Massachusetts Point Project

Administrative Draft EIR

Prepared For
City of Riverside

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Prepared by

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1. Executive Summary

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the Massachusetts Point Project (proposed Project). This EIR has been prepared in conformance with State and City of Riverside environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA).

This Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR will be available for public review at the City of Riverside website https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents.

Written comments related to environmental issues in the Draft EIR should be addressed to:

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A Notice of Availability of the Draft EIR was published concurrently with distribution of this document.

Following public review, the City of Riverside will prepare responses to written comments concerning environmental topics and publish a Final EIR. Before taking action to approve the Project, the City of Riverside (serving as the CEQA Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making processes; (3) make a statement that this EIR reflects the City Riverside's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (CEQA Guidelines Sections 15090-15093).

1.1 PROJECT LOCATION

The Project site is located in the northern portion of the City of Riverside at 2626 Kansas Avenue, 2069 and 1989 Massachusetts Avenue. Regional access to the Project site is provided via Interstate 215 (I-215), State Route 60 (SR-60), and State Route 91 (SR-91). Local access to the Project site is provided via Kansas Avenue, Massachusetts Avenue, and Roberta Street.

The Project site is located within Section 24 Township 2 South, Range 5 West of the Whittier, California, United States Geological Survey (USGS) 7.5-minute Quadrangle. The Project site consists of three parcels encompassing approximately 14.42 acres and is generally located south of Roberta Street, east of Kansas Avenue, and north of Massachusetts Avenue. The site is identified by Assessor's Parcel Numbers (APNs) 210-130-015, -16, and -20.

1.2 PROJECT DESCRIPTION SUMMARY

The applicant, SCIND Massachusetts Point LLC, has submitted applications to the City of Riverside for a Zoning Code (Map/Text) Amendment, Development Agreement, Parcel Map, and Design Review for the

project referred to as the Massachusetts Point Project to allow for development of two single-story industrial buildings. The Zoning Code (Map/Text) Amendment would amend the City's zoning code and zoning map to change the site's Innovation District (ID) Overlay Zoning subdistrict from Employment Emphasis (EE) and Housing Emphasis (HE) to Industrial Emphasis (IE), which will allow for the proposed industrial buildings.

The proposed Project would demolish the existing 99,850 square feet (SF) of structures on 2626 Kansas Avenue and redevelop 2626 Kansas Avenue and 2069 Massachusetts Avenue with two Class A Light Industrial buildings at 99,900 SF and 99,950 SF on approximately 10.21 acres. The proposed industrial building would support warehouse and office uses. The proposed buildings would have a combined total building area of 199,580 SF and a combined total footprint of 197,600 SF. Additional improvements include landscaping, sidewalks, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway, and pavement of parking areas and drive aisles. No development is proposed on 1989 Massachusetts Avenue.

1.2.1 Building and Architecture

Building 1 would be located in the northern portion of the site on 2626 Kansas Avenue and would have a total building area of 99,900 SF, inclusive of 93,900 SF of warehouse space and 6,000 SF of ground floor office space. Building 1 would be oriented to the north, with frontages along Roberta Street to the north and Kansas Avenue to the west. Building 1 would be set back 79 feet from the northern property line, approximately 48 feet from the eastern property line, approximately 70 feet from the southern property line, and a minimum of 10 feet and 6 inches from the western property line.

Building 2 would be located on the southern portion of the site on 2069 Massachusetts Avenue and would have a total building area of 99,950 SF, inclusive of 91,700 SF of warehouse space, 6,000 SF of ground floor office space, and 2,250 of mezzanine space to be used as office space. Building 2 would be oriented to the west, along Kansas Avenue to the west and Massachusetts Avenue to the south. Building 2 would be set back 130 feet from the northern property line, approximately 84 feet from the eastern property line, approximately 10 feet from the southern property line, and approximately 79 feet from the western property line.

1.2.2 Circulation and Street Improvements

The proposed Project would close the existing driveways on Massachusetts Avenue, Kansas Avenue, and Roberta Street, and construct five new driveways: two on Roberta Street, two on Kansas Avenue, and one on Massachusetts Avenue, as shown in Figure 3-13, *Circulation and Driveways*. The proposed northeastern driveway on Roberta Street would be a cul-de-sac driveway.

Driveway 1 would be a cul-de-sac driveway located to the northeast of the Project site, along Roberta Street, would be 37 feet and 6 inches wide, and provide both passenger vehicle and truck access. Driveway 2 would be located on the northwest of the Project site, along Roberta Street, would be 26-feet-wide, and be limited to passenger vehicles. Driveway 3 would be located along Kansas Avenue (center), would be 50-feet-wide, provide access to both passenger vehicles trucks. Driveway 4 would be located to the southwest of the Project site, along Kansas Avenue, would be 26-feet-wide, and be limited to passenger vehicles. Driveway 5 would be located along Massachusetts Avenue, would be 35-feet-wide, and provide both passenger vehicle and truck access. Access to Building 1 would be provided via Driveways 1,2, and 3. Access to Building 2 would be provided via Driveways 3, 4, and 5. The Project's driveways are shown in Figure 3-13, *Circulation and Driveways*.

Trucks are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3rd Street. Internal access for both buildings would be provided via 26- to 35-foot-wide drive aisles which would double as fire lanes. Access to the truck loading dock areas would be controlled by metal sliding gates.

1.2.3 Parking

Building 1 would include 17 dock doors located along the southern side of the building. Additionally, Building 1 would include 130 passenger vehicle spaces, inclusive of electric vehicle (EV) and accessible (ADA) spaces, for use by employees and visitors in surface lots to the north, south, and east sides of Building 1.

Building 2 would include 22 dock doors located along the northern side of the building. Additionally, Building 2 would include 131 passenger vehicle spaces, inclusive of EV and ADA spaces for use by employees and visitors in surface lots to the north, east and west sides of Building 2. Table 3-2 describes the proposed Project's parking breakdown.

1.2.4 Landscaping

The proposed Project includes approximately 22,240 SF (or 0.51 acres) around the perimeter of the site and in-between parking areas. Landscaping would include 24-inch and 36-inch box trees, 5-gallon shrubs, accents, and groundcover to screen the proposed building, parking, and loading areas from off-site viewpoints.

1.2.5 Infrastructure

Regulated electrical, gas, and communication utilities would be extended to the site from existing facilities along Kansas Avenue and Massachusetts Avenue.

The Project would install new public fire hydrants on Massachusetts Avenue, Kansas Avenue, and Roberta Street to meet maximum spacing requirements, as well as new water service laterals that would connect to the existing 10-inch water line in Massachusetts Avenue.

The Project applicant would also install new private sewer lines to connect to the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street.

The proposed Project would close the existing driveways on Massachusetts Avenue, Kansas Avenue, and Roberta Street, and construct five new driveways: two on Roberta Street, two on Kansas Avenue, and one on Massachusetts Avenue. The proposed northeastern driveway on Roberta Street would be a cul-de-sac driveway. The Project includes a proposed right-of-way dedication for construction of the cul-de-sac driveway.

A minimum of six-feet wide sidewalks would be constructed along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Additionally, 24-inch to 48-inch box trees would be planted within the landscaped setbacks on Roberta Street, Kansas Avenue, and Massachusetts Avenue.

1.2.6 Drainage

The proposed development would be consistent with the natural drainage pattern of the existing site. The proposed Project would collect drainage via grate inlets and catch basins, which would convey storm water to an on-site underground storm drain system. The storm drain system would discharge to two proposed onsite underground detention/infiltration systems. Detention/infiltration System A would be located underneath the passenger drive aisle in the northwest portion of the site and would direct overflow to Roberta Street. Detention/infiltration System B would be located beneath the truck court of Building 1 and

would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic square feet (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing onsite flows (Appendix F, Page 5). The infiltration systems are sized to capture peak storm events and any potential overflow will be directed to Kansas Avenue and Roberta Street. The site's storm drainage system would be designed to meet the regional low impact development (LID) structural treatment control best management practices (BMPs).

1.3 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to redevelop a partially underutilized property with an industrial use to provide an employment-generating use to help grow the economy in the City of Riverside. The Project would achieve this goal through the following objectives:

1. To make efficient use of the property in the City of Riverside by adding to its potential for employment generating uses.
2. To attract new business and employment to the City of Riverside and thereby promote economic growth.
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
4. To redevelop a partially underutilized property with two industrial warehouse buildings near I-215, SR-60, and SR-91, to help meet demand for logistics business in the City and surrounding region.
5. To develop two warehouse facilities with updated infrastructure that are up-to-date with efficient building standards.
6. To build an industrial warehouse project in the City of Riverside that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Riverside.

1.4 SUMMARY OF ALTERNATIVES

- **Alternative 1: No Project/No Development Alternative.** Consistent with the requirements of CEQA Guidelines Section 15126.6(e), this alternative consists of the Project not being approved, and the Project site remaining in the condition that existed at the time the Notice of Preparation (NOP) was published (December 12, 2024). Under this alternative, operation of the existing uses on the Project site would continue. Existing uses include: two commercial/industrial buildings on 2626 Kansas Avenue, a lot used for bus parking and storage on 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings on1989 Massachusetts Avenue.

- **Alternative 2: Percent Reduced Project Alternative.** This Reduced Project Alternative (RPA) consists of development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage and operational intensity. Specifically, the RPA would result in the construction of one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

  This alternative would include construction of an onsite drainage system comprised of two underground detention/infiltration systems, like the proposed Project. The RPA would allow for development of only one warehouse building and would therefore reduce the total Project square footage by approximately 50 percent, or by 99,950 SF.

Consistent with the proposed Project, the RPA would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Like the proposed Project, the RPA does not require offsite improvements.

- **Alternative 3: No Project/Buildout of Employment Emphasis Subdistrict.** This alternative consists of developing the Project site in a manner that is consistent with the existing zoning designation of I – General Industrial. In addition, this alternative would be consistent with the existing Innovation District Overlay (ID) Overlay Zone and Employment Emphasis (EE) subdistrict. However, this alternative would require an amendment to the City's zoning code and zoning map due to the current split of subdistrict designations, as all three parcels are presently divided between EE and Housing Emphasis (HE) subdistricts. Therefore, this alternative would include an amendment to the City's zoning code and zoning map to designated the entire three parcels Innovation District (ID) Overlay Zoning subdistrict from EE and HE to exclusively EE.

  This alternative would also include a proposed modification of the development standards in the EE overlay zone. Proposed modifications include, but are not limited to: specifying a minimum floor area ratio (FAR) allowance for sites under 5 acres and sites over 5 acres; modifying the allowed building setbacks; and reducing the parking requirement. These modifications would allow for a minimum FAR of 1 and a maximum FAR of 6 at the site.

  Furthermore, this alternative would require a General Plan Amendment to change the exiting General Plan land use designation of Industrial (I) to Mixed Use-Urban (MU-U), which allows for development of primarily high-density residential development with commercial, office, institutional and business uses emphasizing retail, entertainment and student-oriented activities.

  The EE subdistrict promotes a high-intensity vertical mix of office, clean and green industrial, educational, and hospitality uses to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. Per the City of Riverside Code of Ordinances Title 19, Zoning, Article VI, Overlay Zones, up to 40 percent of the primary and/or accessory buildings in the EE Subdistrict shall be residential with units allowed to average more than 400 SF. Office uses, including administrative and professional facilities, are also permitted in the EE Subdistrict.

  This No Project/Buildout of Employment Emphasis Subdistrict Alternative would consist of construction of two new two-story buildings designed to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. The alternative would consist in the development of 2 two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue).

  Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Building 1 would be on a 5.15-acre lot, resulting in a FAR of 1. Building 2 would be on a 5.06-acre lot, resulting in a FAR of 1.

  This alternative would include construction of an on-site drainage system comprised of two underground detention/infiltration systems, like the proposed Project. Consistent with the proposed Project, the No

Project/ Buildout of Employment Emphasis Subdistrict Alternative would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Areas plan for grading and physical impact would be consistent with the proposed Project. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts.

1.5 SUMMARY OF IMPACTS

Table 1-1, *Summary of Impacts*, summarizes the conclusions of the environmental analysis contained in this EIR. Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts. The level of significance of impacts after the proposed mitigation measures are applied are identified as either significant and unavoidable, less than significant, or no impact. After the application of feasible mitigation measures, the Project would not result in significant and unavoidable environmental impacts.

Table 1-1: Summary of Impacts

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 Aesthetics				
Threshold A: Would the Project have a substantial adverse effect on a scenic vista?		None required	None required	Less than significant
Threshold B: Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?		No impact	None required	No impact
Threshold C: Would the Project, in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point), or in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?		Less than significant	None required	Less than significant
Threshold D: Would the Project create a new source of substantial light or glare which would adversely affect day and nighttime views in the area?	**PPP AES-1:** Light and Glare. All lights shall be directed and/or shielded to prevent the light from adversely affecting adjacent properties. No structure or lighting feature shall be permitted which creates adverse glare. A photometric plan shall be provided that indicates the amount of light emanating from the proposed/existing light fixtures to comply with City of	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Riverside Municipal Code Chapter 19.556, Outdoor Lighting. **PDF AES-1:** Lighting Design. The Project's lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices. All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting.			
Cumulative		Less than significant	None required	Less than significant
5.2 Agriculture and Forestry Resources				
Threshold A: Would the Project 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?		No impact	None required	No impact
Threshold B: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?		No impact	None required	No impact
Threshold C: Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				
Threshold D: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?		No impact	None required	No impact
Threshold E: Would the Project 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?		No impact	None required	No impact
Cumulative		No impact	None required	No impact
5.3 Air Quality				
Threshold A: Would the Project conflict with or obstruct implementation of the applicable air quality plan?		Less than significant	None required	Less than significant
Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard?	**PPP AQ-1:** Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less. **PPP AQ-2:** Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.			
Threshold C: Would the Project expose sensitive receptors to substantial pollutant concentrations?	**PPP AQ-3:** Rule 1470. The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Threshold D: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	**PPP AQ-4:** Rule 402. The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	Less than significant	None required	Less than significant
Cumulative	**PPP AQ-1:** As listed previously **PPP AQ-2**: As listed previously **PP AQ-3**: As listed previously **PP AQ-4**: As listed previously	Less than significant	None required	Less than significant
5.4 Biological Resources				
Threshold A: 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 Wildlife or U.S. Fish and Wildlife Service?		No impact	None required	No impact
Threshold B: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
Threshold C: Would the Project 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?		No impact	None required	No impact
Threshold D: Would the Project 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?		Potentially significant	**Mitigation Measure BIO-1:** Nesting Birds. Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment. If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.	
Threshold E: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		Less than significant	None required	Less than significant
Threshold F: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?		No impact	None required	No impact
Cumulative		Potentially significant	**Mitigation Measure BIO-1:** As listed previously.	Less than significant
5.5 Cultural Resources				
Threshold A: Would the Project cause a substantial adverse change in the significance of a		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
historical resource pursuant to §15064.5?				
Threshold B: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		Potentially significant	**Mitigation Measure CUL-1:** Inadvertent Discovery of Archaeological Resource. During implementation of the project, in the event that archaeological materials are encountered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for Professional Archaeology (United States Department of the Interior, 1983). Construction activities may continue in other areas. If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant's expense.	
Threshold C: Would the Project disturb any human remains, including those interred outside of formal cemeteries?	**PPP CUL-1:** Human Remains. If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	of the remains as provided in Public Resources Code Section 5097.98.			
Cumulative	**PPP CUL-1:** As listed previously	Potentially significant	**Mitigation CUL-1:** As listed previously	Less than significant
5.6 Energy				
Threshold A: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		Less than significant	None required	Less than significant
Threshold B: Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.7 Geology and Soils				
Threshold A: Would the Project 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? (ii) Strong seismic ground shaking?	**PPP GEO-1:** CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
(iii) Seismic-related ground failure, including liquefaction? (iv) Landslides?				
Threshold B: Would the Project result in substantial soil erosion or the loss of topsoil?		Less than significant	None required	Less than significant
Threshold C: Would the Project 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?		Less than significant	None required	Less than significant
Threshold D: Would the Project 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?		Less than significant	None required	Less than significant
Threshold E: Would the Project 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?		No impact	None required	No impact
Threshold F: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		Potentially significant	**Mitigation Measure GEO-1: Paleontological Resources.** Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Western Science Center in Riverside County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Riverside Public Works Department, shall verify that all	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources. After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the City Director of the City Community Development Department, or designee, and the Western Science Center in Riverside County.	
Cumulative	**PPP GEO-1:** As listed previously	Potentially significant	**Mitigation Measure GEO-1:** As listed previously.	Less than significant
5.8 Greenhouse Gas Emissions				
Threshold A: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		Less than significant	None required	Less than significant
Threshold B: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.9 Hazards and Hazardous Materials				
Threshold A: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**PPP HYD-1: NPDES/SWPPP.** Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site. **PPP HAZ-1: SCAQMD Rule 1166.** Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling	Potentially significant.	**Mitigation Measure HAZ-1:** SARWQCB Concurrence. Prior to the issuance of a grading permit or the commencement of any ground-disturbing activities, the City of Riverside shall obtain SARWQCB concurrence with proposed mitigation measures and project design features directly related to environmental conditions regulated by this agency to ensure compliance with applicable regulatory requirements. No grading or construction activities shall begin until written confirmation of regulatory concurrence has been received and verified by the City. **Mitigation Measure HAZ-2:** Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board. The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be	Less than significant.

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.		conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities). Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities. **Mitigation Measure HAZ-3**: Health and Safety Plan (HSP). Prior to ground-disturbing activities, including grading, trenching, excavation, or structure demolition, a HSP shall be approved by the City of Riverside Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			permit(s). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.	
Threshold B: Would the Project 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?	**PPP HAZ-1:** As listed previously. **PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS).** A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.	Less than significant	None required	Less than significant
Threshold C: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		No impact	None required	No impact
Threshold D: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?		Less than significant	None required	Less than significant
Threshold 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		Potentially significant	**Mitigation Measure HAZ-4:** Outdoor lighting. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky.	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
a safety hazard or excessive noise for people residing or working in the Project area?			Outdoor lighting shall be downward facing. **Mitigation Measure HAZ-5:** Prohibited Uses/Activities. The following uses/activities are not included in the proposed project and shall be prohibited at this site: 1. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. 2. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. 3. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators. 4. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. 5. Highly noise-sensitive outdoor nonresidential uses. 6. Any use which results in a hazard to flight, including physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations **Mitigation Measure HAZ-6:** Notice of Airport in Vicinity. The "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property. **Mitigation Measure HAZ-7:** Stormwater Basin Design and Airport Compatibility. Any	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			proposed stormwater basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the stormwater basins that would provide food or cover for birds is incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the stormwater basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries. Landscaping in the stormwater basin, if not rip-rap, shall be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist. A notice sign shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			maintenance is necessary to avoid bird strikes". The sign shall also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.	
Threshold F: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		No impact	None required	Less than significant
Threshold G: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?		No impact	None required	No impact
Cumulative	**PPP HAZ-2:** As listed previously **PPP HYD-1**: As listed previously	Potentially significant	**Mitigation Measure HAZ-1:** As listed previously. **Mitigation Measure HAZ-2**: As listed previously. **Mitigation Measure HAZ-3:** As listed previously. **Mitigation Measure HAZ-4:** As listed previously. **Mitigation Measure HAZ-5:** As listed previously. **Mitigation Measure HAZ-6:** As listed previously.	Less than significant
5.10 Hydrology and Water Quality				
Threshold A: Would the Project violate any water quality standards or waste discharge requirements or otherwise	**PPP HYD-1: NPDES/SWPPP.** Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
substantially degrade surface or groundwater quality?	compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site. **PPP HYD-2: WQMP.** Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.			
Threshold B: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Threshold C: Would the Project 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 result in a substantial erosion or siltation on or off site.	**PPP HYD 1:** as listed previously.	Less than significant	None required.	Less than significant
Threshold D: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river or through the addition of impervious surfaces. In a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site.		Less than significant	None required.	Less than significant
Threshold E: Would the Project substantially alter the existing drainage patterns 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 create or contribute runoff water which would exceed the capacity if existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.		Less than significant	None required.	Less than significant
Threshold F: Would the Project substantially alter the existing		Less than significant	None required.	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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 impede or redirect flood flows?				
Threshold G: Would the Project, in flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation?		No impact	None required	No impact
Threshold H: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	**PPP HYD-2:** As listed previously.	Less than significant	None required	Less than significant
Cumulative	**PPP HYD-1:** As listed previously **PPP HYD-2**: As listed previously	Less than significant	None required	Less than significant
5.11 Land Use and Planning				
Threshold A: Would the Project physically divide an established community?		No impact	None required	No impact
Threshold B: Would the Project 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?	**PDF HAZ-1:** Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.	Less than significant	None required	Less than significant
Cumulative	**PPP HAZ-1:** As listed previously	Less than significant	None required	Less than significant
5.12 Mineral Resources				
Threshold A: Would the Project result in the loss of availability of		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
a known mineral resource that would be of value to the region and the residents of the state?				
Threshold B: Would the Project 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?		No impact	None required	No impact
Cumulative		Less than significant	None required	Less than significant
5.13 Noise				
Threshold A: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
Threshold B: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?				
Threshold 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?				
Cumulative				

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.14 Population and Housing				
Threshold A: Would the Project 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)?		Less than significant	None required	Less than significant
Threshold B: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.15 Public Services				
Threshold A: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?		Less than significant	None required	Less than significant
Threshold B: 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		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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 services?				
Threshold C: 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 school services?	**PPP PS-1:** The Project is required to pay school impact fees in accordance with SB 50 at the time of building permit issuance. The school impact fee for commercial/industrial developments within the RUSD boundary is $0.84 per SF, which would equal approximately $167,874 for the Project.	Less than significant	None required	Less than significant
Threshold D: 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 park services?		Less than significant	None required	Less than significant
Threshold E: Would the Project result in substantial adverse		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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?				
Cumulative		Less than significant	None required	Less than significant
5.16 Recreation				
Threshold 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?	**PPP R-1: Park and Recreation Development Fees.** Pursuant to Municipal Code Chapters 16.44, 16.60, and 16.76, park development fees are imposed on the construction or placement of applicable nonresidential construction in accordance with the schedule of fees adopted by the City Council.	Less than significant	None required	Less than significant
Threshold 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?	**PPP R-1:** As listed previously	Less than significant	None required	Less than significant
Cumulative	**PPP R-1**: As listed previously	Less than significant	None required	Less than significant
5.17 Transportation				
Threshold A: Would the Project conflict with a program, plan, ordinance, or policy addressing	**PDF TRA-1:** Chicago Avenue/Massachusetts Avenue Intersection Improvements: The	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop (AWSC) control. **PDF TRA-2:** Chicago Avenue/3rd Street Intersection Improvements: The Project would change the northbound and southbound signalized control type on Chicago Avenue/3rd Street intersection to split phasing.			
Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?		Less than significant	None required	Less than significant
Threshold C: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		Less than significant	None required	Less than significant
Threshold D: Would the Project result in inadequate emergency access?		Less than significant	None required	Less than significant
Cumulative	**PDF TRA-1**: As listed previously. **PDF TRA-2:** As listed previously.	Less than significant	None required	Less than significant
5.18 Tribal Cultural Resources				
Threshold A: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place,		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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: (i) 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)? (ii) 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 § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
Threshold B: Would THE PROJECT Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is A resource determined by the lead agency, in its		Potentially significant	**Mitigation Measure CUL-1**: As listed previously. **Mitigation Measure TCR-1:** Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?			new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities. **Mitigation Measure TCR-2: On Call Project Archaeologist:** Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on site during all grading and other significant ground-disturbing activities. **Mitigation Measure TCR-3: Treatment and Disposition of**	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. **Consulting Tribes Notified:** Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need approval of the consulting tribe(s); and 3. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources to the consulting tribe(s). The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. Upon consultation with the tribe(s) and if parties agree that reburial on project site is not feasible, a curation agreement with an	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79, if agreed upon by the tribe(s), and therefore will be professionally curated. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes. **Mitigation Measure TCR-4: Cultural Sensitivity Training:** The	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	
Cumulative		Potentially significant	**Mitigation Measure CUL-1**: As listed previously. **Mitigation Measure TCR-1:** As listed previously **Mitigation Measure TCR-2:** As listed previously. **Mitigation Measure TCR-3:** As listed previously. **Mitigation Measure TCR-4:** As listed previously.	Less than significant
5.19 Utilities and Service Systems				
Threshold A: Would the Project require or result in the relocation		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?				
Threshold B: Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?		Less than significant	None required	Less than significant
Threshold C: Would the Project require or result in the relocation or construction of new wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?		Less than significant	None required	Less than significant
Threshold D: Would the Project 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?		Less than significant	None required	Less than significant
Threshold E: Would the Project require or result in the relocation or construction of new drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	**PPP HYD-1: NPDES/SWPPP.** As listed previously **PPP HYD-2: WQMP.** As listed previously	Less than significant	None required	Less than significant
Threshold F: Would the Project generate solid waste in excess of		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
Threshold G: Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?		No impact	None required	Impacts would not occur
Threshold H: Would the Project require or result in the relocation or construction of a new or expanded electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.		Less than significant	None required	Less than significant
Cumulative	**PPP HYD-1:** As listed previously **PPP HYD-2**: As listed previously	Less than significant	None required	Less than significant
5.20 Wildfire				
Threshold A: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?		Less than significant	None required	Less than significant
Threshold B: Would the Project, 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?		Less than significant	None required	Less than significant
Threshold C: Would the Project require the installation or maintenance of associated		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
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?				
Threshold D: Would the Project 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?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant

2. Introduction

This Draft Environmental Impact Report (EIR) is an informational document that evaluates the environmental effects that may result from the planning, construction, and operation of the proposed Massachusetts Point Project (Project), which requires approval of a Zoning Code (Map/Text) Amendment, Development Agreement, Design Review, Parcel Map, and certification of this Draft EIR.

2.1 PURPOSE OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) requires that all State and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision makers and the public generally of the potential significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (State CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes into account environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (State CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

2.2 LEGAL AUTHORITY

This Draft EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.).

Pursuant to CEQA Section 21067 and State CEQA Guidelines Article 4 and Section 15367, the City of Riverside is the Lead Agency under whose authority this Draft EIR has been prepared. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action on any approvals for the Project, the City of Riverside has the obligation to: (1) ensure that this Draft EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Draft EIR as part of its decision-making process; (3) make a statement that this Draft EIR reflects the City of Riverside's independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or Project alternatives identified in this Draft EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090 through 15093).

Pursuant to State CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the City of Riverside will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;
- Disapprove the Project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project would cause a significant effect on the environment if the City of Riverside makes a fully informed and publicly disclosed decision that: (1) there is no feasible way to lessen the effect or avoid the significant effect; and (2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

2.3 ENVIRONMENTAL IMPACT REPORT PROCESS

A project-level analysis has been provided pursuant to State CEQA Guidelines Section 15161. This Draft EIR meets the content requirements discussed in State CEQA Guidelines Article 9, beginning with State CEQA Guidelines Section 15120.

2.3.1 Notice of Preparation

Pursuant to the requirements of CEQA, the City of Riverside issued a Notice of Preparation (NOP) for the Project, which was distributed on December 12, 2024, for a public review period of 40 days through January 20, 2025. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR and to solicit comments from the public regarding potential Project environmental impacts. As provided in the NOP, the City of Riverside determined that impacts related to the following topics are potentially significant and required a detailed level of analysis in this Draft EIR.

- Aesthetics
- Agriculture and forestry resources
- Air quality
- Biological resources
- Cultural resources
- Energy
- Geology and soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology and water quality
- Land use and planning
- Mineral resources
- Noise
- Population and housing
- Public services
- Recreation
- Transportation
- Tribal cultural resources
- Utilities and service systems
- Wildfire

The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP are included in Appendix A and are summarized in Table 2-1, which also includes a reference to the Draft EIR sections in which issues raised in the comment letters are addressed.

Table 2-1: Summary of NOP Comment Letters

Comment Letter and Commet	Relevant Draft EIR Sections
State and Local Agencies	
State of California Department of Justice, December 18, 2024	

The comment states warehouse projects are an important part of the modern economy; however, warehouses can lead to environmental impacts to the communities they are located in such as air quality and noise impacts. The comment requests that the EIR include best practices and mitigation measures included in the Attorney General Office's Warehouse Best Practice document.	Section 3.0, *Project Description* Section 5.3, *Air Quality* Section 5.8, *Greenhouse Gases*
Riverside Transit Agency, January 2, 2025	
The comment states the Riverside Transit Agency has no comments to submit on the Project at this time.	Section 3.0, *Project Description*
Native American Heritage Commission, January 8, 2025	
The comment includes a description of requirements regarding requirements for preparation of an Environmental Impact Report (EIR) pursuant to CEQA Guidelines Section 15064. Additionally, the commenter provides requirements and project applicability under Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18). The commenter recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project as early as possible. The commenter provides a summary of requirements for AB 52 and SB 18 process.	Section 5.18, *Tribal Cultural Resources*
Organization Comments	
Sierra Club, January 17, 2025	
The comment provides information related to Environmental Justice and asks the EIR to include analysis related to the topic. The comment also provides a list of cumulative warehouse projects in the region and requests the project ensure conformity with Assembly Bill 98. Lastly, the comment requests that the EIR include a section related to greenhouse gas emissions.	Section 5.3, *Air Quality* Section 5.8, *Greenhouse Gases* Section 5.11, *Land Use*
Californians Allied for a Responsible Economy (CARE CA), January 20, 2025	
The comment requests a complete analysis of all identified impacts, all feasible mitigation and a reasonable range of alternatives. The letter requests the EIR analysis to discuss reasonable impacts associated with the proposed industrial use, especially in relation to public health.	Section 5.3, *Air Quality* Section 5.8, *Greenhouse Gases* Section 5.11, *Land Use*

2.3.2 Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Riverside hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Draft EIR for the Project. A virtual scoping meeting was held on Thursday, January 9, 2025, via Zoom. No comments were received during the public scoping meeting.

2.3.3 Draft EIR

The City of Riverside has filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research State Clearinghouse, indicating that this Draft EIR has been completed and is available for review

and comment. A Notice of Availability (NOA) of the Draft EIR was published concurrently with distribution of this document. The Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with State CEQA Guidelines Sections 15087 and 15105. During the 45-day review period, the Draft EIR is available for public review digitally on the City of Riverside's website at https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents or physically at the following locations:

City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

Riverside Main Public Library
3911 University Avenue
Riverside, CA 92501

Community Center at Lincoln Park
4261 Park Avenue
Riverside, CA 92507

Written comments related to environmental issues in the Draft EIR should be addressed to:

Candice Assadzadeh, Senior Planner
City of Riverside
3900 Main Street, 3rd Floor
951-826-5667
cassadzadeh@riversideca.gov

2.3.4 Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final EIR will be considered by the City Council. These comments, and their responses, will be included in the Final EIR for consideration by the City of Riverside, as well as other responsible and trustee agencies per CEQA. The Final EIR may also contain corrections and additions to the Draft EIR and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to its certification by the City of Riverside. Notice of the availability of the Final EIR will be sent to all who comments on the Draft EIR.

2.4 ORGANIZATION OF THIS DRAFT EIR

This Draft EIR is organized into the following Sections. To help the reader locate information of interest, a brief summary of the contents of each chapter is provided.

- **Section 1, Executive Summary:** This section provides a brief summary of the Project area, the Project, and alternatives. This section also provides a summary of the potential environmental impacts and mitigation measures, applicable Project design features, applicable regulatory requirements, and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either *less than significant* or *significant and unavoidable*.

- **Section 2, Introduction:** This section provides an overview of the purpose and use of the EIR, the scope of this Draft EIR, a summary of the legal authority for the Draft EIR, a summary of the environmental review process, and the general format of this document.
- **Section 3, Project Description:** This section provides a detailed description of the Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4, Environmental Setting:** This section provides a discussion of the existing conditions within the Project area.
- **Section 5, Environmental Impact Analysis:** This section is divided into sub-sections for each environmental impact area. Each sections includes a summary of the existing statutes, ordinances, and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the Project; applicable Project design features, standard conditions, and plans, policies, and programs that could reduce potential impacts; and feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to *less than significant* are identified as *significant and unavoidable*.
- **Section 6, Other CEQA Considerations:** This section summarizes the significant and unavoidable impacts that would occur from implementation of the Project and provides a summary of the environmental effects of the implementation of the Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the Project. In addition, this section provides a discussion of impacts found not to be significant.
- **Section 7, Alternatives:** This section describes and analyzes a reasonable range of alternatives to the Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is also identified.
- **Section 8, Report Preparation and Persons Contacted:** This section lists authors of the Draft EIR and City of Riverside staff that assisted with the preparation and review of this document. This section also lists other individuals and/or organizations that were contacted for information that is included in this Draft EIR document.

2.5 INCORPORATION BY REFERENCE

State CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document… most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Draft EIR. Where this Draft EIR incorporates a document by reference, the document is identified in the body of the Draft EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this Draft EIR.

The Project is within the geographical limits of the City of Riverside and is covered by the City of Riverside 2025 General Plan. The 2025 General Plan was approved by the City of Riverside in July 2007 and provides the fundamental basis for the City of Riverside's land use and development policies. The 2025 General Plan was the subject of an environmental review under CEQA, and an EIR for the 2025 General Plan was certified by the City of Riverside in November 2007 (State Clearinghouse Number (SCH) 2004021108). Accordingly, the EIR for the 2025 General Plan is herein incorporated by reference with State CEQA Guidelines Section 15150.

Additionally, the City of Riverside adopted a Phase I General Plan Update in 2021. The Phase I General Plan Update was the subject of an environmental review under CEQA, and an EIR for the Phase I General Plan Update was certified by the City of Riverside in July 2021 (State Clearinghouse Number (SCH) 2021040089). Accordingly, the EIR for the Phase I General Plan Update is herein incorporated by reference with State CEQA Guidelines Section 15150. The documents related to the 2025 General Plan and the Phase I General Plan Update are available at https://riversideca.gov/cedd/planning/general-plan.

3. Project Description

"Project," as defined by the State CEQA Guidelines, means "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment," including the "enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700" (14 California Code of Regulations [CCR] Section 15378(a)).

The Project analyzed in this Draft EIR would be developed in one phase and constructed over approximately 14 months. The Draft EIR analyzes buildout at a Project level of detail, based upon entitlement applications being considered by the City of Riverside, compared to existing conditions.

3.1 PROJECT LOCATION AND BACKGROUND

The Project site is located in the northern portion of the City of Riverside at 2626 Kansas Avenue, 2069 Massachusetts Avenue, and 1989 Massachusetts Avenue. Regional access to the Project site is provided via Interstate 215 (I-215), State Route 60 (SR-60) and State Route 91 (SR-91). Local access to the Project site is provided via Kansas Avenue, Massachusetts Avenue, and Roberta Street. Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, and Figure 3-3, *Aerial View*.

The Project site encompasses approximately 14.42 acres and is identified by Assessor's Parcel Numbers (APNs) 210-130-015, -16, and -20. APN 210-130-015 (2626 Kansas Avenue) and is currently developed with a commercial/industrial business, NewBasis, Inc., which is a concrete, polymer, and fiberglass products manufacturing business. The two structures on APN 210-130-015 total approximately 99,850 square feet (SF). APN 210-130-016 (2069 Massachusetts Avenue) is currently a lot used for bus parking and storage. The surface of APN 210-130-016 consists of imported gravel that has been compacted over time and has resulted in a hardpacked ground surface that allows patchy vegetation to grow through cracks in the surface. APN 210-130-020 (1989 Massachusetts Avenue) also currently operates as a bus parking and storage yard and contains two buildings totaling approximately 11,000 SF. Ornamental landscaping that consists of trees and shrubbery exists along the perimeters of all three parcels. The Project site is relatively flat and has an elevation of approximately 904 feet above mean sea level (AMSL) at the southeast corner to approximately 889 feet AMSL at the northwest corner. The Project site's existing conditions are shown in Figure 3-4a-d, *Existing Site Photos*.

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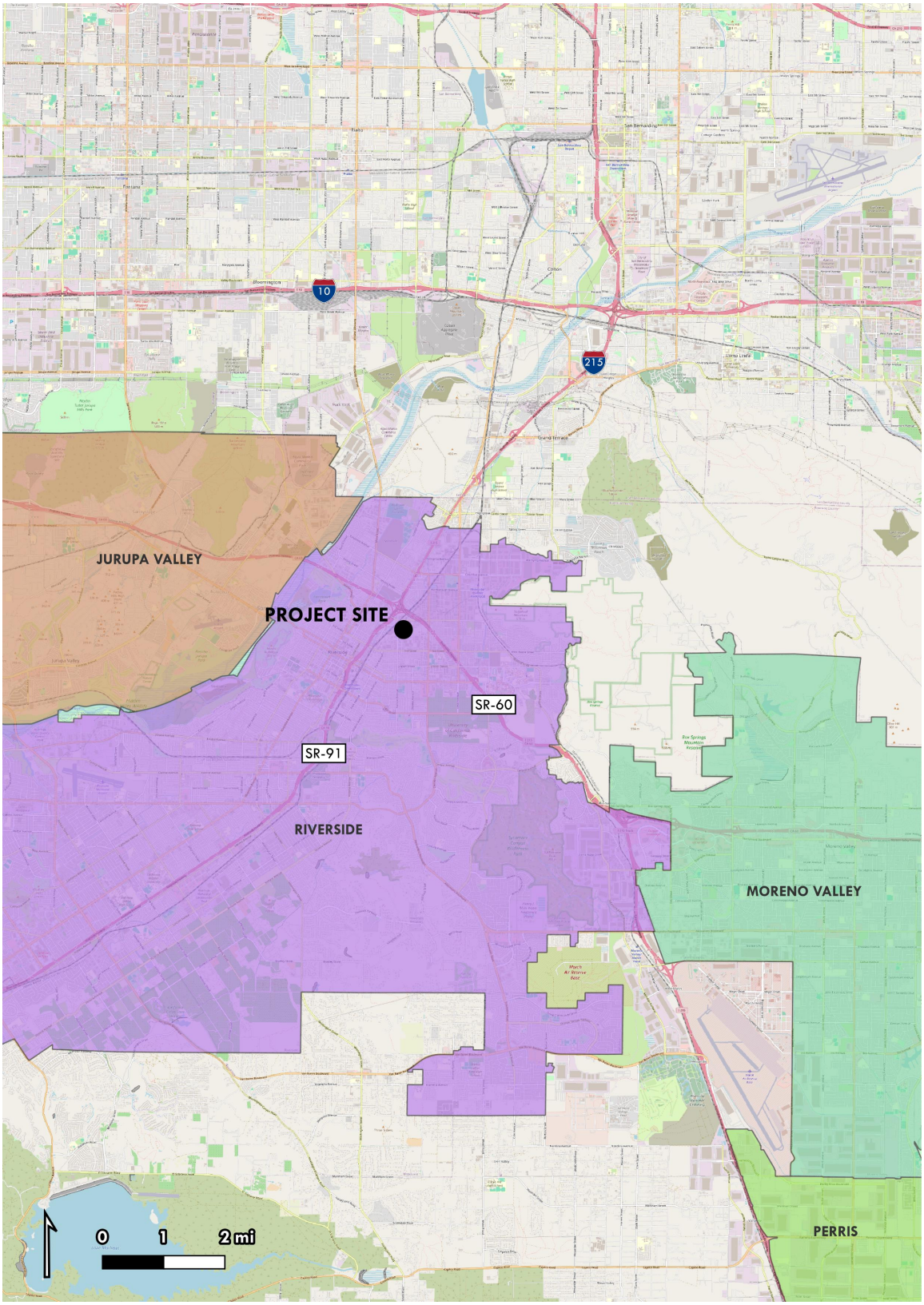
Regional Location



Massachusetts Point Project
City of Riverside

Figure 3-1

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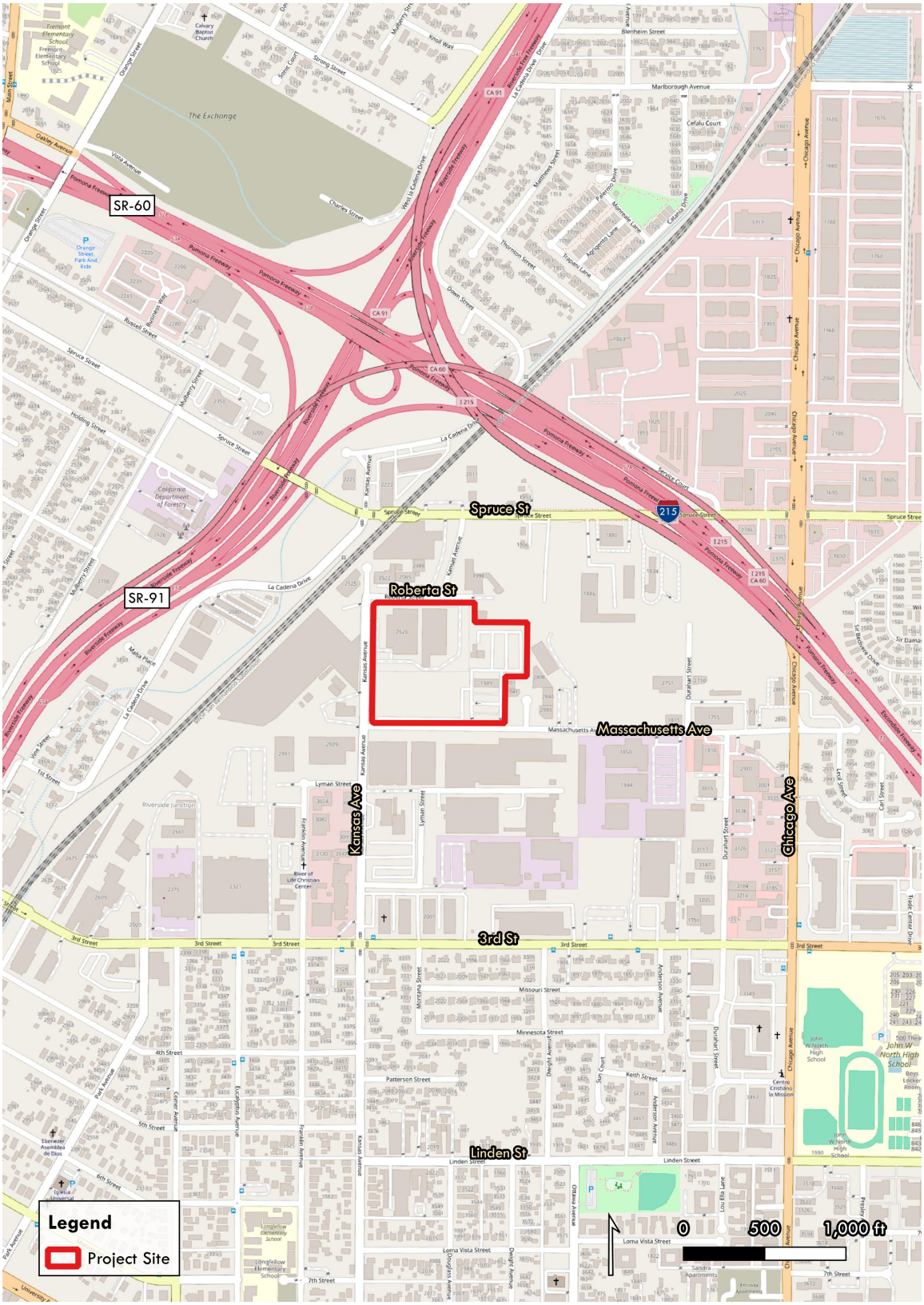
Local Vicinity



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Aerial View

Spruce St
Roberta St
Kansas Ave
Massachusetts Ave
Legend
Project Site
0
150
300 ft

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Existing Site Photos

Key

Viewpoint Location

Direction of Sight

View of the Project Site from the intersection of Kansas Avenue and Massachusetts Avenue, looking northeast.

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Existing Site Photos

Key

Viewpoint Location

Direction of Sight

View of the existing industrial building on the Project Site, from the intersection of Kansas Avenue and Roberta Street.

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Existing Site Photos

Key

Viewpoint Location

Direction of Sight

View of the existing industrial buildings on the Project Site, from Roberta Street.

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Existing Site Photos

Key

Viewpoint Location

Direction of Sight

View of the existing bus storage yard on the Project Site, from Massachusetts Avenue.

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3.1.1 Existing Land Use and Zoning

General Plan and Zoning Designation: The Project site has a General Plan Land Use designation of Industrial (I) and is zoned I - General Industrial. The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The purpose of the Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities. Refer to Figure 3-5, *Existing General Plan Land Use*, and Figure 3-6, *Existing Zoning*.

Overlay Zoning: The site is also within the Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is located within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The EE promotes a high-intensity vertical mix of office, clean and green industrial, educational, and hospitality uses to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. The HE accommodates primarily residential housing development supported by ground-floor neighborhood-serving commercial uses and live-work opportunities, with limited industrial functions. Refer to Figure 3-7, *Existing Innovation District Overlay Zoning Designation*.

3.1.2 Surrounding General Plan and Zoning Designations

The Project site is located within a developed area. The surrounding land uses are described below in Table 3-1.

