteo regalis</i>	ferruginous hawk	Birds	Non	None	CDFW_WL-Watch List IUCN_LC-Least Concern	Open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon and juniper habitats.	Eats mostly lagomorphs, ground squirrels, and mice. Population trends may follow lagomorph population cycles.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Buteo swainsoni</i>	Swainson's Hawk	Birds	None	Threatened	BLM_S-Sensitive IUCN_LC-Least Concern	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees.	Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Catostomus santaanae</i>	Santa Ana sucker	Fish	Threatened	None	AFS_Th-Threatened IUCN_EN-Endangered	Endemic to Los Angeles Basin south coastal streams.	Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Ceratochrysis longimala</i>	desert cuckoo wasp	Insects	None	None				Low. The record is from 1915 and the recorded is possibly, or likely, extirpated.
<i>Chaetodipus fallax fallax</i>	northwestern San Diego pocket mouse	Mammal	None	None		Coastal scrub, chaparral, grasslands, sagebrush, etc. in western San Diego, Riverside, San Bernardino, and Los Angeles Counties, inclusive of Orange County.	Sandy, herbaceous areas, usually in association with rocks or coarse gravel.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Charadrius nivosus nivosus</i>	Western snowy plover	Birds	Endangered	None		Sandy beaches, salt pond levees and shores of large alkali lakes.	Needs sandy, gravelly or friable soils for nesting.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Cicindela tranquebarica viridissima</i>	greenest tiger beetle	Insects	None	None		Inhabits the woodlands adjacent to the Santa Ana River basin.	Usually found in open spots between trees.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Coccyzus americanus occidentalis</i>	Western Yellow-Billed Cuckoo	Birds	Threatened	Endangered	BLM_S-Sensitive USFS_S-Sensitive	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems.	Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Coturnicops noveboracensis</i>	yellow rail	Birds	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFS_S-Sensitive USFWS_BCC-Birds of Conservation Concern	Summer resident in eastern Sierra Nevada in Mono County.	Freshwater marshlands.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Crotalus ruber</i>	red-diamond rattlesnake	Reptiles	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFS_S-Sensitive	Chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains.	Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Danaus plexippus</i>	monarch butterfly	Insects	Candidate for Listing			Monarch butterflies live mainly in prairies, meadows, grasslands and along roadsides.		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Dipodomys merriami parvus</i>	San Bernardino Kangaroo Rat	Mammals	Endangered	Candidate Endangered	CDFW_SSC-Species of Special Concern	Alluvial scrub vegetation on sandy loam substrates characteristic of alluvial fans and flood plains.	Needs early to intermediate seral stages.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Dipodomys stephensi</i>	Stephens' Kangaroo Rat	Mammals	Threatened	Threatened	IUCN_VU-Vulnerable	Primarily annual and perennial grasslands, but also occurs in coastal scrub and sagebrush with sparse canopy cover.	Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Diadophis punctatus modestus</i>	San Bernardino ringneck snake	Reptiles	None	None	USFS_S-Sensitive	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams.	Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Elanus leucurus</i>	white-tailed kite	Birds	None	None	CDFW_FP-Fully Protected	savannas, open woodlands, marshes, desert grasslands, partially cleared lands, and cultivated fields		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Empidonax traillii extimus</i>	southwestern willow flycatcher	Birds	Endangered	Endangered	NABCI_RWL-Red Watch List	Riparian woodlands in Southern California.		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Emys marmorata</i>	western pond turtle	Reptiles	None	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_VU-Vulnerable USFS_S-Sensitive	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation.	Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Eremophila alpestris actia</i>	California horned lark	Birds	None	None	CDFW_WL-Watch List	grasslands along the coast and deserts near sea level to alpine dwarf-shrub habitat above tree line.		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Eugnosta busckana</i>	Busck's gallmoth	Insects	None	None		Coastal southern California.	Tiny micro-moth (1 cm) with larva forming galls on host plant Encelia californica (California brittlebush). Adult flight period is during winter, generally from November to February, and have been reported at UV lights and porch lights.	None. The project site lacks habitat and food resources for the species.
<i>Eumops perotis californicus</i>	western mastiff bat	Mammals	None	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern WBWG_H-High Priority	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc.	Roosts in crevices in cliff faces, high buildings, trees and tunnels.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Euphydryas editha quino</i>	quino checkerspot butterfly	Insects	Endangered	None		Sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties.	Hills and mesas near the coast. Need high densities of food plants Plantago erecta, P. insularis, and Orthocarpus purpurescens.	None. The project site lacks habitat and food resources for the species.
<i>Falco columbarius</i>	merlin	Birds	None	None	CDFW_WL-Watch List IUCN_LC-Least Concern	Seacoast, tidal estuaries, open woodlands, savannahs, edges of grasslands and deserts, farms and ranches.	Clumps of trees or windbreaks are required for roosting in open country.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Gila orcuttii</i>	arroyo chub	Fish	None	None	AFS_VU-Vulnerable CDFW_SSC-Species of Special Concern USFS_S-Sensitive	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave and San Diego river basins.	Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Haliaeetus leucocephalus</i>	bald eagle	Birds	Delisted	Endangered	CDFW_FP-Fully Protected	Coastal areas with mature trees, cliffs, or man-made structures	within two and a half miles of the coast, bays, rivers, lakes, or other bodies of water	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Icteria virens</i>	yellow-breasted chat	Birds	None	None	CDFW_SSC-Species of Special Concern	Brushy tangles, briars, stream thickets with dense vegetation		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Lanius ludovicianus</i>	loggerhead shrike	Birds	None	None	CDFW_SSC-Species of Special Concern IUCN_NT-Near Threatened	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes.	Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Lasiurus xanthinus</i>	western yellow bat	Mammals	None	None	CDFW_SSC-Species of Special Concern IUCN_VU-Vulnerable	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats.	Roosts in trees, particularly palms. Forages over water and among trees.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Laterallus jamaicensis coturniculus</i>	California black rail	Birds	None	Threatened	BLM_S-Sensitive CDFW_FP-Fully Protected IUCN_NT-Near Threatened NABCI_RWL-Red Watch List USFWS_BCC-Birds of	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays.	None. The site lacks habitat for the species.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
					Conservation Concern			
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	Mammals	None	None	-	open grasslands, agricultural fields, and sparse coastal scrub.		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Myotis yumanensis</i>	Yuma myotis	Mammals	None	None	BLM_S-Sensitive IUCN_LC-Least Concern WBWG_LM-Low-Medium Priority	Optimal habitats are open forests and woodlands with sources of water over which to feed.	Distribution is closely tied to bodies of water. Maternity colonies in caves, mines, buildings or crevices.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Neolarra alba</i>	white cuckoo bee	Insects	None	None		Known only from localities in Southern California.	Cleptoparasitic in the nests of perdita bees.	None. The project site lacks habitat for the species.
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	Mammals	None	None	CDFW_SSC-Species of Special Concern	Coastal scrub of Southern California from San Diego County to San Luis Obispo County.	Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs, and slopes.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	Mammals	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc.	Rocky areas with high cliffs.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Oncorhynchus mykiss irideus pop. 10</i>	Steelhead - Southern California DPS	Fish	Endangered	Candidate Endangered	AFS_EN-Endangered	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County).	Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Onychomys torridus ramona</i>	southern grasshopper mouse	Mammals	None	None	CDFW_SSC-Species of Special Concern	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover.	Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Pandion haliaetus</i>	osprey	Birds	None	None	CDFW_WL-Watch List	Rivers, lakes, coast with shallow water and plentiful fish		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Perognathus longimembris brevinasus</i>	Los Angeles pocket mouse	Mammals	None	None	CDFW_SSC-Species of Special Concern	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin.	Open ground with fine, sandy soils. May not dig extensive burrows, hiding under weeds and dead leaves instead.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Phrynosoma blainvillii</i>	coast horned lizard	Reptiles	None	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Polioptila californica californica</i>	Coastal California Gnatcatcher	Birds	Threatened	None	CDFW_SSC-Species of Special Concern NABCI_YWL-Yellow Watch List	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California.	Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
<i>Rana muscosa</i>	southern mountain yellow-legged frog	Amphibians	Endangered	Endangered	CDFW_WL-Watch List IUCN_EN-Endangered USFS_S-Sensitive	Disjunct populations known from southern Sierras (northern DPS) and San Gabriel, San Bernardino, and San Jacinto Mtns (southern DPS). Found at 1,000 to 12,000 ft in lakes and creeks that stem from springs and snowmelt. May overwinter under frozen lakes.	Often encountered within a few feet of water. Tadpoles may require 2 - 4 yrs to complete their aquatic development.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Rhaphiomidas terminatus abdominalis</i>	Delhi Sands flower-loving fly	Insects	Endangered	None		Found only in areas of the Delhi Sands formation in southwestern San Bernardino and northwestern Riverside counties.	Requires fine, sandy soils, often with wholly or partly consolidated dunes and sparse vegetation. Oviposition req. shade.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Rhinichthys osculus ssp. 8</i>	Santa Ana speckled dace	Fish	None	None	AFS_TH-Threatened CDFW_SSC-Species of Special Concern USFS_S-Sensitive	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system.	Requires permanent flowing streams with summer water temps of 17-20 C. Usually inhabits shallow cobble and gravel riffles.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Salvadora hexalepis virgulata</i>	coast patch-nosed snake	Reptiles	None	None	CDFW_SSC-Species of Special Concern	desert scrub, grassland, chaparral, sagebrush plains, and pinyon-juniper woodlands		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Setophaga petechia</i>	yellow warbler	Birds	None	None	CDFW_SSC-Species of Special Concern	montane chaparral, riparian woodland, open ponderosa pine and mixed conifer habitats with substantial amounts of brush		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Spea hammondi</i>	western spadefoot	Amphibians	Proposed Threatened	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern	Occurs primarily in grassland habitats, but can be found in valley-	Vernal pools are essential for breeding and egg-laying.	None. The project site is entirely developed / ornamental