Table 3-1: Surrounding Existing Land Use and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation	Innovation District Subdistrict
North	Industrial (manufacturing) uses and a former single-family residence (across Roberta Street)	I – Industrial	I-ID – General Industrial and Innovation District Overlay Zones	IE - Industrial Emphasis and CS – Civic Space
East	Homeless services/shelter and a manufacturing use.	I – Industrial	I-ID – General Industrial and Innovation District Overlay Zones	HE - Housing Emphasis and EE - Employment Emphasis
South	Industrial (manufacturing) uses (across Massachusetts Avenue)	I – Industrial	I-ID – General Industrial and Innovation District Overlay Zones	EE - Employment Emphasis
West	Industrial (manufacturing) uses (across Kansas Avenue)	B/OP - Business/Office Park	I-ID – General Industrial and Innovation District Overlay Zones	IE - Industrial Emphasis

Source: City of Riverside, 2021a. City of Riverside, 2021b.

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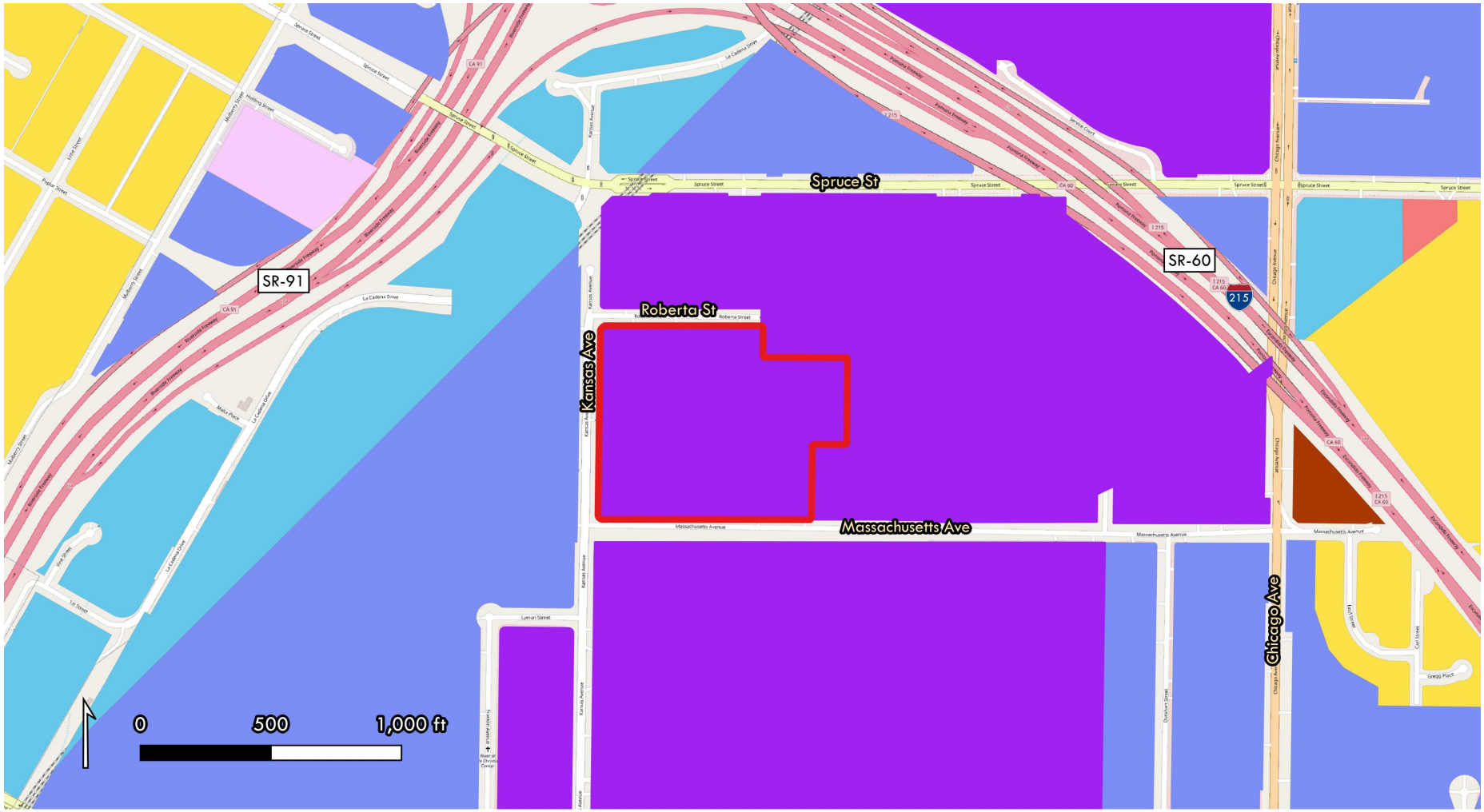
Existing General Plan Land Use



Legend

Project Site

Riverside General Plan Land Use Designation

B/OP - Business/Office Park

C - Commercial

I - Industrial

HDR - High Density Residential

MDR - Medium Density Residential

MU-V - Mixed Use - Village

O - Office

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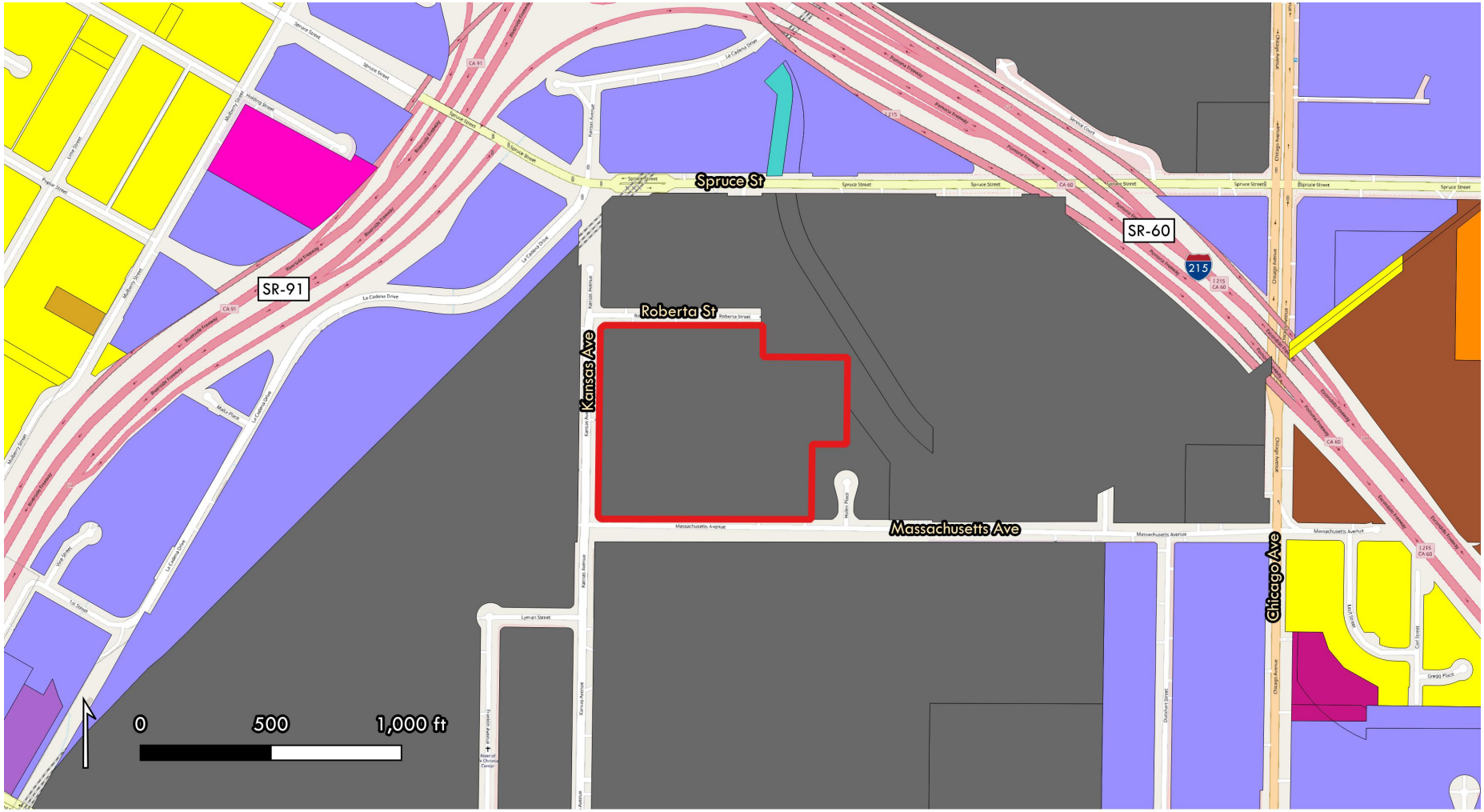
Existing Zoning Designation



Legend

- Project Site

Riverside Zoning Official

- BMP - Business Manufacturing Park - Commercial Storage Overlay
- BMP - Business and Manufacturing Park
- I - General Industrial
- MU - V - Mixed-Use Village
- O - Office
- PF - Public Facilities
- R-1-7000 - Single Family Residential
- R-3-1500 - Multi-Family Residential
- R-3-2000 - Multi-Family Residential
- R-3-3000 - Multi-Family Residential

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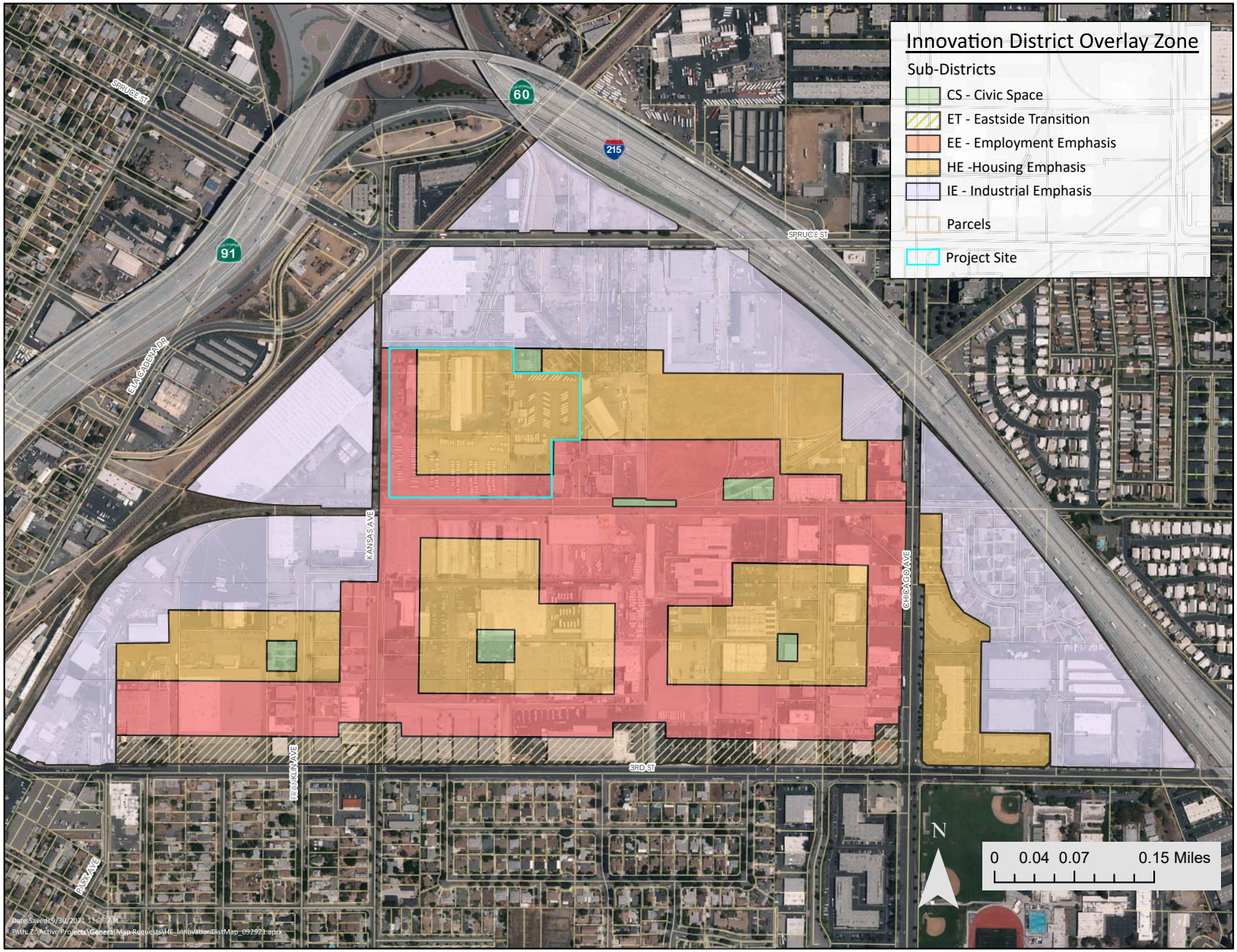
Existing Innovation District Overlay Zoning Designation



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3.2 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to redevelop a partially underutilized property with an industrial use to provide an employment-generating use to help grow the economy in the City of Riverside. The Project would achieve this goal through the following objectives:

1. To make efficient use of the property in the City of Riverside by adding to its potential for employment generating uses.
2. To attract new business and employment to the City of Riverside and thereby promote economic growth.
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
4. To redevelop a partially underutilized property with two industrial warehouse buildings near I-215, SR-60, and SR-91, to help meet demand for logistics business in the City and surrounding region.
5. To develop two warehouse facilities with updated infrastructure that are up-to-date with efficient building standards.
6. To build an industrial warehouse project in the City of Riverside that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Riverside.

3.3 DESCRIPTION OF THE PROJECT

3.3.1 Project Overview

The proposed Project would demolish the existing 99,850 SF of structures on 2626 Kansas Avenue and redevelop 2626 Kansas Avenue and 2069 Massachusetts Avenue with two Class A light industrial buildings at 99,900 SF and 99,950 SF on approximately 10.21 acres. Additional improvements would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway, and pavement of parking areas and drive aisles. No development is proposed on APN 210-130-020 (1989 Massachusetts Avenue). Approvals required for the Project include a Zoning Code Amendment, Development Agreement, Tentative Parcel Map, Design Review, and certification of the Environmental Impact Report. Figure 3-8, *Conceptual Site Plan*, shows the proposed site plan.

3.3.2 Zone Change

The Project proposes an amendment to the City's zoning code and zoning map to change the site's Innovation District (ID) Overlay Zoning subdistrict from Employment Emphasis (EE) and Housing Emphasis (HE) to Industrial Emphasis (IE), which will allow for the proposed industrial buildings. The zone change would occur over all three parcels. Figure 3-9, *Proposed Innovation District Overlay Zoning Designation*, shows the proposed zone change.

The proposed zone change also includes modification of the development standards in the IE overlay zone. Proposed modifications include, but are not limited to: specifying a minimum floor area ratio (FAR) allowance for sites under five acres and sites over five acres; defining the maximum height allowance to be 75 feet; modifying the allowed building setbacks; and reducing the parking requirement.

3.3.3 Tentative Parcel Map

The Project proposes a Tentative Parcel Map (TPM) for a two lot subdivision for condominium purposes that would allow individual ownership of building units. The TPM would not result in any changes to the physical development, intensity, or use of the project site, which would be constructed and operated as described in Section 3.3, Description of the Project. Figure 3-10, *Tentative Parcel Map*, shows the proposed Tentative Parcel Map for condominium purposes.

3.3.4 Development Summary

The proposed Project would construct two new industrial buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) that would support warehouse and office uses. Building 1 is proposed to consist of 99,900 SF, inclusive of 93,900 SF of warehouse space and 6,000 SF of ground floor office space. Building 1 would have a footprint of 99,900 SF, resulting in a FAR of 0.45. Building 2 is proposed to consist of 99,950 SF, inclusive of 91,700 SF of warehouse space, 6,000 SF of ground floor office space, and 2,250 of mezzanine space to be used as office space. Building 2 would have a footprint of 97,700 SF, resulting in an FAR of 0.45. No development is proposed on APN 210-130-020 (1989 Massachusetts Avenue).

Building 1 would be oriented to the north, with frontages along Roberta Street to the north and Kansas Avenue to the west. Building 1 would be set back 79 feet from the northern property line, approximately 48 feet from the eastern property line, approximately 70 feet from the southern property line, and a minimum of 10 feet and 6 inches from the western property line.

Building 2 would be oriented to the west, along Kansas Avenue to the west and Massachusetts Avenue to the south. Building 2 would be set back 130 feet from the northern property line, approximately 84 feet from the eastern property line, approximately 10 feet from the southern property line, and approximately 79 feet from the western property line.

As shown in Figures 3-11a-b, *Elevations*, both buildings would be single-story and approximately 46 feet in height. The buildings would establish an architectural presence through an emphasis on building finish materials and consistent material usage and color scheme. They would be grey with highlights of blue glazing and brick accents. The use of landscaping, building layout, finish materials, and accenting on the Project site would create a quality architectural presence along the Massachusetts Avenue and Kansas Avenue frontages.

3.3.5 Landscaping and Fencing

The Project would include approximately 22,240 SF (or 0.51 acres) of ornamental landscaping around the perimeter of the site and in-between parking areas. Landscaping would include 24-inch and 36-inch box trees, 5-gallon shrubs, accents, and groundcover to screen the proposed building, parking, and loading areas from off-site viewpoints as shown in Figure 3-12, *Conceptual Landscape Plan*.

Building 1 would include 6-foot-high metal sliding gates at the two driveways on Roberta Street and at the east and west entrances to the truck court to provide controlled access. Additionally, a 6-foot-high fence (consisting of a 4-foot-high CMU [concrete masonry unit] wall with 2 feet of tubular steel on top) would be installed along the northern property line, a portion of the northwest property line, and along the southern property line where the truck trailer parking is located. Building 1 would also include a 6-foot-high tubular steel fence along the eastern property line.

Building 2 would include 6-foot-high metal sliding gates at the driveway on Massachusetts Avenue, at the northwest entrance to the passenger vehicle parking, and along the eastern entrance to the truck court to

provide controlled access. Additionally, a 6-foot-high fence (consisting of a 4-foot-high CMU wall with 2 feet of tubular steel on top) would be installed along the northern property line along the truck trailer parking, as well as along the western property line and along the southwest and southeast portions of the southern property line. Building 2 would also include a 6-foot-high tubular steel fence along the eastern property line.

Figure 3-13, *Fencing Plan,* illustrates the proposed fencing plan.

3.3.6 Circulation and Parking

The proposed Project would construct five new driveways. Driveway 1 would be a cul-de-sac driveway located to the northeast of the Project site, along Roberta Street, would be 37 feet and 6 inches wide, and provide both passenger vehicle and truck access. Driveway 2 would be located on the northwest of the Project site, along Roberta Street, would be 26-feet-wide, and be limited to passenger vehicles. Driveway 3 would be located along Kansas Avenue (center), would be 50-feet-wide, and provide access to both passenger vehicles and trucks. Driveway 4 would be located to the southwest of the Project site, along Kansas Avenue, would be 26-feet-wide, and be limited to passenger vehicles. Driveway 5 would be located along Massachusetts Avenue, would be 35-feet-wide, and provide both passenger vehicle and truck access. Access to Building 1 would be provided via Driveways 1, 2, and 3. Access to Building 2 would be provided via Driveways 3, 4, and 5. The Project's driveways are shown in Figure 3-14, *Circulation and Driveways*.

Trucks are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3rd Street. Internal access for both buildings would be provided via 26- to 35-foot-wide drive aisles which would double as fire lanes.

Building 1 would include 17 dock doors located along the southern side of the building. Additionally, Building 1 would include 130 passenger vehicle spaces, inclusive of electric vehicle (EV) and accessible (ADA) spaces, for use by employees and visitors in surface lots to the north, south, and east sides of Building 1.

Building 2 would include 22 dock doors located along the northern side of the building. Additionally, Building 2 would include 131 passenger vehicle spaces, inclusive of EV and ADA spaces for use by employees and visitors in surface lots to the north, east, and west sides of Building 2.

Table 3-2 describes the proposed Project's parking breakdown.

Table 3-2: Project Parking Summary

Auto Parking Provided	Building 1	Building 2	Total
Standard Stall (9 ft x18 ft)	100	100	200
Standard Accessible Stall (9 ft x18 ft)	3	4	7
Van Accessible Stall (12 ft x18 ft)	2	1	3
Electric Vehicle Charging Station (9 ft x18 ft)	19	19	38
Electric Vehicle Charging Station Standard Accessible (9 ft x18 ft)	1	1	2
EVSE[1]	4	4	8
Electric Vehicle Charging Station Van Accessible (12 ft x18 ft)	1	1	2
Total	**130**	**130**	**260**

Note: ft = feet
[1]Electric Vehicle Supply Equipment

3.3.7 Infrastructure Improvements

Energy and Communications Utilities

Regulated electrical, gas, and communication utilities would be extended to the site from existing facilities along Kansas Avenue, Roberta Street, and Massachusetts Avenue.

Specifically, the Project would connect to existing overhead electrical utilities located on Kansas Avenue and Roberta Street (along the northeast boundary). The extended electrical utilities would be undergrounded within the sidewalk and/or parkway along Roberta Street (north side) and Kansas Avenue (west side of the project site).

Water

The Project would install new public fire hydrants on Massachusetts Avenue, Kansas Avenue, and Roberta Street to meet maximum spacing requirements, as well as new water service laterals that would connect to the existing 10-inch water line in Massachusetts Avenue.

Sewer

The Project applicant would also install new private sewer lines to connect to the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street.

Drainage

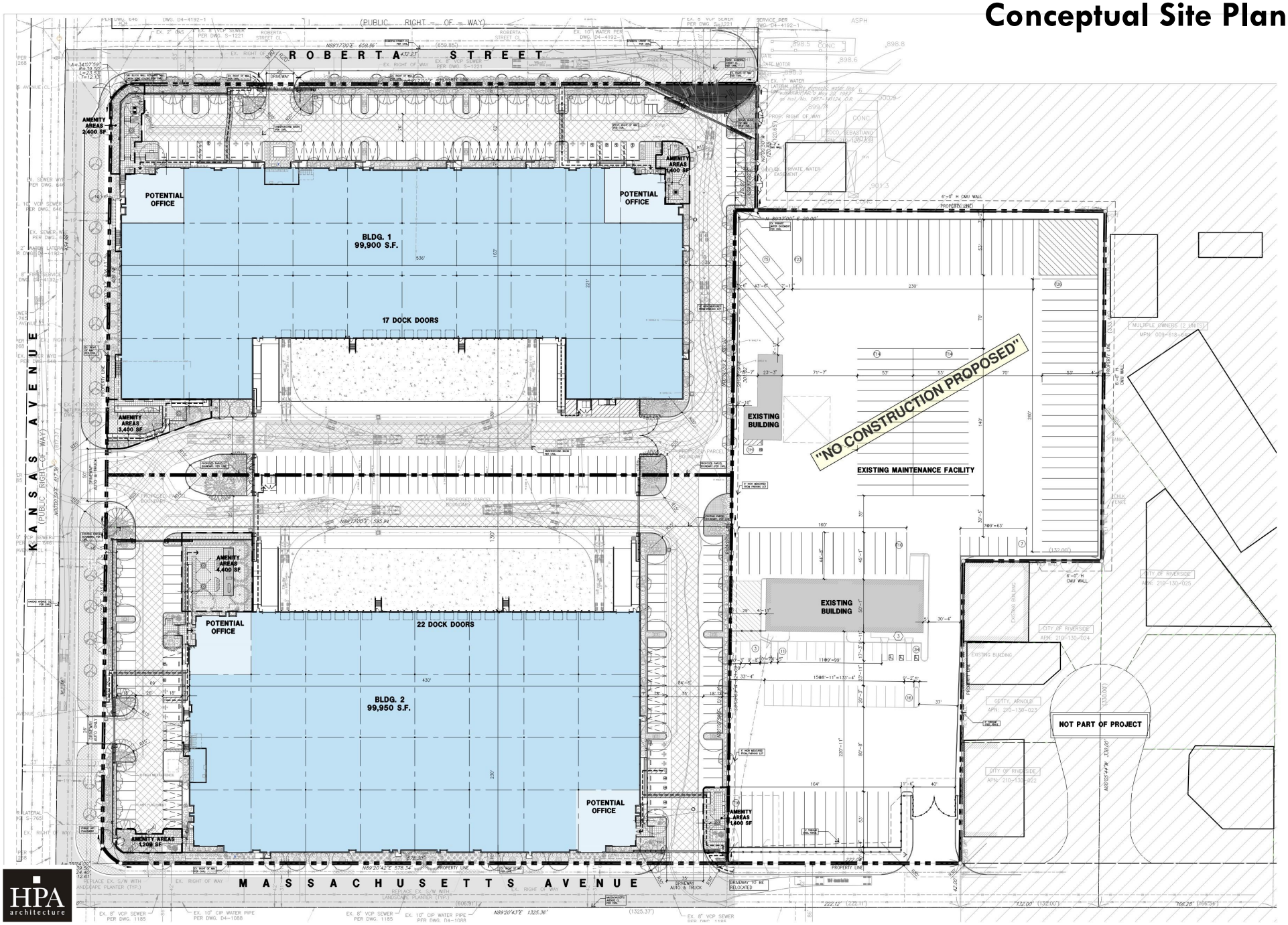
The proposed development would be consistent with the natural drainage pattern of the existing site. The proposed Project would collect drainage via grate inlets and catch basins, which would convey stormwater to an on-site underground storm drain system. The storm drain system would discharge to two proposed on-site, underground detention/infiltration systems. Detention/infiltration System A would be located underneath the passenger drive aisle in the northwest portion of the site and would direct overflow to Roberta Street. Detention/infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic feet per second (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing on-site flows (Appendix F, Page 5). The infiltration systems are sized to capture peak storm events, and any potential overflow will be directed to Kansas Avenue and Roberta Street. The site's storm drainage system would be designed to meet the regional low impact development (LID) structural treatment control best management practices (BMPs).

Street Improvements

The proposed Project would close the existing driveways on Massachusetts Avenue, Kansas Avenue, and Roberta Street, and construct six new driveways: two on Roberta Street, three on Kansas Avenue, and one on Massachusetts Avenue. The proposed northeastern driveway on Roberta Street would be a cul-de-sac driveway. The Project includes a proposed right-of-way dedication for construction of the cul-de-sac driveway.

A minimum of 6-foot-wide sidewalks would be constructed along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Additionally, 24-inch to 48-inch box trees would be planted within the landscaped setbacks on Roberta Street, Kansas Avenue, and Massachusetts Avenue, as shown in Figure 3-11, *Conceptual Landscape Plan*

Conceptual Site Plan



Massachusetts Point Project
City of Riverside

Figure 3-8

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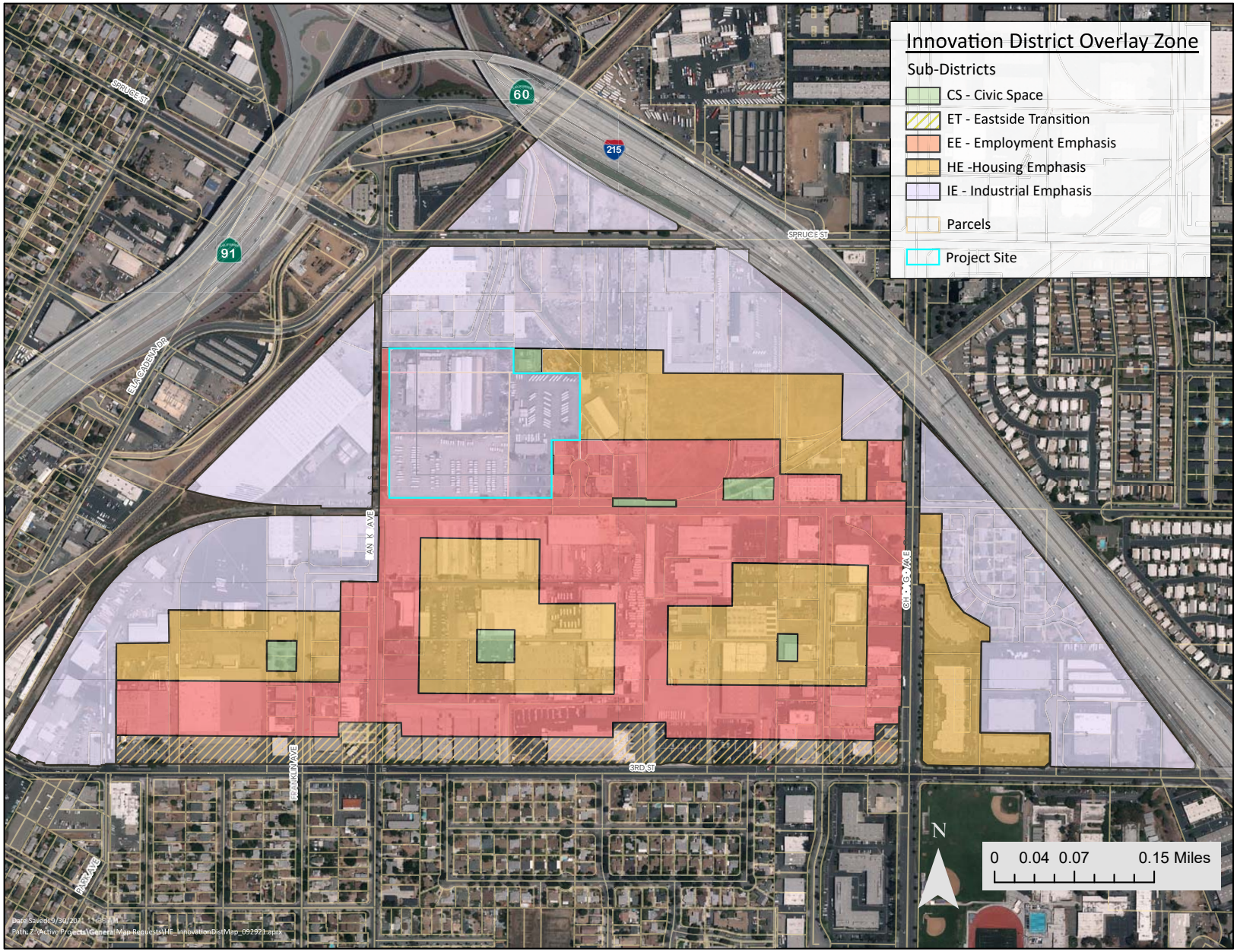
Proposed Innovation District Overlay Zoning Designation



Massachusetts Point Project
City of Riverside

Figure 3-9

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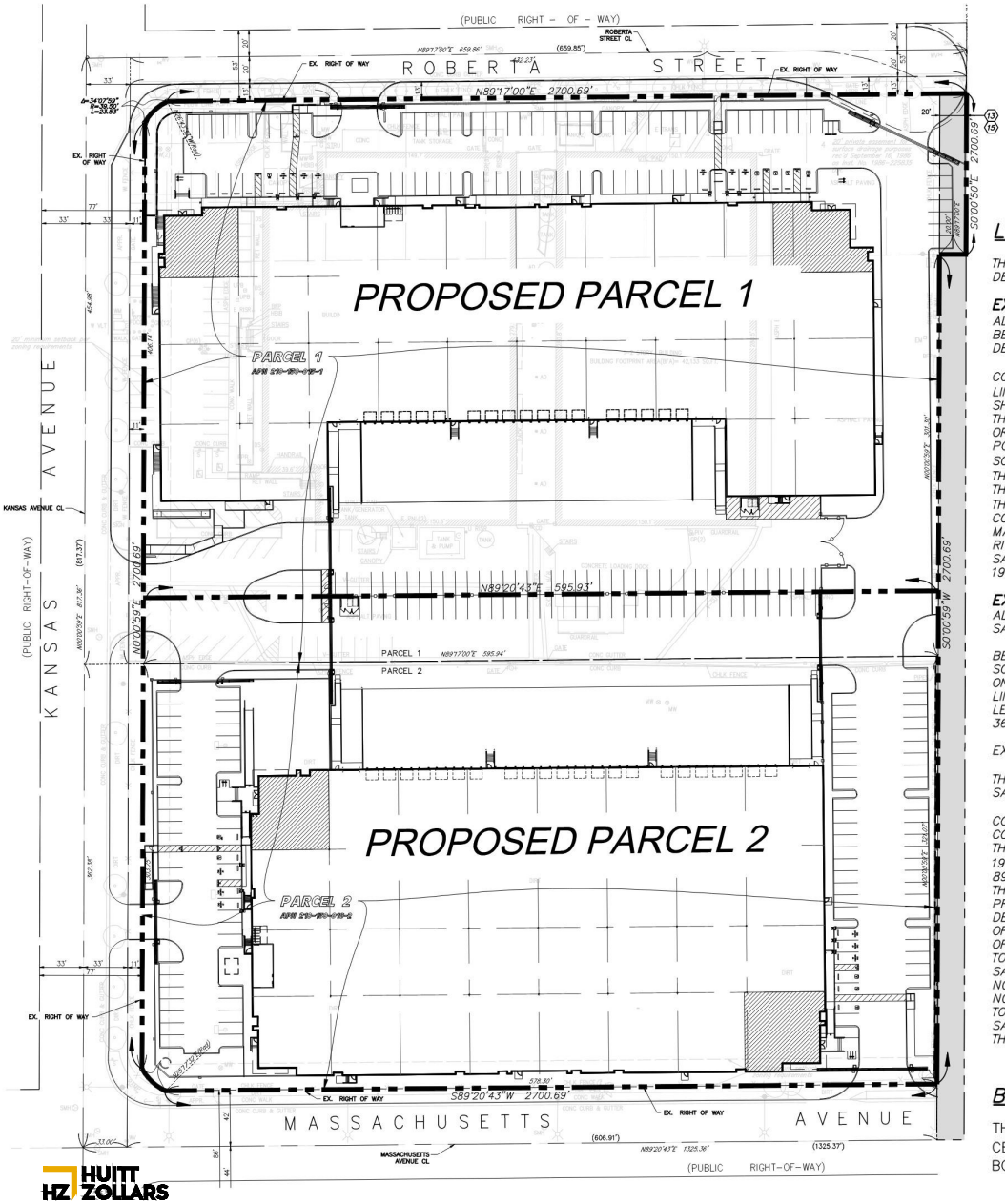
Tentative Parcel Map

TENTATIVE PARCEL MAP NO. 39268

FOR CONDOMINIUM PURPOSES



LEGEND

- BOUNDARY LINE
- EXISTING PROPERTY LINE
- EASEMENT LINE
- COVENANT AND AGREEMENT FOR DRAINAGE AND WATER EASEMENT

PARCEL INFORMATION

PARCEL 1: 253,740 S.F.
PARCEL 2: 191,022 S.F.

GROSS EXISTING PARCEL SIZE: 444,762 S.F. (10.2 AC.)

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF RIVERSIDE, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

EXISTING PARCEL 1:

ALL THAT CERTAIN PORTION OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SECTION 24, TOWNSHIP 2 SOUTH, RANGE 5 WEST, SAN BERNARDINO MERIDIAN, IN THE CITY OF RIVERSIDE, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF, DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF SAID NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SECTION 24; HENCE ALONG THE WESTERLY LINE OF SAID NORTHWEST 1/4 OF THE NORTHEAST 1/4 NORTH 00°00'59" EAST 817.37 FEET TO THE CENTERLINE OF ROBERTA STREET, AS SHOWN BY A MAP OF RECORD OF SURVEY ON FILE IN BOOK 73, PAGE 17 OF THE RECORDS OF SURVEY, RIVERSIDE COUNTY, CALIFORNIA; THENCE ALONG SAID CENTERLINE OF ROBERTA STREET NORTH 89°17'00" EAST 659.86 FEET; THENCE SOUTH 00°00'50" EAST 20.00 FEET, MORE OR LESS, TO THE NORTHEAST CORNER OF LOT 2 OF THE MARIE TRACT, AS SHOWN BY THE ABOVE-MENTIONED RECORD OF SURVEY, SAID POINT BEING THE TRUE POINT OF BEGINNING; THENCE ALONG THE EASTERLY LINE OF SAID LOT 2 SOUTH 00°00'50" EAST 133.65 FEET TO THE SOUTHEAST CORNER THEREOF, SAID SOUTHEAST CORNER BEING THE SOUTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SECTION 24, AS SHOWN BY THE ABOVE-MENTIONED RECORD OF SURVEY; THENCE SOUTH 89°17'00" WEST 20.00 FEET; THENCE SOUTH 00°00'59" WEST 301.32 FEET; THENCE SOUTH 89°17'00" WEST 606.92 FEET, MORE OR LESS, TO A POINT 33 FEET EASTERLY OF THE WESTERLY LINE OF SAID NORTHWEST 1/4 OF THE NORTHWEST 1/4; THENCE NORTH 00°00'59" EAST 434.97 FEET TO THE NORTHWESTERLY CORNER OF LOT 1 OF SAID MARIE TRACT; THENCE NORTH 89°17'00" EAST ALONG THE NORTHERLY LINE OF LOTS 1 AND 4 THROUGH 11 OF SAID MARIE TRACT, 626.85 FEET, MORE OR LESS, TO THE POINT OF BEGINNING. EXCEPTING THEREFROM THAT PORTION GRANTED TO THE CITY OF RIVERSIDE, A MUNICIPAL CORPORATION, BY DEED RECORDED AUGUST 12, 1983, AS INSTRUMENT NO. 1983-164247 OF THE OFFICIAL RECORDS. SAID LEGAL DESCRIPTION IS PURSUANT TO UNRECORDED PARCEL MAP WAIVER 16-834 AS DISCLOSED BY DOCUMENT RECORDED SEPTEMBER 16, 1986, AS INSTRUMENT NO. 1986-225835 OF THE OFFICIAL RECORDS.

EXISTING PARCEL 2:

ALL THAT CERTAIN PORTION OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 24, TOWNSHIP 2 SOUTH, RANGE 5 WEST, SAN BERNARDINO MERIDIAN, IN THE CITY OF RIVERSIDE, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF SAID NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 24; THENCE ALONG THE SOUTHERLY LINE OF SAID NORTHWEST QUARTER OF THE NORTHEAST QUARTER NORTH 9°20'43" EAST, 33.00 FEET, MORE OR LESS, TO A POINT ON THE EASTERLY LINE OF KANSAS AVENUE, SAID POINT BEING THE TRUE POINT OF BEGINNING; THENCE CONTINUING ALONG SAID SOUTHERLY LINE NORTH 89°20'43" EAST, 606.91 FEET; THENCE NORTH 00°00'59" EAST, 363.09 FEET; THENCE SOUTH 89°17'00" WEST, 606.92 FEET, MORE OR LESS, TO A POINT ON THE ABOVE-MENTIONED EASTERLY LINE OF KANSAS AVENUE; THENCE ALONG SAID EASTERLY LINE SOUTH 00°00'59" WEST, 362.43 FEET TO THE POINT OF BEGINNING.

EXCEPTING THEREFROM THAT PORTION LYING WITHIN THE FOLLOWING DESCRIBED PROPERTY:

THAT PORTION OF THE SOUTHERLY 1/2 OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SECTION 24, TOWNSHIP 2 SOUTH, RANGE 5 WEST, SAN BERNARDINO MERIDIAN, DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT IN THE WEST LINE OF SAID SOUTHERLY 1/2, LYING DISTANT THEREON SOUTH 376.32 FEET FROM THE NORTHWEST CORNER THEREOF, SAID POINT ALSO BEING THE INTERSECTION OF THE WEST PROLONGATION OF THE MOST SOUTHERLY LINE OF PARCEL 1 OF THAT CERTAIN PARCEL OF LAND CONVEYED TO THE CITY OF RIVERSIDE BY DEED RECORDED AUGUST 12, 1983, AS INSTRUMENT NO. 1983-164247 OF THE OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, WITH SAID WEST LINE OF SAID NORTHEAST 1/4; THENCE NORTH 89°17'00" EAST ALONG SAID PROLONGATION 33.00 FEET TO THE MOST SOUTHWESTERLY CORNER OF SAID PARCEL 1, SAID CORNER ALSO BEING THE TRUE POINT OF BEGINNING; THENCE SOUTH ALONG THE SOUTH PROLONGATION OF THE WEST LINE OF SAID PARCEL 1, SAID SOUTH PROLONGATION ALSO BEING THE MOST WEST LINE OF PARCEL 2 OF THAT CERTAIN PARCEL OF LAND CONVEYED TO H. K. MARVIN, ET AL., BY DEED RECORDED JULY 03, 1979, AS INSTRUMENT NO. 1979-139180 OF THE OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, A DISTANCE OF 284.00 FEET TO THE MOST SOUTHWESTERLY CORNER OF THE LAST SAID PARCEL 2; THENCE NORTH 89°17'00" EAST ALONG THE SOUTH LINE OF SAID PARCEL 2, A DISTANCE OF 825.00 FEET TO THE MOST SOUTHEASTERLY CORNER THEREOF; THENCE NORTH A DISTANCE OF 42.00 FEET TO A LINE WHICH IS PARALLEL WITH AND DISTANT 42.00 FEET NORTH AS MEASURED AT RIGHT ANGLES FROM THE SOUTH LINE OF THE LAST SAID PARCEL 2; THENCE SOUTH 89°17'00" WEST ALONG SAID PARALLEL LINE A DISTANCE OF 796.37 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE TO THE NORTHEAST, HAVING A RADIUS OF 39.50 FEET. THE INITIAL RADIAL LINE AT SAID BEGINNING BEARS NORTH 25°17'32" EAST; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 35°34'00" AN ARC LENGTH OF 24.52 FEET TO A LINE WHICH IS PARALLEL WITH AND DISTANT 11.00 FEET EAST AS MEASURED AT RIGHT ANGLES FROM THE MOST WEST LINE OF THE LAST SAID PARCEL 2; THENCE NORTH ALONG SAID PARALLEL LINE A DISTANCE OF 225.30 FEET TO THE MOST SOUTH LINE OF AFORESAID PARCEL 1; THENCE SOUTH 89°17'00" WEST ALONG SAID MOST SOUTH LINE A DISTANCE OF 11.00 FEET TO THE TRUE POINT OF BEGINNING.

BASIS OF BEARINGS

THE BEARING SHOWN HEREON ARE BASED ON THE BEARING OF NORTH 0°00' 59" EAST FOR THE CENTERLINE OF KANSAS AVENUE AS SHOWN ON RECORD OF SURVEY, AS PER MAP RECORDED IN BOOK 92, PAGE 22 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF RIVERSIDE COUNTY.

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Building 1 Elevations

Building 1 North Elevation - Roberta Street

Building 1 West Elevation - Kansas Avenue

Building 1 South Elevation

Building 1 East Elevation

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Building 2 Elevations

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Conceptual Landscape Plan

PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Chilopsis linearis Desert Willow	36" Box	12	L	Multi
	Chitalpa tashkentensis Chitalpa	24" Box	20	L	Standard
	Lagerstroemia i 'Muskogee' Crape Myrtle	24" Box	6	M	
	Olea europaea Olive	48" Box	5	L	Multi
	Pinus eldarica Afghan Pine	24" Box	13	L	Standard
	Platanus racemosa California Sycamore	24" Box	3	M	Low Branching
	Quercus agrifolia Coast Live Oak	36" Box	12	M	Multi
	Rhus lancea African Sumac	24" Box	14	L	Standard
	Tristania conferta Brisbane Box	15 Gal	38	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Acca sellowiana Pineapple Guava	5 Gal	0	L	3' OC
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	0	L	3' OC
	Eremophila g. Grey Horizon Emu Bush	5 Gal	0	L	3' OC
	Ligustrum j. Texanum Texas Privet	5 Gal	0	M	3' OC
	Rhaphiolepis i. 'Springtime' Indian Hawthorn	5 Gal	0	L	3' OC
	Rosmarinus o. 'Tuscan Blue' Rosemary	5 Gal	0	L	3' OC
	Salvia greggii Autumn Sage	5 Gal	0	L	3' OC
	Salvia g. 'Lipstick' Autumn Sage	5 Gal	0	L	3' OC
	Salvia leucantha Mexican Sage	5 Gal	0	L	4' OC
	Westringia f. 'Grey Box Dwarf Coast Rosemary	5 Gal	0	L	3' OC

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	
	Agave 'Blue Glow Blue Glow Agave	5 Gal	0	L	3' OC
	Aloe maculata Soap Aloe	5 Gal	0	L	
	Dasylerion wheeleri Desert Spoon	5 Gal	0	L	4' OC
	Hesperaloe parviflora Red Yucca	5 Gal	0	L	3' OC

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	
	Baccharis p. 'Pigeon Point' Dwarf Coyote Bush	1 Gal	6' O.C.	L	
	Bulbine frutiscens Bulbine	1 Gal	24" O.C.	M	
	Gazania 'New Day Mix' New Day Mix Gazania	4" POTS	12" O.C.	M	
	Hemerocallis hybridus-Yellow Yellow Day Lily	1 Gal	24" O.C.	M	24" O.C.
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L	48" O.C.
	Muhlenbergia capillaris Pink Muhly	1 Gal	36" O.C.	L	36" O.C.
	Myoporum parvifolium Myoporum	1 Gal	36" O.C.	L	
	Rosa 'Flower Carpet' -Red Red Flower Carpet Rose	1 Gal	36" O.C.	L	30" O.C.
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	36" O.C.	L	48" O.C.
	Sesleria autumnalis Moor Grass	1 Gal	18" O.C.	M	18" O.C.
	Trachelopspermum jasminiodes Star Jasmine	1 Gal	36" O.C.	M	24" O.C.

N

SCALE: 1" = 40'-0"

0 20' 40' 80'

Massachusetts Point Project
City of Riverside

Figure 3-12

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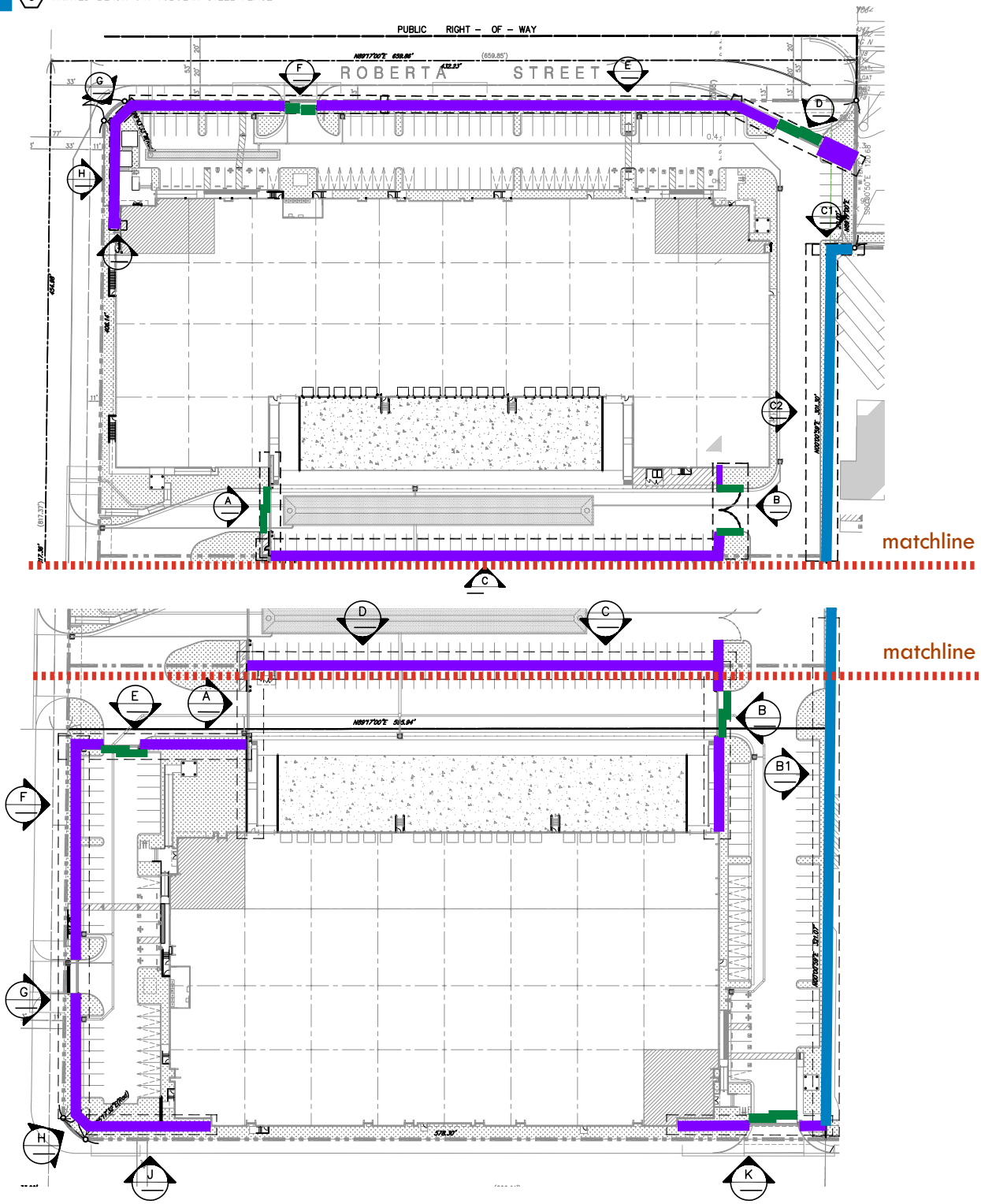
Fencing Plan

KEY NOTES

1. CONCRETE TILT SCREEN WALL
2. PAINTED BLACK 8'H METAL SLIDING GATES
3. PANEL REVEAL
4. PANEL JOINT
5. PAINTED BLACK 8'H TUBULAR STEEL FENCE
6. PAINTED BLACK 6'H TUBULAR STEEL FENCE



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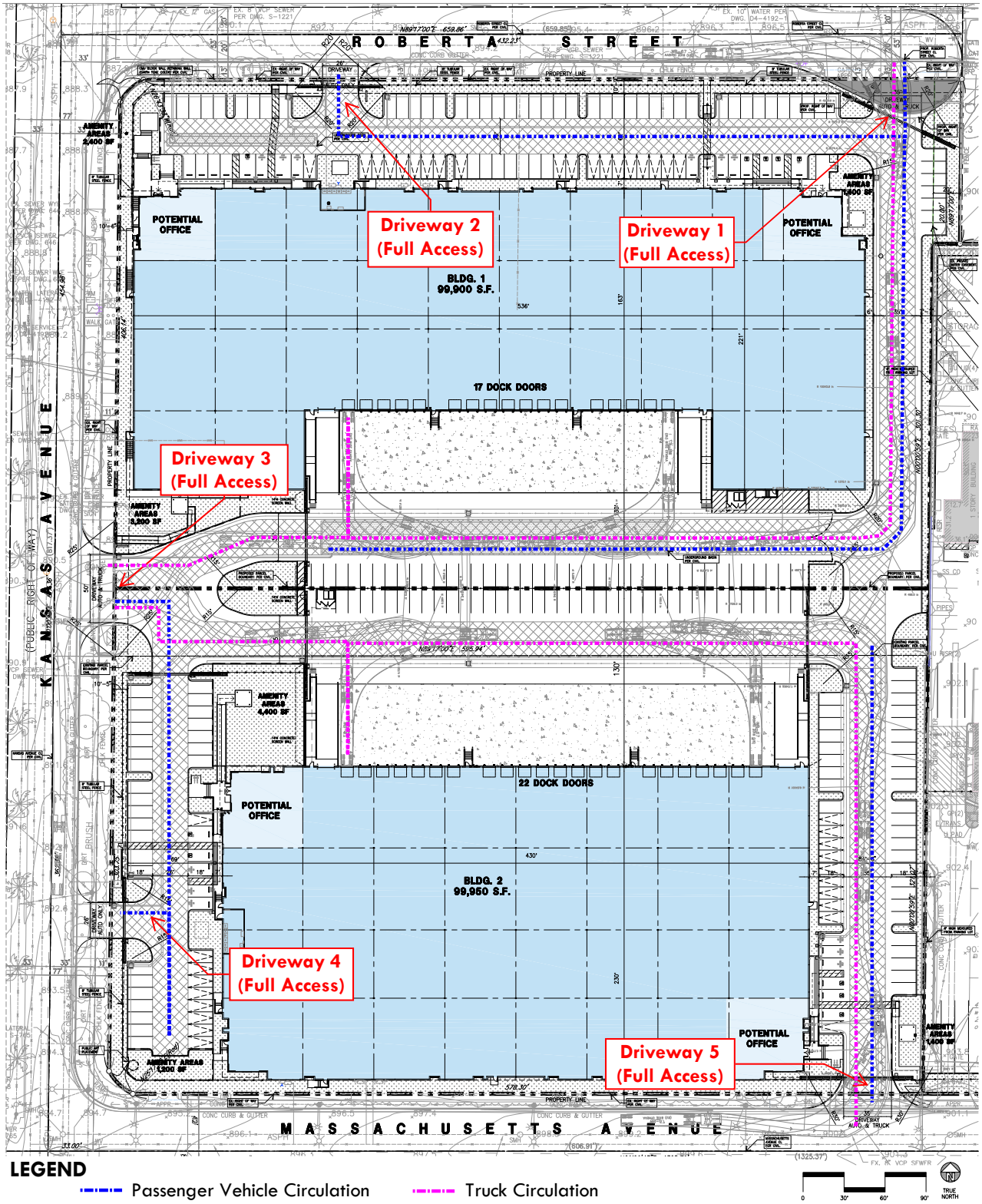
Circulation and Driveways



Massachusetts Point Project
City of Riverside

Figure 3-14

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3.3.8 Construction

Project development is estimated to take approximately 14 months, beginning April 2026 and concluding June 2027. Construction activities for the Project would occur over one phase and include demolition and removal of existing structures, foundations, asphalt/pavement, utilities, and other subsurface improvements; site preparation, which includes clearing any remaining infrastructure, utilities, and trenching for the new utilities and services; grading and excavation; building construction; and landscape installation, paving, and application of architectural coatings. Grading work of soils is expected to result in cut of 15,065 cubic yards (CY) and fill of 24,108 CY of soils for a net import of 9,043 CY. Table 3-3 provides the anticipated construction schedule.

Table 3-3: Construction Schedule

Construction Phase	Timing
Demolition	Approximately 20 workdays
Site Preparation	Approximately 10 workdays
Grading	Approximately 30 workdays
Building Construction	Approximately 300 workdays
Paving	Approximately 20 workdays
Architectural Coating	Approximately 20 workdays

Construction would occur within the hours allowable by the City of Riverside Municipal Code Section 7.35.020, which states that construction shall occur only between the hours of 7:00 AM and 7:00 PM on weekdays and between the hours of 8:00 AM and 5:00 PM on Saturdays. Construction is not permitted on Sundays or any federal holidays. Project construction would comply with RMC Section 7.35.020.

3.3.9 Operations

The Project would be operated as two light industrial warehouses with ancillary office uses and 20 percent cold storage. A light industrial warehouse is used for the storage, receiving, shipping, wholesaling, or manufacturing of goods and merchandise, and any incidental or accessory activities. Buildings 1 and 2 are designed such that business operations would be conducted primarily within the building, with the exception of traffic movement, parking, trailer connection and disconnection, storage, and the loading and unloading of trailers at designated loading bays. The outdoor cargo handling equipment used during loading and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) would be non-diesel powered, in accordance with contemporary industry standards.

Dock doors on Buildings 1 and 2 typically would not be occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies (i.e., trucks dock closest to where the goods carried by the truck are stored inside the warehouse). As a result, many dock door positions are frequently inactive throughout the day. Pursuant to State law and regulation, on-road diesel-fueled trucks are required to comply with air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions (South Coast Air Quality Management District, 2024).

For purposes of evaluation in this Draft EIR, the proposed development is assumed to be operational 24 hours a day, 7 days a week, with exterior loading and parking areas illuminated at night. Lighting would

be subject to and would comply with RMC Section 19.556, which states that all outdoor lighting shall be directed and shielded so that no direct light extends onto neighboring properties.

3.4 GOVERNING DOCUMENTS AND INTENDED USES OF THE EIR

Development and operation of the Project will be governed by applicable State, federal, and local regulations including the following:

- The City of Riverside General Plan, as amended, establishes policies governing land use, circulation, housing, noise, and safety throughout the City.
- The City of Riverside Municipal Code (RMC); which establishes permitted uses within different zoning designations and development standards for the various zones throughout the City.

This EIR is intended to serve as the primary environmental document for all actions associated with the proposed Project, including all discretionary approvals requested or required to implement the Project. In addition, this EIR is the primary reference document in the formulation and implementation of a Mitigation Monitoring and Reporting Program for the proposed Project.

This EIR examines the potential environmental impacts of the proposed Project and will be considered by the City and others in adopting and implementing the Project. The function of the EIR is to enable the City of Riverside, other responsible agencies, and interested parties to evaluate the environmental impacts of the proposed Project and make informed decisions with respect to the requested entitlements.

3.5 DISCRETIONARY APPROVALS AND PERMITS

The City of Riverside is expected to use the information contained in this EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

- Zoning Code (Map/Text) Amendment
- Development Agreement
- Tentative Parcel Map
- Design Review
- Certification of the Environmental Impact Report
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.
- In addition, the Project is subject to review and approval by the Riverside Airport Land Use Commission (ALUC) for the Zoning Code Map and text amendments.

3.6 REFERENCES

City of Riverside. (July 1, 2021a). *Land Use Policy Map*. Retrieved December 2, 2024, from https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Maps/General%20Plan%20Map.pdf

City of Riverside. (July 1, 2021b). *Zoning*. Retrieved December 2, 2024, from https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2021/Maps/Zoning%20Plan%20Map.pdf

South Coast Air Quality Management District. (2024). *Regulations & Other Commitments*. Retrieved December 2, 2024, from https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/regs-commitments

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4. Environmental Setting

The purpose of this section is to provide a description of the environmental setting of the Project site and surrounding area as it existed at the time of the Notice of Preparation (NOP) was published, from both a local and regional perspective. In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

4.1 PHYSICAL ENVIRONMENTAL CONDITIONS

CEQA Guidelines Section 15125(a)(1) states that the physical environmental condition in the vicinity of the Project as it existed at the time the EIR's NOP was released for public review normally be used as the comparative baseline for the EIR. The NOP for this EIR was released for public review on December 12, 2024 The following pages include a description of the physical environmental conditions ("existing conditions") on a regional and local basis at the approximate time the NOP was released. More information regarding the Project site's environmental setting is provided in the specific subsections of EIR Section 5, *Environmental Impact Analysis*.

4.1.1 Aesthetics

Scenic Vistas

The Project site is currently developed with a commercial/industrial business and a bus storage yard. The site is flat and includes ornamental landscaping that consists of trees and shrubbery along the perimeters of all three parcels.

The Project site is bordered by Roberta Street followed by industrial and manufacturing uses and a former single family residence to the north, a homeless shelter and services building and a manufacturing use to the east, Massachusetts Avenue followed by industrial (manufacturing) warehouses to the south, and Kansas Avenue followed by a recycling center to the west.

State Scenic Highway

The General Plan 2025 Program Environmental Impact Report (GP PEIR) describes that the hills and ridgelines that surround the City provide scenic vistas to residents of Riverside where they can experience long distance views of natural terrain. The GP PEIR lists the following scenic vistas as most notable: the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. Additionally, the Santa Ana River watercourse and riverbed, which extends along the City's northern edge, is an important scenic resource within the City.

Visual Character of Project Site and Surrounding Area

The Project site is currently developed with a commercial/industrial business and a bus storage yard. The site is flat and includes ornamental landscaping that consists of trees and shrubbery along the perimeters of all three parcels.

The Project site is bordered by Roberta Street followed by industrial and manufacturing uses and a former single family residence to the north, a homeless shelter and services building and a manufacturing use to the east, Massachusetts Avenue followed by industrial (manufacturing) warehouses to the south, and Kansas Avenue followed by a recycling center to the west.

Scenic Highways

There are no officially State designated scenic roads or highway corridors within or adjacent to the Project site (Caltrans, 2018). Further, there are no officially designated State scenic highways or any eligible State scenic highways that traverse the City (Caltrans, 2018). The closest eligible State scenic highway to the Project site is Interstate 15 (I-15), which is located approximately 13.2 miles southwest.

Light and Glare

Contributors to nighttime ambient light levels within the City include both stationary and mobile sources. Stationary sources of nighttime light within the City include exterior structure illumination, light spillover from interior lighting, lighting for outdoor uses such as sports fields and courts, parking lot lighting, streetlights, and illuminated signage such as billboards. The main source of mobile nighttime light is from vehicle headlights.

The Project site is currently developed with a commercial/industrial business and a bus storage yard. Nighttime lighting in the Project vicinity is currently limited to the existing industrial uses surrounding the site. Lighting and glare is generated by vehicles travelling along Kansas Avenue, Massachusetts Avenue, Roberta Street, and from vehicles moving in and out of the Project site. The light and glare receptors in the Project vicinity include motorists traveling on local streets.

4.1.2 Agriculture and Forestry Resources

The Project site is currently developed with industrial uses. The Project site is not currently used for agricultural production and there is no forest land on the site or in the immediate vicinity. The Project site has a General Plan Land Use designation of Industrial (I) and is zoned General Industrial. Additionally, the Project site is designated as Urban and Built Up Land by the FMMP (California Department of Conservation, 2022).

4.1.3 Air Quality

The South Coast Air Quality Management District (SCAQMD) maintains monitoring stations within district boundaries, called Source Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. The Project site is located within Source Receptor Area (SRA) 23, Metropolitan Riverside. The closest monitoring station for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), and particulate matter (PM_{10} and $PM_{2.5}$) is the SCAQMD Riverside County 1 Rubidoux station (within SRA 23), which is located approximately 3.4 miles northwest of the Project site. This station was identified as the closest monitoring station that would be most applicable to the City of Riverside air quality conditions.

The most recent three years of data available is included in Table 5.3-2, *Air Quality Monitoring Summary 2021-2023*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables. Data for SO_2 has been omitted as attainment is regularly met in the Basin and few monitoring stations measure SO_2 concentrations.

As indicated in the monitoring results included in Table 5.3-2, the 1-hour ozone State standard was exceeded 20 times in 2021, 30 times in 2022, and 48 times in 2023. The 8-hour ozone federal standard was exceeded 55 times in 2021, 70 times in 2022, and 69 times in 2023. The 8-hour ozone State standard was exceeded 57 times in 2021, 72 times in 2022, and 70 times in 2023. The federal PM_{10} standard had no exceedances in 2021, 1 exceedance in 2022, and 1 exceedance in 2023. The State PM_{10} standard was exceeded 16 times in 2021, 55 times in 2022, and 43 times in 2023. The $PM_{2.5}$ federal standard had 10 exceedances in

2021, 1 exceedance in 2022, and 1 exceedance in 2023. In addition, the CO, SO_2, and NO_2 standards were not exceeded in this area during the 3-year period.

The Project site encompasses approximately 14.42 acres. The 10.21-acre portion of the Project site proposed for redevelopment is currently developed with two industrial buildings. Criteria pollutants are currently generated by the operation of existing industrial buildings and related vehicle and truck trips.

4.1.4 Biological Resources

The Project site is located within The Cities of Riverside and Norco Multiple Species Habitat Conservation Plan (MSHCP) Area Plan but is not located within a Criteria Cell or Cell Group. The Project site is not located within any plan-defined areas requiring surveys for amphibian species, burrowing owl, criteria area species, mammalian species, narrow endemic plant species, criteria species, or invertebrate species.

Vegetation Communities and Land Covers

Due to the developed condition of the site, no native plant communities or natural communities of special concern were observed on or adjacent to the Project site. The Project site consists of two land cover types: disturbed and developed.

Topography and Soils

The Project site is located at an approximate elevation of 890 to 901 feet above mean seal level. According to the Habitat Assessment, the Project site is underlain by Arlington fine sandy loam, deep (2 to 8 percent slopes). Soils on the Project site have been heavily disturbed by prior site development.

Special-Status Plant Species

According to the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS), 13 special-status plant species have been recorded in the Riverside East quadrangle. No special-status plant species were observed on the Project site during the field investigation conducted as part of the Habitat Assessment. Due to the disturbed and developed nature of the site, the Project site does not support suitable habitat for special-status plant species and they are presumed to be absent (Appendix D).

Special-Status Wildlife Species

According to the CNDDB, 69 special-status wildlife species have been reported in the Riverside East quadrangle. No special-status wildlife species were observed on the Project site during the field investigation conducted as part of the Habitat Assessment. Due to the disturbed and developed nature of the site, the Project site does not support suitable habitat for special-status wildlife species and they are presumed to be absent (Appendix B).

Special Status Plant Communities

According to the CNDDB, one special-status plant community has been reported in the Riverside East quadrangle. Southern Sycamore Alder Riparian Woodland is listed as a CDFW Sensitive Habitat and has the potential to occur within the Riverside East Quadrangle. However, Southern Sycamore Alder Riparian Woodland habitat was not observed on the Project site during the field investigation and is presumed to be absent from the site. No other special-status plant communities were observed on-site during the field investigation conducted as part of the Habitat Assessment (Appendix D).

Jurisdictional Waters and Wetlands

The Project site consists of disturbed and developed areas. The Habitat Assessment details that the Project site does not contain any streams or drainages or riparian habitat. There are no CDFW, United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) jurisdictional waters. Further, the Project site does not contain any wetlands or vernal pools.

Wildlife Movement

Wildlife movement corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species present. Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and shelter. Animals use these corridors, which are often hillsides or riparian areas, to move between different habitats. Regional corridors provide these functions and link two or more large habitat areas. They provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations.

The Project site is not located within a designated wildlife corridor or linkage. The Project area was evaluated for its function as a wildlife corridor that species use to move between wildlife habitat zones. The Project site consists of flat, disturbed land characterized by disturbed and developed land cover. The Project site is surrounded by urban development. No wildlife movement corridors were found to be present on or adjacent to the Project site.

4.1.5 Cultural Resources

Historical Resources

The Historical/Archaeological Resources Survey Report prepared for the Project site (Appendix E) describes that the first settlers and agricultural fields occurred within the general Project vicinity in the late 1870s. At this time, a few roads and the Riverside Upper Canal were being constructed. Twenty years later, these early roads were replaced by a regular grid of roads, including the forerunners of the present-day Kansas Avenue and Massachusetts Avenue. The entire Project site remained vacant at that time.

For the first four decades of the 20th century, most of the land around the Project site was being used for the cultivation of citrus fruits. Five buildings had appeared within the Project site during this period; however, none of the buildings were of industrial scale. Archival records of the City of Riverside indicate that the present-day New Basis, Inc. buildings at 2626 Kansas Avenue were constructed between 1946 and 1949 for the Colonial Radio Corporation and the Revere Copper and Brass Company, respectively, while the Student Transportation of America buildings on 1989 Massachusetts Avenue were constructed in 1986. The rest of the area surrounding the Project site remained mostly under citrus cultivation for at least a decade after the completion of the buildings at 2626 Kansas Avenue. All traces of the surrounding citrus groves gradually disappeared from the area between 1959 and 1978.

In 1946, the Colonial Radio Corporation expanded its wartime production to the newly completed warehouse constructed at present day 2626 Kansas Avenue. The building was sold to another East Coast manufacturer, the Revere Copper and Brass Company, shortly after due to the ending of World War II. In 1949, the Revere Copper and Brass Company constructed the second building on the property. The Revere Copper and Brass Company occupied the buildings at 2626 Kansas Avenue for 13 years. In 1964, Bridgeport Brass made a number of alterations to the two buildings occupying the site. By at least 1983 and possibly as early as 1970, Associated Plastics, Inc., had become the occupant at this address. In 2000,

the company was integrated with Associated Concrete Products under the name New Basis, Inc., which remains in operation on the site today.

Archaeological Resources

The Historical/Archaeological Resources Survey Report (Appendix E) prepared for the Project site describes that the earliest evidence of human occupation in western Riverside County occurred in the northern portion of the Lakeview Mountains approximately 9,500 years before present and near the shoreline of Lake Elsinore, close to the confluence of Temescal Wash and the San Jacinto River, between 8,000 and 9,000 before present. Additional sites with isolated Archaic dart points, bifaces, and other associated lithic artifacts from the same age range have been found in the nearby Cajon Pass area of San Bernardino County, typically atop knolls with good viewsheds.

The Project region was historically situated between the overlapping Native American territories of the Serrano of the San Bernardino Mountains, the Luiseño of the Perris-Elsinore region, and the Gabrielino of the San Gabriel Valley, and later the Cahuilla (Appendix E).

The Historical/Archaeological Resources Survey Report included a records search of the Eastern Information Center (EIC) for the Project which identified 120 previously recorded cultural resources within a half-mile radius of the Project site. All but three of the 120 known resources were buildings from the historic period, and the other three represented the Riverside Upper Canal, the Riverside Lower Canal, and a segment of the Southern Pacific Railroad (Appendix E). None of the previously recorded resources are located within the Project site.

Additionally, the EIC records search identified 20 previous studies conducted within one-half mile Project site One of the 20 previous studies, completed in 2003 for the Hunter Park Redevelopment Plan, overlaps the Project site (Appendix C). The 2003 study covered a total of 2,625 acres and inventoried previously identified cultural resources and included an overall archaeological sensitivity assessment. The 2003 study did not include a field survey of the entire 2,625 acre study area and did not include a field survey of the current Project site area. The results of the 2003 study suggest that the current Project site is relatively low in sensitivity for archaeological resources of either prehistoric or historical origin (Appendix E).

4.1.6 Energy

Energy

Riverside Public Utilities (RPU) RPU provides electric power to more than 300,000 customers within its 82 square-mile service area (Riverside Public Utilities, 2025). RPU purchases a mix of renewable sources (solar, wind, hydro, etc.) as well as non-renewable sources (coal, natural gas, nuclear, etc.). The Power Content Label (City of Riverside Public Utilities, 2023) states that the power mix for RPU as of 2023 is as follows:

- Non-Renewable Sources (53.6%)
- Eligible renewable (46.4%)

The Project site is currently served by electricity distribution systems that exist along Kansas Avenue and Massachusetts Avenue roadways adjacent to the Project site.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an

annual rate of 2 percent from 2024 to 2040 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and fuel substitution (Southern California Gas Company, et. al., 2024). The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada. SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2035.

The Project is within the service area of SoCal Gas.

4.1.7 Geology and Soils

The City of Riverside generally lies within the northern end of the Peninsular Ranges, approximately 12 miles south of the intersection with the Transverse Range (City of Riverside, 2007a). The Santa Ana Mountains are approximately 15 miles south and southwest of the City, while the San Jacinto Mountains are approximately 10 miles east and northeast of the City of Riverside. The San Bernardino Mountains are about 20 miles north of the City.

The bedrock geology that dominates this region consists of granite, mesozoic granite rock, and alluvium. Most are dated from the Mesozoic period, except for the alluvium, which is dated from the Quaternary.

Faults and Ground Shaking

An active fault is one that has ruptured in the last 11,000 years and is currently under stress whereas an inactive fault has not ruptured in the recent past and is under little or no stress (California Department of Conservation, 2025a; California Department of Conservation, 2025b). The Project site is not within an Alquist-Priolo Earthquake Fault Zone, nor is it within a Riverside County fault zone (Appendix F). According to the Geotechnical Investigation for the Project site prepared by Southern California Geotechnical (included as Appendix F), there is no evidence of faulting on the Project site, therefore the possibility of ground rupture on-site is low. The nearest active fault zones are the San Jacinto Fault Zone, located approximately 6 miles northeast of the Project site, and the Elsinore Fault Zone, located approximately 17 miles southwest of the Project site (California Department of Conservation, 2021). However, both of these faults, as well as other faults in the Southern California region could cause moderate to intense ground shaking at the Project site.

Ground Rupture

Ground rupture occurs when movement on a fault breaks through to the surface (United States Geological Survey, 2024). Surface rupture usually occurs along pre-existing fault traces where zones of weakness exist. The State has established Earthquake Fault Zones for the purpose of mitigating the hazard of fault rupture by prohibiting the location of most human occupancy structures across the traces of active faults. Earthquake fault zones are regulatory zones that encompass surface traces of active faults with a potential for future surface fault rupture. The nearest Earthquake Fault Zone is the San Jacinto Fault Zone. As described above, there are no fault zones within the vicinity of the Project site. Therefore, ground rupture potential is considered to be low at the Project site.

Soils

The Geotechnical Investigation describes that artificial fill, and native alluvium were encountered at the ground surface of all boring locations (shown in Appendix A of the Geotechnical Investigation). The artificial fill extends to depths of approximately 2.5 to 8.5 feet below existing site grades and generally consists of loose to medium dense silty fine sands and silty sands with trace amounts of medium to coarse sands and fine gravel. Native alluvium was encountered beneath the fill soil at all boring locations, extending at least

to the maximum depth explored of 25 feet below ground surface (bgs). The alluvium generally consists of loose to dense fine to medium sands, fine to coarse sands, silty sands, and fine sandy silts with varying sand and fine gravel content (Appendix F).

Expansive Soils

Expansive soils are soils containing water-absorbing minerals that expand as they take in water. These soils can damage buildings due to the force they exert as they expand. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture. The Geotechnical Investigation describes that the near-surface Project site soils consist of silty sands, sands, and sandy silts. The Geotechnical Investigation explains and concludes that these soils are classified as non-expansive (Appendix F).

Groundwater

The Geotechnical Investigation describes that the static groundwater table exists at a depth greater than 25 feet or more bgs. Groundwater was not encountered during the drilling of any of the borings and is not expected to be encountered during grading activities (Appendix F). Additionally, according to data obtained from the California State Water Resources Control Board, several monitoring wells on record are located on the Project site and indicate high groundwater levels ranging from 116 to 129 feet bgs as of 2017 (Appendix F).

Liquefaction, Lateral Spreading, and Settlement

Liquefaction occurs when vibrations or water pressure within a mass of soil cause the soil particles to lose contact with one another. As a result, the soil behaves like a liquid, has an inability to support weight, and can flow down very gentle slopes. This condition is usually temporary and is most often caused by an earthquake vibrating water-saturated fill or unconsolidated soil. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet bgs. Clayey (cohesive) soils or soils which possess clay particles in excess of 20 percent are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table.

Different phenomena associated with liquefaction are described below (United States Geological Survey, n.d.):

Lateral Spreading

Lateral spreading is the lateral movement of stiff, surficial blocks of sediments as a result of a subsurface layer liquefying. The lateral movements can cause ground fissures or extensional, open cracks at the surface as the blocks move toward a slope face, such as a stream bank or in the direction of a gentle slope. When the shaking stops, these isolated blocks of sediments come to rest in a place different from their original location and may be tilted.

Ground Oscillation

Ground oscillation occurs when liquefaction occurs at depth but the slopes are too gentle to permit lateral displacement. In this case, individual blocks may separate and oscillate on a liquefied layer. Sand boils and fissures are often associated with this phenomenon.

Bearing Strength Loss

Bearing strength is the maximum stress load, or force, that the soil can support. Bearing strength decreases with a decrease in effective stress, which is the force that allows soil to remain cohesive. Loss of bearing strength occurs when the effective stresses are reduced due to the fluctuating stresses or strains caused by an earthquake. Even if the soil does not liquefy, the bearing of the soil may be reduced below its value either prior to or after the earthquake. If the bearing strength is sufficiently reduced, structures supported on the sediments can settle, tilt, or even float upward in the case of lightly loaded structures such as gas pipelines.

Ground Fissuring and Sand Boils

A ground fissure is a long narrow crack in the earth's surface while a sand boil is an eruption of water from sand. As apparent from the above descriptions, the likelihood of ground fissures developing is high when lateral spreading, ground oscillations, and flow failure occur. Sand boils occur when the high water pressures are relieved by drainage to the surface along weak spots that may have been created by fissuring. As the water flows to the surface, it can carry sediments, and if the pore water pressures are high enough create a gusher (sand boils) at the point of exit. The following conditions are conducive to the formation of these phenomena:

- Sediments must be relatively young in age and must not have developed large amounts of cementation;
- Sediments must consist mainly of cohesionless sands and silts;
- The sediment must not have a high relative density;
- Free groundwater must exist in the sediment; and
- The site must be exposed to seismic events of a magnitude large enough to induce straining of soil particles.

During the Geotechnical Investigation, groundwater was not encountered during any of the borings. According to the *Riverside County Land Information Service Map My County* (Riverside County, n.d.), the Project site is located within a zone of low liquefaction susceptibility. In addition, the Geotechnical Investigation describes that the subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction (Appendix F).

Subsidence

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement, and occurs in areas with subterranean oil, gas, or groundwater. Effects of subsidence include fissures, sinkholes, depressions, and disruption of surface drainage. The Geotechnical Investigation estimates that removal and recompaction of the artificial fill and near-surface native soils is estimated to result in an average shrinkage of 7 to 16 percent. Minor ground subsidence of 0.1 feet is estimated to occur in the soils below the zone of removal, due to settlement and machinery working (Appendix F).

Landslides

Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. Earthquake-induced land sliding often occurs in areas where previous landslides have moved and in areas where the topographic, geologic, geotechnical, and subsurface groundwater conditions are conducive to permanent ground displacements. As shown in Figure 5.6-1, *Areas Underlain by Steep Slope*, of the City of Riverside General Plan 2025 Program Environmental Impact Report (GP PEIR), the site is within the 0-10 percent slope category. The Project site has an elevation of 904 feet above mean sea level (AMSL) at the southeast corner to

approximately 889 feet AMSL at the northwest corner. There are no slopes within the immediate vicinity of the Project site.

Paleontological Resources

Paleontological resources include fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth. Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

The GP PEIR Section 5-5, *Cultural Resources*, identifies two areas within the General Plan planning area that are considered places of paleontological importance, along the banks of the Santa Ana River (near the historic Campbell's Sand Pit) and Mockingbird Canyon Reservoir. The Project site is over 5 miles away from both of these areas. The Project site was previously disturbed from grading activities for original development of the site in 1946 and 1949 and to construct the present day warehouses occupied by New Basics, Inc.

4.1.8 Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, SF_6 is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF_6, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO_2. Therefore, an emission of one metric ton (MT) of SF_6 could be reported as an emission of 22,800 MT of CO_2e. Large emission sources are reported in million metric tons (MMT) of CO_2e.

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2021 GHG inventory data (i.e., the latest year for which data are available), California emitted 381.3 million metric tons of CO_2e in the year ($MMTCO_2e/yr$).

The proposed Project is located within the South Coast Air Basin (SCAB), which incorporates all of Orange County, and parts of Los Angeles, Riverside, and San Bernardino Counties. The City of Riverside and the SCAB are under the jurisdiction of the SCAQMD.

The 14.42-acre Project site is currently developed with commercial/industrial uses that are comprised of two structures on 2626 Kansas Avenue, one lot used for bus parking and storage on 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings on 1989 Massachusetts Avenue. GHG emissions are currently generated by the existing uses and the related vehicle trips. According to the *Air Quality, GHG, and Energy Impact Analysis* prepared for the Project, the existing emissions at the Project site are 1,785 $MTCO_2e$ (Appendix B).

4.1.9 Hazards and Hazardous Materials

Environmental Site Conditions

Chlorinated Volatile Organic Compounds (VOCs). The Site was historically used for trucking and transportation, plastics manufacturing, and copper and brass manufacturing since at least 1946. The Phase I ESA found that Environmental Site investigations related to VOCs were first conducted at the site in 2013. There are known subsurface impacts at the site, and soil vapor is currently being remediated through Soil Vapor Extraction (SVE). Soil vapor and groundwater investigations are ongoing under the regulatory oversight of the Santa Ana Regional Water Quality Control Board (SARWQCB).

Elevated concentrations of trichloroethene (TCE) have been detected in shallow soil vapor on the northwest portion of the 2626 Kansas Avenue parcel, which are attributed to the early copper and brass manufacturing operations. Similarly, tetrachloroethene (PCE) and TCE have also been detected in southcentral and southeast exterior areas on the 2626 Kansas Avenue parcel at elevated concentrations in soil vapor that may also be indicative of a minor historical release in one or both areas. 1,1-Dichloroethene (1,1-DCE) has also been routinely detected in groundwater monitoring wells on the northwest portion of the 2626 Kansas Avenue parcel, which has been attributed to a hydraulically upgradient off-site source.

PCE and TCE have historically been detected on 2069 Massachusetts Avenue and 1989 Massachusetts Avenue, with the highest concentrations in deep soil vapor. PCE and TCE have also been detected in groundwater underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue. Soil vapor and groundwater PCE and TCE detected underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue is attributed to off-site sources on the adjoining 3016 Kansas Avenue property, where a significant use of chlorinated solvents is documented to have occurred associated with historical aluminum manufacturing operations conducted since the 1940s.

The presence of subsurface chlorinated VOCs at the site is above current regulatory screening thresholds and is considered a recognized environmental condition (REC), however these impacts are not adversely affecting current commercial/industrial operations. Indoor air sampling results indicate that the VOCs in the underlying soil vapor do not present a risk of soil vapor intrusion.

Historical Recognized Environmental Conditions

Underground Storage Tank (UST) Closures in 1996. Three underground storage tanks (USTs) that consisted of one 10,000-gallon diesel fuel (UST), one 5,000-gallon gasoline UST, and one 500-gallon SC1143 3 November 2024 "motor oil drain" (waste oil) UST, were installed by a prior tenant in 1986 at 1989 Massachusetts Avenue. These USTs were removed and disposed of offsite in 1996. Following soil sampling, the County of Riverside Department of Environmental Health (DEH) issued a letter stating that "no significant contamination exists and…no further site mitigation will be required." Due to the regulatory closure, the USTs removed in 1996 are considered an Historical Recognized Environmental Condition (HREC).

UST Closures in 2001. Two USTs that consisted of one 12,000-gallon gasoline UST and one 20,000-gallon diesel UST were installed at 1989 Massachusetts Avenue in 1997. These USTs were removed and disposed of offsite in 2001. During removal operations, soil was over-excavated to an approximate depth of 15 feet. Following confirmatory sampling, DEH issued a letter stating that no further assessment or remediation was required. In March 2008, DEH Hazardous Materials Management Division (HMMD) issued a letter of closure. Due to the regulatory closure, the USTs removed in 2001 are considered an HREC.

Other Environmental Conditions

Per- and Polyfluoroalkyl Substances (PFAS) Database Listing

The 2626 Kansas Avenue parcel was identified on the Per- and Polyfluoroalkyl Substances (PFAS) Enforcement and Compliance History Online (ECHO) database made available by the United States Environmental Protection Agency (USEPA). The ECHO database identifies industries that may handle PFAS based on an industry sector classification code. Inclusion in this database does not indicate that PFAS are or were historically manufactured, processed, used, or released by the facility. Listed facilities are included in the database based on their industrial profile but are unconfirmed by the USEPA as having used PFAS on-site. No evidence of the use or release of PFAS compounds was identified as part of the Phase I ESA. Furthernmore, the site and surrounding properties are not listed on the GeoTracker PFAS map. Therefore, this finding is not a REC but rather an additional finding.

Wildland Fire Zone

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Maps, the City is not located in an area of high fire threat (CAL FIRE, 2023a).

According to the City of Riverside Local Hazards Mitigation Plan, the threat of wildland fires exists in the City in areas where the urban and suburban developments are adjacent to expanses of wildland areas; Specifically, this type of interface can be found in the City in the areas of UCR, Sycamore Canyon/Canyon Crest, Norco 32 Hills, and the regional nature parks (City of Riverside, 2023). As described above, the Project site is entirely developed/urbanized and surrounded by developed land and existing roads. As shown on Figure 4.4.6, *Fire Hazard Map*, of the City's Local Hazards Mitigation Plan, included as Figure 5.9-2, *City of Riverside Fire Wildlands Risk,* of this document, the Project site is not located in a fire wildlands risk area.

Evacuation Routes

The City of Riverside General Plan does not identify evacuation routes in the City. According to the City of Riverside General Plan 2021-2029 Public Safey Element, Programs and Action Items address identification and planning of evacuation routes, development of evacuation and shelter-in-place plans in coordination with CalFire and other local and regional jurisdictions, and verification of compliance of private/public road emergency access routes to requirements of CCR Sections 1273 and 1274 (SRA/VHFHSZ Fire Safe Regulations).

4.1.10 Hydrology and Water Quality

Regional Hydrology

The City of Riverside is located within the Santa Ana Region (RWQCB Region 8). The Santa Ana Region encompasses approximately 2800 square miles and is located in Southern California, roughly between Los Angeles and San Diego. The Santa Ana Region covers parts of southwestern San Bernardino County, western Riverside County, and northwestern Orange County. It includes the upper and lower Santa Ana River watersheds, the San Jacinto River watershed, and several other small drainage areas. In very broad terms, the Santa Ana Region is a group of connected inland basins and open coastal basins drained by surface streams flowing generally southwestward to the Pacific Ocean (State Water Resources Control Board, 2019).

Watershed

The City of Riverside, including the Project site, is located in the Middle Santa Ana River Watershed. The Middle Santa Ana River Watershed covers approximately 488 square miles and lies largely in the southwestern corner of San Bernardino County and the northwestern corner of Riverside County (State Water

Resources Control Board, 2024). The Middle Santa Ana River Watershed drains into the Santa Ana River. The Santa Ana River flows from the San Bernardino Mountains to the Pacific Ocean for over 100 miles. The Santa Ana River is the "receiving water" for over 2,700 square miles covering portions of San Bernardino, Riverside and Orange Counties (City of Riverside, 2007b). The mainstream of the Santa Ana River is divided into six reaches. Reach 3 of the Santa Ana River is the receiving water for the proposed Project site. Reach 3 includes the Santa Ana River from Mission Bridge to Prado Dam. In the Narrows, rising water feeds several small tributaries (Sunnyslope Channel, Tequesquite Arroyo, and Anza Park Drain) which are important breeding and nursery areas for native fish. Temescal, Chino, and Mill/Cucamonga Creeks in Prado Basin are also important river tributaries (State Water Resources Control Board, 2019). Reach 3 of the Santa Ana River is listed as an impaired water body for pathogens on the 2022 CWA Section 303(d) List of Water Quality Limited Segments Being Addressed by USEPA Approved TMDLS (Appendix H).

Groundwater Basin

The City lies within the boundaries of the Upper Santa Ana Valley Groundwater Basin and is underlain by the adjudicated portion of the Riverside-Arlington Groundwater Subbasin. The Riverside-Arlington Subbasin encompasses 58,600 acres (92 square miles). The Riverside-Arlington Subbasin underlies part of the Santa Ana River Valley in northwest Riverside County and southwest San Bernardino County. This subbasin is bound by impermeable rocks of Box Springs Mountains on the southeast, Arlington Mountain on the south, La Sierra Heights and Mount Rubidoux on the northwest, and the Jurupa Mountains on the north. The northeast boundary is formed by the Rialto-Colton fault, and a portion of the northern boundary is a groundwater divide beneath the City of Bloomington. The Santa Ana River flows over the northern portion of the subbasin. The Riverside-Arlington Subbasin is replenished by infiltration from Santa Ana River flow, underflow past the Rialto-Colton fault, intermittent underflow from the Chino Subbasin, return irrigation flow, and deep percolation of precipitation. The total storage capacity of the Riverside-Arlington Subbasin is estimated to be 243,000 acre-feet (AF) (California Department of Water Resources, 2004).

The Western Municipal Water District (WMWD) is one of the largest public agencies in Riverside County, providing water, wastewater (sewer), and recycled water services to nearly 1 million people, both wholesale and retail customers, across 527 square miles in western Riverside County (Western Municipal Water District, 2024). The WMWD manages groundwater within the Riverside-Arlington Subbasin.

The Western-San Bernardino Judgment of 1969 (*Western Municipal Water District of Riverside County v. East San Bernardino County Water District*) addresses groundwater management within the Riverside-Arlington Basin. The Riverside portion of the Riverside-Arlington Basin is split by the Western-San Bernardino Judgment based on county boundaries into Riverside North (San Bernardino County) and Riverside South (Riverside County). The City, including the Project site, is located within the Riverside South Basin. For the Riverside South Basin, the Western-San Bernardino Judgment set a 5-year base period extraction of 29,633 AF for use in Riverside County. In the Riverside South Basin, should extractions exceed the base period extraction over a 5-year period, or by more than 20 percent in a single year, the WMWD is responsible for replenishment in the following year equal to the excess extractions over a 20 percent peaking allowance, unless credits are available from previous years due to productions below the base period extraction or to importing water (Riverside Public Utilities, 2021).

Water Quality

Watershed. The Project site is within the Middle Santa Ana River watershed and under the jurisdiction of the Santa Ana RWQCB, which sets water quality standards for all ground and surface waters within its region. Water quality standards for all ground and surface waters overseen by the Santa Ana RWQCB are documented in its Basin Plan, and the regulatory program of the Santa Ana RWQCB is designed to minimize

and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Drainage. Water quality impairments vary by reach. Drainage from the Project site drains to the Santa Ana River Reach 3. According to the WQMP prepared for the proposed Project, water quality impairments for the Santa Ana River Reach 3 are pathogens (Appendix H).

Water Supply

Riverside Public Utilities (RPU) provides water service to most of the City, including the Project site. RPU's primary source of water supply is local groundwater. RPU also distributes recycled water for non-potable uses, which is supplied from the City of Riverside Regional Water Quality Control Plant. RPU also has an agreement with the WMWD to access imported water when needed. This agreement can provide RPU with up to 21,700 AFY of imported water. RPU also has an exchange agreement with the City of Norco for the sale of up to 1,000 AFY and the exchange of water during emergencies (Riverside Public Utilities, 2021).

Existing Drainage

The Project site generally slopes in the northwest direction at an approximate grade of 1.9 percent with approximately 15 feet of fall. The Project site contains sparse vegetation consisting primarily of ornamental landscaping that consists of trees and shrubbery. The Project site does not contain any existing wetlands, drainages, or jurisdictional waters. The northern portion of the site is developed with a building that is surrounded by asphaltic concrete pavement in the parking lot and drive lane areas, with some landscaped planters scattered throughout the site. The southern portion of the site is a vacant lot that is comprised of barren, loosely compacted dirt/gravel. The southern portion of the site is currently used primarily to store cars, trucks, boats, and heavy machinery like semi-trailers and school buses. Due to the type of use, it is likely that the southern portion of the site is thoroughly compacted and does not infiltrate at a rate that natural ground cover would. Currently, the Project site is approximately 56 percent impervious (Appendix I).