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Project Site
					IUCN_NT-Near Threatened	foothill hardwood woodlands.		landscaped; therefore, it lacks habitat for the species.
<i>Spinus lawrencei</i>	Lawrences goldfinch	Birds	None	None	-	dry, open oak woodlands with chaparral, weedy fields, and a source of freshwater		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	Crustaceans	Endangered	None	IUCN_EN-Endangered CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub.	Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Strix occidentalis occidentalis</i>	California spotted owl	Birds	Proposed Endangered	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern USFS_S-Sensitive USFWS_BCC-Birds of Conservation Concern	Mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods. Canopy closure >40%.	Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Taxidea taxus</i>	American badger	Mamml	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern
<i>Thamnophis hammondi</i>	two-striped gartersnake	Reptiles	None	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFS_S-Sensitive	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation.	Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Vireo bellii pusillus</i>	Least Bell's Vireo	Birds	Endangered	Endangered	IUCN_NT-Near Threatened NABCI_YWL-Yellow Watch List	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft.	Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Special-Status Plants

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Abronia villosa</i> var. <i>aurita</i>	chaparral sand-verbena	Plants	None	None	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden USFS_S-Sensitive	Chaparral, coastal scrub, desert dunes.	Sandy areas. -60-1570 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Allium marvinii</i>	Yucaipa onion	Plants	None	None	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden USFS_S-Sensitive	Chaparral.	In openings on clay soils. 850-1070 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Allium munzii</i>	Munz's onion	Plants	Endangered	Candidate Threatened	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Cismontane woodland, Coastal scrub, Pinyon and juniper woodland, Valley and foothill grassland		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Ambrosia pumila</i>	San Diego ambrosia	Plants	Endangered	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, coastal scrub, valley and foothill grassland.	Sandy loam or clay soil; sometimes alkaline. In valleys; persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 3-580 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Arctostaphylos rainbowensis</i>	rainbow manzanita	Plants	None	None	BLM_S-Sensitive SB_CRES-San Diego Zoo CRES Native Gene Seed Bank USFS_S-Sensitive	Chaparral.	Usually found in gabbro chaparral.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Arenaria paludicola</i>	marsh sandwort	Plants	Endangered	Endangered	SB_SBBG-Santa Barbara Botanic Garden	Marshes and swamps.	Growing up through dense mats of Typha, Juncus, Scirpus, etc. in freshwater marsh. Sandy soil. 3-170 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Artemisia palmeri</i>	San Diego sagewort	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Coastal scrub, chaparral, riparian forest, riparian woodland, riparian scrub.	In drainages and riparian areas in sandy soil within chaparral and other habitats.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Asplenium vespertinum</i>	western spleenwort	Plants	None	None		Chaparral, cismontane woodland, coastal scrub.	Rocky sites.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Astragalus brauntonii</i>	Braunton's milk-vetch	Plants	Endangered	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_SBBG-Santa Barbara Botanic Garden	Chaparral, coastal scrub, valley and foothill grassland.	Recent burns or disturbed areas; usually on sandstone with carbonate layers. Soil specialist; requires shallow soils to defeat pocket gophers and open areas, preferably on hilltops, saddles or bowls between hills. 3-640 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Astragalus hornii</i> var. <i>hornii</i>	Horn's milk vetch	Plants	None	None	BLM_S-Sensitive	Meadows and seeps, playas.	Lake margins, alkaline sites	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