The City of Riverside Public Works Department maintains and operates the City's stormwater system. Stormwater on the northern portion of the site is directed to existing on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue. Stormwater flow for the southern portion of the site is overland flow that is generally conveyed in the southeast-to-northwest direction towards Kansas Avenue. Off-site flows are directed to an existing gutter that runs along Kansas Avenue (Appendix I).

Flood Zone

The Project site is within "Zone X" of "Other Flood Areas," as determined by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map Number 06065C0726H). These areas are defined as areas of 0.2 percent annual chance of flood, areas of 1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile, and areas protected by levees from 1 percent annual chance of flood (Federal Emergency Management Agency, 2024). Zone X is outside the Special Flood Hazard Areas, which are subject to inundation by the 1 percent chance flood.

4.1.11 Land Use and Planning

The Project site has a General Plan Land Use designation of Industrial (I). The City of Riverside 2025 General Plan states that the primary intent of the Industrial (I) land use designation is to allow for manufacturing and wholesaling; support commercial uses; and warehouse and distribution facilities only at specific locations.

Table LU-3 of the City of Riverside 2025 General Plan identifies the Industrial (I) designation as allowing a maximum Floor Area Ratio (FAR) of 0.6.

The Project site is zoned I – General Industrial. The purpose of the I – General Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities.

The site is also within the Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is located within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The EE promotes high-intensity vertical mix of office, clean and green industrial, educational, and hospitality uses to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. The HE accommodates primarily residential housing development supported by ground-floor neighborhood-serving commercial uses and live work opportunities, with limited industrial functions.

4.1.12 Mineral Resources

According to the Final Program Environmental Impact Report for the City of Riverside General Plan and Supporting Documents (SCH #2004021108) (GP PEIR), the city of Riverside is primarily designated as MRZ-4, which are areas with insufficient data to assign any other MRZ designation (City of Riverside, 2007b). The area located between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans is designated as MRZ-2, a State-classified mineral resource zone (City of Riverside, 2007b).

The Project site is currently developed with industrial uses. The Project site is not currently used for mining or mineral extraction operations. The Project site has a General Plan Land Use designation of Industrial (I) and is zoned General Industrial. According to the General Plan EIR, the Project site is in an area designated as MRZ-4. As such, the Project site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.

4.1.13 Noise

Existing Noise Levels

The existing ambient noise in the Project area is characterized by traffic noise from Roberta Street , Kansas Avenue and Massachusetts Avenue, and industrial noises in the vicinity of the Project site. To assess the existing noise levels of the environment, long-term (24-hour) noise measurements were conducted on February 3, 2025, through February 4, 2025, at two locations. Hourly noise levels at the noise measurement locations are as low as 54.2 dBA Leq during nighttime hours and 60.8 dBA Leq during daytime hours. Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the Project area, other sources of groundborne vibration include heavy-duty trucks, such as garbage trucks, on area roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (Federal Transit Administration, 2006).Existing Airport Noise

The closest airports to the proposed project site are Flabob Airport and Riverside Municipal Airport located approximately 3.1 and 5.4 miles west and southwest of the project site, respectively. Based on Map FL-3, Noise Compatibility Contours, of Riverside County Airport Land Use Compatibility Plan (ALUCP) Policy Document, the project is located outside the 65 dBA CNEL noise contour for Flabob Airport. Based on Exhibit

RI-5, Future Noise Impacts, of Riverside County ALUCP – West County Airports Background data, the project is located outside the 65 dBA CNEL noise contour for Riverside Municipal Airport.

Additionally, March Air Reserve Base/Inland Port Airport is located approximately 7.8 miles southeast of the project site. The project site is located within Zone E of the March Air Reserve Base/Inland Port Airport Influence Area. However, it is outside the 65 dBA CNEL noise contour.

Sensitive Receivers

Noise sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residences, schools, hospitals, and recreation areas. The nearest sensitive receptor is the existing housing assistance shelter located at 2801 Hulen Place, approximately 220 feet away from the eastern project construction boundary.

4.1.14 Population and Housing

Population

According to the California Department of Finance (DOF), the City of Riverside had a population of 316,690 in January of 2024 (California Department of Finance, 2024). The Southern California Association of Governments (SCAG) estimates that the City of Riverside had a population of 311,100 persons in 2019 and estimates that the City's population will increase to 386,537 in 2050[1], which is a 24.2 percent increase. In comparison, the SCAG projects the County of Riverside will have a 25.4 percent increase in population between 2019 and 2050.

Housing

The California DOF estimates that the City of Riverside contained 101,922 housing units in January of 2024 (California Department of Finance, 2024). In addition, the California DOF details that the City had an average household size of 3.06 persons per household. In comparison, the County had an average household size of 3.03 persons per household. The California DOF population and housing estimates for 2024 detail that the City of Riverside has a vacancy rate of 4.0 percent. In comparison, the vacancy rate Countywide is higher at 10.1 percent. As shown in Table 5.14-3, *City and County Existing and Projected Housing Units, 2019-2050*, SCAG estimates that between 2019 and 2050, the number of housing units in the City will increase by 45.6 percent while the number of housing units in the County will increase by 42.7 percent.

Employment

The SCAG estimates the City of Riverside had 158,600 employment opportunities in 2019. The SCAG regional growth projections anticipate the number of jobs in the City of Riverside to increase by 28.9 percent to 204,500 jobs in the year 2050. In comparison, the County is projected to see a 39.9 percent increase in the number of jobs by 2050.

[1] The 2050 population estimate was derived using the methodology presented in Section 4.5 of the SCAG Demographics & Growth Forecast which states an estimate of the future City-level population based on Connect SoCal's household forecast can be derived using a county-level Population:Housing ratio from TABLE 12 and applying it to the City's future household growth (Southern California Association of Governments, 2024).

Jobs-Housing Ratio

The jobs-housing ratio is a general measure of the total number of jobs and housing units in a defined geographic area, without regard to economic constraints or individual preferences. SCAG applies the jobs-to-housing ratio at the regional and subregional levels to analyze the fit between jobs, housing, and infrastructure. A major focus of SCAG's regional planning efforts has been to improve this balance.

There is no ideal ratio adopted in State, regional, or City policies. However, the American Planning Association recommends a target ratio of 1.5 jobs per housing unit. Thus, communities with more than 1.5 jobs per dwelling unit are considered jobs-rich, meaning that more employment opportunities are provided than housing in the area, and those with fewer than 1.5 jobs per dwelling unit are considered housing-rich, meaning that more housing is provided than employment opportunities in the area (Weitz, 2003). A job-housing imbalance can indicate potential air quality and traffic problems associated with commuting.

The projected 2050 jobs-to-housing ratios for the City of Riverside and the County of Riverside are 1.49 and 1.12, respectively. This indicates that both the City of Riverside and the County of Riverside are housing-rich, though the City just slightly.

4.1.15 Public Services

Fire Protection Services

The Project site would be served by the City of Riverside Fire Department (RFD). RFD provides fire suppression, emergency medical services (paramedic and non-paramedic), ambulance services, hazardous materials (HAZMAT) response, arson investigation, technical rescue, hazard abatement, acts of terrorism and natural disaster response. The RFD maintains 14 fire stations throughout the City which housed 212 sworn firefighter personnel and 72 emergency services personnel including Basic Life Support and Advanced Life Support personnel (City of Riverside, 2021b). RFD staff also includes 23 civilian personnel including administrative, inspector, engineering, and support staff. RFD also contracts with the California Department of Forestry and Fire Protection (CAL FIRE) to provide mutual aid to the City and fire protection to unincorporated areas within the City's Sphere of Influence.

As described in the Public Safety Element Technical Background Report, RFD has established a performance goal for emergency response to arrive within 8 minutes of dispatch over 90 percent of the time (City of Riverside, 2021b). Between 2018 and 2022, RFD's average response time was 8:34 (RFD, 2023).

As described in RFD's C*ommunity Risk Assessment and Standards of Cover* (2023), the City is divided into 14 geographical planning zones, identified as fire districts, in order to ensure effective distribution of fire resources throughout the City. Each fire district is served by a fire station which serves as the first in response for the area. The first response station for the Project site is Station 4, which is located at 3501 Cranford Avenue, approximately 1.4 roadway miles southeast of the Project site (RFD, 2023). Station 4 is staffed by one captain, one engineer, one firefighter and one firefighter paramedic and is equipped with one fire engine and one water tender (RFD, 2023).

Communities are given an Insurance Services Office (ISO) Public Protection Classification (PPC) rating to score their fire protection capabilities. ISO ratings range on a scale of 1 to 10, with a Class 1 rating representing the highest level of fire protection and ISO Class 10 representing the lowest level of protection. A community's ISO rating takes into account various factors such as fire department operations, water supply, emergency communications, and fire prevention programs. The RFD was last surveyed by the ISO in 2020 and was awarded a Class 1 rating (RFD, 2023).

Police Services

The Riverside Police Department (RPD) is responsible for law enforcement and public safety activities in Riverside. RPD maintains three police stations throughout the City. Orange Station, located 1.9 roadway miles from the Project sit at 4102 Orange Street, is the closest police station to the Project site.

School Services

The Project site is within the Riverside Unified School District (RUSD) boundary. The RUSD currently operates 55 schools, including: 31 elementary schools, 9 middle schools, 7 high schools, and 8 specialty schools (RUSD 2024a). As of the 2023/2024 school year, the RUSD had a total enrollment of 39,505 students (California Department of Education, 2024). The closest schools to the site are Longfellow Elementary School, located at 3610 Eucalyptus Avenue (approximately 0.6 miles south of the Project site), University Heights Middle School, located at 1155 Massachusetts Avenue (approximately 1.2 miles east of the Project site), and Lincoln High School, located at 4341 Victoria Avenue (approximately 1.2 miles south of the Project site.

Other Public Facilities

Other governmental services include a variety of public and quasi-public services including libraries, medical clinics, urgent care facilities, hospitals, social service centers, senior centers, and other facilities. The library closest to the Project site and surrounding area is the Riverside Main Library, located at 3900 Mission Inn Avenue, approximately 1.7 roadway miles west of the Project site.

Additionally, the nearest medical facility to the Project site is the Riverside Community Hospital, located at 4445 Magnolia Avenue, approximately 2.3 roadway miles southwest of the Project site.

4.1.16 Recreation

The City of Riverside has approximately 3,010.53 acres of developed parks and 340.59 acres of undeveloped/planned parks, which when constructed would bring the total park acreage in the City to 3,351.12 acres (C. Assadzadeh, City of Riverside Senior Planner, personal email communication, December 17, 2024). Additionally, there are seven Riverside County parks, regional County-owned parks and reserves, and State park facilities available for use in the region. The closest existing park and recreation facilities to the Project site (within 2 miles) in the City of Riverside are listed in Table 5.16-1, *Riverside Park and Recreation Facilities Within Two Miles of the Project Site*. As shown, the City currently has seven parks and recreation facilities that would provide 500.53 acres of parkland and recreation space within two miles of the Project site.

4.1.17 Transportation

Existing Roadway Network

State Route 91 (SR-91), also known as the Riverside Freeway and the Artesia Freeway, is an east-west highway in the state of California that connects Riverside County to Orange County. Regional access to the Project site is provided by SR-91, which is located approximately 0.15 miles to the west.

State Route 60 (SR-60) is an east-west highway in the state of California and a primary link between Los Angeles and Riverside Counties. Regional access to the Project site is provided by SR-60, which is located approximately 0.30 miles to the east and northeast.

Interstate 215 (I-215) is a north-south Interstate Highway in the Inland Empire region of Southern California. Regional access to the Project site is provided by SR-60, which is located approximately 0.45 miles to the east and southeast.

Massachusetts Avenue is an east-west road located directly south of the Project site. The posted speed limit is 25 miles per hour (mph). There are no existing or planned bicycle facilities along this roadway.

Kansas Avenue is a north-south collector street that is located directly west of the Project site. The posted speed limit is 35 mph. South of the Project site, starting on Linden Street (approximately 0.5 miles south of the Project site), Kansas Avene is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways.

Roberta Street is an east-west road that is located directly north of the Project site. There are no existing or planned bicycle facilities along this roadway.

Spruce Street is an east-west arterial road that is located approximately 0.10 miles north of the Project site. The posted speed limit is 40 mph. Spruce Street is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways and there are existing bike facilities along the roadway.

Chicago Avenue is a north-south arterial road that is located approximately 0.35 miles east of the Project site. The posted speed limit is 45 mph. Chicago Avenue is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways, and there are existing bike facilities along a portion of the roadway.

3rd Street is an east-west arterial road that is located approximately 0.25 miles south of the Project site. The posted speed limit is 40 mph. 3rd Street is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways, and there are existing bike facilities along the roadway.

Existing Site Access

Regional access to the Project site is provided via Interstate 215 (I-215), State Route 60 (SR-60), and State Route 91 (SR-91). Local access to the Project site is provided via Kansas Avenue, Massachusetts Avenue, and Roberta Street.

Existing Transit Service

The Riverside Transit Agency (RTA) currently provides bus services in the city and western Riverside County. In addition to bus route services, RTA also provides CommuterLink and Dial-A-Ride services. CommuterLink routes travel to major transit centers and Metrolink stations in Riverside, San Diego, and San Bernardino counties. Dial-A-Ride is a curb-to-curb transportation services for seniors and persons with disabilities. Dial-A-Ride vehicles travel to areas within three-quarters of a mile of an RTA local fixed bus route.

RTA operates 47 bus routes. Bus Route 10 is located along 3rd Street, approximately 0.25 miles south of the Project site with one stop located near the intersection of 3rd Street and Chicago Avenue. Route 13 is located along Chicago Avenue approximately 0.35 miles east of the Project site, with one stop located near the intersection of Chicago Avenue and Spruce Street.

Existing Bicycle and Pedestrian Facilities

There are no existing bicycle lanes or pedestrian facilities adjacent to the Project site.

Existing Vehicle Miles Traveled

Vehicle miles traveled (VMT) is defined as one vehicle traveling on a road for one mile. Per the Western Riverside Council of Governments Low VMT Area Screening Tool, the Project site is located within a low-VMT

generating area. Low-VMT generating areas are defined as traffic analysis zones (TAZs) with a daily VMT/employee that is less than the baseline level for the City of Riverside. The proposed Project is located in traffic analysis zone (TAZs) 2101(Appendix K).

4.1.18 Tribal Cultural Resources

The Historical/Archaeological Resources Survey Report (Appendix E) prepared for the proposed Project describes that the City of Riverside lies in an area where the traditional territories of three Native American groups have overlapped since at least the Late Prehistoric and Protohistoric Periods: the Serrano of the San Bernardino Mountains, the Luiseño of the Perris-Elsinore region, and the Gabrielino of the San Gabriel Valley. The Historical/Archaeological Resources Survey Report prepared for the Project did not identify any tribal cultural resources within the Project site and within a half-mile radius. The City completed tribal consultation in accordance with AB 52.

4.1.19 Utilities and Service Systems

Water is supplied to the Project site by Riverside Public Utilities (RPU). RPU's service area is approximately 75 square miles, of which approximately 70 square miles are located in Riverside's City limits and the remaining 5 square miles consist of unincorporated land within the County of Riverside (RPU, 2021).

Water Supply and Demand

As described in RPU's 2020 UWMP, RPU's primary source of supply is local groundwater (RPU, 2021). Additionally, RPU has an agreement with Western Municipal Water District (WMWD) to access imported water when needed. The agreement between WMWD and RPU can provide RPU with up to 21,700 acre-feet per year (AFY) of imported water. RPU also has an exchange agreement with the City of Norco for the sale of up to 1,000 AFY and the exchange of water during emergencies. Since 2009, RPU has been imported-water independent by relying solely on local water supplies to meet the water demands of its service area.]

RPU estimates that water supplies in the future are anticipated to be obtained through a similar mix of groundwater, purchased or imported water, and recycled water. The 2020 UWMP anticipates that RPU's water supply will increase from 114,923 AF in 2025 to 129,693 AF in 2045 (increase of 14,770 AF) to meet RPU's anticipated growth in water demands.

The 2020 UWMP describes that water demands per capita have been decreasing in recent years due to new state and local regulations related to water conservation. On July 3, 2024, the State Water Resources Control Board adopted the 'Making Conservation a California Way of Life' regulation, which includes new performance standards. These standards became effective on January 1, 2025, and RPU is within compliance.

Water Infrastructure

An 10-inch diameter water line exists underneath Massachusetts Avenue adjacent to the Project site.

Wastewater

Wastewater service is provided to the Project site by the City of Riverside Public Works Department which owns and operates a sanitary sewer collection system consisting of over 830 miles of sewer lines (City of Riverside, 2022). There are 19 pump stations located throughout the City that range in size from 100 gallons per minute (gpm) up to 2,000 gpm providing service to those areas of geographic need (City of Riverside,

2022). Wastewater treatment is provided at the Regional Water Quality Control Plant (RWQCP), which provides preliminary, primary, secondary, and tertiary wastewater treatment. The RWQCP has a flow rated capacity of approximately 46 MGD and treats approximately 26 MGD per day (Candice Assadzadeh, City of Riverside Senior Planner, personal email communication, December 5, 2024). According to the City's Wastewater Integrated Master Plan, the historic average wastewater flow in the City is 96.6 gallons per capita per day (City of Riverside, 2008).

Site Drainage

The northern portion of the site is developed with two buildings which are surrounded by asphaltic concrete pavement in the parking lot and drive lane areas, with some landscaped planters scattered throughout the site. The southern portion of the site contains a vacant lot that is comprised of barren, loosely compacted dirt/gravel. Stormwater on the developed, northern portion of the site is directed to onsite v-gutters and is conveyed to Roberta Street and Kansas Avenue whereas stormwater flow for the unpaved, southern portion of the site flows over the surface and is generally conveyed to Kansas Avenue. Offsite flows are directed to the gutter that runs along Kansas Avenue. Because the site is currently only partially paved, future development would increase intensity of development and would result in additional impervious surfaces that could increase the volume and velocity of stormwater runoff.

Solid Waste

The GP PEIR describes that solid waste in the City is disposed of at the Badlands Landfill, the Lamb Canyon Landfill, the El Sobrante Landfill, and the Mid-Valley Sanitary Landfill (City of Riverside, 2021c). The daily throughput and average daily capacity of each landfill is provided below.

- The Badlands Landfill is permitted to accept 5,000 tons of solid waste per day and is permitted to operate until January 2059 (CalRecycle, n.d.-a). In December 2024, the average daily tonnage received was 3,010.6 tons (CalRecycle, 2025a). Thus, the facility had additional capacity of approximately 1,989.4 tons per day.
- The Lamb Canyon Landfill is permitted to accept 5,000 tons of solid waste per day and is permitted to operate until April 2032 (CalRecycle, n.d.-b). In December 2024, the average daily tonnage received was 2,044 tons. Thus, Thus, the facility had additional capacity of approximately 2,956 tons per day (CalRecycle, 2025b).
- The El Sobrante Landfill is permitted to accept 16,054 tons of solid waste per day and is permitted to operate until January 2051 (CalRecycle, n.d.-c). In November 2024, the average daily tonnage received was 10,732.4 tons. Thus, the facility had additional capacity of approximately 5,321.6 tons per day (CalRecycle, 2024).
- The Mid-Valley Sanitary Landfill is permitted to accept 7,500 tons of solid waste per day and is permitted to operate until April 2045 (CalRecycle, n.d.-d). In December 2024, the peak tonnage received was 5,852.6 tons. Thus, the facility had additional capacity of approximately 1,647.4 tons per day (CalRecycle, 2025c).

Electrical, Natural Gas, and Telecommunications Facilities

Electricity

Electricity in the City limits is provided by RPU while Southern California Edison (SCE) provides electricity to parcels outside of the City limits (City of Riverside, 2021). RPU's Power Content Label, designed by the California Energy Commission (CEC), provides an overview of the various resources that make up the State of California's and RPU's electric power make up.

Natural Gas

Natural gas services are in the City are provided by Southern California Gas Company (SoCalGas). SoCalGas delivers energy to roughly 21 million consumers across a service area spanning approximately 24,000 square miles in Central and Southern California, utilizing a network of pipelines extending over 3,600 miles and serving more than 500 communities (SoCalGas, 2024).

Telecommunications

The majority of the City's telecommunication and fiber optics services are provided by AT&T (City of Riverside, 2021). There are over 45 cellular towers throughout the City and RPU maintains a 120-mile fiber optic network on which internet service providers or wireless operators can lease to deliver connectivity to customers throughout the City (City of Riverside, 2021). Telecommunications for the Project can be provided by existing providers such as AT&T.

4.1.20 Wildfire

Fire Agencies

The City of Riverside Fire Department provides fire protection services within the Project area. The Fire Prevention Division is located at 3900 Main Street, on the third floor of City Hall. The Fire Marshal oversees the Fire Prevention Division.

Topography and Vegetation

The Project site is generally flat and located at an approximate elevation of 890 to 901 feet above mean sea level. The site is currently entirely developed and disturbed and contains sparse ornamental landscaping. The Project site is surrounded by industrial land uses to the north, south, and west, and by community services/shelter and manufacturing uses to the east.

Wildland Fire Hazards

The Project site is not located within an Fire Hazard Severity Zone (FHSZ). According to the most recent CAL FIRE FHSZ Viewer (CAL FIRE, 2025), the nearest FHSZ areas are designated as Moderate within Local Responsibility Areas. These zones are located approximately 1mile east of the Project site, near the Box Spring Mountains, and approximately 1.5 miles west of the Project site, near Lake Evans. The nearest Very High FHSZ is located approximately 1.5 miles east of the Project site. This area is designated as a Local Responsibility Area and is associated with the Box Spring Mountains. Beyond this, a Very High FHSZ within a State Responsibility Area is also present in the same general vicinity. **Prevailing Winds**

The predominant wind direction at the Project site area is from the west and north (NOAA, 2025). This suggests that a fire burning in the foothills approximately 1.5 miles east of the Project site would be unlikely to be blown across the site during normal prevailing wind conditions.

Large Fire History

According to CAL FIRE, relatively few larger wildfires have occurred within the region surrounding the Project site over the past three years:

- In July 2024, the Columbia Fire burned approximately 58 acres in the hills approximately 1.6 miles east of the Project site in the City of Highgrove. Involved agencies included the CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2024).

- In July 2024, the Top burned approximately 49 acres in the hills approximately 3.5 miles southeast of the Project site in the City of Riverside. Involved agencies included CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2024).
- In June 2024, the Lotus Fire burned approximately 30 acres in the hills approximately 5.3 miles northwest of the Project site in the City of Jurupa Valley. Involved agencies included the CAL FIRE Riverside Unit. No damages were reported. One firefighter injury was reported (CAL FIRE, 2024).
- In July 2023, the Reche Fire burned approximately 436 acres in the hills approximately 7.5 miles east of the Project site in the City of Moreno Valley. Involved agencies included the CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2023b).
- In July 2023, the Oak Fire burned approximately 137 acres in Jurupa Valley approximately 5.5 miles northwest of the Project site. Involved agencies included the CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2023b).

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5. Environmental Impact Analysis

This chapter examines the environmental setting of the Project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter is divided into subsections for each environmental issue area that was determined to need further study in the Draft EIR through the Notice of Preparation (NOP) review and comment process (see Appendix A). Environmental topic areas discussed in this Draft EIR include the following:

5.1 Aesthetics
5.2 Agriculture and Forestry Resources
5.3 Air Quality
5.4 Biological Resources
5.5 Cultural Resources
5.6 Energy
5.7 Geology and Soils
5.8 Greenhouse Gas Emissions
5.9 Hazards and Hazardous Materials
5.10 Hydrology and Water Quality
5.11 Land Use and Planning
5.12 Mineral Resources
5.13 Noise
5.14 Population and Housing
5.15 Public Services
5.16 Recreation
5.17 Transportation
5.18 Tribal Cultural Resources
5.19 Utilities and Service Systems
5.20 Wildfire

This Draft EIR evaluates the direct and indirect impacts resulting from the planning, construction, and operations of the Project. Under CEQA, EIRs are intended to focus their discussion on significant impacts and may limit discussion of other impacts to a brief explanation of why the impacts are not significant.

FORMAT OF ENVIRONMENTAL TOPIC SECTIONS

Each environmental topic section generally includes the following main subsections:

- **Introduction.** This describes the purpose of analysis for the environmental topic and referenced documents used to complete the analysis. This subsection may define terms used.
- **Regulatory Setting.** This subsection describes applicable federal, state, and local plans, policies, and regulations that the Project must address and may affect its implementation.
- **Environmental Setting.** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance.** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are "significant." The thresholds of significance used to assess the significant of impacts are based on those provided in Appendix G of the CEQA Guidelines.
- **Methodology.** This subsection provides a descriptioFn of the methods used to analyze the impact and determine whether it would be significant or less than significant.
- **Environmental Impacts.** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
    - A statement of the CEQA threshold being analyzed,
    - The Draft EIR's conclusion as to the significance of the impact.
    - An impact assessment that evaluates the changes to the physical environment that would result from the Project.
    - An identification of significance comparing identified impacts of the Project to the significance threshold with implementation of existing regulations, prior to implementation of any required mitigation.

- **Cumulative Impacts.** This subsection describes the potential cumulative impacts that would occur from the Project's environmental effects in combination with other cumulative projects (See Table 5-1).
- **Existing Regulations and Plans, Programs, or Policies.** A list of applicable laws and regulations as well as specific Plans, Programs, or Policies (PPPs) that would reduce potentially significant impacts.
- **Project Design Features.** A list of Project Design Features (PDFs) that are features incorporated into the project with the effect of minimizing potential impacts.
- **Level of Significance Before Mitigation.** A determination of the significance of the impacts after the application of applicable existing regulations and regulatory requirements.
- **Mitigation Measures.** For each impact determined to be potentially significant after the application of applicable laws and regulations, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
    - avoid a significant impact;
    - minimize the severity of a significant impact;
    - rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
    - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the Project; and/or
    - compensating for the impact by replacing or providing substitute resources or environmental conditions.
- **Level of Significance After Mitigation.** This section provides the determination of the impact's level of significance after the application of regulations, regulatory requirements, and mitigation measures.
- **References.** A list of references supporting the information contained in the analysis.

CUMULATIVE IMPACTS

Cumulative impacts refer to the combined effect of the proposed Project's impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts.

According to Section 15355 of the CEQA Guidelines, 'cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

a) The individual effects may be changes resulting from a single project or a number of separate projects.
b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this Draft EIR focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects. Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in

the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed Project would have no environmental impact. Analysis of cumulative impacts is, however, provided for all Project impacts that are evaluated within this Draft EIR.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for air quality, greenhouse gas emissions, and transportation relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as the Southern California Regional Transportation Plan, Southern California Association of Governments (SCAG) growth projections, and the Western Riverside Council of Governments VMT screening tool). The cumulative analyses for other environmental issues use the list of projects approach.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to project area viewsheds. Thus, in assessing aesthetic resources impacts, only development within and immediately adjacent to the Project area would contribute to a cumulative visual effect is analyzed, whereas cumulative transportation impacts are based upon annual growth projections and the other proposed and/or foreseeable development within the traffic study area of roadways and intersections. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic. Table 5-1 provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by the City, and Figure 5-1 shows the locations.

Table 5-1: Cumulative Projects List

No.	Project	Address	Land Use/Project Type	Size
1	P13-0087 P13-0262	2450 Market Street	Residential (Senior Housing)	1.7 acres; 67 units
2	P15-0535	3530/3540/3558 Fairmount & 3555/3547/3545/3505 Market	Hotel	Phase 1: 62,852 SF, 104 Rooms. Phase 2: 74, 275 SF, 135 rooms.
3	P15-0536	2375 Third Street	Industrial	26,076 SF Industrial Building
4	P15-0537	2941 Market Street	Residential	17 Townhomes
5	P15-0538	3491 Market Street	Commercial	3,400 SF Commercial Retail Building
6	P15-0539	3001 Iowa Avenue	Mixed-use (Residential and Retail)	299 Multi-family Residential Units and 1,385 SF of Retail Area

No.	Project	Address	Land Use/Project Type	Size
7	P15-0540	3521 Main Street	Banquet Hall	2,050 SF Banquet Hall
8	P15-0541	1705 Seventh Street	Residential	65-unit Multi-family Residential Development
9	P15-0542	1535 W. La Cadena Drive	Residential	15-unit Multi-family Residential Apartment Complex
10	P15-0543	NEC Orange Street and Vista Avenue	Residential	482 Multi-family Residential units, 44,500 SF of Retail/Restaurant Space, Fuel Station with 4,000 SF Convenience Store, Two Hotels totaling 229 rooms, and and 27 RV Camping Spaces
11	P15-0544	3723 Strong Street	Residential (Senior Housing)	58-unit Senior Housing Complex
12	P15-0545	3102 Main Street	Residential	85-unit, Multi-family Residential Development
13	P15-0546	Patterson Street and Minnesota Street	Residential	33-Unit Apartment Complex
14	P15-0547	1990 Patterson Street	Residential	57-unit Affordable Multi-family Development
15	P15-0548	1737 Atlanta Avenue	Church	5,245 SF Assemblies of People – Non-Entertainment (South Hills Community Church) Building
16	P15-0549	1575 University Avenue	Residential	257 Dwelling Units and 4,431 SF of Commercial Space
17	P15-0550	3093 Mission Inn Avenue	Mixed-use (Residential and Retail)	363 Residential Dwelling Units

No.	Project	Address	Land Use/Project Type	Size
				and 2,000 SF of Retail Space
18	P15-0551	3491 Market Street	Commercial	4,590 SF Multi-tenant Commercial Building
19	P15-0552	2060 University Ave	Library	15,000 SF Library Building
20	P15-0553	2610 Durahart Street	Outdoor Storage	4,000 SF Office Building and 2,000 SF Workshop
21	P15-0554	2039 University Avenue	Commercial/Retail	5,000 SF Multi-tenant Restaurant and Retail Building
22	P15-0555	SEC Primer Street and Interchange Street	Commercial/Retail	1,100 SF Drive-thru Restaurant
23	P15-0556	2610 Durahart Road	Outdoor Storage	Outdoor Storage Yard Consisting of 52 Truck Trailer Stalls on a 1.59-acre Site

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Cumulative Projects

Massachusetts Point Project
City of Riverside

Figure 5-1

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IMPACT SIGNIFICANCE CLASSIFICATIONS

The below classifications are used throughout the impact analysis in this Draft EIR to describe the level of significance of environmental impacts. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines.

- **No Impact.** The Project would not change the environment.
- **Less Than Significant.** The Project would not cause any substantial, adverse change in the environment.
- **Less Than Significant with Mitigation Incorporated.** The Draft EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and Unavoidable.** The Project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

EFFECTS FOUND NOT SIGNIFICANT

CEQA Guidelines Section 15126.2(a) states that "[a]n EIR shall identify and focus on the significant effects on the environment". CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant. During the preparation of this EIR, the Project was determined to have no potential to result in significant impacts under two environmental issue areas: agriculture and forestry resources and mineral resources. These environmental issue areas and the reason that they were determined to have no impact are discussed in Sections 5.2 and 5.12, respectively.

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5.1 Aesthetics

5.1.1 INTRODUCTION

This section describes the visual setting and aesthetic character of the Project site and evaluates the potential for the Project to impact scenic vistas, the visual character and quality of the Project site, and cause light and glare impacts. The analysis focuses on changes that would be seen from public viewpoints and provides an assessment of whether aesthetic changes from Project implementation would result in substantially degraded aesthetic conditions. Descriptions of existing aesthetic/visual conditions are based, in part, on site visits by the consulting team, analysis of aerial photography (Google Earth Pro, 2024), and the Project application materials submitted to the City of Riverside described in Section 3.0, *Project Description*, of this Draft EIR. This section is also based, in part, on the following documents and resources:

- California Department of Transportation (Caltrans) Scenic Highway Mapping System, 2018
- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, certified November 2007
- City of Riverside Municipal Code

Aesthetics Terminology

- **Aesthetic Resources** include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, that provide an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area, but also communicate the value placed upon a landscape or scene by its observers.
- **Scenic Resources** are visually significant hillsides, ridges, water bodies, and buildings that are critical in shaping the visual character and scenic identity of the area and surrounding region.
- **Scenic Vistas** are defined as panoramic views of important visual features, as seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting.
- **Visual Character** broadly describes the unique combination of aesthetic elements and scenic resources that characterize a particular area. The quality of an area's visual character can be qualitatively assessed considering the overall visual impression or attractiveness created by the particular landscape characteristics. In urban settings, these characteristics largely include land use type and density, urban landscaping and design, architecture, topography, and background setting.

5.1.2 REGULATORY SETTING

5.1.2.1 Federal Regulations

There are no federal regulations concerning aesthetic impacts that are applicable to the Project.

5.1.2.2 State Regulations

California Department of Transportation State Scenic Highway Program

The California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality. The intent of the State Scenic Highway Program is to protect and enhance California's natural scenic beauty by allowing local governments the opportunity to nominate eligible scenic highways and adopt corridor protection programs to obtain official scenic highway status (Caltrans, 2024). Suitability for designation as a State scenic highway is based on vividness, intactness, and unity, as described in the Caltrans's *Guidelines for Official Designation of Scenic Highways* (2008):

- Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- Intactness is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- Unity is the extent to which development is sensitive to and visually harmonious with the natural landscape.

2022 Building Energy Efficiency Standards, Title 24, Part 6

The 2022 California Energy Code (CEC) includes standards for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. CEC Section 130.2 sets forth requirements for outdoor lighting controls and luminaire cutoff requirements. CEC Section 140.7 sets forth outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by Lighting Zone, as defined in CEC Section 10-114, where all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for building entrances and exits, outdoor sales frontage, hardscape ornamental lighting, building façade lighting, canopies, outdoor dining, and special security lighting for retail parking and pedestrian hardscape.

California Green Building Standards Code, Title 24, Part 11

The California Green Building Standards Code (CALGreen Code) includes standards for maximum allowable light levels, efficiency requirements for lighting, miscellaneous control requirements, and light trespass requirements for electric lighting and daylighting. Section 5.1106.8 Light Pollution Reduction, specifies that all non-residential outdoor lighting must comply with the following:

- The minimum requirements for Lighting Zones 1-4 as defined in Chapter 10 of the California Administrative Code; and
- Backlight, uplight and glare (BUG) ratings as defined in the Illuminating Engineering Society (IES) Technical Memorandum (TM)-15-07; and
- Allowable BUG rating not exceeding those shown in Table A5.106.8 in Section 5.106.8 of the CALGreen Code; or
- Comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

5.1.2.3 Regional Regulations

There are no regional regulations applicable to the proposed Project.

5.1.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to aesthetic resources that are applicable to the Project.

Land Use and Urban Design Element

Objective LU-3: Preserve prominent ridgelines and hillsides as important community visual, recreational and biological assets.

Objective LU-27: Enhance, maintain and grow Riverside's inventory of street trees.

Policy LU-27.1: Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.

Policy LU-27.4: Encourage trees on private property to add to the City's urban forest.

Objective LU-28: Preserve and enhance the quality and character of Riverside by ensuring compliance with all relevant codes and regulations.

Objective LU-29: Minimize the visual impact of aerial facilities on the City's landscape.

Policy LU-29.1: Promote the formation of districts for the undergrounding of utilities.

Policy LU-30.3: Ensure that the distinct character of each of Riverside's neighborhoods is respected and reflected in all new development, especially infill development.

Open Space and Conservation Element

Policy OS-5.1: Preserve significant habitat and environmentally sensitive areas, including hillsides, rock outcroppings, creeks, streams, viewsheds and arroyos through application of the RC Zone standards and the Hillside/Arroyo standards of the City's Grading Code.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

City of Riverside Municipal Code

Riverside Municipal Code Title 19, Zoning, includes the City's zoning regulations and standards. The purpose of Title 19 is to designate, regulate, and control the location, use, height, and alteration of buildings, structures, and land for residence, commerce, trade and industry, or other purposes.

Chapter 19.556: Outdoor Lighting. This chapter sets forth standards to ensure that outdoor lighting is adequate for safety, security and commerce while preserving the naturally dark night sky by mitigating artificial sky glow and preventing glare and light trespass.

5.1.3 ENVIRONMENTAL SETTING

Aesthetic resources include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, that impart an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area, but also communicate the value placed upon a landscape or scene by its observers.

5.1.3.1 Scenic Vistas

The General Plan 2025 Program Environmental Impact Report (GP PEIR) describes that the hills and ridgelines that surround the City provide scenic vistas to residents of Riverside where they can experience long distance views of natural terrain. The GP PEIR lists the following scenic vistas as most notable: the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. Additionally, the Santa Ana River watercourse and riverbed, which extends along the City's northern edge, is an important scenic resource within the City.

5.1.3.2 Visual Character and Quality of Site and Surrounding Area

The Project site is currently developed with a commercial/industrial business and a bus storage yard. The site is flat and includes ornamental landscaping that consists of trees and shrubbery along the perimeters of all three parcels. The site's existing conditions are shown in Figure 3-3, *Aerial View*, in Section 3.0, *Project Description*.

The Project site is bordered by Roberta Street followed by industrial and manufacturing uses and a single family residence to the north, a homeless shelter and services building and a manufacturing use to the east, Massachusetts Avenue followed by industrial (manufacturing) warehouses to the south, and Kansas Avenue followed by a recycling center to the west.

5.1.3.3 Scenic Highways

There are no officially State designated scenic roads or highway corridors within or adjacent to the Project site (Caltrans, 2018). Further, there are no officially designated State scenic highways or any eligible State scenic highways that traverse the City (Caltrans, 2018). The closest eligible State scenic highway to the Project site is Interstate 15 (I-15), which is located approximately 13.2 miles southwest.

5.1.3.4 Light and Glare

Contributors to nighttime ambient light levels within the City include both stationary and mobile sources. Stationary sources of nighttime light within the City include exterior structure illumination, light spillover from interior lighting, lighting for outdoor uses such as sports fields and courts, parking lot lighting, streetlights, and illuminated signage such as billboards. The main source of mobile nighttime light is from vehicle headlights.

The Project site is currently developed with a commercial/industrial business and a school storage yard. Nighttime lighting in the Project vicinity is currently limited to the existing industrial uses surrounding the site. Lighting and glare is generated by vehicles travelling along Kansas Avenue, Massachusetts Avenue, Roberta Street, and from vehicles moving in and out of the Project site. The light and glare receptors in the Project vicinity include motorists traveling on local streets.

5.1.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

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

Threshold C In nonurbanized 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), or if the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

Threshold D Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

5.1.5 METHODOLOGY

Aesthetic resources were assessed based on the visual quality of the Project site and surrounding area and the changes that would occur from implementation of the proposed Project. The significance determination for scenic vistas is based on consideration of whether the vista can be viewed from public areas within or near the Project site and the potential for the Project to either hinder views of the scenic vista or result in its visual degradation. As the Project site is located within an "urbanized area," as defined by Public Resources Code Section 21071, the analysis of visual character or quality of public views of the site focuses on the Project's consistency with applicable zoning and other regulations governing scenic quality, such as density, height, bulk, setbacks, landscaping, signage, etc.

The analysis of light and glare identifies light-sensitive land uses and describes the Project's light and glare sources, and the extent to which Project lighting could spill from the Project site onto adjacent existing and future light-sensitive areas. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

5.1.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT HAVE A SUBSTANTIAL EFFECT ADVERSE EFFECT ON A SCENIC VISTA?

Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. As described above, the City's GP PEIR identifies the following scenic vistas as most notable: the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. Additionally, the Santa Ana River watercourse and riverbed, which extends along the City's northern edge, is an important scenic resource within the City. Distant, obstructed views of Mount Rubidoux and the Box Springs Mountains are visible from the Project site to vehicles and pedestrians traveling north to south on Kansas Avenue and traveling east or west on Massachusetts Avenue and Roberta Street. Views of the Santa Ana River watercourse and riverbed are not visible from the Project site or within the immediate vicinity of the site.

A portion of the Project site is currently developed with an existing industrial building and a bus storage yard. The Project would redevelop 10.21 acres of the site with two industrial warehouse buildings that would be approximately 46 feet tall and would be set back from the adjacent streets so as not to encroach into the existing public long-distance views. As such, implementation of the Project would not substantially change the existing available views of Mount Rubidoux and the Box Springs Mountains compared to existing conditions.

The proposed Project has a minimum landscaped setback of 10 feet along Kansas Avenue, Massachusetts Avenue, and Roberta Street. Additionally, Building 1 would be set back approximately 79 feet from the northern property line, a minimum of 48 feet from the eastern property line, a minimum of 35 feet from the southern property line, and a minimum of 10 feet and 6 inches from the western property line. Building 2 would be set back approximately 130 feet from the northern property line, a minimum of 84 feet from the eastern property line, a minimum of 10 feet from the southern property line, and a minimum of 79 feet from the western property line. The building setbacks would ensure that public views along the nearby roads would not be impacted, and landscaping would ensure that views of the site would be broken up and avoid monotonous views of the large walls of the buildings.

In addition, the Project would also install a minimum of 6-foot-wide sidewalk on all Project frontages on Kansas Avenue, Massachusetts Avenue, and Roberta Street. The building height, massing, setbacks, new sidewalks and layered landscaping along Kansas Avenue, Massachusetts Avenue, and Roberta Street would ensure that public views of Mount Rubidoux and the Box Springs Mountains remain visible to vehicles and pedestrians traveling along Kansas Avenue, Massachusetts Avenue, and Roberta Street. Thus, long range views of Mount Rubidoux and the Box Springs Mountains would continue to be available from public vantage points on surrounding streets. Therefore, the Project would have a **less than significant impact** on any scenic vistas in the area.

THRESHOLD B: WOULD THE PROJECT SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING BUT NOT LIMITED TO TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS WITHIN A STATE SCENIC HIGHWAY?

The Project site is currently developed with an existing industrial use and a bus storage yard. As described above, there are no officially designated State scenic highways or any eligible State scenic highways within the City of Riverside (Caltrans, 2018). The closest eligible scenic highway to the Project site is I-15 which is located approximately 13.2 miles southwest of the site. The Project site would not be visible from I-15; therefore, the Project would not substantially damage scenic resources within a State scenic highway. **Therefore, the Project would have no impact on scenic resources.**

THRESHOLD C: WOULD THE PROJECT, IN NONURBANIZED 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), OR IF THE PROJECT IS IN AN URBANIZED AREA, CONFLICT WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING SCENIC QUALITY?

For an unincorporated area, Public Resources Code Section 21071(b) defines "urbanized area" as being completely surrounded by one or more incorporated cities and meeting both criteria:

> (i) The population of the unincorporated area and the population of the surrounding incorporated city or cities equals not less than 100,000 persons.
>
> (ii) The population density of the unincorporated area at least equals the population density of the surrounding city or cities.

Based on these criteria, the Project is located within an urbanized area for purposes of determining if the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project site has a General Plan land use designation of Industrial (I) and is zoned General Industrial, as shown in Figure 3-5, *Existing Land Use*, and Figure 3-6, *Existing Zoning*, in Section 3.0, *Project Description*. The Project is within the City's Innovation District (ID) Overlay Zone and is within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts as shown in Figure 3-7, *Existing Innovation District Overlay Zoning Designation*. The Project includes an amendment to the City's zoning code and zoning map to change the site's ID Overlay Zoning subdistrict from EE and HE to Industrial Emphasis (IE) so that the zone is consistent with the proposed industrial buildings and the General Plan as shown in Figure 3-9, *Proposed Innovation District Overlay Zoning Designation*. Additionally, the proposed zone change also includes modification of the development standards in the IE zone, for which the proposed Project would be subject to. Table 5.1-1 describes Project consistency with the City's proposed modifications to the IE zone development standards.