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<i>Atriplex coronata</i> var. <i>notatior</i>	San Jacinto Valley crownscale	Plants	Endangered	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Playas, valley and foothill grassland, vernal pools.	Alkaline areas in the San Jacinto River Valley. 35-460 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Atriplex parishii</i>	Parish's brittlescale	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank USFS_S-Sensitive	Vernal pools, chenopod scrub, playas.	Usually on drying alkali flats with fine soils	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Atriplex serenana</i> var. <i> davidsonii</i>	Davidson's saltscale	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal bluff scrub, coastal scrub.	Alkaline soil	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Berberis nevini</i>	Nevin's Barberry	Plants	Endangered	Endangered	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_SBBG-Santa Barbara Botanic Garden	Chaparral, cismontane woodland, coastal scrub, riparian scrub.	On steep, N-facing slopes or in low grade sandy washes. 90-1590 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Brodiaea filifolia</i>	three-leaved brodiaea	Plants	Threatened	Endangered	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral (openings), cismontane woodland, coastal scrub, playas, valley and foothill grassland, vernal pools.	Usually associated with annual grassland and vernal pools; often surrounded by shrubland habitats. Occurs in openings on clay soils. 15-1030 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Calochortus plummerae</i>	Plummer's mariposa-lily	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest.	Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 60-2500 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Carex comosa</i>	bristly sedge	Plants	None	None	IUCN_LC-Least Concern	Marshes and swamps, coastal prairie, valley and foothill grassland.	Lake margins, wet places; site below sea level is on a Delta island	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Caulanthus simulans</i>	Payson's jewelflower	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank USFS_S-Sensitive	Chaparral, Coastal scrub		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Centromadia pungens ssp. laevis</i>	smooth tarplant	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland.	Alkali meadow, alkali scrub; also in disturbed places. 5-1170 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Chloropyron maritimum ssp. maritimum</i>	Salt Marsh Bird's-Beak	Plants	Endangered	Endangered	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank SB_SBBG-Santa Barbara Botanic Garden	Marshes and swamps, coastal dunes.	Limited to the higher zones of salt marsh habitat. 0-10 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Chorizanthe leptotheca</i>	Peninsular spineflower	Plants	None	None		Chaparral, Coastal scrub, Lower montane coniferous forest	alluvial fan	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Chorizanthe parryi var. parryi</i>	Parry's spineflower	Plants	None	None	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden USFS_S-Sensitive	Coastal scrub, chaparral, cismontane woodland, valley and foothill grassland.	Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland. Dry, sandy soils. 90-1220 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Chorizanthe polygonoides var. longispina</i>	long-spined spineflower	Plants	None	None	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools.	Gabbroic clay. 30-1630 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Chorizanthe xanti var. leucotheca</i>	white-bracted spineflower	Plants	None	None	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_USDA-US Dept of Agriculture USFS_S-Sensitive	Mojavean desert scrub, pinyon and juniper woodland, coastal scrub (alluvial fans).	Sandy or gravelly places	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Convolvulus simulans</i>	small-flowered morning-glory	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral (openings), Coastal scrub, Valley and foothill grassland		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Cuscuta obtusiflora</i> <i>var. glandulosa</i>	Peruvian dodder	Plants	None	None		Marshes and swamps (freshwater).	Freshwater marsh	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Deinandra paniculata</i>	paniculate tarplant	Plants	None	None		Coastal scrub, Valley and foothill grassland, Vernal pools		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Dodecahema leptoceras</i>	Slender-Horned Spineflower	Plants	Endangered	Endangered	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, cismontane woodland, coastal scrub (alluvial fan sage scrub).	Flood deposited terraces and washes; associates include Encelia, Dalea, Lepidospartum, etc. Sandy soils. 200-765 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Dudleya multicaulis</i>	many-stemmed dudleya	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden USFS_S-Sensitive	Chaparral, coastal scrub, valley and foothill grassland.	In heavy, often clayey soils or grassy slopes. 1-910 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Eriastrum densifolium</i> <i>ssp. sanctorum</i>	Santa Ana River Woollystar	Plants	Endangered	Endangered	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal scrub, chaparral.	In sandy soils on river floodplains or terraced fluvial deposits. 180-705 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button celery	Plants	Endangered	Endangered	SB_CalBG/RSABG- California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Vernal pools, coastal scrub, valley and foothill grassland.	San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. 15-880 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Galium californicum</i> <i>ssp. primum</i>	Alvin Meadow bedstrawPlants	Plants	None	None	SB_CalBG/RSABG- California/Rancho Santa Ana Botanic Garden USFS_S-Sensitive	Chaparral, lower montane coniferous forest.	Grows in shade of trees and shrubs at the lower edge of the pine belt, in pine forest-chaparral ecotone. Granitic, sandy soils.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Harpagonella palmeri</i>	Palmer's grapplinghook	Plants	None	None	SB_CalBG/RSABG- California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, coastal scrub, valley and foothill grassland.	Clay soils; open grassy areas within shrubland. 20-955 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Helianthus nuttallii</i> <i>ssp. parishii</i>	Los Angeles sunflower	Plants	None	None		Marshes and swamps (coastal salt and freshwater).		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Hordeum intercedens</i>	vernal barley	Plants	None	None	SB_CalBG/RSABG- California/Rancho Santa Ana Botanic Garden	Coastal dunes, Coastal scrub, Valley and foothill grassland (depressions, saline flats), Vernal pools		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden USFS_S-Sensitive	Chaparral, cismontane woodland, coastal scrub.	Sandy or gravelly sites. 15-1645 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Imperata brevifolia</i>	California satintail	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_SBBG-Santa Barbara Botanic Garden USFS_S-Sensitive	Coastal scrub, chaparral, riparian scrub, Mojavean desert scrub, meadows and seeps (alkali), riparian scrub.	Mesic sites, alkali seeps, riparian areas.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Juglans californica</i>	Southern California black walnut	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden IUCN_NT-Near Threatened SB_USDA-US Dept of Agriculture	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland	alluvial	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	Plants	None	None	BLM_S-Sensitive SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_SBBG-Santa Barbara Botanic Garden	Coastal salt marshes, playas, vernal pools.	Usually found on alkaline soils in playas, sinks, and grasslands. 1-1375 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	Plants	None	None		Chaparral, coastal scrub.	Dry soils, shrubland. 4-1435 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Lycium parishii</i>	Parish's desert-thorn	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Coastal scrub, Sonoran desert scrub.	-3-570 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Malacothamnus parishii</i>	Parish's bush-mallow	Plants	None	None		Chaparral, coastal sage scrub.	In a wash. 305-455 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Monardella pringlei</i>	Pringle's monardella	Plants	None	None		Coastal scrub.	Sandy hills.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Microseris douglasii</i> ssp. <i>platycarpha</i>	small-flowered microseris	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Cismontane woodland, Coastal scrub, Valley and foothill grassland, Vernal pools		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Monardella pringlei</i>	Pringle's monardella	Plants	None	None		Coastal scrub.	Sandy hills. 300-400 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Myosurus minimus ssp. apus</i>	little mousetail	Plants	None	None	SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Vernal pools, valley and foothill grassland.	Alkaline soils.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Nasturtium gambelii</i>	Gambel's water cress	Plants	Endangered	Threatened	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_SBBG-Santa Barbara Botanic Garden	Marshes and swamps.	Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Navarretia fossalis</i>	Spreading navarretia	Plants	Threatened	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Vernal pools, chenopod scrub, marshes and swamps, playas.	San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. 15-850 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Phacelia stellaris</i>	Brand's star phacelia	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal scrub, coastal dunes.	Open areas. 3-370 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Pseudognaphalium leucocephalum</i>	white rabbit-tobacco	Plants	None	None		Riparian woodland, cismontane woodland, coastal scrub, chaparral.	Sandy, gravelly sites. 35-515 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Quercus engelmannii</i>	Engelmann oak	Plants	None	None	IUCN_EN-Endangered SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, Cismontane woodland, Riparian woodland, Valley and foothill grassland		None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Ribes divaricatum var. parishii</i>	Parish's gooseberry	Plants	None	None		Riparian woodland.	Salix swales in riparian habitats.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Romneya coulteri</i>	Coulter's matilija poppy	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Coastal scrub	Burned areas (often)	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Senecio aphanactis</i>	chaparral ragwort	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, cismontane woodland, coastal scrub.	Drying alkaline flats. 20-1020 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Sidalcea neomexicana</i>	salt spring checkerbloom	Plants	None	None	USFS_S-Sensitive	Playas, chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub.	Alkali springs and marshes. 3-2380 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Scientific Name	Common Name	Taxonomic Group	Federal Listing	State Listing	Other Status	General Habitat	Microhabitat	Potential to Occur on Study area
<i>Sphenopholis obtusata</i>	prairie wedge grass	Plants	None	None		Cismontane woodland, meadows and seeps.	Open moist sites, along rivers and springs, alkaline desert seeps. 15-2625 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Symphyotrichum defoliatum</i>	San Bernardino aster	Plants	None	None	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden SB_CRES-San Diego Zoo CRES Native Gene Seed Bank USFS_S-Sensitive	Meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, valley and foothill grassland.	Vernally mesic grassland or near ditches, streams and springs; disturbed areas. 3-2045 m.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Texosporium sancti-jacobi</i>	woven-spored lichen	Plants	None	None		Chaparral.	Open sites; in California with <i>Adenostoma fasciculatum</i> , <i>Eriogonum</i> , <i>Selaginella</i> . Found on soil, small mammal pellets, dead twigs, and on <i>Selaginell</i>	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Tortula californica</i>	California screw moss	Plants	None	None	BLM_S-Sensitive	Chenopod scrub, valley and foothill grassland.	Moss growing on sandy soil.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.
<i>Trichocoronis wrightii</i> var. <i>wrightii</i>	Wright's trichocoronis	Plants	None	None		Marshes and swamps, riparian forest, meadows and seeps, vernal pools.	Mud flats of vernal lakes, drying river beds, alkali meadows.	None. The project site is entirely developed / ornamental landscaped; therefore, it lacks habitat for the species.