Table 5.1-1: Project Consistency with Development Standards

IE Zone Development Standard		Project Consistency
Lot Width	Minimum: 25 feet	**Consistent.** Lot width is approximately 600 feet.
Floor Area Ratio	Sites over 5 acres: Minimum: 0.40 Maximum: N/A The Project proposes a text amendment to the IE Development Standards to distinguish sites that are under 5 acres shall have a minimum FAR of 1.0 and a maximum FAR of 2.0 and sites that are over 5 acres shall have a minimum FAR of 0.40 and no maximum FAR.	**Consistent:** Building 1 would have a FAR of 0.45. Building 2 would have a FAR of 0.45. *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*
Building Height (Primary Building)	Maximum: 75 feet The Project proposes a text amendment to the IE Development Standards to change the allowed building height from a minimum of 2 floors and a maximum of 5 floors to 75 feet as the maximum allowable height.	**Consistent.** Both Building 1 and Building 2 would be single-story and approximately 46 feet tall. *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*
Front Setback (Kansas, Massachusetts, and Chicago Avenues)	Minimum: 5 feet Maximum: 10 feet The Project proposes a text amendment to the IE Development Standards to require minimum 5 feet setbacks and maximum 10 feet setbacks to Principal Buildings fronting on Kansas, Massachusetts, and Chicago Avenues.	**Consistent:** Building 1 would be set back approximately 7' 11" to 10' 9" from Kansas Avenue. Building 2 would be set back approximately 60' 8" to 65' 2" from Kansas Avenue and 10 feet from Massachusetts Avenue. *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*

Front Setback (All Other Frontages)	Same as I – General Industrial Zone which is a minimum front setback of 20 feet. The Project proposes a text amendment to the IE Development Standards to require front setbacks on buildings fronting any street besides Kansas, Massachusetts, and Chicago Avenues to follow the required setback in the General Industrial zone (Riverside Municipal Code Section 19.130.030).	**Consistent:** Building 1 would be set back 79 feet from Roberta Street. *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*
Interior Side Setback	Minimum: 5 feet Maximum: None The Project proposes a text amendment to the IE Development Standards to remove the maximum 10 feet interior side setback requirement.	**Consistent:** Building 1 would be set back a minimum of 48 feet from the eastern property line (interior side). Building 2 would be set back a minimum of 84 feet and 6 inches from the eastern property line (interior side). *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*
Rear Setback	Minimum: 10 feet Maximum: None The Project proposes a text amendment to the IE Development Standards to remove the maximum 10 feet rear setback requirement.	**Consistent:** Building 1 would be set back a minimum of 10 feet from the southern property line (rear side). Building 2 would be set back a minimum of 130 feet from the northern property line (rear side). *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*
Architectural Feature Projection Encroachment Setback	Minimum: None Maximum: 5 feet The Project proposes a text amendment to the IE Development Standards to change the maximum Architectural Feature Projection Encroachment from 40% to 5 feet.	**Consistent:** The Project does not include architectural feature projections that encroach into the required setbacks. *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*
Off-Street Parking	Minimum: 1 space per 500 SF or per Zoning Code, whichever is less Maximum: 5 spaces per 1,000 SF Based on these calculations, the Project would require the following: 199,850 SF / 500 SF = 400 spaces or 14250 SF / 250 SF = 57 spaces	**Consistent.** Municipal Code Section 19.580.060 requires warehousing and distribution facilities to provide 1 space/1,000 square feet of floor area plus 1 space/250 square feet of office area. The Project proposes 14,250 SF of office space requiring 57 spaces and

	185,600 SF / 1000 SF = 186 spaces 57 + 186 = 243 spaces The Project proposes a text amendment to the IE Development Standards to change the minimum parking requirement from 2 spaces per 1,000 SF of floor space to 1 space per 500 SF or per Zoning Code, whichever is less. The amendment also provides a maximum parking allowance of 5 spaces per 1,000 SF.	185,600 total SF of warehousing, requiring 186 stalls. The Project proposes a total of 261 parking spaces. Building 1 would have 130 spaces and Building 2 would have 131 spaces. *The proposed Project would be consistent with this standard following approval of the proposed text amendments to Riverside Municipal Code Section 19.170.070 Sub-district development standards.*

Notes: FAR = floor area ratio, SF = square feet
Source: Riverside Municipal Code Section 19.170.070

As shown in Table 5.1-1, the Project would be consistent with the proposed modifications to the IE development standards and would not conflict with an applicable zoning regulation related to scenic quality. Therefore, impacts related to conflict with applicable zoning and other regulations governing scenic quality would be **less than significant.**

THRESHOLD D: WOULD THE PROJECT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?

Construction

Limited nighttime lighting would be needed for Project construction. Construction would occur within the hours allowable by the City of Riverside Municipal Code Section 7.35.020, which states that construction shall occur only between the hours of 7:00 AM and 7:00 PM on weekdays and between the hours of 8:00 AM and 5:00 PM on Saturdays. Construction is not permitted on Sundays or any federal holidays. Thus, most construction activity would occur during daytime hours during the week, and construction-related illumination would be used for limited safety and security purposes and would be required to be directed downward in compliance with Riverside Municipal Code Chapter 19.556 (Outdoor Lighting), included as PPP AES-1 (see Section 5.1.8, *Existing Regulations and Plans, Programs, or Policies*). In addition, construction of the Project would not include any materials that would generate off-site glare that could direct light to sensitive receptors. Therefore, impacts related to lighting and glare during construction would be **less than significant.**

Operation

Development of the Project would introduce new sources of light and glare into the area from street lighting, parking lot lighting, outdoor lighting, vehicle lighting and building lighting. The proposed Project is located in a developed area that is primarily developed with industrial uses. The nearest occupied residence is located approximately 40 feet to the north, across Roberta Street. Potential spill of light onto surrounding properties and “night glow” would be reduced by using hoods and other design features on the light fixtures used within the proposed Project. The Project’s lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices (PDF AES-1). All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting. Additionally, implementation of the existing regulatory requirements per City of Riverside Municipal Code Chapter 19.556 (Outdoor Lighting), included as PPP AES-1, would occur during the City’s permitting process and would ensure that impacts related to light and glare are less than significant.

The proposed building materials do not consist of highly reflective materials, lights would be shielded consistent with Municipal Code Chapter 19.556 requirements included as PPP AES-1, and the proposed landscaping along Project boundaries would screen sources of light and reduce the potential for glare. The proposed Project would create limited new sources of light or glare from security and site lighting but would not adversely affect day or nighttime views in the area given the similarity of the existing lighting in the surrounding urban environment. Thus, impacts would be **less than significant.**

5.1.7 CUMULATIVE IMPACTS

The cumulative aesthetics study area for the proposed Project includes the viewshed from public areas that can view the Project site as well as locations that can be viewed from the Project site, which may include areas under a different jurisdiction such as Riverside County. Although views of the surrounding mountains are available in the Project area, they are not panoramic. Additionally, these views are available throughout the cumulative aesthetics study area and are not unique to the Project site.

There is one cumulative project within the viewshed of the proposed Project located at 3016-3112 Kansas Avenue (PR-2023-001482), directly south of the Project site across Massachusetts Avenue. The 3016-3112 Kansas Avenue project proposes a rezone of a 21-acre site to Innovation District Overlay (ID) subdistrict. No construction is planned as part of the 3016-3112 Kansas Avenue project, thus, the combination of the proposed Project and the 3016-3112 Kansas Avenue would not create a cumulatively considerable impact related to aesthetics. There are also three entitled projects (PR-2020-000429, PR-2022-001367, and PR-2023-00173) located approximately 1,000 feet east of the site. However, due to the existing development in between the Project site and the three cumulative project sites, the cumulative project sites are not visible from the proposed Project site. Additionally, other developments proposed in the cumulative study area would be required to comply with the applicable City of Riverside Municipal Code development standards. Accordingly, with buildout of the Project and other developments within the Project's viewshed, impacts to scenic vistas would not be cumulatively significant and the Project's contributions would be **less than cumulatively considerable**.

As discussed in Impact B, the Project site is not within proximity to any designated State scenic routes. In addition, cumulative Projects within the cumulative study area for aesthetics would also not be within proximity to any designated State scenic routes. Therefore, the Project has **no potential to contribute to a cumulatively significant impact** to scenic resources within a designated scenic route.

The Project would not conflict with applicable design regulations of City of Riverside Municipal Code for the IE zoning designation. Therefore, the Project has no potential to contribute to cumulatively considerable scenic quality impacts. Moreover, any new development in the cumulative study area would be subject to applicable development regulations and design standards imposed by the governing jurisdiction, which would ensure that development incorporates high quality building materials, architectural design, and landscaping to avoid potential adverse effects to local scenic quality. Therefore, cumulative impacts related to conflict with applicable design regulations would be **less than significant**.

With respect to potential cumulative light and glare impacts, the Project would be required to comply with City of Riverside Municipal Code Chapter 19.556 (Outdoor Lighting), which sets standards for exterior lighting/fixtures. Any development project in the cumulative study area would be required to comply with the light reduction requirements applicable in their respective jurisdiction. Although cumulative development in the Project's surrounding area is expected to introduce new sources of artificial lighting and potentially reflective materials, the required compliance with the governing development code requirements would ensure that future cumulative development does not introduce substantial sources of artificial lighting or glare. As such, the Project would not contribute to cumulatively considerable adverse impacts to the existing

daytime or nighttime views of the Project sites or their surroundings. Therefore, cumulative impacts related to light and glare would be **less than significant**.

5.1.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- 2022 California Energy Code Title 24, Part 6
- California Green Building Standards Code, Title 24, Part 11

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to aesthetics. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP AES-1: Light and Glare. All lights shall be directed and/or shielded to prevent the light from adversely affecting adjacent properties. No structure or lighting feature shall be permitted which creates adverse glare. A photometric plan shall be provided that indicates the amount of light emanating from the proposed/existing light fixtures to comply with City of Riverside Municipal Code Chapter 19.556, Outdoor Lighting.

5.1.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would result in no impact related to Threshold B and less-than-significant impacts with respect to Thresholds A, C, and D.

5.1.10 PROJECT DESIGN FEATURES

PDF AES-1: Lighting Design. The Project's lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices. All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting.

5.1.11 MITIGATION MEASURES

No mitigation measures are required.

5.1.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable aesthetic impacts would occur.

5.1.13 REFERENCES

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5.2 Agriculture and Forestry Resources

5.2.1 INTRODUCTION

This section describes the agricultural and forestry resource conditions in the Project region and potential impacts on agricultural and forestry resources from Project implementation. The analysis in this section is based, in part, on the following documents and resources:

- California Department of Conservation Farmland Mapping and Monitoring Program, 2022
- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside General Plan Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report State Clearinghouse No. 2021040089,* prepared July 2021, certified September 2021
- City of Riverside Municipal Code

5.2.2 REGULATORY SETTING

5.2.2.1 Federal Regulations

Forest and Timberland

The United States Forest Service (USFS) defines a forested area as "forest land" if it is at least one acre in size and at least 10 percent occupied by forest trees of any size or formerly having had such tree cover and not currently developed for non-forest use (United States Department of Agriculture, 2024). Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land includes transition zones which are those “areas located between heavily forested and non-forested lands that are at least 10 percent stocked with forest trees, and forest areas adjacent to urban and built-up lands.” The majority of federal forest land is managed as the National Forest System, which includes timberland.

California Public Resources Code (PRC) § 4526 defines “Timberland” as land, other than land owned by the federal government and designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Sections 51112 or 51113 of California Government Code defines “Timberland Production Zone" (TPZ) as land used for growing and harvesting timber and compatible uses.

5.2.2.2 State Regulations

Farmland Mapping and Monitoring Program

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of important farmland. It divides the State's farmland into different categories based on soil quality and existing agriculture, which are used to identify productive farmland and to analyze impacts on farmland. The various types of farmland identified by FMMP include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, farmland of local importance, and grazing land. The highest rated farmland is Prime Farmland.

The list below describes the categories mapped by the DOC through the FMMP (DOC, 2024). Collectively, lands classified as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are referred to as "farmland."

- **Prime Farmland.** Farmland that has the ideal combination of physical and chemical features. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields and long-tern agricultural production. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance**. Farmland that is similar to Prime Farmland but with minor shortcomings, such as greater slopes or lower moisture content. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Unique Farmland.** Land with lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but may include land that supports non-irrigated orchards or vineyards, as found in some climatic zones in California. The land must have been used for crops at some time during the 4 years prior to the mapping date.
- **Farmland of Local Importance.** Land that is important to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups with an interest in grazing activities.
- **Urban and Built-Up Land.** Land that is developed with structures that have been built to a density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land supports residential, industrial, commercial, institutional, and public administrative uses; railroad and other transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment facilities; water control structures; and other developed uses.
- **Other Land.** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Undeveloped and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Williamson Act Contracts

The California Land Conservation Act (Williamson Act) was passed in 1965 to protect specific parcels of land in agricultural and open space use. Landowners enter into 10-year contracts with local governments and in return receive lower property tax assessments. Williamson Act Contracts are self-renewing; the contracts automatically renew each year for an additional year. This continues indefinitely unless the County or the landowner files a Notice of Non-Renewal which then terminates the contract at the end of its term (9 years). When a Non-Renewal is filed by the landowner, the property tax assessment gradually reverts back to being computed upon full market value.

Timberland

Section 12220(g) of the California Public Resources Code defines forest land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

5.2.2.3 Regional Regulations

There are no regional regulations applicable to the proposed Project.

5.2.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives related to agriculture resources that are applicable to the Project .

Open Space and Conservation Element

Objective LU-6: Retain functional agricultural areas within Riverside, particularly within the greenbelt area, while allowing for sensitive, low-intensity residential uses.

Objective OS-3: Preserve designated agricultural lands in recognition of their economic, historic and open space benefits and their importance to the character of the City of Riverside.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.2.3 ENVIRONMENTAL SETTING

5.2.3.1 City-Wide

The City of Riverside Phase I General Plan Update EIR describes that most of the existing agricultural resources within the City limits are located within the Arlington Heights Greenbelt (City of Riverside, 2021). Agricultural resources are also located in the City's Sphere of Influence, especially in the Highgrove, Woodcrest, and Rancho El Sobrante areas. The California Department of Conservation Farmland Mapping and Monitoring Program designates a majority of the City as Urban and Built-Up Land; however, small areas of the City such as near the southern boundary of the City, south of Victoria Avenue and west of Washington Street within the Arlington Heights Neighborhood, and the northeastern area of the City within the University of California, Riverside West Campus are designated as Important Farmland, Farmland of Statewide Importance, Unique Farmland, and Other Land (City of Riverside, 2021).

There are ten Williamson Act contract parcels within the City limits: four parcels are in the Prenda neighborhood and six parcels are in the southeastern portion of the City in the Woodcrest area (City of Riverside, 2021).

5.2.3.2 Project Site

The Project site is currently developed with industrial uses. The Project site is not currently used for agricultural production. The Project site has a General Plan Land Use designation of Industrial (I) and is zoned General Industrial. Additionally, the Project site is designated as Urban and Built Up Land by the FMMP (DOC, 2022).

5.2.3.3 Forestry Resources

The Project site is located in a fully developed area of the City of Riverside. There is no forest land on the site or in the immediate vicinity of the Project site.

5.2.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold 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.

Threshold B Conflict with existing zoning for agricultural use, or a Williamson Act contract.

Threshold C Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

Threshold D Result in the loss of forest land or conversion of forest land to non-forest use.

Threshold 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?

5.2.5 METHODOLOGY

Agricultural resources were assessed based on the DOC's FMMP, which is a biennial report and mapping resource on the conversion of farmland and grazing land and the City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report (2021). Using these sources, the proposed Project was analyzed for potential conversion of important farmland, conflicts with zoning designations, conflicts with Williamson Act contract lands, and other changes in the existing environment which, due to their location or nature, result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use

Forest resources were assessed based on the City of Riverside General Plan (2007a) and the City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report (2021). Using these sources, the proposed Project was analyzed for the potential conversion of forest land, conflicts with zoning designations, and community changes resulting from the proposed Project that would remove existing forest land.

5.2.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT 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?

According to the DOC Important Farmland Finder, the Project site is identified as Urban and Built-Up Land and is not identified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (DOC,

2022). Additionally, the Project site is not identified as Farmland of Local Importance by the City (City of Riverside 2007a). The Project site has a land use designation of Industrial and a zoning designation of General Industrial. The site is also within the Innovation District (ID) Overlay Zone and is zoned as Employment Emphasis (EE) and Housing Emphasis (HE). The Project includes a zone change to change the site's ID zoning from EE and HE to Industrial Emphasis (IE). The Project site is currently used for industrial purposes and does not includes agricultural uses. Additionally, the Project site's existing land use, zoning, and proposed zoning do not support agricultural uses. Therefore, the proposed Project would result in **no impact** related to the conversion of Prime, Statewide, or Unique farmland to non-agricultural use.

THRESHOLD B: WOULD THE PROJECT CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?

As identified above, the Project site does not include agricultural land or farmland of Prime, Statewide, or Unique Importance. The Project site has a land use designation of Industrial and a zoning designation of General Industrial. The site is also within the ID Overlay Zone and is zoned as EE and HE. The Project includes a zone change to change the site's ID zoning from EE and HE to IE. The Project site is currently used for industrial purposes and does not includes agricultural uses. Additionally, the Project site's existing land use and zoning and proposed zoning do not support agricultural uses. No agriculture zoning exists on or adjacent to the Project site. Additionally, as shown on the Riverside General Plan Figure OS-3, *Williamson Act Preserves,* the Project site is not subject to a Williamson Act contract (City of Riverside, 2007b). Therefore, the proposed Project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract and **no impact** would occur.

THRESHOLD C: WOULD THE PROJECT CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 12220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?

The Project site is currently developed with industrial uses. No forest land exists on or adjacent to the Project site. The Project site is zoned General Industrial, and it is not zoned for forest land or timberland uses. Therefore, the Project would not result in impacts related to conflicts with existing forest land or timberland zoning. **No impact** would occur.

THRESHOLD D: WOULD THE PROJECT RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?

The Project site is currently developed with industrial uses. No forest land exists on or adjacent to the Project site. The Project site is not zoned for forest land or timberland uses. Therefore, the proposed Project would not result in impacts related to loss or conversion of forest land to non-forest use. **No impact** would occur.

THRESHOLD E: WOULD THE PROJECT 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?

As identified above, the Project site is not identified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland by the DOC's Important Farmland Finder map. Additionally, the proposed Project would not convert farmland to a nonagricultural use or convert forest land to a non-forest use. Therefore, the proposed Project would not involve other changes in the existing environment which, due to its location or nature, could result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use, and **no impacts would occur**.

5.2.7 CUMULATIVE IMPACTS

Agricultural Resources

The cumulative study area for agricultural resources for this Draft EIR is the County of Riverside as these resources are regularly assessed on the countywide level as part of the State's FMMP. There is no Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance within the Project site or within the immediate vicinity of the Project site. As discussed, Project implementation would not directly impact Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Therefore, the Project does not have an incremental effect that would combine with other projects in the County to cumulatively contribute to the loss or conversion of Farmland to a non-agricultural use. Thus, **cumulative impacts related to Farmland would not occur**.

Forestry Resources

The cumulative study area for forestry resources is the County of Riverside. There are no forest resources or woodland vegetation within the immediate vicinity of the Project site and limited lowland woodlands within the peripheries of the City. As discussed, Project implementation would not directly impact forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project does not have an incremental effect that would combine with other projects in the County to cumulatively contribute to forest resource impacts. Thus, **cumulative impacts related to forest resources would not occur**.

5.2.8 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Thresholds A through E were determined to have no impact.

5.2.9 MITIGATION MEASURES

No mitigation measures are required.

5.2.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable agricultural or forestry resource impacts would occur.

5.2.11 REFERENCES

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5.3 Air Quality

5.3.1 INTRODUCTION

This section provides an overview of the existing air quality within the Project site and surrounding region, a summary of applicable regulations, and analyses of potential short-term and long-term air quality impacts from implementation of the Project. Mitigation measures are recommended as necessary to reduce significant air quality impacts. This analysis is based on the following documents:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code
- *Air Quality, Energy, and GHG Impact Analysis*, prepared by EPD Solutions, Inc., May 2025 (Appendix B)
- *Health Risk Assessment*, prepared by EPD Solutions, Inc., May 2025 (Appendix C)

5.3.2 REGULATORY SETTING

5.3.2.1 Federal Regulation

United States Environmental Protection Agency

Criteria Air Pollutants

At the federal level, the United States Environmental Protection Agency (USEPA) has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA were made by Congress in 1990.

The CAA requires the USEPA to establish National Ambient Air Quality Standards (NAAQS). The USEPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particles with a diameter of 10 micrometers or less (PM_{10}), particles with a diameter of 2.5 micrometers or less ($PM_{2.5}$), and lead. Table 5.3-1, *Ambient Air Quality Standards for Criteria Pollutants*, shows the NAAQS for these pollutants (descriptions of each pollutant are also included in Section 5.3.3.2, *Criteria Air Pollutants*).

The CAA also requires each state to prepare an air quality control plan, referred to as a State Implementation Plan (SIP). The CAA Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. The USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and to determine whether implementing the SIPs will achieve air quality goals. If the USEPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area.

The USEPA also has regulatory and enforcement jurisdiction over emission sources beyond state waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The USEPA's primary role at the state level is to oversee state air quality programs. The USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the CAAA directed the USEPA to promulgate national emissions standards for HAPs (NESHAP). The NESHAP may differ for major sources as opposed to area sources of HAPs. Major sources are defined as stationary sources with potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources. The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the USEPA developed technology-based emission standards designed to produce the maximum emission reduction achievable. These standards are generally referred to as requiring maximum achievable control technology (MACT). For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the USEPA promulgated health-risk-based emissions standards that were deemed necessary to address risks remaining after implementation of the technology-based NESHAP standards.

Table 5.3-1: Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 hour 8 hours	0.09 ppm 0.07 ppm	--- 0.075 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when ROG and NOx react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial/industrial mobile equipment.
Carbon Monoxide (CO)	1 hour 8 hours	20 ppm 9.0 ppm	35 ppm 9 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
Nitrogen Oxide (NOx)	1 hour Annual Arithmetic Mean	0.18 ppm 0.030 ppm	0.100 ppm 0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
Sulfur Dioxide (SO_2)	1 hour 3 hours 24 hours Annual Arithmetic Mean	0.25 ppm --- 0.04 ppm ---	75 ppb 0.50 ppm 0.14 ppm 0.03 ppm	Irritates upper respiratory tract, injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
Respirable Particulate Matter (PM_{10})	24 hours Annual Arithmetic Mean	50 µg/m³ 20 µg/m³	150 µg/m³ ---	May irritate eyes and respiratory tract, decrease lung capacity, increase cancer and mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Fine Particulate Matter ($PM_{2.5}$)	24 hours	---	35 µg/m³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics.
	Annual Arithmetic Mean	12 µg/m³	12 µg/m³		
Lead (Pb)	30 Day Average	1.5 µg/m³	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	*Present source:* lead smelters, battery manufacturing and recycling facilities. *Past source:* combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m³		
	Rolling 3-Month Average	---	0.15 µg/m³		
Hydrogen Sulfide	1 hour	0.03 ppm	…	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations).	Geothermal power plants, petroleum production and refining.
Sulfates (SO_4)	24 hours	25 µg/m³	…	Decrease in ventilatory functions, aggravation of asthmatic symptoms, aggravation of cardio-pulmonary disease, vegetation damage, degradation of visibility, and property damage.	Industrial processes.
Visibility Reducing Particles	8 hours	Extinction of 0.23/km; visibility of 10 miles or more	…	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See $PM_{2.5}$.

Notes: ppm = parts per million, ppb = parts per billion, µg/m³ = micrograms per cubic meter.
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

The CAAA also required the USEPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, Section 219 required the use of reformulated gasoline in selected areas with the most severe ozone nonattainment conditions to further reduce mobile-source emissions.

5.3.2.2 State Regulations

California Air Resources Board

California Clean Air Act (CCAA) and Criteria Air Pollutants

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of State and local air pollution control programs in California and for implementation of the CCAA. The CCAA, which was adopted in 1988, requires CARB to establish the California Ambient Air Quality Standards (CAAQS). California has generally adopted more stringent ambient air quality standards than Federal standards for the criteria air pollutants and has adopted air quality standards for some pollutants

for which there is no corresponding national standard, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Applicable CAAQS are included in Table 5.3-1 above.

The CCAA requires all local air districts in the state to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts shall focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Among CARB's other responsibilities are overseeing compliance by local air districts with California and federal laws, approving local air quality plans, submitting SIPs to the USEPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

Diesel Regulations

CARB has adopted several iterations of regulations for diesel trucks that are aimed at reducing diesel particulate matter (DPM). More specifically, the CARB Drayage Truck Regulation, the CARB statewide On-road Truck and Bus Regulation require accelerated implementation of "clean trucks" into the statewide truck fleet. In other words, older, more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements.

Moreover, the average statewide DPM emissions for heavy duty trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to these regulatory requirements. Diesel emissions identified in this analysis therefore overstate future DPM emissions because not all of these regulatory requirements are reflected in the modeling for the sake of providing a conservative analysis.

Toxic Air Contaminants

Air quality regulations also focus on toxic air contaminants (TACs). In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no safe level of exposure. This contrasts with the criteria for air pollutants, for which acceptable levels of exposure can be determined and for which ambient standards have been established. Instead, the USEPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the MACT or best available control technology (BACT) for toxins and to limit emissions. These statutes and regulations, in conjunction with additional rules set forth by the districts, establish the regulatory framework for TACs.

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill (AB) 1807 [Chapter 1047, Statutes of 1983]) (Health and Safety Code Section 39650 *et seq.*) and the Air Toxics Hot Spots Information and Assessment Act (Hot Spots Act) (AB 2588 [Chapter 1252, Statutes of 1987]) (Health and Safety Code Section 44300 et seq.). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted the USEPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure (ATCM) for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate BACT to minimize emissions.

The Air Toxics Hot Spots Information and Assessment Act requires existing facilities emitting toxic substances above a specified level to prepare a toxic-emission inventory, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB published the *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook), which provides guidance concerning land use compatibility with TAC sources. Although it is not a law or adopted policy, the Handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help keep children and other sensitive populations out of harm's way. Based on CARB's Community Health Air Pollution Information System (CHAPIS), no major TAC sources are located in proximity to the Project area. In addition, CARB has promulgated the following specific rules to limit TAC emissions:

- **CARB Rule 2485** (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **CARB Rule 2480** (13 CCR Chapter 10 Section 2480), Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **CARB Rule 2477** (13 CCR Section 2477 and Article 8), Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

California Assembly Bill 1493 – Pavley

In 2002, the California Legislature adopted AB 1493 requiring the adoption of regulations to develop fuel economy standards for the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce fuel use and emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). CARB, the USEPA, and the United States Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy standards for model 2017-2025 vehicles, which are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than five consecutive minutes. The idling limit does not apply to:

- Idling when queuing;
- Idling to verify that the vehicle is in safe operating condition;
- Idling for testing, servicing, repairing or diagnostic purposes;
- Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
- Idling required to bring the machine system to operating temperature; and
- Idling necessary to ensure safe operation of the vehicle.

Title 24, California Energy Code and California Green Building Standards

The Building Energy Efficiency Standards embodied in Title 24 of the California Code of Regulations (CCR) include the Energy Code (Title 24, Part 6) and voluntary energy efficiency provisions in California Green Building Standards Code (CALGreen) (Title 24, Part 11). The Title 24 Building Energy Efficiency Standards are updated every three years.

The California Energy Code (CCR Title 24 Part 6) was first adopted in 1978 by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in response to a legislative mandate to reduce California's energy consumption. The Energy Code is updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The most recently approved update is the 2022 Energy Code, which became effective on January 1, 2023.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The CALGreen (24 CCR, Part 11) was adopted as part of the California Building Standards Code and was last updated in 2022. The 2022 CALGreen standards became effective January 1, 2023. The 2022 CALGreen standards that reduce emissions and are applicable to the proposed Project include, but are not limited to, the following:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 of CalGreen Code (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 of CalGreen Code (5.106.5.3). Additionally, Table 5.106.5.4.1 of CalGreen Code specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 of CalGreen Code (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
- Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute at 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not

more than 1.8 gallons per minute at 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 square feet (SF) or for excess consumption where any tenant within a new building or within an addition that is projected to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Commissioning. For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

The 2022 Energy Code has been adopted by the City of Riverside Municipal Code in Chapter 16.13: Energy Code. The 2022 CALGreen Code has been adopted by the City of Riverside Municipal Code in Chapter 16.07: Green Code.

Senate Bill 1000 Environmental Justice in Local Land Use Planning

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed and Governor Brown signed Senate Bill (SB) 1000 in 2016, requiring local governments to identify environmental justice communities (called "disadvantaged communities") in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments' planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities.

5.3.2.3 Regional Regulations

South Coast Air Quality Management District

Criteria Air Pollutants

The South Coast Air Quality Management District (SCAQMD) attains and maintains air quality conditions in the South Coast Air Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of the SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the CAA, CAAA, and CCAA. Air quality plans applicable to the Project are discussed below.

Air Quality Management Plan

The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the air quality management plan (AQMP), which addresses federal and State CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin.

The 2012 AQMP was adopted by the SCAQMD Governing Board on December 12, 2012. The purpose of the 2012 AQMP for the Basin is to set forth a comprehensive and integrated program that will lead the region into compliance with the federal 24-hour $PM_{2.5}$ air quality standard, and to provide an update to the Basin's commitment towards meeting the federal 8-hour ozone standards. The AQMP would also serve to satisfy recent USEPA requirements for a new attainment demonstration of the revoked 1-hour ozone standard, as well as a vehicle mile travelled (VMT) emissions offset demonstration. The 2012 AQMP, as approved by CARB, serves as the official SIP submittal for the federal 2006 24-hour $PM_{2.5}$ standard. In addition, the AQMP updates specific new control measures and commitments for emissions reductions to implement the attainment strategy for the 8-hour ozone SIP. The 2012 AQMP set forth programs which require integrated planning efforts and the cooperation of all levels of government: local, regional, State, and federal.

In March 2017, the SCAQMD finalized the 2016 AQMP, which continued to evaluate integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporated scientific and technological information and planning assumptions, including from the SCAG's 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and updated emission inventory methodologies for various source categories.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 federal 8-hour ozone standard. SCAQMD included a total of 49 control measures in the 2022 AQMP, including control measures focused on widespread deployment of zero emission and low NOx technologies through a combination of regulatory approaches and incentives.

The RTP/SCS also provides a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and Federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and use resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the Project include the following:

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices (BMP), such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Applicable Rule 403 dust suppression (and PM_{10} generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1470 – Requirements for Stationary Diesel-fueled Internal Combustion and Other Compression Ignition Engines. This rule applies to any person who owns or operates a stationary compression ignition engine in the SCAQMD with a rated brake horsepower greater than 50. This rule sets operational hour requirement stating that new stationary emergency diesel engines shall not operate more than 50 hours a year for maintenance and testing. Additionally, under this rule, emergency generators shall operate for a maximum of 200 hours a year.

5.3.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following policies and objectives related to air quality that are applicable to the Project (City of Riverside, 2007):

Air Quality Element

Objective AQ-1: Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.

Policy AQ-1.1: Ensure that all land use decisions, including enforcement actions, are made in an equitable fashion to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status or geographic location, from the health effects of air pollution.

Policy AQ-1.2: Consider potential environmental justice issues in reviewing impacts (including cumulative impacts for each project proposed).

Policy AQ-1.3: Separate, buffer and protect sensitive receptors from significant sources of pollution to the greatest extent possible.

Policy AQ-1.5: Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.

Policy AQ-1.20: Create the maximum possible opportunities for bicycles as an alternative work transportation mode.

Policy AQ-1.21: Cooperate and participate in regional air quality management plans, programs and enforcement measures.

Policy AQ-1.22: Implement the required components of the Congestion Management Plan (CMP) and continue to work with Riverside County Transportation Commission on annual updates to the CMP.

Objective AQ-2: Reduce air pollution by reducing emissions from mobile sources.

Policy AQ-2.3: Cooperate with local, regional, State and Federal jurisdictions to reduce vehicle miles traveled (VMT) and motor vehicle emissions through job creation in job-poor areas.

Policy AQ-2.4: Monitor and strive to achieve performance goals and/or VMT reduction which are consistent with SCAG's goals.

Policy AQ-2.24: Support full compliance with the SCAQMD's Clean Fleet Rules.

Objective AQ-3: Prevent and reduce pollution from stationary sources, including point sources (such as power plants and refinery boilers) and area sources (including small emission sources such as residential water heaters and architectural coatings).

Policy AQ-3.4: Require projects to mitigate, to the extent feasible, anticipated emissions which exceed AQMP Guidelines.

Policy AQ-3.6: Support "green" building codes that require air conditioning/filtration installation, upgrades or improvements for all buildings, but particularly for those associated with sensitive receptors.

Policy AQ-3.7: Require use of pollution control measures for stationary and area sources through the use of best available control activities, fuel/material substitution, cleaner fuel alternatives, product reformulation, change in work practices and of control measures identified in the latest AQMP.

Objective AQ-4: Reduce particulate matter, as defined by the Environmental Protection Agency (EPA), as either airborne photochemical precipitates or windborne dust.

Policy AQ-4.1: Identify and monitor sources, enforce existing regulations and promote stronger controls to reduce particulate matter (e.g., require clean fuels for street sweepers and trash trucks, exceed the AQMD requirements for fleet rules).

Policy AQ-4.2: Reduce particulate matter from agriculture (e.g., require use of clean non-diesel equipment and particulate traps), construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way and off-road vehicles to the extent possible, as provided in SCAQMD Rule 403.

Policy AQ-4.3: Support the reduction of all particulates potential sources.

Policy AQ-4.5: Require the suspension of all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

Policy AQ-4.6: Cooperate with local, regional, State and Federal jurisdictions to better control particulate matter.

Objective AQ-5: Increase energy efficiency and conservation in an effort to reduce air pollution.

Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.

Objective AQ-7: Support a regional approach to improving air quality through multi-jurisdictional cooperation.

Policy AQ-7.1: Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.

Policy AQ-7.9: Adhere with Federal, State and regional air quality laws, specifically with Government Code Section 65850.2, which requires that each owner or authorized agent of a project indicate, on the development or building permit for the project, whether he/she will need to comply with the requirements for a permit for construction or modification from the SCAQMD.

Policy AQ-7.10: Incorporate, to the extent applicable and permitted by law, current and proposed AQMP measures.

City of Riverside Phase I General Plan Update

The City of Riverside Phase I General Plan Update (adopted 2021) contains the following policies related to air quality that are applicable to the Project (City of Riverside, 2021):

Environmental Justice Element

Policy AQ-EJ-1.0 Air Quality: Ensure that land use decisions, including enforcement actions, are made in an equitable fashion to protect residents and workers in environmental justice communities from the short- and long-term effects of air pollution.

5.3.3 ENVIRONMENTAL SETTING

5.3.3.1 Climate and Meteorology

The Project area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of southern California combine to make the Basin an area of high air pollution

potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and San Bernardino mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

5.3.3.2 Criteria Air Pollutants

The CARB and the USEPA currently focus on the following air pollutants as indicators of ambient air quality: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM_{10}), fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less ($PM_{2.5}$), and lead. These pollutants are referred to as "criteria air pollutants" because they are the most prevalent air pollutants known to be injurious to human health. Extensive health-effects criteria documents regarding the effects of these pollutants on human health and welfare have been prepared over the years. Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal CAA. California has generally adopted ambient air quality standards that are more stringent than Federal standards for the criteria air pollutants (referred to as the CAAQS, or the State standards) and has adopted air quality standards for some pollutants for which there is no corresponding national standard, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Ozone

Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air; but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NOx). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed, it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth ("rainout"), or absorption by water molecules in clouds that later fall to earth with rain ("washout").

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal

combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide

NO_2 is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO_2. The combined emissions of NO and NO_2 are referred to as NOx, which are reported as equivalent NO_2. Aside from its contribution to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

Sulfur Dioxide

SO_2 is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfur trioxide (SO_3). Collectively, these pollutants are referred to as sulfur oxides (SOx).

Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO_2 aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. Long-term SO_2 exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

Particulate Matter

PM_{10} and $PM_{2.5}$ consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM_{10} and $PM_{2.5}$ represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis and respiratory illnesses in children. Particulate matter can also damage materials and reduce visibility. One common source of $PM_{2.5}$ is diesel exhaust emissions.

PM_{10} consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO_2 and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM_{10} and $PM_{2.5}$ are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. $PM_{2.5}$ can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROGs, ammonia (NH_3), NOx, and SOx.

Lead

Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles.

Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates.

5.3.3.3 Toxic Air Contaminants

Concentrations of TACs (or in federal parlance, HAPs) are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., DPM). DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

Unlike the other TACs, no ambient monitoring data is available for DPM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a particulate matter exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of DPM. In addition to DPM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

5.3.3.4 CO Hotspots

An adverse CO concentration, known as a "hot spot" is an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent over the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated as attainment.

5.3.3.5 Odorous Emissions

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Offensive odors are unpleasant and can lead to public distress generating citizen complaints to local governments. Although unpleasant, offensive odors rarely cause physical harm. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source, wind speed, direction, and the sensitivity of receptors.

5.3.3.6 Existing Conditions

The SCAQMD maintains monitoring stations within district boundaries, called Source Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. The Project site is located within SRA 23, Metropolitan Riverside. The closest monitoring station for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ is the SCAQMD Riverside County 1 Rubidoux station (within SRA 23), which is located approximately 3.4 miles northwest of the Project site. This station was identified as the closest monitoring station that would be most applicable to the City of Riverside and Project site air quality conditions.

The most recent three years of data available is shown in Table 5.3-2, *Air Quality Monitoring Summary 2021-2023*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables. Data for SO_2 has been omitted as attainment is regularly met in the Basin and few monitoring stations measure SO_2 concentrations.

As indicated in the monitoring results included in Table 5.3-2, the 1-hour ozone State standard was exceeded 20 times in 2021, 30 times in 2022, and 48 times in 2023. The 8-hour ozone federal standard was exceeded 55 times in 2021, 70 times in 2022, and 69 times in 2023. The 8-hour ozone State standard was exceeded 57 times in 2021, 72 times in 2022, and 70 times in 2023. The federal PM_{10} standard had no exceedances in 2021, 1 exceedance in 2022, and 1 exceedance in 2023. The State PM_{10} standard was exceeded 16 times in 2021, 55 times in 2022, and 43 times in 2023. The $PM_{2.5}$ federal standard had 10 exceedances in 2021, 1 exceedance in 2022, and 1 exceedance in 2023. In addition, the CO, SO_2, and NO_2 standards were not exceeded in this area during the 3-year period. See Table 5.3-3 for attainment designations for the Basin.

Table 5.3-2: Air Quality Monitoring Summary 2021-2023

Pollutant	Standard	Year		
		2021	2022	2023
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.117	0.122	0.139
Maximum Federal 8-Hour Concentration (ppm)		0.097	0.095	0.106
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	20	30	48
Number of Days Exceeding Federal 8-Hour Standard	> 0.070 ppm	55	70	69
Number of Days Exceeding State 8-Hour Standard	> 0.070 ppm	57	72	70
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.1	3.3	1.4
Maximum Federal 8-Hour Concentration	> 20 ppm	1.8	1.2	1.2
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.052	0.056	0.055
PM_{10}				
Maximum Federal 24-Hour Concentration (µg/m³)	> 150 µg/m³	76	153	166
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m³	0	1	1
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m³	16	55	43

Pollutant	Standard	Year		
		2021	2022	2023
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration (µg/m³)	> 35 µg/m³	82.1	38.5	48.7
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m³	10	1	1

Notes: O_3 = ozone, CO = carbon monoxide, NO_2 = nitrogen dioxide, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns), ppm = parts per million, µg/m³= micrograms per cubic meter
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Both CARB and the USEPA use this type of monitoring data to designate areas with air quality problems and to initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet, or that contributes to ambient air quality in a nearby area that does not meet the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified on the basis of available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

Table 5.3-3: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Attainment	Unclassifiable/Attainment
Pb	Attainment	Unclassifiable/Attainment

Notes: O_3 = ozone, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns), CO = carbon monoxide, NO_2 = nitrogen dioxide, SO_2 = sulfur dioxide, Pb = lead
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

The 10.21-acre Project site is currently developed with two industrial buildings. Criteria pollutants are currently generated by the operation of existing industrial buildings and related vehicle and truck trips.

5.3.3.7 Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public according to the thresholds below, because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation.

5.3.4 THE PROJECT SITE IS SURROUNDED PRIMARILY BY INDUSTRIAL USES TO THE NORTH, EAST, SOUTH, AND WEST. THE CLOSEST SENSITIVE RECEPTORS TO THE PROJECT SITE IS A HOUSING ASSISTANCE SHELTER LOCATED AT 2801 HULEN PLACE, APPROXIMATELY 67.3 METERS EAST OF THE PROJECT SITE, AS SHOWN IN FIGURE 5.3-1, *SENSITIVE RECEPTORS*. THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold A Conflict with or obstruct implementation of the applicable air quality plan.

Threshold 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.

Threshold C Expose sensitive receptors to substantial pollutant concentrations.

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

Regional Significance Thresholds

The SCAQMD's existing regional significance thresholds for regulated pollutants are listed in Table 5.3-4. The SCAQMD's CEQA air quality methodology provides that any projects that result in daily emissions that exceed any of the thresholds in Table 5.3-4 would result in both an individually (project-level) and cumulatively significant air quality impact.

Table 5.3-4: SCAQMD Regional Air Quality Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)	
	Construction	Operations
ROGs	75	55
NOx	100	55
CO	550	550
SO_2	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)

Local Significance Thresholds

SCAQMD has also developed localized significance thresholds (LSTs) that 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 standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of that pollutant for each of the 38 SRAs in the Basin. The localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by SCAQMD, were developed for use on projects

that are less than or equal to 5 acres in size and are only applicable to the following criteria pollutants: NOx, CO, PM_{10}, and $PM_{2.5}$.

Construction. Table 5.3-5, *Daily Acres Disturbed*, shows that, based on the size of the Project site and the default acres of grading derived from CalEEMod, the Project construction would disturb a maximum of 4 acres per day, with the most disturbed acres occurring during the grading phase of construction.

Table 5.3-5: Daily Acres Disturbed

Activity	Equipment Type	Equipment Quantity	Operating Hours per Day[1]	Acres Disturbed per piece of Equipment per Day	Acres Disturbed per Day
Demolition	Concrete/Industrial Saws	1	8	0	0
	Excavators	3	8	0	0
	Rubber Tired Dozers	2	8	0.5	1
				Total Acres Disturbed Per Day	1
Site Preparation	Rubber Tired Dozers	3	8	0.5	1.5
	Crawler Tractors	4	8	0.5	2.0
				Total Acres Disturbed Per Day	3.5
Grading	Excavators	2	8	0	0
	Graders	1	8	0.5	0.5
	Rubber Tired Dozers	1	8	0.5	0.5
	Scrapers	2	8	1.0	2.0
	Crawler Tractor	2	8	0.5	1.0
				Total Acres Disturbed Per Day	4
				Maximum Acres Graded Per Day	**4**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).
[1] Average construction equipment activity hours is based on the Default Data Tables of the CalEEMod User Guide: https://www.caleemod.com/user-guide

The Project site is located within SRA 23, Metropolitan Riverside. SCAQMD provides LST screening tables for 25, 50, 100, 200, and 500-meter source-receptor distances. The closest sensitive receptors to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site, as shown in Figure 5.3-1, Sensitive Receptors. A threshold of 50 meters was utilized to allow for a conservative analysis. Furthermore, as the Project's site is 10.21-acres, the threshold for 5-acres was utilized to yield a conservative analysis. This approach is conservative as it assumes that all on-site emissions associated with the Project would occur within a concentrated 5-acre area at a distance of 50 meters. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring within a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over the entire Project site. As such, LSTs for a 5-acre site are used as a screening tool to determine if there is potential for impacts to occur. Table 5.3-6 lists the thresholds that are used to evaluate construction-related LST emissions.

Table 5.3-6: SCAQMD Construction Localized Significance Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)
NOx	268
CO	1,872.7
PM_{10}	33.3
$PM_{2.5}$	8.7

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter.
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Operation. According to the SCAQMD LST methodology, LSTs apply to Project operational stationary and on-site mobile sources. Projects that involve mobile sources spending long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational localized significance thresholds.

As the Project site is 10.12 acres, the threshold for 5 acres was utilized to yield a conservative analysis because the LSTs increase with the size of the site. The nearest sensitive receptor is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site, as shown in Figure 5.3-1, *Sensitive Receptors*. As such, the LSTs for the 50-meter distance were utilized to provide a conservative analysis. Table 5.3-7 lists the thresholds that are used to evaluate operational LST emissions.

Table 5.3-7: SCAQMD Operational Localized Significance Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)
NOx	302
CO	2,178
PM_{10}	10
$PM_{2.5}$	3

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter.
Source: Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix B).

CO Hot Spots

Areas of vehicle congestion have the potential to create pockets of CO called hot spots. These pockets have the potential to exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels as well as implementation of control technology on industrial facilities, CO concentrations in the Basin and the state have steadily declined. The analysis of CO hot spots compares the volume of traffic that has the potential to generate a CO hot spot and the volume of traffic with implementation of the proposed Project.

Health Risk Threshold

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer

risk due to DPM exposure. Non-cancer health risks are conveyed in terms of the Hazard Index (HI). A ratio of the predicted concentration of the facility's reported TAC emissions to a concentration is considered acceptable to public health professionals. A significant risk is defined as an HI of 1.0 or greater. These thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant.

5.3.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Project, based on the maximum development assumptions that are outlined in Section 3.0, *Project Description*.

Air pollutant emissions associated with the proposed Project would result from construction equipment usage and from construction-related traffic. Additionally, emissions would be generated from operations of the future warehouses and from traffic volumes generated by this new use. The net increase in emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to the applicable thresholds of significance recommended by SCAQMD.

AQMP Consistency

SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed General Plan land use and zoning designation changes) would be consistent with the AQMP:

1. The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts.
2. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG's growth forecast and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities and counties located within the SCAG region, and, in part, on SCAG's three Land Development Categories. Therefore, if the level of housing or employment related to the proposed Project are consistent with the applicable assumptions used in the development of the AQMP, the Project would not jeopardize attainment of the air quality levels identified in the AQMP. For the proposed Project, the site would be redeveloped with two new industrial buildings that would generate employment. As no housing is proposed, the analysis focuses solely on employment generation.

Consistency Criterion No. 2 refers to the CAAQS. An impact would occur if the long-term emissions associated with the proposed Project would exceed the SCAQMD's regional significance thresholds for operation-phase emissions.

Construction

Short-term construction-generated emissions of criteria air pollutants and ozone precursors from development of the Project were assessed in accordance with methods recommended by SCAQMD. The Project's regional emissions were modeled using the California Emissions Estimator Model (CalEEMod), as recommended by SCAQMD. CalEEMod was used to determine whether short-term construction-related emissions of criteria air

pollutants associated with the proposed Project would exceed applicable regional thresholds and where mitigation would be required. Modeling was based on Project-specific data and predicted short-term construction-generated emissions associated with the Project and were compared with applicable SCAQMD regional thresholds for determination of significance.

In addition, to determine whether or not construction activities associated with development of the Project would create significant adverse localized air quality impacts on nearby sensitive receptors, the worst-case daily emissions contribution from the proposed Project was compared to SCAQMD's LSTs that are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts. The daily total on-site combustion, mobile, and fugitive dust emissions associated with construction were combined and evaluated against SCAQMD's LSTs for a 5-acre site.

Operations

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors, including mobile- and area-source emissions from the Project, were also quantified using the CalEEMod computer model. Area-source emissions were modeled according to the size and type of the land uses proposed. Mass mobile-source emissions were modeled based on the increase in daily vehicle trips that would result from the proposed Project. Trip generation rates were available from the traffic impact analysis prepared for the proposed Project (EPD, 2025c). Predicted long-term operational emissions were compared with applicable SCAQMD thresholds for determination of significance.

Trip length. The trip rate was adjusted to match the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, auto trip rates for general light industrial land use. Truck trip lengths were obtained from the SCAQMD's WAIRE Menu Technical Report Appendix B, Truck Trip Lengths. Vehicle splits were obtained using the daily trip total from the operational trip generation provided by the traffic impact analysis prepared for the proposed Project (EPD, 2025c). Truck trips were applied to the User Defined Industrial land use in CalEEMod, where 2-axle trucks with a 15.3-mile trip length and a trip percentage of 34.50 percent, were applied to non-residential H-W (home to work trips); 3-axle trucks with a 14.2-mile trip length and a trip percentage of 11.11 percent were applied to non-residential W-O (work to other); and 4+ axle trucks with a 40-mile trip length and a trip percentage of 54.39 percent were applied to non-residential O-O (other to other trips).

On-site Equipment Emissions. It is anticipated that the operation of the proposed Project would utilize diesel fire pumps and emergency generators. This analysis assumes that during the operation of the proposed Project, two diesel fire pumps would operate for 50 hours during the year and 2 diesel emergency generators would operate for 200 hours per year. It is assumed that operational equipment would also include 20 compressed natural gas (CNG) forklifts that operate for 8 hours per day.

5.3.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN?

Pursuant to Consistency Criterion No. 1, the SCAQMD's 2022 AQMP is the applicable air quality plan for the proposed Project site. Projects that are consistent with the regional forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

According to the City's current General Plan, the Project site has a General Plan land use designation of Industrial (I) and is zoned as Industrial (I) – Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is located within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The Project proposes an amendment to the City's zoning code and zoning map to change the site's Innovation District (ID) Overlay Zoning subdistrict from Employment Emphasis (EE) and Housing Emphasis (HE) to Industrial Emphasis (IE), which will allow for the proposed industrial buildings. The proposed zone change also includes modification of the development standards in the IE overlay zone. The General Plan land use designation of Industrial (I) would allow for a maximum floor area ration (FAR) of 0.6. The proposed Project includes two new industrial buildings – Building 1 would have footprint of 99,900 SF with a FAR of 0.45 and Building 2 would have a footprint of 97,700 SF with a FAR of 0.45. Therefore, the proposed Project is consistent with the land use designation for the site. Additionally, as detailed in Section 5.14, *Population and Housing*, the proposed Project is estimated to generate 194 permanent jobs at full buildout. The site's existing use was estimated to accommodate approximately 97 jobs; thus, the Project would result in an increase of 97 additional employment opportunities upon operation (Appendix B). However, as detailed in Section 5.14, *Population and Housing*, employment in the City of Riverside is expected to increase by 45,900 jobs between 2019 and 2050. Based on these growth projections, full buildout of the proposed Project represents approximately 0.4 percent of SCAG's projected employment growth within the City of Riverside. Thus, while the Project would result in a change in the site's zoning, the proposed Project would generate growth consistent with SCAG's growth forecasts and would not conflict with implementation of the AQMP under Consistency Criterion No. 1. As a result, no impacts related to SCAQMD AQMP Consistency Criterion No. 1 would occur.

Regarding Consistency Criterion No. 2, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations, as described previously, an impact related to Consistency Criterion No. 2 would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds for operation-phase emissions. As detailed below under Threshold B, the Project would result in regional operational-source emissions that would not exceed the SCAQMD thresholds of significance for ROG, NOx, CO, SO_2, PM_{10}, or $PM_{2.5}$. Therefore, the Project would not result in an increase in the frequency or severity of existing air quality violations, contribute to new violations, delay the timely attainment of air quality standards, or the interim emissions reductions specified in the AQMP. As a result, the proposed Project would result in less-than-significant impacts related to Consistency Criterion No. 2.

Overall, the Project would be consistent with SCAG's regional growth forecasts, and Project-generated air quality emissions would not exceed thresholds. Therefore, the proposed Project would not result in a conflict with, or obstruct, implementation of the AQMP and impacts would be **less than significant**.

THRESHOLD B: WOULD THE PROJECT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?

Construction

Construction of the Project would occur over an approximately 14-month period. Construction activities associated with the Project would result in emissions of CO, ROG, NOx, SOx, PM_{10}, and $PM_{2.5}$. Pollutant emissions associated with construction would be generated from the following construction activities: (1) demolition, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coatings. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the import of 9,043 CY of soil during the grading phase and from export of 24,092 tons of debris during the demolition of the existing building.

Construction emissions are short-term and temporary. The maximum daily construction emissions for the proposed Project were estimated using CalEEMod and the modeling includes compliance with SCAQMD Rules 403 and 1113 (described above in Section 5.3.2.3, *Regional Regulations*) that would reduce air contaminants during construction. Table 5.3-8 provides the maximum daily emissions of criteria air pollutants from construction of the Project.

Table 5.3-8: Regional Project Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2026						
Demolition	2.7	44.9	25.6	0.2	24.1	5.4
Site Preparation	3.9	34.7	32.0	0.1	7.7	4.4
Grading	3.5	33.0	30.5	0.1	5.0	2.6
Building Construction	1.5	12.1	20.4	<0.1	1.8	0.7
Maximum Daily Emissions 2026	3.9	44.9	32.0	0.2	24.1	5.4
2027						
Building Construction	1.4	11.6	18.6	<0.1	1.8	0.7
Paving	1.4	7.0	10.7	<0.1	0.5	0.3
Architectural Coating	54.7	1.2	2.3	<0.1	0.2	0.1
Maximum Daily Emissions 2027	54.7	11.6	18.6	<0.1	1.8	0.7
Maximum Daily Emission 2026-2027	**54.7**	**44.9**	**32.0**	**0.2**	**24.1**	**5.4**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

As shown in Table 5.3-8, construction emissions generated by the proposed Project would not exceed the SCAQMD's regional significance thresholds. Therefore, impacts related to construction air quality emissions would be **less than significant**.

Operation

Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors from the following primary sources: area sources, energy sources, mobile sources, off-road sources, and stationary sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions include natural gas and electricity consumption. Mobile-source emissions are from vehicle trips traveling to and from the Project site and from vehicles in the parking lots and loading areas. Off-road-source emissions would result from operation of forklifts, and stationary-source emissions would result from operation of fire pumps and emergency generators, as described in Section 5.3.5, *Methodology*.

Table 5.3-9: Regional Project Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	3.3	28.1	42.1	0.3	16.8	4.7
Area	6.2	0.1	8.7	<0.1	<0.1	<0.1
Energy	0.1	2.1	1.8	<0.1	0.2	0.2
Off-Road	<0.1	17.7	176.2	<0.1	<0.1	<0.1
Stationary	1.6	4.4	4.0	<0.1	0.2	0.2
Total Project Operational Emissions	**11.3**	**52.4**	**232.7**	**0.3**	**17.2**	**5.1**
Existing Use Operational Emissions	1.9	31.6	61.0	0.4	23.1	6.3
Net New Emissions	**9.3**	**20.8**	**171.8**	**<0.1**	**-6.0**	**-1.3**
SCAQMD Significance Thresholds	*55*	*55*	*550*	150	150	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO_2 = sulfur dioxide, NOx = nitrogen oxides, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

As shown in Table 5.3-9, the Project's net operational activities would not exceed the SCAQMD's regional significance thresholds. Therefore, impacts related to operational air quality emissions would be **less than significant**.

THRESHOLD C: WOULD THE PROJECT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?

Construction

As discussed previously, the daily construction emissions generated on-site by the proposed Project are evaluated against SCAQMD's LSTs to determine whether the emissions would cause or contribute to adverse localized air quality impacts.

The Project site is located within SRA 23, Metropolitan Riverside. As described previously in Section 5.3.4, *Thresholds of Significance*, the sensitive receptors closest to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site. . Construction of the proposed Project is estimated to disturb a maximum of 4 acres per day. Therefore, the thresholds for 4 acres at a distance of 50 meters were used to provide a conservative analysis for localized construction emissions. Table 5.3-10 presents the Project's daily localized emissions during construction.

Table 5.3-10: Localized Project Construction Emissions

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
2026				
Demolition	20.7	19.0	17.9	3.4
Site Preparation	34.6	31.0	7.4	4.3
Grading	30.0	28.7	4.1	2.3

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Building Construction	10.7	28.1	0.8	0.8
Maximum Daily Emissions 2026	34.6	31.0	17.9	4.3
2027				
Building Construction	10.2	14.0	0.4	0.3
Paving	6.9	10.0	0.3	0.3
Architectural Coating	1.1	1.5	<0.1	<0.1
Maximum Daily Emissions 2027	10.2	14.0	0.4	0.3
Maximum Daily Emission 2026-2027	**34.6**	**31.0**	**17.9**	**4.3**
SCAQMD Localized Significance Thresholds	45.17	6,285.3	89	28.3
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns).
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

As shown in Table 5.3-10, construction emissions generated by the Project would not exceed the applicable SCAQMD LSTs at the nearest sensitive receptor. Therefore, impacts related to the exposure of sensitive receptors to substantial pollutant concentrations during construction would be **less than significant**.

Operation

As described previously, LSTs apply to Project operational stationary and on-site mobile sources. As described in Section 5.3.4, *Thresholds of Significance* the closest sensitive receptor to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site. Although the Project site is 10.12 acres, the threshold for 4 acres was used to yield a conservative analysis. Therefore, the thresholds for 4 acres at a distance of 50 meters were used to provide a conservative analysis for localized operational emissions. Table 5.3-11 presents the Project's daily localized emissions during operation.

Table 5.3-11: Localized Project Operational Emissions

Operational Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Mobile	3.6	6.6	0.2	<0.1
Area	0.1	8.7	<0.1	<0.1
Energy	2.1	1.8	0.2	0.2
Off-Road	17.7	176.2	<0.1	<0.1
Stationary	4.4	4.0	0.2	0.2
Total Project Operational Emissions	**27.8**	**197.3**	**0.6**	**0.4**
SCAQMD Localized Significance Thresholds	302	2,178	10	3
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter (10 microns), $PM_{2.5}$ = particulate matter (2.5 microns).
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

As shown in Table 5.3-11, operational emissions generated by the Project would not exceed the applicable SCAQMD LSTs at the nearest sensitive receptor. Therefore, impacts related to the exposure of sensitive receptors to substantial pollutant concentrations during operations would be **less than significant**.

Construction and Operational Health Risk

A Health Risk Assessment (HRA), included as Appendix C, was prepared to evaluate the potential health impacts to sensitive receptors from the construction and operation of the proposed Project. The HRA focuses on the emissions of DPM from the operation of the heavy-duty diesel vehicles and off-road construction equipment that would be utilized for the construction of the proposed Project. The predominant sources of DPM emissions resulting from the operation of the Project would be derived from the heavy-duty diesel trucks that would travel to and from and within the Project site each day. Additional DPM emissions would result from the operation of the stationary emergency generator set as well as the diesel fire pump.

As described in Section 5.3.4, *Thresholds of Significance,* the closest sensitive receptor to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site. However, the housing assistance shelter located at 2801 Hulen Place has a maximum stay limit of 90 days. As a result, any exposure to the Project's construction and operational DPM emissions by individuals at the shelter would be temporary and limited in duration. In contrast, the nearest residential receptor, which is a single-family residence located 212 meters northeast of the Project site, would experience exposure to construction DPM emissions over a period of approximately 1.21 years, and operational emissions over the project's 30-year lifetime. Given the temporary nature of exposure at the shelter, the Project's DPM emissions would not pose a greater health risk to individuals at 2801 Hulen Place than to those at the nearest residential receptor.

While the nearest residential receptor is the single-family residence located approximately 212 meters northeast of the Project site, the most impacted residential sensitive receptor was identified as a single-family residence located at the northwest corner of Massachusetts Avenue and Chicago Avenue, approximately 574.5 meters east of the Project site. The nearest worker receptor is located 40 feet away, at a commercial building west of the Project boundary.

The estimated health risk impacts are compared to the health risk significance thresholds recommended by the SCAQMD for use in CEQA assessments of 10 persons per million for cancer risk and a health index of 1.0 for non-cancer health risks due to DPM exposure.

Table 5.3-12 presents a summary of cancer risks and chronic non-cancer hazards resulting from the proposed Project's construction DPM emissions. As shown in Table 5.3-12, the estimated maximum cancer risks for construction are 0.63 in one million for sensitive/residential receptors. The estimated maximum cancer risks for worker receptors during construction are 0.58 in one million. In addition, the Project's maximum estimated construction results for non-cancer health risk are less than 0.01 for the maximum impacted sensitive receptor and 0.04 for the maximum impacted worker receptor, which is below the significance threshold of 1.0. As such, construction of the Project would not cause a significant human health or cancer risk to nearby residences and workers. Thus, health risks impacts from Project construction activities related to exposure of sensitive receptors to substantial pollutant concentrations would be **less than significant**.

Table 5.3-12: Summary of Project Construction Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	

Maximum Impacted Sensitive Receptor Prebirth to 1.21 years	0.63	10	No
Maximum Impacted Sensitive Receptor Prebirth to 1.21 years	0.63	10	No
Maximum Impacted Sensitive Receptor Adult (1.21 years)	0.01	10	No
Maximum Impacted Worker Receptor (1.21 years)	0.58	10	No
Receptor	**Chronic Non-Cancer Hazard Index**		**Exceeds Significance Threshold?**
	Maximum Lifetime Proposed Project Risk	**Significance Threshold**	
Maximum Impacted Sensitive Receptor	<0.01	1.0	No
Maximum Impacted Worker Receptor	0.04	1.0	No

Source: Health Risk Assessment (Appendix C)

Table 5.3-13 presents a summary of cancer risks and chronic non-cancer hazards resulting from the proposed Project's operational DPM emissions. As shown in Table 5.3-13, the estimated maximum cancer risks for operations is 5.59 in one million for sensitive/residential receptors. The estimated maximum cancer risks for worker receptors during operations is 4.04 in one million. In addition, the Project's maximum estimated operational results for non-cancer health risk are less than 0.01 for the maximum impacted sensitive receptor and 0.01 for the maximum impacted worker receptor, which is below the significance threshold of 1.0. As such, operation of the Project would not cause a significant human health or cancer risk to residences and workers. Therefore, health risks impacts from Project operational activities related to exposure of sensitive receptors to substantial pollutant concentrations would be **less than significant**.

Table 5.3-13: Summary of Project Operational Health Risk

Receptor	**Cancer Risk (per million)**		**Exceeds Significance Threshold?**
	Maximum Lifetime Proposed Project Risk	**Significance Threshold**	
Maximum Impacted Sensitive Receptor Prebirth to 30 years	5.59	10	No
Maximum Impacted Sensitive Receptor Prebirth to 9 years	3.97	10	No
Maximum Impacted Sensitive Receptor Adult (30 years)	0.71	10	No
Maximum Impacted Worker Receptor (30 years)	4.04	10	No
Receptor	**Chronic Non-Cancer Hazard Index**		**Exceeds Significance Threshold?**
	Maximum Lifetime Proposed Project Risk	**Significance Threshold**	
Maximum Impacted Sensitive Receptor	<0.01	1.0	No
Maximum Impacted Worker Receptor	0.01	1.0	No

Source: Health Risk Assessment (Appendix C).

Table 5.3-14 presents the combined construction and operational cancer risk for the Project. The Project would result in a maximum cancer risk impact of 3.82 in one million at the nearest sensitive/residential receptor and a maximum cancer risk impact of 3.81 in one million for the nearest worker receptor. The

combined construction and operational cancer risk impacts would not exceed the SCAQMD cancer health risk significance threshold of 10 in one million. As such, the proposed Project would not cause a significant human health or cancer risk to residents and workers. Thus, health risks impacts from Project construction and operational activities combined related to exposure of sensitive receptors to substantial pollutant concentrations would be **less than significant**.

Table 5.3-14: Summary of Combined Project Construction and Operational Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	3.82	10	No
Maximum Impacted Worker Receptor	3.81	10	No

Source: Health Risk Assessment (Appendix C).

CO Hotspot Analysis

Vehicular trips associated with the proposed Project would contribute to congestion at intersections and along roadway segments in the Project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels and potential impacts to sensitive receptors.

An assessment of Project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate Project vicinity are not available. Ambient CO levels monitored at the Metropolitan Riverside County 1 Rubidoux station (within SRA 23) located 3.3 miles from the site (the closest station to the Project site monitoring CO) showed a highest recorded 1-hour concentration of 3.3 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.8 ppm (the State standard is 9 ppm) from 2021 to 2023 (Table 5.3-2). The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

AS DESCRIBED IN SECTION 5.17, *TRANSPORTATION*, AND SHOWN IN TABLE 5.17-4, THE PROPOSED PROJECT IS ANTICIPATED TO GENERATE 487 NET DAILY TRIPS, INCLUDING 74 NET AM PEAK HOUR TRIPS AND 66 NET PM PEAK HOUR TRIPS. GIVEN THE EXTREMELY LOW LEVEL OF CO CONCENTRATIONS IN THE PROJECT AREA, AND LIMITED NUMBER OF VEHICLE TRIPS DURING THE PEAK HOURS, PROJECT-RELATED VEHICLES WOULD NOT CONTRIBUTE SIGNIFICANTLY TO RESULT IN THE CO CONCENTRATIONS EXCEEDING THE STATE OR FEDERAL CO STANDARDS. AS SUCH, IMPACTS RELATED TO CO IN REGARD TO EXPOSURE OF SENSITIVE RECEPTOR TO SUBSTANTIAL POLLUTANT CONCENTRATIONS WOULD BE LESS THAN SIGNIFICANT.THRESHOLD D: WOULD THE PROJECT RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?

The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.*

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project would implement industrial development within the Project site. This land use does not involve the types of uses that would emit objectionable odors affecting a substantial number of people. Odors generated by industrial land uses are generated from uses such as manufacturing facilities, paint/coating operations, refineries, chemical manufacturing, and food manufacturing facilities. At the current time, the specific tenants and uses of the proposed industrial building are unknown. However, new tenants for these types of uses would be required to be reviewed through the City's permitting process. However, the future tenant would be subject to comply with SCAQMD Rule 402 *Nuisance*, including odor regulations, as stated above.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials.

In addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts associated with other operation- and construction-generated emissions, such as odors, would be **less than significant**.

5.3.7 CUMULATIVE IMPACTS

The geographic area for analysis of cumulative air quality impacts is the Basin.

The SCAQMD 2022 AQMP evaluates regional conditions within the Basin and sets regional emission significance thresholds for both construction and operation of development projects that apply to project-specific impacts and cumulatively-considerable impacts. Therefore, according to SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants. Projects that do not exceed SCAQMD's thresholds are considered to have a less than significant project specific and cumulative impact (Appendix B).

As described in Threshold B above, emissions from Project construction and operation would not exceed SCAQMD's regional thresholds for any criteria pollutants. Therefore, incremental effects of the proposed Project related to criteria pollutant emissions would not be cumulatively considerable and impacts would be **less than significant**.

As discussed in Threshold C, the Project would not cause significant localized emissions impact to adjacent land uses as a result of Project construction or operation activity. Therefore, incremental effects of the proposed Project related to localized emissions would not be cumulatively considerable and impacts would be **less than significant**.

Regarding DPM emissions, SCAQMD has applied a 1,000-foot distance from a proposed project to identify other development projects that could contribute to cumulative impacts with the proposed project. The search radius for this Project was extended to 0.25 miles (1,320 feet) to identify potential cumulative sources. There are two potentially concurrent projects within the 0.25-mile radius, , both located near 2610 Durahart Street. These concurrent projects are an outdoor storage facility, inclusive of a 4,000 square-foot office building and a 2,000 square-foot workshop and an outdoor storage yard consisting of 52 truck trailer stalls.

The Traffic Impact Analysis prepared for the proposed Project included a trip generation for proposed development projects within a 2-mile radius of the Project site. The two projects described above are estimated to result in a daily trip generation of 53 passenger vehicle and trucks and 49 passenger vehicle and trucks, respectively. These two projects were estimated to not generate over 100 truck trips per day. Pursuant to CARB's guidance, a cumulative health risk assessment would not be required for projects under this threshold. In addition, project-specific thresholds were established at levels intended to reduce cumulative health risk impacts. Therefore, project-specific thresholds are the same as cumulative thresholds. Since the Project would not exceed project-level thresholds, and there are no projects within the 0.25-mile buffer that warrant a cumulative analysis, the Project would also have a **less than significant** cumulative impact to cancer and non-cancer risks.

As discussed under Threshold D, the Project would not expose surrounding uses to objectionable odors. Thus, there is no potential for odors from the Project to combine with odors from surrounding development Projects and expose nearby sensitive receptors to offensive odors. Therefore, incremental effects of the proposed Project related to odors would not be cumulatively considerable and impacts would be **less than significant**.

5.3.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES.

Existing Regulations

State

- Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Idling Restriction (13 CCR 2449)
- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Regional

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 1108: Volatile Organic Compounds
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1143: Paint Thinners and Solvents
- SCAQMD Rule 1186: Street Sweeping
- SCAQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD Rule 1470: Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

- SCAQMD Rule 2305: Warehouse Indirect Source Rule

Plans, Programs, or Policies

The following PPPs would reduce impacts related to air quality. These actions will be included in the Project's mitigation monitoring and reporting program (MMRP):

PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

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

PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

PPP AQ-3: Rule 1470. The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.

PPP AQ-4: Rule 402. The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

5.3.9 PROJECT DESIGN FEATURES

None.

5.3.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impacts under Thresholds A, B, C, and D would be less than significant.

5.3.11 MITIGATION MEASURES

No mitigation measures are required.

5.3.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts related to air quality would occur. Impacts would be less than significant.

5.3.13 REFERENCES

City of Riverside. (2007, November). Riverside General Plan 2025. Retrieved from: https://www.riversideca.gov/cedd/planning/general-plan

City of Riverside. (2021, October). *City of Riverside 2021-2029 Public Safety Element*. https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/2023/FINAL%20Public%20Safety%20Element.pdf

EPD Solutions, Inc. (2025a). *Massachusetts Point Riverside Air Quality, Energy, and GHG Impact Analysis*. (**Appendix B)**

EPD Solutions, Inc. (2025b). *Massachusetts Point Riverside Health Risk Assessment*. (**Appendix C)**

EPD Solutions, Inc. (2025c). *Traffic Impact Assessment*.

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5.4 Biological Resources

5.4.1 INTRODUCTION

This section addresses potential environmental effects of the Project related to biological resources. The information and analysis herein rely on the following technical reports and documents regarding the biological resources and conditions of the Project site:

- *Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis for the Proposed Warehouse Development Project Located Within Assessor Parcel Numbers (APNs) 210-130-015, and -016 in the City of Riverside, Riverside County, California*, prepared by ELMT Consulting, December 12, 2024 (Appendix D).
- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* certified September 2021
- City of Riverside Municipal Code

5.4.2 REGULATORY SETTING

5.4.2.1 Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 defines an endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as "any species which is likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA, unless properly permitted, it is unlawful to "take" any endangered or threatened listed species. "Take" is defined in Section 3(18) of FESA as: "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the United States Fish and Wildlife Service (USFWS), through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification as forms of "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action which could affect a federally listed plant or animal species, the property owner and agency are required to consult with USFWS pursuant to Section 7 of the FESA if there is a federal nexus, or consult with USFWS and potentially obtain a permit pursuant to Section 10 of the FESA in the absence of a federal nexus. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

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.

Clean Water Act

The Clean Water Act (CWA) (United States Code Title 33 Section 1251 et seq.) (1972) establishes the basic structure for regulating discharges of pollutants into the waters of the United States, which includes those waters listed in Code of Federal Regulations (CFR) Title 33 Section 328.3, as amended, and regulating quality standards for surface waters. The CWA is the primary federal statute regulating the protection of the nation's water. The CWA aims to prevent, reduce, and eliminate pollution in the nation's water in order to "restore and maintain the chemical, physical, and biological integrity of the nation's waters", as described in CWA Section 101(a). A stated CWA goal is to eliminate discharge of pollutants into navigable waters, as defined in CWA Section 502(7) and corresponding case law. Under the CWA, is it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit is obtained.

Pursuant to CWA Section 404, the U.S. Army Corps of Engineers (USACE) is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the United States (including wetlands). With oversight from the Environmental Protection Agency (EPA), the USACE has the authority to issue CWA Section 404 permits.

Under CWA Section 401, an activity requiring an USACE Section 404 permit must obtain a State Water Quality Certification (or waiver thereof) to ensure that the activity will not violate established State water quality standards. The State Water Resources Control Board (SWRCB), in conjunction with the nine California Regional Water Quality Control Boards (RWQCBs), is responsible for administering the CWA Section 401 Water Quality Certification Program. The RWQCB is required to provide "certification that there is reasonable assurance that an activity that may result in the discharge to 'waters of the U.S.' will not violate water quality standards." Water Quality Certification must be based on the finding that a proposed discharge will comply with applicable water quality standards.

Under CWA Section 401, an activity involving discharge into a water body must obtain a federal permit and a State Water Quality Certification to ensure the activity will not violate established water quality standards. The U.S. EPA is the federal regulatory agency responsible for implementing the CWA Section 401 program. However, pursuant to the CWA, the SWRCB, in conjunction with the nine RWQCBs, has been delegated the responsibility to administer the CWA Section 401 Water Quality Certification Program.

Section 402 of the CWA establishes the National Pollutant Discharge Elimination System (NPDES), which regulates the discharge of pollutants from point sources (such as pipes or industrial facilities) into waters of the United States. Under this section, any entity wishing to discharge pollutants must obtain an NPDES permit from the EPA or an authorized State agency. The permits set limits on the amount and types of pollutants that can be released and include requirements for monitoring and reporting.

5.4.2.2 State Regulations

California Endangered Species Act

Under the California's Endangered Species Act (CESA) (Fish and Game Code § 2050 et seq.), California Species of Special Concern are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. Informally listed species are not protected per se but warrant consideration in the preparation of biological resource assessments. For some species, the California Natural Diversity Database (CNDDB) is only concerned with specific portions of the life history, such as roosts, rookeries, or nest areas. The California Department of Fish and Wildlife (CDFW) administers CESA and

enforces relevant statutes from the California Fish and Game Code and Title 14 of the California Code of Regulations (CCR).

Natural Community Conservation Planning Act

The statutory framework (Fish and Game Code § 2800 et seq.) for natural community conservation plans (NCCP), which provide long-term, landscape-scale protection for natural vegetation communities and wildlife diversity. It supports collaborative planning and approval by local governments, State and federal agencies, environmental organizations, landowners, and members of the public.

California Rare Plant Ranks (CRPR)

The California Native Plant Society (CNPS) maintains a list of special-status plant species based on collected scientific information. Although CNPS's designations have no legal status or protection under federal or State endangered species legislation, three designations meet the criteria of Section 15380 of the CEQA Guidelines—CRPR 1A, plants presumed extinct; CRPR 1B, plants rare, threatened, or endangered in California and elsewhere; and CRPR 2, plants rare, threatened, or endangered in California, but more numerous elsewhere (CNPS, 2020).

California Fish and Game Code, Sections 3503.5, 3511, 3515

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 is it unlawful to take any non-game migratory bird protected under the MBTA.

Native Plant Protection Act of 1977

This act (Fish and Game Code § 1900 et seq.) directed CDFW to "preserve, protect and enhance rare and endangered plants in this State." It gave the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take. CESA, which came later, entered all "rare" animals as "threatened" species, but not rare plants. Thus, there are three listings for plants in California: rare, threatened, and endangered. Because rare plants are not included in CESA, mitigation measures for impacts to rare plants are specified in a formal agreement between CDFW and the project applicant.

Lake or Streambed Alteration Program (California Fish and Game Code Section 1602)

California Fish and Game Code Section 1602, known as the Lake or Streambed Alteration Program, requires that anyone proposing to substantially alter the bed, bank, or channel of a lake or stream in California must notify the CDFW and obtain a permit before proceeding with the project. The law is designed to protect the state's aquatic ecosystems and wildlife by ensuring that any modifications to water bodies do not harm fish habitats or water quality. CDFW evaluates the potential impacts of the proposed alteration and may impose conditions to minimize environmental harm. This law is especially relevant for activities like construction, excavation, or dredging in or near lakes, rivers, or streams.

5.4.2.3 Regional Regulations

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The Western Riverside County MSHCP is a comprehensive, multijurisdictional habitat conservation planning program for western Riverside County, California. The Western Riverside County MSHCP provides coverage/take authorization for some species listed under the FESA or CESA as well as non-listed special-status plant and wildlife species. It also provides mitigation for impacts to special-status species and their associated habitats.

Through agreements with the USFWS and CDFW, 129 listed and special-status plant and animal species receive some level of coverage under the Western Riverside County MSHCP. Of the 129 covered species, the majority have no additional survey needs or conservation requirements. However, several of the species covered under the Western Riverside County MSHCP have additional survey requirements in specific areas of the County.

The Project site is located within the Western Riverside County MSHCP boundaries. The City of Riverside is a permittee under the Western Riverside County MSHCP and, therefore, is afforded coverage for impacts to listed species covered by the plan. The City is required to document consistency with the Western Riverside County MSHCP in conjunction with any discretionary approvals for a development project, which has been provided in the Habitat Assessment included as Appendix D.

Stephens' Kangaroo Rat Habitat Conservation Plan

The City is located within the boundary of the adopted HCP for the endangered Stephens' kangaroo rat (SKR-HCP) administered by the Riverside County Habitat Conservation Agency (RCHCA). The SKR-HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring them. The SKR-HCP initially established Core Reserves for the conservation of key SKR populations. Outside of the Core Reserves, the SKR-HCP established a fee assessment area by which individual projects are granted coverage under the HCP by payment of SKR fees. The MSHCP, through its goals for SKR, reaffirms the conservation goals of the SKR-HCP, while expanding the coverage area outside of the original coverage boundaries of the SKR-HCP. Neither the SKR-HCP nor MSHCP requires project-specific SKR surveys for sites located outside of the existing Core Reserves. Instead, payments of SKR fees are sufficient to obtain take authorization for SKR, unless specific lands are targeted for conservation by SKR-HCP or MHSCP. The Project site is not located within a Core Reserve; however, it is within the SKR fee assessment area. The Project applicant is required to pay the Stephens' Kangaroo Rat Preservation fee in effect at the time a grading permit is issued which is collected per Riverside Municipal Code Section 16.40.040.

5.4.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to biological resources that are applicable to the Project.

Land Use and Urban Design Element

Objective LU-3: Preserve prominent ridgelines and hillsides as important community visual, recreational and biological assets.

Objective LU-7: Preserve and protect significant areas of native wildlife and plant habitat, including endangered species.

Policy LU-7.4: Continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Objective LU-27: Enhance, maintain and grow Riverside's inventory of street trees.

Policy LU-27.1: Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.

Policy LU-27.4: Encourage trees on private property to add to the City's urban forest.

Open Space and Conservation Element

Objective OS-5: Protect biotic communities and critical habitats for endangered species throughout the General Plan Area.

Policy OS-5.1: Preserve significant habitat and environmentally sensitive areas, including hillsides, rock outcroppings, creeks, streams, viewsheds and arroyos through application of the RC Zone standards and the Hillside/Arroyo standards of the City's Grading Code.

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.

Policy OS-5.4: Protect native plant communities in the General Plan Area, including sage scrub, riparian areas and vernal pools, consistent with the MSHCP.

Objective OS-6: Preserve and maintain wildlife movement corridors.

Policy OS-6.1: Protect and enhance known wildlife migratory corridors and create new corridors as feasible.

Policy OS-6.2: Support regional and local efforts to acquire, develop and maintain open space linkages.

Policy OS-6.3: Preserve the integrity of Riverside's arroyos and riparian habitat areas through the preservation of native plants.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

City of Riverside Urban Forest Tree Policy

The City of Riverside Urban Forest Tree Policy Manual provides guidelines for the preservation and protection of the City of Riverside's tree heritage. The Manual provides guidelines for the planting, pruning, preservation and removal of all trees in City rights-of-way and recreational facilities.

City of Riverside Municipal Code

Section 16.72.040, MSHCP Mitigation Fee. This municipal code section requires that a Local Development Mitigation Fee shall be paid prior to the issuance of building permits for developments.

Section 16.40.040, Threatened and Endangered Species Fees. This municipal code section requires that development fees be collected to serve to mitigate the impacts of development upon threatened and endangered species.

5.4.3 ENVIRONMENTAL SETTING

The Project site is located within the Cities of Riverside and Norco MSHCP Area Plan but is not located within a Criteria Cell or Cell Group. The Project site is not located within any plan-defined areas requiring surveys for amphibian species, burrowing owl, criteria area species, mammalian species, narrow endemic plant species, criteria species, or invertebrate species.

5.4.3.1 Vegetation Communities

Due to the developed condition of the site, no native plant communities or natural communities of special concern were observed on or adjacent to the Project site. The Project site consists of two land cover types: disturbed and developed.

5.4.3.2 Topography and Soils

The Project site is located at an approximate elevation of 889 to 904 feet above mean seal level. According to the Habitat Assessment, the Project site is underlain by Arlington fine sandy loam, deep (2 to 8 percent slopes). Soils on the Project site have been heavily disturbed by prior site development.

5.4.3.3 Special-Status Plant Species

According to the CNDDB and CNPS, 13 special-status plant species have been recorded in the Riverside East quadrangle. No special-status plant species were observed on the Project site during the field investigation conducted as part of the Habitat Assessment. Due to the disturbed and developed nature of the site, the Project site does not support suitable habitat for special-status plant species and they are presumed to be absent (Appendix D). Table 5.4-1 lists the special-status species and identifies that there is no potential for these species to occur on the Project site due to lack of habitat.

Table 5.4-1: Special Status Plan Species with their Potential to Occur

Scientific Name Common Name	**Listing Status[1]**	**Habitat**	**Potential to Occur on Project Site**
Arenaria paludicola Marsh sandwort	FED: END CA: END CNPS: 1B.1	Grows mainly in wetlands and freshwater marshes in arid climates. The plant can grow in saturated acidic bog soils and soils that are sandy with a high organic content. Found at elevations ranging from 33 to 558 feet. Blooming period is from May to August.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Berberis nevinii Nevin's barberry	FED: END CA: END	Grows in chaparral, cismontane woodland, coastal scrub, and riparian scrub. Usually found on steep, north facing slopes or in low grade sandy	**Presumed Absent.** This species was not observed during the

Scientific Name Common Name	**Listing Status[1]**	**Habitat**	**Potential to Occur on Project Site**
	CNPS: 1B.1	washes. Found at elevations ranging from 197 to 3,904 feet. Blooming period ranges from March to June.	field investigation. No suitable habitat is present within or adjacent to the Project site.
Calochortus plummerae Plummer's mariposa-lily	FED: None CA: None CNPS: 4.2	Prefers openings in chaparral, foothill woodland, coastal sage scrub, valley foothill grasslands, cismontane woodland, lower montane coniferous forest and yellow pine forest. Often found on dry, rocky slopes and soils and brushy areas. Can be very common after a fire. Found at elevations ranging from 459 to 6,299 feet. Blooming period is from May to July.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Centromadia pungens ssp. laevis smooth tarplant	FED: None CA: None CNPS: 1B.1	Occurs in alkaline soils within chenopod scrub, meadows and seeps, playas, riparian woodland, and valley and foothill grassland habitats. Grows in elevation ranging from 0 to 2,100 feet. Blooming period ranges from April to September.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Chloropyron maritimum ssp. maritimum Salt marsh birds-beak	FED: END CA: END CNPS: 1B.2	Upper terraces and higher edges of coastal salt marshes where tidal inundation is periodic. Found at elevations ranging from 0 to 99 feet. Blooming period is from May to October.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Chorizanthe parryi var. parryi Parry's spineflower	FED: None CA: None CNPS: 1B.1	Occurs on sandy and/or rocky soils in chaparral, coastal sage scrub, and sandy openings within alluvial washes and margins. Found at elevations ranging from 951 to 3,773 feet. Blooming period is from April to June.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Deinandra paniculata paniculate tarplant	FED: None CA: None CNPS: 4.2	Typically found in vernally mesic, sometimes sandy soils in coastal scrub, valley and foothill grasslands, and vernal pools. Found at elevations ranging from 80 to 3,085 feet. Blooming period is from April to November	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Hordeum intercedens Vernal barley	FED: None CA: None CNPS: 3.2	Found in coastal dunes, coastal scrub, vernal pools, and valley and foothill grassland habitats. Found at elevations ranging from 16 to 3,281 feet. Blooming period is from March to June.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
Juglans californica southern California black walnut	FED: None CA: None CNPS: 4.2	Found in chaparral, cismontane woodland, coastal scrub, and riparian woodland habitats. Found at elevations ranging from 164 to 2,953 feet. Blooming period is from March to August.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Lepidium virginicum var. robinsonii Robinson's pepper-grass	FED: None CA: None CNPS: 4.3	Dry soils on chaparral and coastal sage scrub. Found at elevations ranging from 3 to 2,904 feet. Blooming period is from January to July.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Phacelia stellaris Brand's star phacelia	FED: None CA: None CNPS: 1B.1	Occurs in a variety of arid habitats within the Mojave Desert. Found at elevations ranging from 1,600 to 6,600 feet. Blooming period is from March to June.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Romneya coulteri Coulter's Matilija poppy	FED: None CA: None CNPS: 4.2	Found in recently burned areas within chaparral and coastal scrub habitats. Found at elevations ranging from 66 to 3,937 feet. Blooming period is from March to July.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Senecio aphanactis Chaparral ragwort	FED: None CA: None CNPS: 2B.2	Found in sometimes alkaline soils in chaparral, cismontane woodland, and coastal scrub. Found at elevations ranging from 425 to 2,165 feet. Blooming period is from January to April.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.

Source: Habitat Assessment (Appendix D)

[1] Listing is as follows: U.S. Fish and Wildlife Service (USFWS) – Federal: END - Federally Endangered; THR - Federally Threatened.

California Native Plant Society (CNPS) *California Rare Plant Rank*: 1A – Plant presumes extirpated in California and either rare or extinct elsewhere; 1B – Plants that are rare, threatened, or endangered in California and elsewhere; 2B – Plants that are rare, threatened, or endangered in California but more common elsewhere; 3 – Plants which require further information; 4 – Plans of limited distribution, watch list. Threat Ranks: 0.1 – seriously threatened in California; 0.2 – moderately threatened in California; 0.3 – not very threatened in California.

5.4.3.4 Special-Status Wildlife Species

According to the CNDDB, 69 special-status wildlife species have been reported in the Riverside East quadrangle. No special-status wildlife species were observed on the Project site during the field investigation

conducted as part of the Habitat Assessment. Due to the disturbed and developed nature of the site, the Project site does not support suitable habitat for special-status wildlife species and they are presumed to be absent (Appendix D). Table 5.4-2 lists these special-status wildlife species and identities that none have the potential to occur on the Project site due to lack of habitat.