Appendix C

Biologist Qualifications

EDUCATION

B.S., Wildlife Ecology, University of Wisconsin-Madison, 2004

CERTIFICATIONS

Certified Wildlife Biologist, The Wildlife Society 2014

Certified Technical Service Provider (TSP) for Fish and Wildlife Management Plans, USDA NRCS 2017

Authorized Desert Tortoise Biologist – Numerous BOs

Unmanned Aircraft System Pilot Certification, FAA #4177603

TRAINING

Wetland Delineation Training Course – The Wetland Institute (2014)

Southwest Willow Flycatcher Workshop, 2017

USGS Desert Tortoise Health Assessment and Tissue Collection Techniques Training, 2009

Matthew South

PRINCIPAL BIOLOGIST

Matthew South founded South Environmental in 2018. He is a certified wildlife biologist with over 17 years of professional experience providing natural resources consulting services for a wide variety of clients that include residential, commercial, government, utility, infrastructure, research, and non-profit projects. For the last 14 years, Mr. South has been an environmental consultant in southern California acting as a Wildlife Biologist and Geographic Information System (GIS) Analyst. In early 2018 he started South Environmental and has since been supporting clients in Los Angeles, Ventura, Santa Barbara, San Bernardino, and Riverside Counties.

Mr. South's background in ecology has led to a passion for conservation planning and resources assessments for the purpose of preservation and management. The integration of the latest technologies such as advanced GIS systems, mobile computing, and drone sensing allows him to innovate new data collection, analysis, and collaboration tools for the environmental sciences that produce more accurate data and better-informed resource managers.

EXPERTISE

- **Conservation and Management Planning.** Mr. South's has extensive experience preparing mitigation and monitoring plans, habitat conservation plans, and technical biological resources management plans that are compliant with federal, state, and local regulations. Mr. South is the only active NRCS TSP for Fish and Wildlife Plans Certified in California.
- **Biological Resources Assessment.** Mr. South has completed dozens of biological resources assessments throughout southern California.
- **Rare Plants and Arborist Services.** Mr. South has surveyed and assessed thousands of native and landscaped trees in southern California. He is a certified arborist with 5-years of tree survey experience working closely with some of the most experienced arborists in California. In addition, he has performed hundreds of hours of rare plant surveys and habitat assessments.
- **Wetland & Jurisdictional Delineations.** Mr. South has conducted dozens of jurisdictional and wetland delineations per the guidelines and methods from the US Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the state Regional Water Quality Control Boards (RWQCB).
- **GIS.** Mr. South is an expert at spatial data collection and analysis using ESRI mobile and desktop software products and Trimble hardware.

SELECT PROJECT EXPERIENCE

EVMWD Rice Canyon Reservoir Access Road and New Conduit Project, City of Lake Elsinore, Riverside County, California (2022). South Environmental was retained to complete biological and cultural resources services. Biological resources work included a Jurisdictional Delineation Report, a Biological Resources Assessment/MSHCP Consistency Analysis, Rare Plant Surveys, Burrowing Owl Surveys, and mitigation planning. Matthew South was the Principal Biologist on the project.

Wendy's in Calimesa Project, Riverside County, California (2023). South Environmental was retained to complete a Biological Resources Assessment and Western Riverside County MSHCP Consistency Analysis Report. Mr. South served as the Principal Biologist on the Project.

Southern California Gas (SCG) As-Needed Biological and Cultural Resources Services (2022-ongoing). As a subconsultant on this contract Mr. South has overseen the assessment numerous resources from single point locations to many miles of pipelines. More recently he has begun to conduct biological assessment in the coastal zone in Santa Barbara County as well as endangered species Biological Assessments (BAs) in support of Coastal Development Permits for SCG. Wetland delineation and permitting, biological resources assessments, and resources surveys and monitoring are services that Mr. South both provides personally and oversees a team of specialists that support the environmental impacts analysis and permitting for SCG.

Southern California Edison (SCE) As-Needed Natural and Cultural Resources Services (2021-ongoing). As a subconsultant on this contract for multiple Primes (SWCA, EI, Rincon, Cardno, and ERM), South Environmental has focused its biological resources services on wetland delineations and permitting efforts for SCE throughout all its regions. From single pole delineations in roadside ditches to several hundred poles through miles of wet meadows in the Sierras, the projects vary in size and complexity as well as location. Primarily, delineations have been in the Sierras with the largest and most complex projects in Inyo and Mono Counties and several in Kern and Tulare. A few of the specific projects include

- Pickle Meadow: Aquatic Resources Delineation Report and Permitting for 300-poles located in a wet meadow behind Bridgeport Reservoir.
- Kern River: Wetland Delineation and Permitting for 15 pole replacements in Kernville.
- June Lake to Tom's Place: Wetland Delineation and Permitting for 40 poles spread through Inyo and Mono Counties.
- Cajon Wash: Jurisdictional Delineation and SBKR Assessment and Permitting for 10 pole replacements and realignment for a capital project located in SBKR Critical Habitat.
- Pipes Wash: Delineation and Permitting for 25-poles that are within Pipes Wash, a large ephemeral wash in the San Bernardino desert.

City of Palmdale - Palmdale Warehouse Project (2022-on going). South Environmental prepared a jurisdictional delineation and permit applications to CDFW and RWQCB for the project. Services included EPIMS application and RWQCB Dredge and Fill Application and coordination including for mitigation management and alternatives analysis. Currently South Environmental is overseeing the compliance monitoring for the project.

City of Los Angeles Recreation and Parks Department Controlled Burn Project Burrowing Owl Surveys and Mitigation (2022). Mr. South planned and implemented a large scale burrowing owl protocol survey at



a model airfield park in the Sepulveda Basin. The survey was conducted over 1,300-acres and two burrowing owls were identified. Mr. South prepared a mitigation plan for conducting the controlled burn and avoiding impacts to burrowing owls.

California Coastal Zone Experience (2018-2024).

- Old Chimney Road Development, Santa Monica Mountains LCP (2018-present). Completed a BRA and oak tree survey per the LCP guidelines and presented to the Environmental Review Board (ERB).
- Gold Stone Road Development, Santa Monica Mountain LCP (2019-present). Completed a BRA, oak tree survey, and native tree survey per the LCP guidelines.
- Entrada Road Development, Santa Monica Mountains LCP (2020). Completed a BRA and oak tree survey per the LCP guidelines.
- Schueren Road Development, Santa Monica Mountains LCP (2019-2020). Completed a wetland delineation according to the California Coastal Commission guidelines.
- Decker Edison Road Development, City of Malibu (2020). Completed a BRA per the City of Malibu LCP guidelines.
- Malibou Lake Developments, North Santa Monica Mountains SEA (2020). Completed a biological resources map per the updated SEA guidelines.
- Medley Lane Development, Santa Monica Mountains LCP (2020). Completed a biological inventory per the guidelines of the Santa Monica Mountains LCP.
- Stunt Road Development, Santa Monica Mountains LCP (2018). Completed a BRA per the LCP guidelines.
- Malibou Lake Mountain Club, North Santa Monica Mountains SEA (2018). Completed permit packages for routine maintenance dredging of the lake, including a BRA, Section 404 CWA permit application, and CDFW Lake and Streambed Alteration Agreement.