Table 5.4-2: Special Status Wildlife Species and their Potential to Occur

Scientific Name Common Name	**Listing Status[1]**	**Habitat**	**Potential to Occur on Project Site**
Accipiter cooperii Cooper's hawk	Fed: None CA: WL	Common yearlong resident of California. Typically forages in broken woodland and habitat edges with dense stands of coast live oak (*Quercus agrifolia*), riparian deciduous, or other forest habitat near water. Usually nests in dense riparian areas, usually near streams.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Accipiter striatus sharp-shinned hawk	Fed: None CA: WL	Found in pine, fir and aspen forests. They can be found hunting in forest interior and edges from sea level to near alpine areas. Can also be found in rural, suburban and agricultural areas, where they often hunt at bird feeders. Typically found in southern California in the winter months.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Agelaius tricolor tricolored blackbird	Fed: None CA: THR	Prefers wetland and grassland habitats, wetlands, and active agricultural areas. Breeds and nests in marshes in cattails, bullrushes, and willows. Forages in irrigated pastures, dry rangeland.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Aimophila ruficeps canescens southern California rufous-crowned sparrow	Fed: None CA: WL	Typically found between 3,000 and 6,000 feet in elevation. Breed in sparsely vegetated scrubland on hillsides and canyons. Prefers coastal sage scrub dominated by California sagebrush (*Artemisia californica*), but they can also be found breeding in coastal bluff scrub, low-growing serpentine chaparral, and along the edges of tall chaparral habitats.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Ammodramus savannarum Grasshopper sparrow	Fed: None CA: SSC	Occurs in grassland, upland meadow, pasture, hayfield, and old field habitats. Optimal habitat contains short- to medium-height bunch grasses interspersed with patches of bare ground, a shallow litter layer, scattered forbs, and few shrubs. May inhabit thickets, weedy lawns, vegetated landfills, fence rows, open fields, or grasslands.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Anniella stebbinsi southern California legless lizard	Fed: None CA: SSC	Occurs in sparsely vegetated habitat types including coastal sand dunes, chaparral, pine-oak woodland, desert scrub, open grassland, and riparian areas. Requires sandy or loose loamy substrates conducive to burrowing.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or

Scientific Name Common Name	**Listing Status**[1]	**Habitat**	**Potential to Occur on Project Site**
			adjacent to the Project site.
Aquila chrysaetos golden eagle	Fed: None CA: FP, WL	Occupies nearly all terrestrial habitats of the western states except densely forested areas. Favors secluded cliffs with overhanging ledges and large trees for nesting and cover. Hilly or mountainous country where takeoff and soaring are supported by updrafts is generally preferred to flat habitats. Deeply cut canyons rising to open mountain slopes and crags are ideal habitat.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Ardea alba great egret	Fed: None CA: None	Yearlong resident throughout California, except for the high mountains and deserts. Feeds and rests in fresh, and saline emergent wetlands, along the margins of estuaries, lakes, and slow-moving streams, on mudflats and salt ponds, and in irrigated croplands and pastures.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Ardea Herodias great blue heron	Fed: None CA: None	Fairly common all year throughout most of California, in shallow estuaries and fresh and saline emergent wetlands. Less common along riverine and rocky marine shores, in croplands, pastures, and in mountains about foothills.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Arizona elegans occidentalis California glossy snake	Fed: None CA: SSC	Inhabits arid scrub, rocky washes, grassland, and chaparral. Appears in microhabitats of open areas and areas with soil loose enough for easy burrowing.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Artemisiospiza belli belli Bell's sparrow	Fed: None CA: WL	Generally prefers semi-open habitats with evenly spaced shrubs 1 – 2 meters in height. Dry chaparral and coastal sage scrub. Less common in tall dense, old chaparral.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Asio flammeus short-eared owl	Fed: None CA: SSC	Suitable habitats include salt- and freshwater marshes, irrigated alfalfa or grain fields, and ungrazed grasslands and old pastures. Tule marsh or tall grasslands with cover 30 to 50 cm in height can support nesting pairs.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Aspidoscelis hyperythra	Fed: None CA: WL	Semi-arid brushy areas typically with loose soil and rocks, including washes, stream sides, rocky hillsides, and coastal chaparral. They are	**Presumed Absent.** This species was not observed during the

Scientific Name Common Name	**Listing Status[1]**	**Habitat**	**Potential to Occur on Project Site**
orange-throated whiptail		typically found in hot, dry, flat open spaces. Typically, they are seen on the ground running in open spots from bush to bush, but rarely climbing on rocks or vegetation.	field investigation. No suitable habitat is present within or adjacent to the Project site.
Aspidoscelis tigris stejnegeri coastal whiptail	Fed: None CA: SSC	Found in a variety of ecosystems, primarily hot and dry open areas with sparse foliage - chaparral, woodland, and riparian areas.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Athene cunicularia burrowing owl	Fed: None CA: CE, SSC	Primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity. Occurs in open, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Bombus crotchii Crotch bumble bee	Fed: None CA: CE	Exclusive to coastal California east towards the Sierra-Cascade Crest; less common in western Nevada.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Bombus pensylvanicus American bumble bee	Fed: None CA: None	Prefers habitats in open farmland, prairies, and agricultural fields. Nests below grass or underground. Forages for pollen and nectar in meadows, parks, open fields, gardens, and sometimes forests.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Buteo regalis ferruginous hawk	Fed: None CA: WL	Occurs primarily in open grasslands and fields, but may be found in sagebrush flats, desert scrub, low foothills, or along the edges of pinyonjuniper woodland. Feeds primarily on small mammals and typically found in agricultural or open fields.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Buteo swainsoni Swainson's hawk	Fed: None CA: THR	Typical habitat is open desert, grassland, or cropland containing scattered, large trees or small groves. Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grassland or suitable grain or alfalfa fields or livestock pastures.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
Calypte costae Costa's hummingbird	Fed: None CA: None	Desert and semi-desert, arid brushy foothills and chaparral. A desert hummingbird that breeds in the Sonoran and Mojave Deserts. Departs desert heat moving into chaparral, scrub, and woodland habitats.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Catostomus santaanae Santa Ana sucker	Fed: THR CA: SSC	Occur in the watersheds draining the San Gabriel and San Bernardino Mountains of southern California. Steams that Santa Ana Sucker inhabit are generally perennial streams with water ranging in depth from a few inches to several feet and with currents ranging from slight to swift.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Chaetodipus fallax fallax northwestern San Diego pocket mouse	Fed: None CA: None	Occurs in desert and coastal habitats in southern California, Mexico, and northern Baja California, from sea level to at least 1,400 meters above msl. Found in a variety of temperate habitats ranging from chaparral and grasslands to scrub forests and deserts. Requires low growing vegetation or rocky outcroppings, as well as sandy soils for burrowing.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Chaetura vauxi Vaux's swift	Fed: None CA: SSC	Prefers redwood and Douglas-fir habitats with nest-sites in large hollow trees and snags, especially tall, burned-out snags. Fairly common migrant throughout most of the state in April and May, and August and September.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Circus hudsonius northern harrier	Fed: None CA: SSC	Frequents meadows, grasslands, open rangelands, desert sinks, fresh and saltwater emergent wetlands; seldom found in wooded areas. Mostly found in flat, or hummocky, open areas of tall, dense grasses moist or dry shrubs, and edges for nesting, cover, and feeding.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Coccyzus americanus occidentalis western yellow-billed cuckoo	Fed: THR CA: END	In California, the breeding distribution is now thought to be restricted to isolated sites in Sacramento, Amargosa, Kern, Santa Ana, and Colorado River valleys. Obligate riparian species with a primary habitat association of willow-cottonwood riparian forest.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Coleonyx variegatus abbotti San Diego banded gecko	Fed: None CA: SSC	Occurs in coastal and cismontane southern California from interior Ventura County south, although it is absent from the extreme outer coast. It is uncommon in coastal scrub and chaparral, most often occurring in granite or rocky outcrops in these habitats.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
			adjacent to the Project site.
Crotalus ruber red-diamond rattlesnake	Fed: None CA: SSC	Found from desert dense chaparral communities in the foothills (it avoids the mountains above around 4,000 feet), to warm inland mesas and valleys, all the way to the cool ocean shore. Most commonly associated with heavy brush and large rocks or boulders. Dense chaparral in the foothills, cactus or boulder associated coastal sage scrub, oak and pine woodlands, and desert slope scrub associations are known to carry populations of the northern red-diamond rattlesnake; however, chamise and red shank associations may offer better structural habitat for refuges and food resources for this species than other habitats.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Diadophis punctatus modestus San Bernardino ringneck snake	Fed: None CA: None	Common in open, relatively rocky areas within valley-foothill, mixed chaparral, and annual grass habitats.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Dipodomys stephensi Stephens' kangaroo rat	Fed: END CA: END	Occur in arid and semi-arid habitats with some grass or brush. Prefer open habitats with less than 50% protective cover. Require soft, well-drained substrate for building burrows and are typically found in areas with sandy soil.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Elanus leucurus white-tailed kite	Fed: None CA: FP	Widespread in California along shores of coastal estuaries, fresh and saline emergent wetlands, ponds, slow-moving rivers, irrigation ditches, and wet fields. In southern California, common yearlong in the Imperial Valley and along the Colorado River.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Empidonax traillii willow flycatcher	Fed: None CA: END	Occurs in riparian woodlands in southern California. Typically requires large areas of willow thickets in broad valleys, canyon bottoms, or around ponds and lakes. These areas typically have standing or running water, or are at least moist.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Empidonax traillii extimus southwestern willow flycatcher	Fed: END CA: END	Occurs in riparian woodlands in southern California. Typically requires large areas of willow thickets in broad valleys, canyon bottoms, or around ponds and lakes. These areas typically have standing or running water, or are at least moist.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
			adjacent to the Project site.
Eremophila alpestris actia California horned lark	Fed: None CA: WL	Generally found in shortgrass prairies, grasslands, disturbed fields, or similar habitat types along the coast or in deserts. Trees are shrubs are usually scarce or absent. Generally rare in montane, coniferous, or chaparral habitats. Forms large flocks outside of the breeding season.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Eugnosta busckana Busck's gallmoth	Fed: None CA: None	Occurs in coastal scrub dunes habitat.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Falco columbarius merlin	Fed: None CA: WL	Nest in forested openings, edges, and along rivers across northern North America. Found in open forests, grasslands, and especially coastal areas with flocks of small songbirds or shorebirds.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Falco mexicanus prairie falcon	Fed: None CA: WL	Commonly occur in arid and semiarid shrubland and grassland community types. Also occasionally found in open parklands within coniferous forests. During the breeding season, they are found commonly in foothills and mountains which provide cliffs and escarpments suitable for nest sites.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Falco peregrinus anatum American peregrine falcon	Fed: DL CA: DL	Uncommon winter resident of the inland region of southern California. Active nesting sites are known along the coast north of Santa Barbara, in the Sierra Nevada, and in other mountains of northern California. Breeds mostly in woodland, forest, and coastal habitats. Riparian areas and coastal and inland wetlands are important habitats yearlong, especially in nonbreeding seasons.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Gila orcuttii arroyo chub	Fed: None CA: SSC	Warm streams of the Los Angeles Plain, which are typically muddy torrents during the winter, and clear quiet brooks in the summer, possibly drying up in places. They are found both in slow-moving and fast-moving sections, but generally deeper than 40 cm.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Icteria virens yellow-breasted chat	Fed: None CA: SSC	Primarily found in tall, dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush with well-developed	**Presumed Absent.** This species was not observed during the

Scientific Name Common Name	**Listing Status**[1]	**Habitat**	**Potential to Occur on Project Site**
		understories. Nesting areas are associated with streams, swampy ground, and the borders of small ponds. Breeding habitat must be dense to provide shade and concealment. It winters south the Central America.	field investigation. No suitable habitat is present within or adjacent to the Project site.
Lanius ludovicianus loggerhead shrike	Fed: None CA: SSC	Common yearlong resident of California. Prefers open habitats with bare ground, scattered shrubs, and areas with low or sparse herbaceous cover. Requires suitable perches including trees, posts, fences, utility lines, or other perches.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Larus californicus California gull	Fed: None CA: WL	Require isolated islands in rivers, reservoirs and natural lakes for nesting, where predations pressures from terrestrial mammals are diminished. Uses both fresh and saline aquatic habitats at variable elevations and degrees of aridity for nesting and for opportunistic foraging.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Lasiurus xanthinus western yellow bat	Fed: None CA: SSC	Occurs in valley/foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts under palm trees and feeds in, and near, palm oases and riparian habitats.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Laterallus jamaicensis coturniculus California black rail	Fed: None CA: THR, FP	Shallow marshes, and wet meadows; in winter, drier fresh-water and brackish marshes, as well as dense, deep grass.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Lepus californicus bennettii San Diego black-tailed jackrabbit	Fed: None CA: None	Found in diverse habitats, but primarily is found in arid regions supporting shortgrass habitats. Openness of open scrub habitat is preferred over dense chaparral.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Lynx rufus pallescens pallid bobcat	Fed: None CA: None	Found on the western edge of the great basin habitat in extreme northeast California. Live in a variety of habitats including forests, deserts, mountains, swamps, and farmland.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
Nannopterum auritum double-crested cormorant	Fed: None CA: WL	Common yearlong resident in southern California. Occurs widely in freshwater and marine habitats along coastlines. Require open water where they can forage for schooling fish.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Neotoma lepida intermedia San Diego desert woodrat	Fed: None CA: SSC	Occurs in coastal scrub communities between San Luis Obispo and San Diego Counties. Prefers moderate to dense canopies, and especially rocky outcrops.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Nycticorax nycticorax black-crowned night heron	Fed: None CA: None	Fairly common, yearlong resident in lowlands and foothills throughout most of California, including the Salton Sea and Colorado River areas, and very common locally in large nesting colonies. Feeds along the margins of lacustrine, large riverine, and fresh and saline emergent habitats and rarely, on kelp beds in marine sub tidal habitats. Nests and roosts in dense-foliaged trees and dense emergent wetlands.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Nyctinomops femorosaccus pocketed free-tailed bat	Fed: None CA: SSC	Prefers open lowland areas near water in arid or semi-arid habitats including deserts and scrublands including pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis. Colonial roosting sites include caves, mines, and rock crevices, and to a lesser extent, buildings, bridges, and trees.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Onychomys torridus ramona Southern grasshopper mouse	Fed: None CA: SSC	Inhabits alkali desert scrub and other desert scrub habitats, and to a lesser extent succulent shrubs, desert washes, desert riparian, coastal scrub, mixed chaparral, and sagebrush habitats. Generally rare in valley foothill and montane riparian habitats. Prefers low to moderate shrub cover and requires friable soils.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Pandion haliaetus osprey	Fed: None CA: WL	Remains close to still or slow-moving bodies of water including oceans, rivers, lakes, mangroves, coastal wetlands, lagoons, reefs, estuaries and marshes. Generally, nests in high places, such as trees, power poles, or cliffs.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Perognathus longimembris brevinasus	Fed: None CA: SSC	Occurs in lower elevation grasslands and coastal sage scrub communities in and around the Los Angeles Basin. Prefers open ground with fine sandy soils. May not dig extensive burrows, but	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat

Scientific Name Common Name	**Listing Status[1]**	**Habitat**	**Potential to Occur on Project Site**
Los Angeles pocket mouse		instead will seek refuge under weeds and dead leaves instead.	is present within or adjacent to the Project site.
Phrynosoma blainvillii coast horned lizard	Fed: None CA: SSC	Found in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. The key elements of such habitats are loose, fine soils with a high sand fraction; an abundance of native ants or other insects; and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Polioptila californica californica coastal California gnatcatcher	Fed: THR CA: SSC	Common yearlong resident of southern California in sage scrub habitats that are dominated by California sagebrush (*Artemisia californica*). Prefers scrub habitat with more low-growing vegetation. Species generally occurs below 750 feet above mean sea level (msl) along the coast and below 1,500 feet above msl within inland regions.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Pyrocephalus rubinus vermilion flycatcher	Fed: None CA: SSC	Occupies desert riparian habitat, particularly cottonwoods, willows, mesquite, and other large desert riparian trees, in habitat adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas where it can forage.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Salvadora hexalepis virgultea Coast patch-nosed snake	Fed: None CA: SSC	Found in brushy or shrubby vegetation along the coast and requires small mammal burrows for refuge and overwintering.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Selasphorus rufus rufous hummingbird	Fed: None CA: None	During breeding, they are found in forests, on seed-tree harvest units, riparian shrub, and spruce-fir habitats. During the winter, it migrates to lowland stream bottoms, foothill brush land, seacoast and high mountain meadows.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Setophaga petechia yellow warbler	Fed: None CA: SSC	Nests over all of California except the Central Valley, the Mojave Desert region, and high altitudes and the eastern side of the Sierra Nevada. Winters along the Colorado River and in parts of Imperial and Riverside Counties. Nests in riparian areas dominated by willows, cottonwoods, sycamores, or alders or in mature chaparral. May also use oaks, conifers, and urban areas near stream courses	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
Spea hammondii western spadefoot	Fed: PT CA: SSC	Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washed, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Rainpools which do not contain bullfrogs, fish, or crayfish are necessary for breeding.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Spinus lawrencei Lawrence's goldfinch	Fed: None CA: None	Open woodlands, chaparral, and weedy fields. Closely associated with oaks. Nests in open oak or other arid woodland and chaparral near water.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Spizella breweri Brewer's sparrow	Fed: None CA: None	Habitats include sagebrush scrub and brushy plains.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Streptocephalus wootoni Riverside fairy shrimp	Fed: None CA: END	Freshwater crustacean that is found in vernal pools in the coastal California area.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Taxidea taxus American badger	Fed: None CA: SSC	Primarily occupy grasslands, parklands, farms, tallgrass and shortgrass prairies, meadows, shrub-steppe communities and other treeless areas with sandy loam soils where it can dig more easily for its prey. Occasionally found in open chaparral (with less than 50% plant cover) and riparian zones.	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Thamnophis hammondii Two-striped gartersnake	Fed: None CA: SSC	Utilizes a variety of habitats including forests, mixed woodlands, grassland, chaparral, and farmlands. Often found near ponds, marshes, or streams	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or adjacent to the Project site.
Vireo bellii pusillus least Bell's vireo	Fed: END CA: END	Primarily occupy Riverine riparian habitat that typically feature dense cover within 1 -2 meters of the ground and a dense, stratified canopy. Typically, it is associated with southern willow scrub, cottonwood-willow forest, mule fat scrub, sycamore alluvial woodlands, coast live oak	**Presumed Absent.** This species was not observed during the field investigation. No suitable habitat is present within or

Scientific Name Common Name	Listing Status[1]	Habitat	Potential to Occur on Project Site
		riparian forest, arroyo willow riparian forest, or mesquite in desert localities. It uses habitat which is limited to the immediate vicinity of water courses, 2,000 feet elevation in the interior	adjacent to the Project site.

Source: Habitat Assessment (Appendix D)
[1] U.S. Fish and Wildlife Service (USFWS) - Federal: END - Federally Endangered; THR - Federally Threatened; PT - Proposed Threatened; DL – Delisted
California Department of Fish and Wildlife (CDFW) - California: END - State Endangered; CE - State Candidate Endangered; SSC - Species of Special Concern; WL - Watch List; FP - Fully Protected

5.4.3.5 Special-Status Plant Communities

According to the CNDDB, one special-status plant community has been reported in the Riverside East quadrangle. Southern Sycamore Alder Riparian Woodland is listed as a CDFW Sensitive Habitat and has the potential to occur within the Riverside East Quadrangle. However, Southern Sycamore Alder Riparian Woodland habitat was not observed on the Project site during the field investigation and is presumed to be absent from the site. The Project site is disturbed and developed, and is surrounded by industrial uses; as such, no suitable habitat is present within or adjacent to the Project site. No other special-status plant communities were observed on-site during the field investigation conducted as part of the Habitat Assessment (Appendix D).

5.4.3.6 Jurisdictional Waters

The Project site consists of disturbed and developed areas. The Habitat Assessment details that the Project site does not contain any streams or drainages or riparian habitat. There are no CDFW, United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) jurisdictional waters. Further, the Project site does not contain any wetlands or vernal pools.

5.4.3.7 Wildlife Movement

Wildlife movement corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species present. Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and shelter. Animals use these corridors, which are often hillsides or riparian areas, to move between different habitats. Regional corridors provide these functions and link two or more large habitat areas. They provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations.

The Project site is not located within a designated wildlife corridor or linkage. The Project area was evaluated for its function as a wildlife corridor that species use to move between wildlife habitat zones. The Project site consists of flat, disturbed land characterized by disturbed and developed land cover. The Project site is surrounded by urban development. No wildlife movement corridors were found to be present on or adjacent to the Project site.

5.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold 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 Wildlife or U.S. Fish and Wildlife Service.

Threshold 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 Wildlife or U.S. Fish and Wildlife Service.

Threshold 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.

Threshold 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.

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

Threshold 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.

5.4.5 METHODOLOGY

The analysis within this EIR section is based on the Habitat Assessment completed for the Project site (included as Appendix D). The assessment is based on literature review of biological resources occurring within the Project site and surrounding vicinity. The review included aerial photographs and topographic maps, the CNDDB, the USFWS Endangered Species Lists, and the CNPS rare plant lists. The CNDDB and USFWS critical habitat databases were utilized, together with Geographic Information System (GIS) software, to locate the previously recorded locations of sensitive plant and wildlife occurrences and designated critical habitat and determine the distance from the Project site. Additionally, the Western Riverside County MSHCP was reviewed to determine requirements for sensitive species surveys. A Field survey was conducted on November 7, 2024, to document existing conditions within the Project site and surrounding area.

5.4.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: 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 WILDLIFE OR U.S. FISH AND WILDLIFE SERVICE?

Special Status Plants

As detailed in Table 5.4-1, there are 13 plant species that are listed as State and/or federal Threatened, Endangered, or Candidate species, or are 1B.1 listed plants in the CNPS Rare Plant Inventory that have the potential to occur within the Project region. Table 5.4-1 details that these special-status plant species do not have the potential to occur on the Project site due to lack of habitat. None of the special-status plant species were observed during the general biological surveys conducted on November 7, 2024. Therefore, **no impacts related to special status plants would occur** from the proposed Project.

Special Status Animal Species

As shown in Table 5.4-2, a total of 69 special status animal species have the potential to occur within the Project region. However, habitat for these species does not exist on the site and none of the animal species were observed during the field survey. Therefore, **no impacts related to special status wildlife would occur** from the proposed Project.

THRESHOLD B: WOULD THE PROJECT 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 WILDLIFE OR U.S. FISH AND WILDLIFE SERVICE?

As described previously, the Project site is comprised of disturbed/developed areas that do not include riparian habitats or other sensitive natural communities. The Habitat Assessment describes that no jurisdictional drainages, riparian, riverine and/or wetland features were observed within the Project site during the field investigation. Additionally, no sensitive natural communities were observed during the field investigation and presumed to be absent due to lack of suitable habitat. Therefore, development of the proposed Project would not result in impacts to riparian or riverine habitats or sensitive natural communities. **No impacts would occur**.

THRESHOLD C: WOULD THE PROJECT 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?

No jurisdictional drainage and/or wetland features were observed on the Project site during the field investigation (Appendix D). Further, no blueline streams have been recorded on the Project site. Therefore, development of the Project would not result in impacts to wetlands and regulatory approvals would not be required. **No impacts would occur.**

THRESHOLD D: WOULD THE PROJECT 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?

Wildlife Movement

The Habitat Assessment describes that the Project site is not located within a designated wildlife corridor or linkage. During the field survey for the Habitat Assessment, the Project area was evaluated for its function as a wildlife corridor that species use to move between wildlife habitat zones. The Project site consists of flat, disturbed land characterized by disturbed and developed land cover. Further, the Project site is surrounded by urban development such as industrial uses and roadways. No wildlife movement corridors were found to be present on or adjacent to the Project site during the field sruvey. Thus, **no impacts related to wildlife movement corridors would occur** with implementation of the Project.

Nesting Birds

The Project site has the potential to support songbird and raptor nests due to the presence of shrubs, ground cover, and trees. Project development activities could disturb or destroy active migratory bird nests including eggs and young. Disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Game Code Section 3503. As such, direct impacts to breeding birds (e.g., through nest removal) or indirect impacts (e.g., by noise causing abandonment of the nest) is considered a potentially significant impact. Therefore, Mitigation Measure BIO-1 is included to require a nesting bird survey if vegetation is removed during nesting season (February 1st through August 31st). If an active nest is found during the nesting bird surveys, the project biologist would establish a no-

disturbance buffer, which would prevent direct and indirect impacts to nesting birds by minimizing disturbance from construction activities. As such, with Mitigation Measure BIO-1, potential impacts to biological resources are a less-than-significant. **Impacts would be less than significant with mitigation incorporated.**

THRESHOLD E: WOULD THE PROJECT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS A TREE PRESERVATION POLICY OR ORDINANCE?

The City's General Plan Open Space and Conservation Element includes Policies LU-7.4, OS-5.2, OS-5.4, and OS-6.1 that are related to participation in the MSHCP, protection of native plant communities, and protection and enhancement of wildlife migratory corridors. As detailed within this EIR Section, the proposed Project would be consistent with the MSHCP (see discussion under Threshold F). Also, the site does not include either native plant communities or wildlife migratory corridors. Therefore, the proposed Project would not conflict with the City's General Plan Policies related to biological resources.

All projects within the City of Riverside that includes planting or removal of a street tree within a City right-of-way is required to adhere to the City's Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute.

The proposed Project includes installation of trees along the perimeter of the Project site and along the street rights-of-ways adjacent to the Project site, including along Roberta Street, Kansas Avenue, and Massachusetts Avenue. The installation of these trees would be in compliance with the Tree Policy Manual. The City's Planning Division and Public Works Department, Urban Forestry Division would review the landscaping plans through plan checks and inspection of the landscaping during installation, which would ensure that all required City requirements related to the street trees are incorporated. Therefore, **potential impacts related to local policies or ordinances protecting biological resources would be less than significant**.

THRESHOLD F: WOULD THE PROJECT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?

As described above, the Project site is located within an MSHCP Area Plan. However, the site is not located within any Criteria Cells or Cell Groups. Additionally, the Project site is not located within any MSHCP designated species survey areas. A discussion of the Project's consistency with applicable Western Riverside County MSHCP requirements is provided below:

Section 6.1.2 Species Associated with Riparian/Riverine Habitat and Vernal Pools

The Project site does not contain habitat that may be considered riparian/riverine areas as defined in Section 6.1.2 of the MSHCP. Due to the lack of suitable riparian habitat on the Project site, focused surveys for riparian/riverine bird species listed in Section 6.1.2 of the MSHCP are not warranted.

Vernal pools are seasonal wetlands that occur in depression areas without a continual source of water. They are covered by shallow water for variable periods from winter to spring but may be completely dry most of the summer and fall. Vernal pools are usually associated with hard clay layers or bedrock, which helps keep water in the pools. Vernal pools and seasonal depressions usually are dominated by hydrophytic plans, hydric soils, and evidence of hydrology.

The Habitat Assessment included a review of recent and historic aerial photographs (1994-2024) of the Project site and found that no evidence of vernal pool conditions exist within the Project site. No ponding

was observed, further supporting the fact that the drainage patterns currently occurring on the Project site do not follow hydrologic regimes needed for vernal pools. Therefore, the Habitat Assessment concluded that there is no indication of vernal pools or suitable fairy shrimp habitat occurring within the proposed Project site. Therefore, the Project is consistent with Section 6.1.2 of the MSHCP.

Section 6.1.3 Sensitive Plant Species

The Project site is not located within the Western Riverside County MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA) as listed in Section 6.1.3 of the MSHCP. Therefore, the NEPSSA requirements are not applicable to the Project.

Section 6.1.4 Urban/Wildlands Interface Guidelines

The Project site is not located within or adjacent to a Western Riverside County MSHCP Conservation Area; therefore, the Urban/Wildlands Interface requirements are not applicable to the Project.

Section 6.3.2 Additional Surveys and Procedures

The Project site is not located within the Western Riverside County MSHCP Additional Survey Areas for any special-status flora or wildlife species. In addition, the Project site is not located within the Western Riverside County MSHCP Criteria Area Plant Species Survey Area (CAPSSA) as listed in Section 6.3.2 of the Western Riverside County MSHCP. Additionally, the site is fully developed and heavily disturbed; therefore, there is no suitable habitat for burrowing owl or other special status species.

Therefore, the Project would not result in conflicts with the adopted habitat conservation plan, due to lack of suitable environment for the Western Riverside County MSHCP Covered Species. With payment of the required MSHCP fees, the Project would not result in any conflicts with the MSHCP. **No impact would occur.**

5.4.7 CUMULATIVE IMPACTS

The cumulative study area for biological resources encompasses the Riverside County MSHCP area. This cumulative impact analysis considers development of the Project in conjunction with other development projects identified in Section 5.0, *Environmental Impact Analysis*, Table 5-1, *Cumulative Projects List*. The Project would not have significant impacts related to jurisdictional waters, wildlife movement, local ordinances or regulations protecting biological resources, habitat conservation plans, plant communities, and habitat fragmentation. In addition, although the Project could have potentially significant impacts to nesting birds, compliance with Mitigation Measures BIO-1 would reduce potential impacts to less-than-significant levels.

Similar to the Project, the cumulative projects would be required to comply with applicable survey requirements pursuant to Riverside County and MSHCP requirements and mitigation for biological resources, such as the Migratory Bird Treaty Act. Since all projects would be required to implement their respective mitigation measures, their contribution would not be cumulatively considerable. There are no projects that would, in combination with the Project, produce a significant impact to biological resources. Therefore, Project impacts would be **less than cumulatively considerable** and thus **less than significant**.

5.4.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Federal

- Federal Endangered Species Act
- Migratory Bird Treaty Act

State

- California's Endangered Species Act
- California Fish and Game Code

Regional

- Western Riverside Multiple Species Habitat Conservation Plan

Existing Plans, Programs, or Policies

- City of Riverside Urban Forestry Policy Manual
- City of Riverside Municipal Code Section 16.40 (Threatened and Endangered Species Preservation Development Fees)
- City of Riverside Municipal Code Section 16.72 (Western Riverside Multiple Species Habitat Conservation Plan Fee Program)

5.4.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The following thresholds would result in **no impacts**:

- Threshold A: Impacts to special status species in local or regional plans, policies, or regulations.
- Threshold B: Impacts to riparian habitat or sensitive communities.
- Threshold C: Impacts to State or federally protected wetlands.
- Threshold F: Impacts related to conflict with provisions of the MSHCP.

The following thresholds would result in **less-than-significant impacts**:

- Threshold E: Impacts related to conflict with local policies or ordinances

Without mitigation, the following thresholds would be **potentially significant**:

- Threshold D: Impacts to wildlife movement or native wildlife nursery sites.

5.4.10 MITIGATION MEASURES

Mitigation Measure BIO-1: Nesting Birds. Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

5.4.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The mitigation measure listed above, in addition to existing regulations, would reduce potential impacts associated with biological resources for Threshold D to a level that is less than significant. Therefore, no significant and unavoidable adverse impacts related to biological resources would occur.

5.4.12 REFERENCES

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5.5 Cultural Resources

5.5.1 INTRODUCTION

This section addresses potential environmental effects to cultural resources related to implementation of the proposed Project. Cultural resources detailed herein include historic and archaeological resources. The analysis in this section is based on the following documents and resources:

- *Historical/Archaeological Resources Survey Report Kansas Massachusetts Industrial Project*, prepared by CRM Tech, December 31, 2024, included as Appendix EE
- *City of Riverside General Plan 2025*, adopted 2007
- *City of Riverside General Plan Program Environmental Impact Report*, July 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* certified September 2021
- City of Riverside Municipal Code

In accordance with Public Resources Code Section 15120(d), certain information and communications that disclose the location of archaeological sites and sacred lands are allowed to be exempt from public disclosure.

Cultural Resources Terminology

- A **unique archaeological resource** is defined in Section 21083.2 of the PRC as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
    - Contains information needed to answer important scientific research questions and for which there is a demonstrable public interest
    - Has a special and particular quality such as being the oldest of its type or the best available example of its type
    - Is directly associated with a scientifically recognized important prehistoric or historic event or person
- **Historical resources** are defined as "a resource listed or eligible for listing on the California Register of Historical Resources" (California Register) (Public Resources Code, Section 5024.1; 14 CCR 15064.5) and defined in CEQA Guidelines Section 15064.5 (detailed in Section 5.2.2.2 State Regulations).
- **Tribal cultural resources** is defined by Assembly Bill (AB) 52 as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources (Public Resources Code, Section 21074 (a)(1)).

5.5.2 REGULATORY SETTING

5.5.2.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and

districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria per 36 Code of Federal Regulations Part 60:

a. Properties that are associated with events that have made a significant contribution to the broad patterns of our history;
b. Properties that are associated with the lives of persons significant in our past;
c. Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d. Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic "integrity," which is "the ability of a property to convey its significance." The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register.

Properties listed in or eligible for listing in the National Register are also eligible for listing in the California Register, and as such, are considered historical resources for CEQA purposes.

Section 106 of the NHPA

Section 106 of the NHPA requires that each federal agency identify and assess the effects its actions may have on historic buildings (United States General Services Administration, 2023). If a federal or federally-assisted project has the potential to affect historic properties, a Section 106 review will take place. The Advisory Council on Historic Preservation (ACHP) has defined a federal undertaking in Code of Federal Regulations (CFR) Title 36 Section 800.16(y) as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency. After an undertaking is identified, federal agency stakeholders should follow these four steps to fulfill Section 106 requirements:

1. Initiate consultation by notifying the appropriate consulting parties. Consultation is between the federal agency, the State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), and other consulting parties including but not limited to the ACHP, certified local governments, and members of the general public with an economic, social or cultural interest in the project.
2. Identify properties that may be affected by the project and determine if the property or properties are historic as determined by eligibility or listing in the National Register of Historic Places.
3. Assess the effects of the undertaking on the resources in consultation with interested parties and establish if they are adverse. Determining adverse effects on historic resources is based on criteria established by the regulations, 36 CFR Part 800 of the ACHP regulations.
4. Resolve adverse effects by developing and evaluating alternatives that could avoid, minimize, or mitigate these impacts on historic resources. The result of consultation may be a Memorandum of Agreement (MOA) or a Programmatic Agreement (PA). The MOA or PA is a legally binding document, which evidences the agency's compliance with Section 106 and records the outcome of consultation and the effects of an agency's project, projects or program on historic resources.

5.5.2.2 State Regulations

California Register of Historical Resources

Eligibility for inclusion in the California Register is determined by applying the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in California's past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value; or
4. It has yielded or is likely to yield information important in prehistory or history. The Register includes properties which are listed or have been formally determined to be eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest (PRC §5024.1).

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). The California Register also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association (California Office of Historic Preservation, 2011).

CEQA Guidelines Section 15064.5

CEQA Guidelines Section 15064.5(a), states that "historical resources" shall include the following:

1. A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in, the California Register of Historical Resources (Public Resources Code, Section 5024.1).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1) including the following:

    a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    b. Is associated with the lives of persons important in California's past;
    c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
    d. Has yielded, or may be likely to yield, information important in prehistory or history.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining

that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

California Health and Safety Code Section 7050.5

Health and Safety Code Section 7050.5(b) and (c) provides that if human remains are discovered, excavation or disturbance in the vicinity of human remains shall cease until the County Coroner is contacted and has reviewed the remains. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

Public Resources Code Section 5097.98

Public Resources Code Section 5097.98 provides guidance on the appropriate handling of Native American remains. Once the NAHC receives notification from the Coroner of a discovery of Native American human remains, the NAHC is required to notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.98(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

5.5.2.3 Regional Regulations

There are no regional regulations applicable to the proposed Project.

5.5.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to cultural resources that are applicable to the Project.

Historic Preservation Element

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

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

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

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

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

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

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

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

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

Land Use and Urban Design Element

Policy LU-4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

Riverside Municipal Code, Title 20, Cultural Resources

The City's historical preservation program is among the most active in the state. Riverside adopted Title 20 of the Riverside Municipal Code (RMC), otherwise known as the "preservation ordinance," and created the Cultural Heritage Board in 1969. This ordinance forms the primary body of local historical preservation law. The California Office of Historic Preservation designated the City of Riverside as a Certified Local Government; a distinction that ensures the City's preservation program meets all federal and State standards.

Chapter 20.50 of the RMC defines eligible cultural resources as:

> *A cultural resource or historic district which has been determined by the Historic Preservation Officer or Qualified Designee, Board, or City Council to meet the City's designation criteria pursuant to a survey prepared by a professional meeting the Secretary of the Interior's standards which either documents the resource, records the resource on the State Department of Parks and Recreation survey forms, or has been so designated by the California State Historic Preservation Officer.*

RMC Title 20 establishes procedures for preserving, protecting, and designating significant cultural resources should the resource be considered a historical/cultural resource, and outlines the criteria for Landmarks, Resources or Structures of Merit, and Historic Districts (RMC, Title 20, Section 20.50.010). A cultural resource may be eligible for one of the three City designations:

Landmark Designation Criteria

"Landmark" means any improvement or natural feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City, retains a high degree of integrity; and meets one or more of the following criteria:

1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
2. Is identified with persons or events significant in local, state or national history;
3. Embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
4. Represents the work of a notable builder, designer, or architect, or important creative individual;
5. Embodies elements that possess high artistic values or represents a significant structural or architectural achievement or innovation;
6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;
7. Is one of the last remaining examples in the city, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or
8. Has yielded, or may be likely to yield, information important in history or prehistory.

Structure or Resource of Merit Criteria

"Resource or Structure of Merit" means any improvement or natural feature which contributes to the broader understanding of the historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City while retaining sufficient integrity, and meets one or more of the following criteria:

1. Has a unique location, embodies a singular physical characteristic, or contains a view or vista representing an established and familiar visual feature within a neighborhood, community or area;
2. Is an example of a type of building which was once common but is now rare in its neighborhood, community or area;
3. Is connected with a business or use which was once common but is now rare;
4. Has yielded or may be likely to yield, information important in history or prehistory; or
5. Represents an improvement or cultural resource that no longer exhibits the high degree of integrity sufficient for landmark designation, yet still retains necessary integrity under one or more of the landmark criteria to convey cultural resource significance as a structure or resource of merit.

Historic District

A "Historic District" contains either:

A. A concentration, linkage, or continuity of cultural resources, where at least fifty percent of the structures or elements retain significant history integrity (a "geographic Historic District"); or
B. A thematically-related grouping of cultural resources that contribute to each other and are unified aesthetically by plan or physical development, and which have been designated or determined eligible for designation as a historic district by the Historic Preservation Officer, Board, or City Council, or is listed in the National Register of Historic Places or the California Register of Historical Resources, or is a California Historical Landmark or a California Point of Historical Interest (a "thematic Historic District").
C. In addition to either A or B above, the area must also:
    1. Exemplify or reflect special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
    2. Identify with persons or events significant in local, state, or national history
    3. Embody distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship
    4. Represent the work of notable builders, designers, or architects
    5. Embody a collection of elements of architectural design, detail, materials, or craftsmanship that represents a significant structural or architectural achievement or innovation

6. Reflect significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning
7. Convey a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship or association
8. Yield or may be likely to yield, information important in history or prehistory.

5.5.3 ENVIRONMENTAL SETTING

5.5.3.1 Historical Setting

The Historical/Archaeological Resources Survey Report prepared for the Project site (Appendix EE) describes that the first settlers and agricultural fields occurred within the general Project vicinity in the late 1870s. At this time, a few roads and the Riverside Upper Canal were being constructed. Twenty years later, these early roads were replaced by a regular grid of roads, including the forerunners of the present-day Kansas Avenue and Massachusetts Avenue. The entire Project site remained vacant at that time, and the most notable features in the surrounding area were two major railroads that linked Riverside to the rest of the United States, namely the Southern California Railroad to the west of the Project site, a Santa Fe subsidiary, and the now-dismantled Southern Pacific Railroad to the south.

For the first four decades of the 20th century, most of the land around the Project site was being used for the cultivation of citrus fruits. Five buildings had appeared within the Project site during this period; however, none of the buildings were of industrial scale. Archival records of the City of Riverside indicate that the present-day New Basis, Inc. buildings at 2626 Kansas Avenue were constructed between 1946 and 1949 for the Colonial Radio Corporation and the Revere Copper and Brass Company, respectively, while the Student Transportation of America buildings on 1989 Massachusetts Avenue were constructed in 1986. The westerly of the two buildings at 2626 Kansas Avenue had a railroad spur on its eastern side that connected to the Southern Pacific Railroad, but it was eventually abandoned and removed sometime in the 1960s – 1970s. The rest of the area surrounding the Project site remained mostly under citrus cultivation for at least a decade after the completion of the buildings at 2626 Kansas Avenue. All traces of the surrounding citrus groves gradually disappeared from the area between 1959 and 1978.

The Colonial Radio Corporation, established in New York in 1924, secured its first military production contract in 1940 and by April 1942, its entire operation had become devoted to wartime military production. In 1946, the Colonial Radio Corporation expanded its wartime production to the newly completed warehouse constructed at present day 2626 Kansas Avenue. The building was sold to another East Coast manufacturer, the Revere Copper and Brass Company, shortly after due to the ending of World War II. In 1949, the Revere Copper and Brass Company constructed the second building on the property. The Revere Copper and Brass Company occupied the buildings at 2626 Kansas Avenue for 13 years. In 1964, Bridgeport Brass made a number of alterations to the two buildings occupying the site. By at least 1983 and possibly as early as 1970, Associated Plastics, Inc., had become the occupant at this address. In 2000, the company was integrated with Associated Concrete Products under the name New Basis, Inc., which remains in operation on the site today.

5.5.3.2 Archaeological Setting

The Historical/Archaeological Resources Survey Report (Appendix EE) prepared for the Project site describes that the earliest evidence of human occupation in western Riverside County occurred in the northern portion of the Lakeview Mountains approximately 9,500 years before present and near the shoreline of Lake Elsinore, close to the confluence of Temescal Wash and the San Jacinto River, between 8,000 and 9,000 before present. Additional sites with isolated Archaic dart points, bifaces, and other associated lithic artifacts

from the same age range have been found in the nearby Cajon Pass area of San Bernardino County, typically atop knolls with good viewsheds.

The Project region was historically situated between the overlapping Native American territories of the Serrano of the San Bernardino Mountains, the Luiseño of the Perris-Elsinore region, and the Gabrielino of the San Gabriel Valley, and later the Cahuilla (Appendix EE).

The Historical/Archaeological Resources Survey Report included a records search of the Eastern Information Center (EIC) for the Project which identified 120 previously recorded cultural resources within a half-mile radius of the Project site. All but three of the 120 known resources were buildings from the historic period, and the other three represented the Riverside Upper Canal, the Riverside Lower Canal, and a segment of the Southern Pacific Railroad (Appendix E). None of the previously recorded resources are located within the Project site.

Additionally, the EIC records search identified 20 previous studies conducted within one-half mile Project site One of the 20 previous studies, completed in 2003 for the Hunter Park Redevelopment Plan, overlaps the Project site (Appendix E). The 2003 study covered a total of 2,625 acres and inventoried previously identified cultural resources and included an overall archaeological sensitivity assessment. The 2003 study did not include a field survey of the entire 2,625 acre study area and did not include a field survey of the current Project site area. The results of the 2003 study suggest that the current Project site is relatively low in sensitivity for archaeological resources of either prehistoric or historical origin (Appendix E).

5.5.3.3 Previous Site Ground Disturbances

The entirety of the Project site is highly disturbed from previous agricultural activity, development, and land maintenance activities. Historically, the Project site was used for the cultivation of citrus fruit prior to the development of the two buildings at 2626 Kansas Avenue in 1946 and 1949.

5.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

Threshold B Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

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

Historical Resource Thresholds

Historical resources are usually 50 years old or older and must meet at least one of the criteria for listing in the California Register (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient level of physical integrity (CEQA Guidelines Section 15064.5[a][3]). Additionally, CEQA Guidelines Section 15064.5(b), states that a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that would have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

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

5.5.5 METHODOLOGY

The cultural resources impact analysis in this section is based on the *Historical/Archaeological Resources Survey Report Kansas Massachusetts Industrial Project* (Appendix E), and contains information that was compiled through field reconnaissance, record searches, and reference materials. In determining whether an archaeological related impact would result from the proposed Project, the analysis includes record searches of past identified resources, past disturbance on the site, and the proposed excavation.

Archaeological and Historic Records Search

On August 31, 2021, a record search request was submitted to the California Historical Resource Information System (CHRIS) from the Eastern Information Center (EIC), located on the campus of University of California, Riverside. The CHRIS search included areas within a half-mile radius of the Project site and included a review of the National Register, the California Register, the California Points of Historical Interest list, the California Historical Landmarks list, the Riverside County Historic Landmarks list, and the California Historical Resources Inventory. Also, a Sacred Lands File search was requested from the NAHC on June 23, 2021. The NAHC responded on August 5, 2021, stating that there are no known sacred lands within the Project vicinity (Appendix E).

Archaeological and Historic Field Survey

A pedestrian reconnaissance survey was conducted across the Project site on September 10, 2021. The Project site is almost completely covered by buildings, asphalt pavement, gravel, and material storage, thus, the survey was conducted by meandering across the property and opportunistically inspecting the ground surface wherever it was exposed, which was mostly limited to the perimeter and a large area of hard-pack ground in the southwestern portion (Appendix E). Considering the extensive ground disturbance from past development, the survey procedures were deemed adequate for the study.

Historical Resource Assessment

A Historical Resource Assessment was conducted to evaluate the subject historic-age (older than 50 years) structures present on the Project site for eligibility under the Riverside Local Register and California Register to identify whether the buildings meet the definition of a historical resource under the California Register and pursuant to § 15064.5 of the CEQA Guidelines. As a part of the research procedures, the Riverside Historical Society, the Old Riverside Foundation, and the Riverside County Mexican American Historical Society were contacted between September 21 and October 7, 2021, for supplementary information on the Project site, especially pertaining to the existing buildings, and to inquire about potential local historic interest in the buildings or concerns over their removal (Appendix E).

5.5.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE PURSUANT TO § 15064.5?

As described previously, historical resources are defined as "a resource listed or eligible for listing on the California Register of Historical Resources" (Public Resources Code, Section 5024.1; 14 CCR 15064.5). Under CEQA Guidelines Section 15064.5(a), the term "historical resources" includes the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (Public Resources Code, Section 5024.1).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1) including the following:

    a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    b. Is associated with the lives of persons important in California's past;
    c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
    d. Has yielded, or may be likely to yield, information important in prehistory or history.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

The Historical/Archaeological Resources Survey Report (Appendix E) describes that the buildings at 1989 Massachusetts Avenue, including the two-story office building and the vehicle maintenance building behind it, are of standard design and construction for buildings of similar nature and demonstrate no special qualities in architecture, engineering, or aesthetics. As such, they are not considered potential historical resources under CEQA. The parcel would be included in the proposed zone change as part of the Project; however, no changes to the existing buildings at 1989 Massachusetts Avenue are proposed as part of this Project. Therefore, implementation of the proposed Project would result in no impact to the structures at 1989 Massachusetts Avenue.

As described above, 2626 Kansas Avenue is occupied by two structures, one which was originally constructed in 1946 for the Colonial Radio Corporation and the other in 1948-1949 after the Revere Copper and Brass Company acquired the property. The proposed Project would demolish the existing two structures and the site associated improvements for development of the Project. The Historic/Archaeological Resources Survey Report describes that since the buildings meet the 50-year age threshold for consideration as potential

"historical resources," the buildings were recorded into the California Historical Resources Inventory with the temporary designation of CRM TECH 3758-1H, pending assignment of an official site number by the California Historical Resources Information System (CHRIS) (Appendix E). As described in the Report, the buildings have not been listed or formally determined eligible for listing in the California Register, nor have they been previously designated by the City of Riverside as being historically significant.

The Historic/Archaeological Resources Survey Report describes that the buildings represent long-standing elements of the lasting industrial area of the City of Riverside; however, neither of the two buildings are closely associated with any persons or events, either a specific event or a pattern of events, of recognized significance in national, state, or local history (Appendix E). Additionally, the utilitarian architectural, structural, engineering, and aesthetic merits of the buildings are not considered important or particularly remarkable examples of any style, property type, period, region, and method of construction, nor are they known to embody the work or accomplishment of any prominent architect, designer, or builder. Furthermore, the mid-20th century industrial growth theme that characterizes the buildings is well documented in historical accounts, contemporary literature, as well as archival records, both nationwide and in the City of Riverside, and thus these buildings hold little potential for any new or important data for the study of this subject.

Based on these considerations, the industrial buildings at 2626 Kansas Avenue do not appear eligible for listing in the National Register or the California Register, or for local designation by the City of Riverside as a "Landmark" or a "Resource of Merit." Therefore, the buildings do not meet the definition of a "historical resource" in the category of "discretionary historical resources," and the structures are not considered historical resources under CEQA. Implementation of the proposed Project would result in a **less than significant impact** related to historical resources.

THRESHOLD B: WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO § 15064.5?

As described above, an archaeological records search was conducted at the EIC and included a one-half mile radius of the Project site. The records search identified 120 previously recorded archaeological resources within a one-half mile radius of the Project site; however, none of the resources occur within the boundaries of the proposed Project. Additionally, as described above, the records search identified 20 previous studies conducted within one-half mile Project site, including one study conducted in 2003 which overlapped the Project site. However, the results of the 2003 study which overlapped the Project site suggest that the current Project site is relatively low in sensitivity for archaeological resources of either prehistoric or historical origin (Appendix E). None of the previous studies indicated the presence of any archaeological resources within the Project site or vicinity. Further, no archeological resources were identified within the Project site during the Project-specific field survey conducted on September 10, 2021 (Appendix E).

Construction of the proposed Project would involve ground disturbance activities such as demolition, site preparation, and grading that may unearth an unknown archeological resource. However, the Project site has been previously disturbed; therefore, there is reduced potential for the Project to impact archaeological resources. Additionally, as described above, neither the records search nor the field survey identified any evidence of archaeological resources on the site (Appendix E). Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource. However, if the discovery of archaeological resources occurs during ground disturbing activities, Mitigation Measure (MM) CUL-1 would be implemented which would require work to be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. **With the implementation of MM CUL-1, the Project's impacts related to archaeological resources would be reduced to a less than significant level.**

THRESHOLD C: WOULD THE PROJECT DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF DEDICATED CEMETERIES?