EDUCATION

M.S., Earth, Environmental, and Physical Science, Wichita State University, 2012

B.S., Bachelor of Science, Biology, Wichita State University, 2004

PROFESSIONAL EXPERIENCE

South Environmental (2021-Present), Senior Biologist

AGEISS, Inc. (2020-2021), Environmental Scientist

Timberwolf Environmental (2019), Senior Project Manager

Nebraska Oil and Gas Conservation Commission (2018-2019), Project Manager

Stelbar Oil Corporation, Inc. (2006-2018), Project Manager

GIS

ESRI ArcGIS Pro, ArcCollector, Survey123, AccGIS online

Trimble GPS

James McNutt, M.S.

SENIOR BIOLOGIST AND LEAD WATERS DELINEATOR

James McNutt is a Senior Environmental Scientist and Lead Delineator with 19 years of professional experience in environmental project management, jurisdictional and wetland delineations, environmental permitting, technical documents, biological resource and community identification, and geology. Mr. McNutt brings over 15 years of experience completing jurisdictional and wetland delineations as a lead delineator in accordance with the U.S. Army Corps of Engineers (USACE) 1987 Delineation Manual Protocols. Mr. McNutt brings 5 years of experience identifying non-wetland features using the Arid West OHWM Identification Manual.

Since starting at South Environmental in early 2021, Mr. McNutt has completed dozens of jurisdictional and wetland delineations throughout Southern California. This experience includes utility project for Southern California Gas (SoCal Gas) and Southern California Edison (SCE) as well as private enterprise developments, and local government projects. He has been responsible for determining the boundary of jurisdictional features using Trimble GIS to accurately collect data, while using modules such as ArcCollector and Survey123 to validate all data collection processes. He is also a GIS analyst that creates figures for data packages regarding jurisdictional delineation reporting and permitting documents.

As a project manager, environmental scientist, and geologist for oil and gas companies, environmental consultants, and agencies in the west and Midwest, he oversaw wetland investigations and delineations on client assets such as leaseholds and drill-sites using the Criteria Determination Methodologies for Vegetation, Soil, and Hydrology. In these roles, he has also completed permit applications and successfully negotiated wetlands and non-wetland permits for dozens of projects, while closely coordinating with clients, agencies, and managers. This includes projects requiring compliance with the implementation of Mitigation Monitoring Reporting Plans, regulatory compliance, and data management processes.

EXPERTISE

- Environmental Regulations and Permitting
- Environmental Project Management
- Jurisdictional and Wetland Delineations
- Biological Habitat Assessment Reporting
- USACE Section 401/404 Compliance
- Biological Data Collection and Assessment Methods

SELECT WATERS DELINEATION PROJECT EXPERIENCE

Southern California Gas On-Call Waters Delineation Services. Conducted standard jurisdictional and wetland delineation work, as well emergency repair jurisdictional and wetland delineation work, for biological resource assistance regarding construction and maintenance projects throughout southern California. Activities have included data collection near protected resources for conducting wetland and jurisdictional delineations, jurisdictional delineation and habitat assessment reporting, and permit generation for RWQCB, USACE, and CDFW compliance.

Notable SGC Delineation Projects:

- Aliso Canyon Facility,
- L-85 Line north of Castaic,
- L-404 Line near Oak Park,
- L-127 Line in Montecito,
- Sylmar Gould Canyon, and
- L324 near Salt Canyon Creek

Southern California Edison On-Call Waters Delineation Services. Conducted standard jurisdictional and wetland delineation work, as well emergency repair jurisdictional and wetland delineation work, for biological resource assistance regarding construction and maintenance projects throughout southern California. Activities have included data collection near protected resources for conducting wetland and jurisdictional delineations, jurisdictional delineation and habitat assessment reporting, and permit generation for RWQCB, USACE, and CDFW compliance.

Notable SCE Delineation Projects:

- Dozens of utility projects throughout Los Angeles County, San Bernardino County, Riverside County, Ventura County, Kern County, and Santa Barbara County.

Private Development Waters Delineation Services in Southern California. Conducted standard jurisdictional and wetland delineation work and habitat assessment work for biological resource assistance regarding industrial, commercial, and residential projects throughout southern California. Activities have included data collection for conducting wetland and jurisdictional delineations, jurisdictional delineation and habitat assessment reporting, and permit generation for RWQCB, USACE, and CDFW compliance.

Notable Private Development Delineation Projects:

- Trader Joes' Warehouse in Palmdale,
- TTM 48307 housing development near Lakeview Drive in Palmdale,
- land for truck stop developments in Temescal Valley,
- land for housing developments in Lake Elsinore,
- land for industrial development near the Los Angeles River in Long Beach,
- Avenue I and 30th Street in Lancaster,
- Silverlake Equestrian Park in Norco, and

- land for housing developments in San Bernardino County.

Local Government Environmental Services in Southern California. Conducted standard jurisdictional and wetland delineation work and habitat assessment work for biological resource assistance regarding municipal and county projects throughout southern California. Activities have included data collection for conducting wetland and jurisdictional delineations, jurisdictional delineation and habitat assessment reporting, and permit generation for RWQCB, USACE, and CDFW compliance.

Notable Local Government Delineation Projects:

- Bell Canyon Creek for City of Los Angeles Recreation and Parks Department,
- Bronson Canyon Playground in Griffith Park for City of Los Angeles Recreation and Parks Department,
- Rice Canyon for EVMWD,
- Almond Street Road extension in Rancho Cucamonga, and
- land near Santa Clara River for city of Oxnard Fire Station.

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

INITIAL STUDY – APPENDIX B

**DOWNTOWN SPECIFIC PLAN
CONSISTENCY TABLE**

**Downtown Specific Plan (DSP) – Raincross District
Consistency Table**

<i>Goal/Policy No.</i>	<i>Raincross District Policy</i>	<i>Project Consistency</i>
Land Use Goals and Policies		
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.	
<i>Policy LU 1.1:</i>	<p><i>Maintain the integrity of, and interrelationship between, each (applicable) Downtown district.</i></p> <p>Raincross District: <i>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.</i></p>	Consistent. The Project would provide a mixture of residential, commercial, hotel, and restaurant uses through infill construction incorporating design compatible with the unique Downtown identity. The Project supports the Raincross District as Downtown’s pedestrian-oriented center through the incorporation of an outdoor meeting space and passive park area along with several pedestrian pathways. The pedestrian pathways would facilitate movement of pedestrians within the Project site and provide connectivity to existing sidewalks that connect to other Downtown districts.
<i>Policy LU-2:</i>	<i>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.</i>	Consistent. The Project includes an Outdoor Plaza to accommodate pedestrian-oriented retail shops.
<i>Policy LU-3:</i>	<i>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.</i>	Consistent. The Project includes an Outdoor Plaza that could provide a location for pedestrian-oriented retail shops such as, but not limited to, various types of restaurants, for daytime and nighttime outdoor dining.
<i>Policy LU-4:</i>	<i>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.</i>	Consistent. The Project is a mixed-use entertainment project development that includes up to a maximum of 168 new residential units consisting of 55 (for sale) condominium units and 113 (for rent) multi-family residential units. The residential buildings may include a rooftop pool and deck.
<i>Policy LU-5:</i>	<i>Provide incentives for infill development throughout Downtown, and with an emphasis on the key opportunity sites identified in this plan.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. The Project, which includes infill components, would not preclude implementation of this policy.
<i>Policy LU-6:</i>	<i>Place a strong emphasis on supporting, preserving, and expanding the Raincross District as a major center for culture, learning, and the arts.</i>	Consistent. The Project is a mixed-use entertainment project that includes expansion of the Riverside Convention Center in addition to retail, and hotel uses. As such, the proposed Project would support and contribute to the expansion of the Raincross District as a major center for culture, learning and the arts.
<i>Policy LU-7:</i>	<i>Promote nightlife activity in the Raincross District with restaurants and a variety of entertainment opportunities.</i>	Consistent. As a mixed-use entertainment project, the Project would promote nightlife activity and a variety of entertainment opportunities with the Convention Center expansion, new hotels, the proposed commercial retail uses that may include restaurant and other entertainment

Goal/Policy No.	Raincross District Policy	Project Consistency
		uses, and the proposed Outdoor Plaza with its flexible outdoor gathering space.
<i>Policy LU-8:</i>	<i>Strengthen the interrelationship between the Marketplace and Downtown through attractive physical linkages, transit oriented linkages, and complimentary uses.</i>	Not Applicable. The Project site is not located within or adjacent to the Riverside Marketplace area. Additionally, transit linkages would be the responsibility of the City and Riverside Transit Agency (RTA). Nevertheless, implementation of the Project would not preclude implementation of this policy.
<i>Policy LU-9:</i>	<i>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.</i>	Consistent. The Project would not conflict with Policy LU-9, which requires trash compactors be situated in a low visibility area with adequate provisions for cleaning and maintenance.
<i>Policy LU-10:</i>	<i>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.</i>	Consistent. As a mixed-use entertainment project, the Project includes a combination of new residential, office, retail, hotel and parking facilities in addition to expanding the Riverside Convention Center. This mix of uses would provide opportunities for residents and visitors to be present in the Downtown area to live, work, shop, eat, and be entertained. By providing reasons to be Downtown outside of normal business hours, these new opportunities would contribute towards the creation of a vibrant daytime, evening, and weekend environment.
<i>Policy LU-11:</i>	<i>Promote the expansion of the convention center and related hotel uses to support increased convention and tourist activity.</i>	Consistent. The Project includes expansion of the Riverside Convention Center and two new full-service hotel buildings that would directly support increased convention and tourist activity.
<i>Policy LU-12:</i>	<i>Maintain a continuity of pedestrian activity through active retail and restaurant ground level uses along Mission Inn Avenue, Main Street and University Avenue.</i>	Not Applicable. The Project is not located along Mission Inn Avenue, Main Street or University Avenue. Nevertheless, implementation of the Project would not preclude implementation of this policy.
Housing Goals and Policies		
Goal H-1:	To help Riverside’s Downtown succeed as an active daytime, evening, and weekend downtown, encourage housing beyond the traditional residential neighborhoods, to include the North Main Street Specialty Services, Market Street Gateway, Raincross, Almond Street, and Prospect Place Office Districts.	
<i>Policy H-1-1:</i>	<i>Provide a variety of housing options, including medium and high density apartments and condominiums, live/work loft space, and mixed-use buildings with a residential component.</i>	Consistent. The Project would provide mixed-used buildings that could include a maximum of 168 residential units consisting of for-rent apartments (113 units) and for sale luxury condominiums (55 units) that may include a rooftop pool and deck.
<i>Policy H-1-2:</i>	<i>Ensure the preservation and enhancement of the single-family residential neighborhoods in the Downtown.</i>	Not Applicable. The Project site is currently developed with non-residential uses and does not contain single family housing. Nevertheless, implementation of the Project is not would not preclude implementation of this policy.
<i>Policy H-1-3:</i>	<i>Provide incentives for ownership housing in the Downtown and continue to support the efforts</i>	Not Applicable.

Goal/Policy No.	Raincross District Policy	Project Consistency
	<i>of the Mission Village Homeownership Zone Initiative (1996).</i>	Implementation of this policy is the responsibility of the City. The Project supports this policy by including up to a maximum of 55 for-sale condominiums that would provide ownership opportunities Downtown.
<i>Policy H-1-4:</i>	<i>Encourage adaptive reuse of existing structures, or the development of new buildings, for the purpose of live/work space in the Raincross, North Main Street Specialty Services, Almond Street and Prospect Place Office Districts.</i>	Not Applicable. The Project does not propose development. Future implementation of the proposed Project would not preclude implementation of said policy.
<i>Policy H-1-5:</i>	<i>Encourage and promote new high density residential projects and the use of upstairs spaces in existing buildings in the Raincross District for housing to increase housing options and help bring daytime, evening, and weekend activity to the Downtown.</i>	Consistent. The Project would increase housing options in the Raincross District by providing an opportunity for mixed-used buildings that include a maximum of 168 residential units consisting of for-rent apartments (113 units) and for sale condominiums (55 units) that may include a rooftop pool and deck.
<i>Policy H-1-6:</i>	<i>The City shall provide incentives for the conversion of single-family residential structures that have been divided into multiple dwelling units back into single-family residential uses.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, the Project site does not include any single-family residential structures that have been divided into multiple dwelling units.
<i>Policy H-1-7:</i>	<i>Promote housing affordability through diversification of housing for varied income groups.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, the Project supports this policy by including up to a maximum of 113 for-rent apartments that constitutes a diversification of housing types in the Raincross District.
Economic Development Goals and Policies		
Goal ED-1:	Strengthen Downtown as a local and regional destination for specialty shopping, dining, nightlife, employment, culture, and the arts.	
<i>Policy ED-1-1:</i>	<i>Make Downtown attractive to a broad range of individuals to live, work, and recreate.</i>	Consistent. As a mixed-use entertainment project, the Project proposes to include a combination of residential, office, retail (including restaurant), and hotel uses, in addition to and expanding the Convention Center. These new uses combined with the Convention Center expansion provide new opportunities that would make Downtown attractive to a broad range of individuals to live, work, and recreate.
<i>Policy ED-1-2:</i>	<i>Encourage the expansion of law and other professional office related uses in the Justice Center.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Further, the Project site is not within the Justice Center. Nonetheless, implementation of the proposed Project would not preclude implementation of said policy.
<i>Policy ED-1-3:</i>	<i>Foster entrepreneurship, with an emphasis on entertainment, dining, and culture in the Raincross District, craftsman supplies and services in the North Main Specialty Services District, small businesses in the Almond Street and Prospect Place Office Districts, family goods and services in the Neighborhood Commercial District, and legal services in the Judicial District.</i>	Consistent. The Project would foster entrepreneurship within the Raincross District by providing new restaurant, hotel, and residential uses and expanding the Convention Center which would not only provide opportunities for new business but would also introduce new residents and visitors into the area.

Goal/Policy No.	Raincross District Policy	Project Consistency
<i>Policy ED-1-4:</i>	<i>Pursue an aggressive program to recruit quality development and consider incentives to attract these uses.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, the proposed Project represents the type of quality development envisioned by this policy.
<i>Policy ED-1-5:</i>	<i>Target specialty retail, eating, drinking, and entertainment establishments for the Raincross District.</i>	Consistent. The Project proposes up to 61,981 square feet of commercial retail uses that may include a combination of retail, restaurant and entertainment establishments in the Raincross District.
<i>Policy ED-1-6:</i>	<i>Target key infill residential opportunities including small lot and row homes, apartments and condominiums and live/work loft space.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, the Project includes a maximum of 168 residential units consisting of for-rent apartments and for-sale condominiums. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy ED-1-7:</i>	<i>Develop a financing plan that determines the scope of public improvements to be funded, the responsibilities of the public and private sector participants, and the methods of financing the improvements.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Implementation of the proposed Project would not preclude implementation of this policy.
Urban Design Goals and Policies		
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.	
<i>Policy UD-1-1:</i>	<i>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.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, future development proposals within the Project site would be subject to the City's design review process to ensure the design enhances the character of the Raincross District. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy UD-1-2:</i>	<i>Enhance the connection between the Downtown and the Riverside Marketplace by working with Caltrans to establish effective pedestrian and vehicular connections in conjunction with the widening of the 91 Freeway. These connections should include well-designed public art, lighting or landscaping as necessary to enhance the pedestrian environment.</i>	Not Applicable. Implementation of this policy is the responsibility of the City and Caltrans. Implementation of the proposed Project would not preclude implementation of the policy.
<i>Policy UD-1-3:</i>	<i>Improve street design on key corridors in the Downtown and create a sense of arrival at key gateways, which reinforce the City's natural, cultural and historic characteristics.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, the Project does not propose any street improvements. Implementation of the proposed Project would not preclude implementation of the policy.
<i>Policy UD-1-4:</i>	<i>Consider the development of a public improvements plan to implement the streetscape and gateway design concepts for the Downtown.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, future development within the Project site would be subject to the City's design review process to ensure the consistency with the streetscape and gateway design concepts for Downtown. Implementation of the

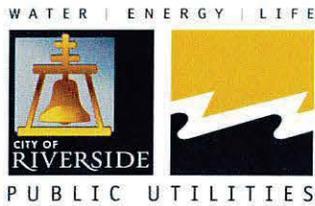
Goal/Policy No.	Raincross District Policy	Project Consistency
		proposed Project would not preclude implementation of the policy.
<i>Policy UD-1-5:</i>	<i>Encourage appropriate public art to further establish a sense of history and pride in the community.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, future development within the Project site would be subject to the City’s design review process, which is the appropriate stage to consider public art. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy UD-1-6:</i>	<i>Establish development standards to preserve the view of historic buildings along Mission Inn Avenue from the vantage point of the Riverside 91 Freeway.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, given the location of the Project site in relation to the 91 freeway and Mission Inn Avenue, future building constructed within the Project site would not block existing views of historic buildings. Implementation of the proposed Project would not preclude implementation of this policy.
Historic Preservation Goals and Policies		
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.	
<i>Policy HP-1-1:</i>	<i>Promote the preservation of the historic housing stock and existing character of the distinct single family residential neighborhoods.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, the proposed Project does not entail demolition of existing housing and the Project site is not located within a single family residential neighborhood.
<i>Policy HP-1-2:</i>	<i>Promote community appreciation for the history of Riverside.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy HP-1-3:</i>	<i>Provide incentives to encourage the restoration, and, if necessary, relocation of private historic structures to conserve the integrity of the buildings in the best condition possible.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, there are no historic structures located on the Project site. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy HP-1-4:</i>	<i>Through design review, encourage new development to be compatible with adjacent historical structures in scale, massing, building materials, and general architectural treatment.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, there are not historical structures adjacent to the Project site. Nonetheless, future development within the Project site would be subject to the City’s design review process to ensure the consistency with the streetscape and gateway design concepts for Downtown. Implementation of the proposed Project would not preclude implementation of the policy.
<i>Policy HP-1-5:</i>	<i>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.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, future development within the Project site would be subject to the City’s design review process to ensure consistency with established design guidelines for the Raincross District.

Goal/Policy No.	Raincross District Policy	Project Consistency
		Implementation of the proposed Project would not preclude implementation of the policy.
Circulation Goals and Policies		
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.	
<i>Policy C-1-1:</i>	<i>Define a multi-modal street hierarchy for Downtown.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Implementation of the proposed Project would not preclude implementation of the policy.
<i>Policy C-1-2:</i>	<i>Provide enhanced transit amenities within the Downtown, including bus stops and a downtown transit center.</i>	Not Applicable. Implementation of this policy is the responsibility of the City and RTA. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-3:</i>	<i>Develop strong pedestrian connections between the Downtown and the Riverside Marketplace.</i>	Not Applicable. The Project site is not located within or adjacent to the Riverside Marketplace area. Additionally, development of strong pedestrian connections would be the responsibility of the City. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-4:</i>	<i>Protect residential areas from traffic intrusion.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, as part of the design review process for future development within the Project site, traffic patterns would be reviewed to ensure that residential areas are protected from new development-generated traffic. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-5:</i>	<i>Define principal transportation entry corridors into the Downtown.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-6:</i>	<i>Focus traffic on key routes through or on the edge of Downtown, i.e. Market Street, University Avenue, Third Street, Fourteenth Street, Lime Street.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. However, since local access to the Project site is provided via Main Street, Third Street, Fifth Street, Market Street and Orange Street, the Project is consistent with this policy. Therefore, implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-7:</i>	<i>Improve traffic circulation by re-establishing closed street connections wherever feasible.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, there are no closed street connections in proximity to the Project site. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-8:</i>	<i>Do not permit any further street closures in the downtown area.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, the Project does not propose any permanent street closures. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-9:</i>	<i>Facilitate public transit opportunities in Downtown.</i>	Not Applicable. Implementation of this policy is the responsibility of the City and RTA. Implementation of

<i>Goal/Policy No.</i>	<i>Raincross District Policy</i>	<i>Project Consistency</i>
		the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-10:</i>	<i>Provide bike lanes on major streets approaching Downtown and within downtown where feasible.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Additionally, the Project does not include any street improvements because the streets surrounding the Project site are fully improved with sidewalks, curbs and gutters on both sides of the street. Implementation of the proposed Project would not preclude implementation of this policy.
<i>Policy C-1-11:</i>	<i>Provide for pedestrian circulation at ground level. Do not provide grade-separated pedestrian facilities (except freeway over crossing).</i>	Consistent. The Project includes several ground-level pedestrian pathways to facilitate movement of pedestrians within the Project site and provide connectivity to existing sidewalks that connect to other Downtown districts. The Project does not propose any grade-separated pedestrian facilities.
<i>Policy C-1-12:</i>	<i>Improve way-finding signage, including: directional (both on freeways approaching the downtown and on downtown streets), destination-related, and signage for parking facilities. In addition to signage, encourage the development and use of landmarks in the landscape for way-finding and place-making purposes.</i>	Not Applicable. Implementation of this policy is the responsibility of the City. Nonetheless, as part of the City’s design review process, signage proposed as part of future development within the Project site would be reviewed to ensure consistency with this policy. Implementation of the proposed Project would not preclude implementation of this policy.

INITIAL STUDY – APPENDIX C

WSA LETTER



July 25, 2024

Jennifer Lilley
Community & Economic Development Director
City of Riverside
3900 Main Street
Riverside, CA 92501

Subject: Future Water Demand Estimates for the Riverside Alive Project

Dear Ms. Lilley:

This letter is in response to the proposed Riverside Alive Project projected water demand.

The proposed project consists of approximately 10.26-acres and is in the northwestern section of the City of Riverside. The project is generally bounded by Orange Street to the east, 3rd Street to the north, 5th to the South and Market Street to the east. The project site currently has a General Plan Land Use designation of DSP Downtown Specific Plan. The proposed mixed-use project consists of multi-family residential dwelling units, multi-tenant commercial buildings, a parking facility, retail, restaurants, two hotels, a gym and grocery store. Multifamily apartments are anticipated to be located on the southeast corner of Market Street and Third Street, with luxury condominium units proposed to be located on the top two levels of the full-service hotel building to be located along Third Street. The commercial/retail portion of the project would be located on the western half of the project site along Third Street. A 208-room full-service hotel would be located within one building along Third Street. A second, 168-room extended stay hotel would be within a separate building east of the Multifamily Residential. The extended stay hotel building would also include a small local-serving grocery store and fitness center on the first two levels. The hotels will operate independently of each other.

The proposed development includes provisions for an outdoor plaza within the courtyard in the center of the project site. The outdoor plaza area may be partially covered or wholly uncovered and is intended to be fully programmable for outdoor events on an intermittent basis.

The project will also expand the existing convention center with 189,000 square feet of additional exhibition areas, reception, and backhouse support facilities.

An estimate of the new water demand was made using typical industry duty factors as well as those factors developed as part of the City's Water System Master Plan, updated in 2021. The water demand estimate is presented in Table 1. As indicated in this table, the estimated new total demand for the Riverside Alive Project is projected to be about 226 acre-feet per year (AFY).

Table 1 - Water Demand Summary

Land Use Area	Product Type	Proposed Bldg. Floor Space	Rooms	Duty Factor ^{2,3} (GPM/AC)	SB 7X-7 ¹		Potable Demand	
					Demand AFY	Demand (GPM)	Demand (GPD)	Demand (AFY)
RES	HDR 710 SF - 1297 SF		168	-	0.715/unit ¹	-	-	120
COM ⁴	G-C	281,981 SF	-	1.81	-	11.72	16,872	19
CT	Hotel	131,600 SF	376	14	-	41.12	19,600	66
Other	Convention Center Expansion	189,000 SF	-	2.99	-	12.96	18,657	21
Project Totals						65.79	55,129.28	226

1 Using the updated compliance target pursuant to the SB X7-7 as shown in Table 5-2 of the 2020 Urban Water Management.

2 Water Duty Factor based on the Water Master Plan 2021. (pg. 115-116)

3 Duty factor (gpm/ac) = [(gpd/ac) / 60min x 24hr].

4 Commercial = Office + Retail + Grocery

RPU provides municipal water service to customers within its service area which includes the proposed project site. RPU has over 5,000 water supply connections; therefore, SB 610 (Water Code section 10912 (a)) requires RPU to prepare a water supply assessment when a project includes any of the following components: (1) more than 500 residential dwelling units, (2) a shopping center or business with more than 500,000 square feet of floor space or more than 1,000 employees, (3) a commercial office building with more than 250,000 square feet of floor space or more than 1,000 employees, (4) a hotel or motel with more than 500 rooms, (5) an industrial, manufacturing or processing plant, or an industrial park, with more than 650,000 square feet of floor area, more than 1,000 employees, or that occupies more than 40 acres, (6) a mixed-use project that includes one or more of the projects specified in the subdivision, or (7) 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.

In determining whether a project would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project, which equates to about 318 AFY according to RPU's 2020 Urban Water Management Plan (UWMP). This demand is at a high-end estimate given that the anticipated upcoming conservation standards (part of Making Conservation a California Way of Life) would reduce the future demand for 500 dwellings.

RPU's analysis has determined that 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 water supply assessment is not required for the proposed project.

Therefore, pursuant to the information contained in RPU's 2020 UWMP, it appears that there is a sufficient surplus water supply available to RPU to meet the Riverside Alive project's incremental increase in water demand of 226 acre-ft.

If you have any questions, please contact Jon C Colón, Water Resources Engineer at (951) 351-6409.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Garcia". The signature is fluid and cursive, with the first name being the most prominent.

David A. Garcia
Interim Utilities General Manager
Riverside Public Utilities

INITIAL STUDY

**PUBLIC REVIEW COMMENT
LETTERS**

From: [Montejo, Paige](#)
To: [Jacqueline Gamboa](#); [Eliza Laws](#); [Stephanie Standerfer](#)
Cc: [Taylor, Matthew](#)
Subject: FW: Riverside Alive Project
Date: Thursday, October 17, 2024 10:01:45 AM

Good Morning Webb Team,

Just passing along this email comment I received from RTA for tracking purposes. Please let me know if you have questions.

Paige Montejo | Senior Planner
City of Riverside | 951.826.5773

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Thursday, October 17, 2024 9:09 AM
To: Montejo, Paige <PMontejo@riversideca.gov>
Subject: [EXTERNAL] Riverside Alive Project

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Good Morning Paige,

Thank you for including Riverside Transit Agency in the review of the Riverside Alive Project. After reviewing the documents, there is one recommendation to make. RTA has an active bus stop on Market Street NS Third Street. It is recommended to incorporate pedestrian pathways throughout the site to provide a safe connection for people to utilize public transportation.

Thank you for considering this comment.

Mauricio Alvarez, MBA
Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)
1825 Third Street, Riverside, CA 92507

Stay in-the-know with all things Riverside! Connect with us at
RiversideCA.gov/Connect.



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
<https://dtsc.ca.gov>



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 21, 2024

Paige Montojo
Senior Planner
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522
PMontojo@riversideca.gov

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR RIVERSIDE ALIVE DATED OCTOBER 09, 2024, STATE CLEARINGHOUSE NUMBER [2024100396](#)

Dear Paige Montojo,

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Riverside Alive project (project). The City of Riverside is considering the development of a new mixed-use entertainment and hospitality project which will include a combination of residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities in place of the existing Lot 33 and Outdoor Plaza area. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean](#)

[Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#)

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the Riverside Alive project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Paige Montojo
October 21, 2024
Page 3

cc: (via email)

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NATIVE AMERICAN HERITAGE COMMISSION

November 7, 2024

Paije Montojo
City of Riverside
3900 Main Street
3rd Floor
Riverside CA 92522

RECEIVED

NOV 15 2024

Community & Economic
Development Department

Re: 2024100396 Riverside Alive Project, Riverside County

Dear Ms. Montojo:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@NAHC.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



11/8/2024

Paige Montojo, Senior Planner
City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
E-mail: PMontojo@riversideca.gov

RE: NOP Comments for Riverside Alive Project

Dear Ms. Montojo,

On behalf of Californians Allied for a Responsible Economy ("CARE CA") thank you for the opportunity to provide comments on the Notice of Preparation (NOP) for environmental review of the Riverside Alive Project (the "Project"). The Project proposes to include a combination of residential, office, retail, and hotel uses; a Convention Center expansion; and new parking facilities.

The goal of an EIR is to provide decisionmakers and the public with detailed information about the effects of a proposed project on the environment, how significant impacts will be minimized and alternatives to the project (Pub. Res. Code § 21002.2). We, therefore, respectfully request a complete analysis of all identified impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives. In addition, we wish to provide the following comments:

- i) Air Quality and Public Health: CARE CA has a particular interest in air quality and public health. Estimates of the significance of air quality impacts must be consistent with current epidemiological studies regarding the effects of pollution and various kinds of environmental stress on public health.
- ii) Greenhouse Gas Emissions: In the DEIR analysis, the City has the discretion to quantify GHG emissions resulting from a project and/or rely on a qualitative analysis or performance-based standards "based to the extent possible on scientific and factual data" Guidelines §,15064, subd. (b). To determine the significance of the Project's GHG, we urge the City to adopt quantitative thresholds that embody climate change's existential threat to humankind and provide detailed discussion on the plan to offset the Project's GHG emissions. We can always do more to slow down global warming.

iii) Alternatives: The DEIR should analyze reasonable Alternatives that include less parking, and address potential air quality, GHG and traffic impacts associated with the excess parking.

iv) Mitigation measures: We request that the City make every effort to mitigate all impacts to the fullest extent feasible. A Statement of Overriding Considerations should be considered only after ALL feasible mitigation measures are included in the MMRP.

The mitigation measures must be effective and enforceable. Every effort must be made to incorporate modern technology in the mitigation measures and MMRP. For example, a requirement that all off-road equipment and trucks using the site during construction be zero emission would both reduce and/or eliminate air pollution impacts and CO2 emissions.

Thank you for the opportunity to submit NOP comments. Again, CARE CA respectfully requests full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski

Executive Director