The Project site is heavily disturbed and partially developed with two existing industrial buildings; the site has no history of previous cemetery uses. As detailed in the previous response, soils have been extensively disturbed by past development. Human remains on the Project site are unlikely, as they typically would have been identified during previous ground disturbing activities. However, in the unanticipated event that human remains are found during Project construction activities, compliance with California Health and Safety Code Section 7050.5, which is enforced through a City Standard Condition of Approval, would ensure that human remains were treated with dignity and as specified by law which would reduce the impact to a less than significant level.

As specified by California Health and Safety Code Section 7050.5, if human remains are found on the Project site, the County Coroner's office shall be immediately notified and no further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If the Coroner recognizes the remains to be Native American, he or she shall contact the NAHC within 24 hours. The NAHC would make a determination as to the Most Likely Descendent. Compliance with the existing California Health and Safety Code regulations, via the City's Standard Condition of Approval would ensure impacts related to potential disturbance of human remains would be **less than significant.**

5.5.7 CUMULATIVE IMPACTS

Historical Resources: The Project's contribution to cumulative impacts to historical resources was analyzed in context with historical resources within the City. As detailed previously, records searches and field surveys indicate the absence of significant historical sites and resources within the Project site and vicinity, and the Historical Resources Assessment determined that the existing structures on the site are not historical resources (Appendix E). Therefore, Project implementation would have no potential to contribute towards a significant cumulative impact to historical resources. Thus, **cumulatively considerable historical resource related impacts would not occur.**

Archaeological Resources: The cumulative study area for archaeological resources includes the southern California region, which contains the same general prehistoric uses and migration trends as the Project site. Cumulative development projects in the region would involve ground disturbances that could reveal buried archaeological resources. However, as detailed previously, the soils within the Project site have been substantially disturbed and the site has a low to moderate potential for archaeological resources and the Project would implement MM CUL-1 to ensure that impacts would not occur in the case of an inadvertent discovery of a potential resource, including a tribal cultural resource. The mitigation measure ensures that the Project would not contribute to a cumulative loss of archaeological resources. Other cumulative projects would be required to undergo CEQA review and implement similar mitigation, as deemed necessary. Therefore, **Project impacts would be less than cumulatively significant.**

Disturbance of Human Remains: Mandatory compliance with the provisions of California Health and Safety Code § 7050.5, Public Resources Code § 5097 et seq., and CEQA Guidelines Section 15064.5, which are enforced through the City's standard Condition of Approval, would assure that all future development projects treat human remains that may be uncovered during development activities in accordance with prescribed, respectful, and appropriate practices, thereby avoiding significant cumulative impacts. **No cumulatively significant impact would occur.**

5.5.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Health and Safety Code Section 7050.5
- Public Resources Code Section 5097.98

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to cultural resources. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP CUL-1: Human Remains. If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

5.5.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Threshold A and C would be less than significant. Threshold B would be less than significant with implementation of MM CUL-1.

5.5.10 MITIGATION MEASURES

Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. During implementation of the project, in the event that archaeological materials are encountered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for Professional Archaeology (United States Department of the Interior, 1983). Construction activities may continue in other areas. If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant's expense.

5.5.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of MM CUL-1, Threshold B would be less than significant.

5.5.12 REFERENCES

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5.6 Energy

5.6.1 INTRODUCTION

This section assesses the significance of the use of energy, including electricity, natural gas, and gasoline and diesel fuels, that would result from implementation of the proposed Project. It discusses existing energy use patterns and examines whether the proposed Project (including construction and operation) would result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with State or local plans for renewable energy or energy efficiency. The analysis in this section is based, in part, on the following documents and resources:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code
- *Air Quality, Energy, and GHG Impact Analysis*, prepared by EPD Solutions, Inc., May 2025, included as Appendix B

Refer to Section 5.8, *Greenhouse Gas Emissions*, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emissions, and Section 5.19, *Utilities and Service Systems*, for a discussion of utilities.

5.6.2 REGULATORY SETTING

5.6.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

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

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy (CAFE) Standards

On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

5.6.2.2 State Regulations

Assembly Bill 1575, Warren-Alquist Act

In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs; license power plants of 50 megawatts (MW) or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and *State CEQA Guidelines* Section 15126.4 to require Environmental Impact Reports (EIRs) to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the *State CEQA Guidelines*. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the *State CEQA Guidelines* also states that the goal of conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including: (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting

In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every 2 years and an update every other year. The most recently adopted report includes the *2023 Integrated*

Energy Policy Report. The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standard

SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the Renewable Portfolio Standards of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all the State's electricity come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.

Title 24, California Energy Code

The California Energy Code contains energy conservation standards applicable to all residential and non-residential buildings throughout California. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The California Energy Commission anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons.

The Building Energy Efficiency Standards include the Energy Code (Title 24, Part 6) and voluntary energy efficiency provisions in California Green Building Standards Code (CALGreen) (Title 24, Part 11). The Title 24 Building Energy Efficiency Standards are updated every three years. The most recently approved update includes the 2022 Energy Code and 2022 CALGreen standards, which became effective January 1, 2023 The efficiency standards apply to both new construction and rehabilitation of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in CCR Title 24.

California Energy Efficiency Strategic Plan

On September 18, 2008, the California Public Utilities Commission (CPUC) adopted California's first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in California. The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The plan also reiterates the following four specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that were established by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020.

- All new commercial construction will be ZNE by 2030.
- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

5.6.2.3 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following policies and objectives related to energy that are applicable to the Project (City of Riverside, 2007):

Air Quality Element

Objective AQ-3: Prevent and reduce pollution from stationary sources, including point sources (such as power plants and refinery boilers) and area sources (including small emission sources such as residential water heaters and architectural coatings).

Policy AQ-3.6: Support "green" building codes that require air conditioning/filtration installation, upgrades or improvements for all buildings, but particularly for those associated with sensitive receptors.

Public Facilities and Infrastructure Element

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

Policy PF-6.1: Continue to support the development of green power and expand the use of green power in the City's energy portfolio.

Policy PF-6.3: Promote and encourage energy conservation.

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

Policy PF-6.5: Promote green building design.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

Riverside Municipal Code

Title 16, *Buildings and Construction*, of the Riverside Municipal, includes adoption of 2022 California Energy Code (Title 24, Part 6), The 2022 California Green Building Standards Code (Title 24, Part 11), and 2022 California Building Code (Title 24, Part 2), as well as other State standards by the City.

5.6.3 ENVIRONMENTAL SETTING

5.6.3.1 Electricity

Riverside Public Utilities (RPU) RPU provides electric power to more than 300,000 customers within its 82 square-mile service area (Riverside Public Utilities, 2025). RPU purchases a mix of renewable sources (solar, wind, hydro, etc.) as well as non-renewable sources (coal, natural gas, nuclear, etc.). The Power Content Label (City of Riverside Public Utilities, 2023) states that the power mix for RPU as of 2023 is as follows:

- Non-Renewable Sources (53.6%)
- Eligible renewable (46.4%)

The Project site is currently served by electricity distribution systems that exist along Kansas Avenue and Massachusetts Avenue roadways adjacent to the Project site.

5.6.3.2 Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of 2 percent from 2024 to 2040 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and fuel substitution (Southern California Gas Company, 2024). The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada. SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2035.

The Project is within the service area of SoCalGas.

5.6.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

Threshold B Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.6.5 METHODOLOGY

A number of factors are considered when weighing whether a project would use a proportionately large amount of energy or whether the use of energy would be wasteful in comparison to other projects. Factors such as the use of on-site renewable energy features, energy conservation features or programs, and relative use of transit are considered.

According to Appendix F of the CEQA Guidelines, conserving energy is defined as decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F of the CEQA Guidelines nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing "the wasteful, inefficient, and unnecessary consumption of energy."

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used during construction activities. Energy usage during project operation would be considered "wasteful, inefficient, and unnecessary" if the project were to violate federal, State, and/or local energy standards, including Title 24 of the CCR, inhibit pedestrian or bicycle mobility, inhibit access to transit, or inhibit feasible opportunities to use alternative energy sources, such as solar energy, or otherwise inhibit the conservation of energy.

This analysis focuses on the sources of energy that are relevant to the proposed Project: electricity, natural gas, and transportation fuel (diesel and gasoline). The Project's electrical, natural gas, and fuel usage was derived using the California Emissions Estimator Model (CalEEMod) Version 2022.1 and California Air Resources Board (CARB) Emission FACtor (EMFAC2021) model. Fuel consumption (diesel and gasoline) from vehicle trips during operation was estimated for the opening year (2027) of the proposed Project based on trip estimates from the CalEEMod model and fuel efficiencies from the CARB EMFAC2021 model. Estimates of fuel consumption (diesel and gasoline) from construction trucks and construction worker vehicles for the construction start year of 2026 were based on trip estimates from the CalEEMod model and fuel efficiencies from the CARB EMFAC2021 model. For the purposes of this analysis, the amount of electricity, construction fuel, and fuel use from operations are quantified and compared to that consumed from similar land uses in Riverside County to determine if the proposed Project would result in "wasteful, inefficient, and unnecessary" use of electricity. The electricity use of the proposed Project is analyzed as a whole on an annual basis. Electricity use was estimated for the Project using default energy intensities by land use type in CalEEMod.

5.6.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT RESULT IN POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES, DURING PROJECT CONSTRUCTION OR OPERATION?

Construction

Construction of the proposed Project would occur over approximately 14 months and would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the Project site, and delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction of the proposed Project would not involve consumption of natural gas because the construction-related equipment would not be powered by natural gas.

The energy analysis modeling for the proposed Project (included as Appendix B) shows that construction-related use of construction vehicles and off-road equipment would utilize approximately 59,818 gallons of diesel fuel and 15,304 gallons of gasoline, as detailed in Table 5.6-1 below.

Table 5.6-1: Construction Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	21,839	15,304
Off-Road Construction Equipment	37,979	0
Total	**59,818**	**15,304**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

According to fuel consumption information obtained from EMFAC2021, approximately 135,661,936 gallons of diesel fuel and 500,969,721 gallons of gasoline would be consumed in Riverside County in 2027. Thus, the construction of the Project would marginally increase the annual fuel usage within the County by 0.04 percent for annual diesel consumption and less than 0.01 percent for annual gasoline consumption (Appendix B). The Project construction would thus have a negligible effect on local and regional energy supplies within Riverside County.

Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Also, CCR Title 13, Motor Vehicles, Section 2449(d)(3), *Idling*, generally limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Additionally, construction contractors are required to demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption.

Due to the Project size and the fact that construction is temporary, the electricity used during construction would be substantially less than that required for Project operation and would have a negligible contribution to the Project's overall energy consumption. The electric power used would be for as-necessary construction tools, lighting, and electronic equipment such as computers used inside temporary construction trailers. Natural gas is not anticipated to be needed for construction activities.

Overall, Project construction activities would require limited energy consumption relative to County projections, would comply with all existing regulations, and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Therefore, the proposed Project would not result in inefficient, wasteful, or unnecessary consumption of energy resources during construction and impacts would be **less than significant**.

Operation

Once operational, the proposed Project would generate demand for electricity, natural gas, and petroleum (gasoline and diesel) for motor vehicle trips. Operational use of energy includes the fuel used for vehicle trips associated with the Project, heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity and water to areas where they would be consumed. The proposed Project includes the operation of two diesel fire pumps that are assumed to operate for one hour per day for a total of 50 hours per year and two emergency generators that are assumed to operate for one hour per day for a total of 200 hours per year[1]. In addition, operation of 20 compressed natural gas (CNG) forklifts was assumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The Project's operational energy consumption is provided in Table 5.6-2 below. As detailed in Table 5.6-2, the proposed Project's annual energy consumption would include 2,493,702 kilowatt-hours (kWh) of electricity, 7,924,546 thousand British Thermal Unit (kBTU), 130,759 gallons of gasoline fuel, and 453,441 gallons of diesel fuel.

[1] Hours of operation are established in accordance with SCAQMD Rules 1470 and 1110.2, which limit diesel fire pumps to a maximum of 50 operating hours per year and emergency generators to 200 hours per year.

Table 5.6-2: Project Annual Operational Energy Consumption

Electricity (kWh)		
Proposed Project	2,493,702	
Existing Use	955,472	
Natural Gas (kBTU)		
Proposed Project	7,924,546[1]	
Existing Use	4,288,590	
Petroleum (Gasoline) Consumption		
	Annual VMT	Gallons of Gasoline Fuel
Proposed Project	4,042,423	130,759
Existing Use	2,952,844	95,515
Petroleum (Diesel) Consumption		
	Annual VMT	Gallons of Diesel Fuel
Proposed Project	3,568,847	453,441[2]
Existing Use	281,430	35,145
Net Total Energy Use		
Net Electricity (Kilowatt-Hours)		**1,538,230**
Net Natural Gas (Thousands British thermal Units)		**3,635,956**
Net Gasoline Consumption (Gallons)		**35,244**
Net Diesel Consumption (Gallons)		**418,296**

Notes: kWh= kilowatt-hours, kBTU = thousand British Thermal Unit, VMT = Vehicle miles traveled
[1] Inclusive of the 20 on-site CNG forklifts presumed for the operation of the Project.
[2] Inclusive of the two diesel emergency generators and two diesel fire pumps presumed for the operation of the Project.
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

As shown in Table 5.6-2, the proposed Project is expected to require more electricity, natural gas, gasoline, and diesel fuel than the existing on-site use. However, the operation of the Project would be similar to other similarly sized industrial projects within the City. Additionally, the proposed Project would be required to comply with existing regulations related to energy efficiency and consumption, such as Title 24 regulations and CCR Title 13, *Motor Vehicles*, Section 2449(d)(3) related to idling, as well as all applicable City energy codes. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. Therefore, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation and impacts would be **less than significant**.

THRESHOLD B: WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY?

As described previously, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project and comply with all applicable City energy codes. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures and occurs during the permitting process, which ensures that all requirements are met. In addition, Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow

for the future installation of rooftop solar. As a result, the proposed Project would not conflict with or obstruct with CCR Title 24 energy efficiency standards.

The City's General Plan also includes various policies related to energy efficiency and energy conservation that are applicable to the proposed Project. As shown in Table 5.6-3, the proposed Project would be consistent with the energy-related policies contained in the City's General Plan policies.

Table 5.6-3: Consistency with City of Riverside 2025 General Plan Energy Policies

Policy	Project Consistency
Policy AQ-3.6: Support "green" building codes that require air conditioning/filtration installation, upgrades or improvements for all buildings, but particularly for those associated with sensitive receptors.	**Consistent.** As described above, the proposed Project would meet typical CCR Title 24 energy efficiency standards that include: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights.
Policy PF-6.1: Continue to support the development of green power and expand the use of green power in the City's energy portfolio.	**Consistent.** As previously described, the proposed buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. The City would verify, during the permitting process, that the proposed Project is consistent with Title 24 requirements.
Policy PF-6.3: Promote and encourage energy conservation.	**Consistent.** As described above, the proposed Project would comply with existing CCR Title 24 Part 6. Title 24 includes measures that promote and encourage energy conservations such as: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City would verify, during the permitting process, that the proposed Project would adhere to these energy-efficiency strategies.
Policy PF-6.4: Encourage energy-efficient development through its site plan and building design standard guidelines.	**Consistent.** As described above, the proposed Project would comply with existing CCR Title 24 Part 6. Title 24 include measures that encourage energy-efficient development such as: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City would verify, during the permitting process, that the proposed Project would adhere to these energy-efficiency strategies.
Policy PF-6.5: Promote green building design.	**Consistent.** The proposed Project would comply with existing CCR Title 24 Part 6. Title 24 includes measures that promote green building design such as: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. Furthermore, the proposed Project would be solar ready for future installation of solar panels. The City would verify, during the permitting process, that the proposed Project would adhere to these energy-efficiency strategies.

Source: (City of Riverside, 2007)

Therefore, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be **less than significant**.

5.6.7 CUMULATIVE IMPACTS

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within Riverside County. All development projects throughout Riverside County would be required to comply with the energy efficiency standards in the Title 24 requirements. Additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED-type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, cumulative electricity and natural gas consumption would not be wasteful, inefficient, or unnecessary. Therefore, the incremental effects of the proposed Project related to electricity and natural gas consumption would not be cumulatively considerable and impacts would be **less than significant**.

Petroleum consumption associated with the proposed Project and cumulative development projects would be primarily attributable to transportation, especially vehicle and truck use. However, the State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the State's Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources. In addition, CCR Title 13, *Motor Vehicles*, Section 2449(d)(3) limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. For these reasons, the consumption of petroleum would not be wasteful, inefficient, or unnecessary. Therefore, incremental effects of the proposed Project related to petroleum consumption would not be cumulatively considerable and impacts would be **less than significant**.

5.6.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

The following existing standard regulations would reduce potential impacts related to energy:

- California Energy Code (CCR Title 24 Part 6)
- California Green Building Standards Code (CALGreen; CCR Title 24 Part 11)
- California Code of Regulations Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*

5.6.9 PROJECT DESIGN FEATURES

None.

5.6.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would have less less-than-significant impacts under Thresholds A and B with implementation of exiting regulatory requirements.

5.6.11 MITIGATION MEASURES

No mitigation measures are required.

5.6.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts related to energy would occur. Impacts would be less than significant.

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5.7 Geology and Soils

5.7.1 INTRODUCTION

This section addresses the potential environmental effects of the Project related to geology, soils, seismicity, and paleontological resources. The impacts examined include risks related to geologic hazards such as earthquakes, liquefaction, and expansive soils; impacts on the environment related to soil erosion and sedimentation; and impacts related to paleontological resources. The analysis in this section is based, in part, on the following documents and reports:

- *Geotechnical Investigation Two Proposed Warehouses NEC Massachusetts Avenue and Kansas Avenue Riverside, California for Staley Point Capital*, prepared by Southern California Geotechnical, July 21, 2021, included as Appendix F
- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, certified November 2007
- City of Riverside Municipal Code

5.7.2 REGULATORY SETTING

5.7.2.1 Federal Regulations

Clean Water Act (Erosion Control)

The Federal Clean Water Act (CWA) (33 United States Code [USC] 1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point-source and certain nonpoint-source discharges to surface water. Such discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). Projects that disturb 1 acre or more are required to obtain NPDES coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activity (Construction General Permit), Order No. 2009-0009-DWQ. The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) to regulate stormwater runoff, including measures to prevent soil erosion. Requirements of the CWA and associated SWPPP are described in further detail in Section 5.10, *Hydrology and Water Quality*.

International Building Code

The International Building Code (IBC) is published by the International Code Council. The scope of this code covers major aspects of construction and design of structures and buildings. The IBC has replaced the Uniform Building Code as the basis for the California Building Code (CBC) and contains provisions for structural engineering design. The 2021 IBC addresses the design and installation of structures and building systems through requirements that emphasize performance. The IBC includes codes governing structural as well as fire and life safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act (Act) was enacted in 1997 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the Act established the National Earthquake Hazards Reduction Program that provides characterization and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. Programs under this Act provide building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which development under the proposed Project would be required to adhere to.

5.7.2.2 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Act) (Public Resources Code Section 2621) requires the State Geologist to establish "Earthquake Fault Zones" and publish appropriate maps that depict these zones. The boundary of an Earthquake Fault Zone is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The Act also requires local agencies to regulate development within Earthquake Fault Zones. Before a development project can be permitted within an Earthquake Fault Zone, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a minimum of 50 feet from the fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (Act) addresses earthquake hazards related to liquefaction and seismically induced landslides. (California Public Resources Code Section 2690 – 2699.) Under the Act, seismic hazard zones are mapped by the State Geologist to assist local governments in land use planning. The Act states "it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety." Public Resources Code Section 2697(a) of the Act states that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."

California Building Code

The California Building Code (CBC) is included in Title 24 of the California Code of Regulations. The current CBC was adopted by the City of Riverside and is included in Chapter 16.08 of the Municipal Code. The CBC provides standards to protect property and enhance public safety. The CBC regulates the design and construction of excavations, foundations, building frames, retaining walls, and other building elements, and thereby mitigates the effects of seismic shaking and adverse soil conditions. The CBC also regulates grading activities, including drainage and erosion control.

Requirements for geotechnical investigations are included in CBC Appendix J, *Grading*, Section J104. Additional requirements for subdivisions requiring tentative and final maps and for other specified types of structures are in the California Health and Safety Code Sections 17953 to 17955 and in CBC Section 1803. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must

be done as needed to evaluate site geology, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness. CBC Section J105 sets forth requirements for inspection and observation during and after grading.

California Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) that regulates construction site stormwater management (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ). Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent (NOI), a SWPPP, and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH (potential of hydrogen) and turbidity, as well as requirements for qualified professionals to prepare and implement the plan. The Construction General Permit requires the SWPPP to identify BMPs that will be implemented to reduce soil erosion, such as preservation of vegetation and sediment control (e.g., fiber rolls). The SWPPP must 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 monitoring plan if the site discharges directly to a water body listed on the State's 303(d) list of impaired waters.

The Santa Ana Regional Water Quality Control Board (RWQCB) administers the NPDES permit program within its jurisdiction, which includes the Project area. An appropriate permit fee must also be paid to the State Water Resources Control Board.

Public Resources Code (PRC) Section 5097.5

Requirements for paleontological resource management are included in PRC Division 5, Chapter 1.7, Section 5097.5, which states, "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands." Violation of this section is a misdemeanor. These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, County, City, and District) lands.

5.7.2.3 Regional Regulations

Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan

The County of Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan (MJLHMP), also known as the Base Plan, identifies and assesses hazards in Riverside County, analyzes past disasters, estimates the likelihood of future events, and sets goals to reduce or eliminate long-term risks to people and property from both natural and human-caused hazards. The Plan was developed in accordance with the Disaster Mitigation Act of 2000 to ensure eligibility for federal mitigation funding through the Federal Emergency Management Agency's (FEMA) various grant programs, such as the Flood Mitigation Assistance, Pre-Disaster Mitigation, and Hazard Mitigation Grant Programs. The MJLHMP identifies vulnerabilities, proposes prioritized mitigation actions, evaluates available resources, highlights any mitigation gaps, and outlines future planning and maintenance needs to improve disaster resilience in the County.

5.7.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following policies related geology, soils, and paleontological resources that are applicable to the Project.

Public Safety Element

Policy PSE-1 **Natural Hazards.** Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding, drought, and structural and wildland fires.

Historic Preservation Element

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

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

Riverside Municipal Code

Chapter 16.08: Building Code. Within this Chapter, the City of Riverside adopts the CBC, 2022 Edition, with some adaptations. These codes set site-specific investigation requirements, construction standards, and inspection procedures to ensure that development projects within the City do not pose a threat to the public.

Title 17: Grading. This title sets forth rules and regulations intended to further implement the goals and objectives of the General Plan, to control evacuation, grading and earthwork construction, including fills and embankments. It also establishes the administrative procedures for grading plan approval, issuance of permits, and inspections, and it establishes penalties for unauthorized grading activity. The purpose of this title is to protect life, limb, property, the public welfare, and the physical environment by regulating grading.

5.7.3 ENVIRONMENTAL SETTING

5.7.3.1 Regional Setting

The City of Riverside generally lies within the northern end of the Peninsular Ranges, approximately 12 miles south of the intersection with the Transverse Range (City of Riverside, 2007a). The Santa Ana Mountains are approximately 15 miles south and southwest of the City, while the San Jacinto Mountains are approximately 10 miles east and northeast of the City of Riverside. The San Bernardino Mountains are about 20 miles north of the City.

The bedrock geology that dominates this region consists of granite, mesozoic granite rock, and alluvium. Most are dated from the Mesozoic period, except for the alluvium, which is dated from the Quaternary.

5.7.3.2 Faults and Ground Shaking

An active fault is one that has ruptured in the last 11,000 years and is currently under stress whereas an inactive fault has not ruptured in the recent past and is under little or no stress (California Department of Conservation, 2025a; California Department of Conservation, 2025b). The Project site is not within an Alquist-Priolo Earthquake Fault Zone, nor is it within a Riverside County fault zone (Appendix F). According to the Geotechnical Investigation for the Project site prepared by Southern California Geotechnical (included as Appendix F), there is no evidence of faulting on the Project site, therefore the possibility of ground rupture on-site is low. The nearest active fault zones are the San Jacinto Fault Zone, located approximately 6 miles northeast of the Project site, and the Elsinore Fault Zone, located approximately 17 miles southwest of the Project site (California Department of Conservation, 2021). However, both of these faults, as well as other faults in the Southern California region could cause moderate to intense ground shaking at the Project site.

5.7.3.3 Ground Rupture

Ground rupture occurs when movement on a fault breaks through to the surface (United States Geological Survey, 2024). Surface rupture usually occurs along pre-existing fault traces where zones of weakness exist. The State has established Earthquake Fault Zones for the purpose of mitigating the hazard of fault rupture by prohibiting the location of most human occupancy structures across the traces of active faults. Earthquake fault zones are regulatory zones that encompass surface traces of active faults with a potential for future surface fault rupture. The nearest Earthquake Fault Zone is the San Jacinto Fault Zone. As described above, there are no fault zones within the vicinity of the Project site. Therefore, ground rupture potential is considered to be low at the Project site.

5.7.3.4 Soils

The Geotechnical Investigation describes that artificial fill, and native alluvium were encountered at the ground surface of all boring locations (shown in Appendix A of the Geotechnical Investigation). The artificial fill extends to depths of approximately 2.5 to 8.5 feet below existing site grades and generally consists of loose to medium dense silty fine sands and silty sands with trace amounts of medium to coarse sands and fine gravel. Native alluvium was encountered beneath the fill soil at all boring locations, extending at least to the maximum depth explored of 25 feet below ground surface (bgs). The alluvium generally consists of loose to dense fine to medium sands, fine to coarse sands, silty sands, and fine sandy silts with varying sand and fine gravel content (Appendix F).

5.7.3.5 Expansive Soils

Expansive soils are soils containing water-absorbing minerals that expand as they take in water. These soils can damage buildings due to the force they exert as they expand. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture. The Geotechnical Investigation describes that the near-surface Project site soils consist of silty sands, sands, and sandy silts. The Geotechnical Investigation explains and concludes that these soils are classified as non-expansive (Appendix F).

5.7.3.6 Groundwater

The Geotechnical Investigation describes that the static groundwater table exists at a depth greater than 25 feet or more bgs. Groundwater was not encountered during the drilling of any of the borings and is not expected to be encountered during grading activities (Appendix F). Additionally, according to data obtained from the California State Water Resources Control Board, several monitoring wells on record are located on the Project site and indicate high groundwater levels ranging from 116 to 129 feet bgs as of 2017 (Appendix F).

5.7.3.7 Liquefaction, Lateral Spreading, and Settlement

Liquefaction occurs when vibrations or water pressure within a mass of soil cause the soil particles to lose contact with one another. As a result, the soil behaves like a liquid, has an inability to support weight, and can flow down very gentle slopes. This condition is usually temporary and is most often caused by an earthquake vibrating water-saturated fill or unconsolidated soil. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet bgs. Clayey (cohesive) soils or soils which possess clay particles in excess of 20 percent are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table.

Different phenomena associated with liquefaction are described below (United States Geological Survey, n.d.):

Lateral Spreading: Lateral spreading is the lateral movement of stiff, surficial blocks of sediments as a result of a subsurface layer liquefying. The lateral movements can cause ground fissures or extensional, open cracks at the surface as the blocks move toward a slope face, such as a stream bank or in the direction of a gentle slope. When the shaking stops, these isolated blocks of sediments come to rest in a place different from their original location and may be tilted.

Ground Oscillation: Ground oscillation occurs when liquefaction occurs at depth but the slopes are too gentle to permit lateral displacement. In this case, individual blocks may separate and oscillate on a liquefied layer. Sand boils and fissures are often associated with this phenomenon.

Bearing Strength Loss: Bearing strength is the maximum stress load, or force, that the soil can support. Bearing strength decreases with a decrease in effective stress, which is the force that allows soil to remain cohesive. Loss of bearing strength occurs when the effective stresses are reduced due to the fluctuating stresses or strains caused by an earthquake. Even if the soil does not liquefy, the bearing of the soil may be reduced below its value either prior to or after the earthquake. If the bearing strength is sufficiently reduced, structures supported on the sediments can settle, tilt, or even float upward in the case of lightly loaded structures such as gas pipelines.

Ground Fissuring and Sand Boils: A ground fissure is a long narrow crack in the earth's surface while a sand boil is an eruption of water from sand. As apparent from the above descriptions, the likelihood of ground fissures developing is high when lateral spreading, ground oscillations, and flow failure occur. Sand boils occur when the high water pressures are relieved by drainage to the surface along weak spots that may have been created by fissuring. As the water flows to the surface, it can carry sediments, and if the pore water pressures are high enough create a gusher (sand boils) at the point of exit. The following conditions are conducive to the formation of these phenomena:

- Sediments must be relatively young in age and must not have developed large amounts of cementation;
- Sediments must consist mainly of cohesionless sands and silts;
- The sediment must not have a high relative density;
- Free groundwater must exist in the sediment; and
- The site must be exposed to seismic events of a magnitude large enough to induce straining of soil particles.

During the Geotechnical Investigation, groundwater was not encountered during any of the borings. According to the *Riverside County Land Information Service Map My County* (Riverside County, n.d.), the Project site is located within a zone of low liquefaction susceptibility. In addition, the Geotechnical Investigation describes that the subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction (Appendix F).

5.7.3.8 Subsidence

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement, and occurs in areas with subterranean oil, gas, or groundwater. Effects of subsidence include fissures, sinkholes, depressions, and disruption of surface drainage. The Geotechnical Investigation estimates that removal and recompaction of the artificial fill and near-surface native soils is estimated to result in an average shrinkage of 7 to 16 percent. Minor ground subsidence of 0.1 feet is estimated to occur in the soils below the zone of removal, due to settlement and machinery working (Appendix F).

5.7.3.9 Landslides

Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. Earthquake-induced land sliding often occurs in areas where previous landslides have moved and in areas where the topographic, geologic, geotechnical, and subsurface groundwater conditions are conducive to permanent ground displacements. As shown in Figure 5.6-1, *Areas Underlain by Steep Slope*, of the City of Riverside General Plan 2025 Program Environmental Impact Report (GP PEIR), the site is within the 0-10 percent slope category. The Project site has an elevation of 904 feet above mean sea level (AMSL) at the southeast corner to approximately 889 feet AMSL at the northwest corner. There are no slopes within the immediate vicinity of the Project site.

5.7.3.10 Paleontological Resources

Paleontological resources include fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth. Significant paleontological resources are defined as fossils or assemblages of fossils that are unique,

unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

The GP PEIR Section 5-5, *Cultural Resources*, identifies two areas within the General Plan planning area that are considered places of paleontological importance, along the banks of the Santa Ana River (near the historic Campbell's Sand Pit) and Mockingbird Canyon Reservoir. The Project site is over 5 miles away from both of these areas. The Project site was previously disturbed from grading activities for original development of the site in 1946 and 1949 and to construct the present day warehouses occupied by New Basics, Inc.

5.7.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold 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);
- ii) Strong seismic ground shaking;
- iii) Seismic-related ground failure, including liquefaction; or
- iv) Landslides.

Threshold B Result in substantial soil erosion or the loss of topsoil.

Threshold 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.

Threshold 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.

Threshold 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?

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

5.7.5 METHODOLOGY

A site-specific Geotechnical Investigation (Appendix F) was prepared for the Project site. The following were conducted as part of the site-specific Geotechnical Investigation: visual site reconnaissance, subsurface exploration, field and laboratory testing, and geotechnical engineering analysis to provide criteria for preparing the design of the building foundations, building floor slab, and parking lot pavements along with site preparation recommendations and construction considerations for the proposed development. The laboratory testing determined the characteristics of the geology and soils that underlie the Project site. The subsurface conditions were then analyzed to identify potential significant impacts resulting from construction and operation of the proposed development of the Project in relation to geology and soils.

In determining whether a geotechnical related impact would result from the Project, the analysis includes consideration of State law, including the CBC which is integrated into the City of Riverside Municipal Code, and implemented/verified during permitting approvals. In general, existing State law, building codes, and ordinances that are implemented by the approving agency provide for an adequate level of safety or reduction of potential effects such that projects developed and operated to code reduce potential of impacts (Federal Emergency Management Agency, 2025).

5.7.6 ENVIRONMENTAL IMPACTS

THRESHOLD A(i): WOULD THE PROJECT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP, ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT (REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42)?

The Project site is not within an Alquist Earthquake Fault Zone, and there are no known active faults within 500 feet. The nearest active fault zones are the San Jacinto Fault Zone, located approximately 6 miles northeast of the Project site and the Elsinore Fault Zone, located approximately 17 miles southwest of the Project site (California Department of Conservation, 2021). Since the site is not located within an Alquist-Priolo Earthquake Fault Zone, impacts related to the surface rupture of a known earthquake fault would not occur on the Project site. **No impact would occur.**

THRESHOLD A(ii): WOULD THE PROJECT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING?

The Project site is located within a seismically active region, with numerous faults capable of producing significant ground motions. Project development could subject people and structures to hazards from ground shaking. However, seismic shaking is a risk throughout Southern California, and the Project site is not at greater risks of seismic activity or impacts as compared to other areas within the region.

The CBC includes provisions to reduce impacts caused by major structural failures or loss of life resulting from earthquakes or other geologic hazards. Chapter 16 of the CBC contains requirements for design and construction of structures to resist loads, including earthquake loads. The CBC provides procedures for earthquake resistant structural design that include consideration for on-site soil conditions, occupancy, and the configuration of the structure, including the structural system and height.

The City has adopted the CBC as part of the Municipal Code (Chapter 16.08), which regulates all building and construction projects within the City and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. All structures within the City are required to be built in compliance with the CBC. Because the Project would be required to be constructed in compliance with the CBC and the Municipal Code, which would be verified through the City's plan check and permitting process, and is included as PPP GEO-1 (see Section 5.7.8, *Existing Regulations and Plans, Programs, or Policies*), the Project would result in a **less than significant impact** related to strong seismic ground shaking.

THRESHOLD A(iii): WOULD THE PROJECT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR

DEATH INVOLVING SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?

According to the *Riverside County Land Information Service Map My County* (Riverside County, n.d.), the Project site is located within a zone of low liquefaction susceptibility. Additionally, during the Geotechnical Investigation, groundwater was not encountered during any of the drillings for the borings and groundwater on-site is expected to be around 116 to 129 feet bgs (Appendix F). In addition, the Geotechnical Investigation describes that the subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction because there is no evidence of a long-term groundwater table within the depths explored by the borings. The proposed Project would also be required to be constructed in compliance with the CBC and the City's Municipal Code, which would be verified through the City's plan check and permitting process (PPP GEO-1), and which would reduce risks related to seismic-related ground failure. Therefore, impacts related to liquefaction are expected to be **less than significant.**

THRESHOLD A(iv): WOULD THE PROJECT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LANDSLIDES?

As shown in Figure 5.6-1, *Areas Underlain by Steep Slope*, in the GP PEIR, the site is within the 0-10 percent slope category. The Project site has relatively flat topography and it has been graded and developed with industrial uses and a bus storage yard. There are no slopes on the Project site or within the immediate vicinity of the Project site. Therefore, **no impacts would occur** related to landslides from with implementation of the Project.

THRESHOLD B: WOULD THE PROJECT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?

Construction

Construction of the proposed Project has the potential to contribute to soil erosion and the loss of topsoil. Grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water. However, Riverside Municipal Code Chapter 17.16.010 requires the preparation of an erosion control plan prior to the issuance of grading permits. Section 17.16.010 also requires that clearing, grading or excavation that results in the disturbance of at least 1 acre or more must adhere to the RWQCB NPDES Stormwater Permit Order No. R8-2013-0024 (MS4 Permit). The MS4 Permit establishes minimum stormwater management requirements and controls that are required to be implemented for the Project prior to issuance of a grading permit or the commencement of grading activity at the Project site.

Pursuant to the MS4 Permit requirements, a SWPPP is required to be developed by a Qualified SWPPP Developer, which would be implemented by the City's conditions of approval. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil. Erosion control BMPs include use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. Upon compliance with Municipal Code Section 17.15.010, *Stormwater Management Requirements*, RWQCB SWPPP requirements, and installation of BMPs, which would be verified by the City's Public Works Department as part of Project permitting, construction impacts related to erosion and loss of topsoil would be **less than significant.**

Operation

The proposed Project includes installation of landscaping adjacent to the proposed buildings and throughout the proposed parking areas. With this landscaping, areas of exposed topsoil that could erode by wind or water would not exist upon operation of the proposed Project. Furthermore, implementation of the Project

requires City approval of a Water Quality Management Plan (WQMP), which would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be **less than significant.**

THRESHOLD C: WOULD THE PROJECT 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?

As described above, the Project site does not contain, nor is it adjacent to, any significant slope or hillside area. The proposed Project would also not create slopes. Thus, on or off-site landslides would not occur from implementation of the proposed Project.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. As described previously, the Geotechnical Investigation found that the site possesses a low liquefaction potential. Additionally, because the site is relatively flat, the potential for earthquake-induced lateral spreading is considered low at the site (Appendix F). Therefore, and as described above, impacts related to liquefaction and lateral spreading are not anticipated at the Project site.

Subsidence is a general lowering of the ground surface over a large area that is generally attributed to lowering of the ground water levels within a groundwater basin. Localized or focal subsidence or settlement of the ground can occur as a result of earthquake motion in an area where groundwater in a basin is lowered. As described above, the Geotechnical Investigation estimates that removal and recompaction of the artificial fill and near-surface native soils is estimated to result in an average shrinkage of 7 to 16 percent shrinkage. Minor ground subsidence of 0.1 feet is estimated to occur in the soils below the zone of removal, due to settlement and machinery working (Appendix F).

The Geotechnical Investigation describes that the near-surface native alluvial soils encountered within the upper 6 to 12 feet generally consist of silty sands and sands which possess variable strength and unfavorable consolidation and collapse characteristics. However, the alluvium greater than 6 to 12 feet in depth generally possess high strengths and densities and favorable consolidation and collapse characteristics. Additionally, one of the borings encountered consolable/collapsible soils extending to a depth of 12 feet. The Geotechnical Investigation describes that the recommended remedial grading would remove the undocumented fill soils and the upper portion of the near-surface native alluvial soils and replace these materials as compacted structural fill soils (Appendix F). Excavation and recompaction of the artificial fill soils and near-surface alluvium would be conducted in compliance with the CBC as required through the City's permitting process.

Overall, compliance with the requirements of the CBC, as ensured by the City through the permitting process, would reduce potential impacts related to lateral spreading, subsidence, liquefaction, and collapse to a **less than significant** level.

THRESHOLD D: WOULD THE PROJECT 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?

Expansive soils contain significant amounts of fine-grained silt and clay particles that swell when wet and shrink when dry. The amount of swelling and contracting is subject to the amount of fine-grained clay

materials present in the soils, and the amount of moisture that the soil is exposed to. Foundations constructed on expansive soils are subjected to forces caused by the swelling and shrinkage of the soils, which can cause physical distress on the structure. Without proper measures taken, heaving and cracking of both building foundations and slabs-on-grade could result.

The Geotechnical Investigation describes that the Project site's near-surface soils consist of loose to medium dense silty fine sands and silty sands with trace amounts of medium to coarse sands and fine gravel. According to the Geotechnical Investigation, these materials are considered non-expansive (Appendix F). In addition, as described above, compliance with the CBC is a standard City practice and is included as a condition of approval. Therefore, compliance with the requirements of the CBC as part of the building plan check and development review process, would ensure that impacts related to expansive soil would be **less than significant.**

THRESHOLD E: WOULD THE PROJECT 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?

The Project includes the construction of an on-site sewer system that would connect to a new off-site sewer main in Kansas Avenue and Massachusetts Avenue, which would be constructed as part of the proposed Project. The Project would not use septic tanks or alternative wastewater disposal systems. As a result, **no impacts** related to septic tanks or alternative wastewater disposal systems would occur from implementation of the proposed Project.

THRESHOLD F: WOULD THE PROJECT DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?

The proposed Project consists of the development of industrial warehouse buildings and associated infrastructure improvements. Earthmoving activities, including grading and trenching activities, have the potential to disturb previously unknown paleontological resources. The Project site has been heavily disturbed due to past grading and development. Therefore, there is a reduced chance that sensitive paleontological resources or unique geological features underly the site. However, according to *Riverside County Land Information Service Map My County* (Riverside County, n.d.), the Project site is in an area with high paleontological sensitivity. If an unanticipated on-site fossil is encountered during construction, Mitigation Measure GEO-1 would be implemented and would require all construction plans and specifications to state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist has evaluated the find. **Implementation of Mitigation Measure GEO-1 would reduce potential impacts related to paleontological resources to a less than significant level.**

5.7.7 CUMULATIVE IMPACTS

Geology and Soils: Geotechnical impacts tend to be site-specific rather than cumulative in nature. Direct and indirect impacts related to geology and soils would be mitigated through mandatory conformance with the CBC, City of Riverside Municipal Code, and site-specific geotechnical recommendations, which will be incorporated as part of the Project's design and construction efforts. With the exception of erosion hazards, potential hazardous effects related to geologic and soil conditions are unique to each project site, and inherently restricted to the developments proposed. That is, issues including fault rupture, seismic ground shaking, liquefaction, landslides, and expansive soils would involve effects to (and not from) the development, are specific to conditions on the property, and are not influenced by or additive with the geologic and/or soils hazards that may occur on other, off-site properties. Because of the site-specific nature of these potential

hazards and the measures to address them, there would be no direct or indirect connection to similar potential issues or cumulative effects at the Project site.

Impacts related to erosion and loss of topsoil could be cumulatively considerable. However, as discussed under Impact B, mandates related to the NPDES permit, preparation of a WQMP, Erosion Control Plan, and SWPPP, as well as compliance with SCAQMD Rule 403 (Fugitive Dust) incorporate measures during construction activities to ensure that significant erosion impacts do not occur. Other development projects in the vicinity of the Project site would be required to comply with the same regulatory requirements as the Project to preclude substantial adverse water and wind erosion impacts. Because the Project and related projects within the cumulative study area, as shown on Figure 5-1, *Cumulative Projects*, in Section 5.0, *Environmental Impact Analysis*, would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards would be **less than significant.**

Paleontological Resources: The cumulative paleontological impact assessment considers the development of the Project in conjunction with other development projects, as listed in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, in the context of the Riverside County region, which is identified as sensitive for paleontological resources. The geographic area of potential cumulative impacts related to paleontological resources includes areas that are underlain by similar geologic units from the same time period. A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. As detailed previously, the Project site is in an area with high paleontological sensitivity. However, with incorporation of Mitigation Measure GEO-1, potential impacts related to paleontological resources would be reduced to less than significant. Therefore, **the Project would not result in cumulatively considerable impacts related to paleontological resources.**

5.7.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed are applicable to the proposed Project. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.

5.7.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Thresholds A(ii), A(iii), B, C, and D would be less than significant. Thresholds A(i), A(iv), and E would have no impact.

Without mitigation, Threshold F could be potentially significant.

5.7.10 MITIGATION MEASURES

Mitigation Measure GEO-1: Paleontological Resources. Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets

the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Western Science Center in Riverside County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Riverside Public Works Department, shall verify that all project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources.

After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the City Director of the City Community Development Department, or designee, and the Western Science Center in Riverside County.

5.7.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with existing regulatory programs and implementation of Mitigation Measure GEO-1 would reduce potential impacts associated with potential geotechnical hazards and unique paleontological resource impacts to a level that is less than significant. Therefore, no significant and unavoidable impacts related to geology and soils or paleontological resources would occur.

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5.8 Greenhouse Gas Emissions

5.8.1 INTRODUCTION

This section of the Draft EIR evaluates greenhouse gas (GHG) emissions associated with the proposed Project and its contribution to global climate change. Specifically, this section evaluates the extent to which GHG emissions from the Project contribute to elevated levels of GHGs in the Earth's atmosphere and consequently contribute to climate change. This section also addresses the Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing the emissions of GHGs. The analysis within this section is based on the following:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code
- *Air Quality, GHG, and Energy Impact Analysis*, prepared by EPD Solutions, Inc., 2025, included as Appendix B

5.8.2 REGULATORY SETTING

5.8.2.1 State Regulations

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted Assembly Bill (AB) 1493 requiring the adoption of regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the California Air Resources Board (CARB) approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). In September 2009, CARB adopted amendments to the Pavley Regulations to reduce GHG emissions between 2009 and 2016. CARB, the United States Environmental Protection Agency (USEPA), and the United States Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was signed by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill 1279

Assembly Bill (AB) 1279 requires the State to achieve net zero GHG emission as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. The bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels and directs the CARB to work with relevant State agencies to achieve these goals.

California Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006)

In 2006, the Legislature passed the California Global Warming Solutions Act of 2006 (AB 32), which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required the CARB to develop a Scoping Plan that describes the approach California will take to reduce GHG emissions to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by the CARB in 2008 and must be updated at least every five years. Since 2008, there have been three updates to the Scoping Plan. Each of the Scoping Plans have included a suite of policies to help the State achieve its GHG targets, in large part leveraging existing programs whose primary goal is to reduce harmful air pollution. The 2017 Scoping Plan identified how the State could reach the 2030 climate target to reduce GHG emissions by 40 percent from 1990 levels, and substantially advance toward the 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions because local governments have the primary authority to plan, zone, approve, and permit development to accommodate population growth and the changing needs of their jurisdictions. The Scoping Plan also relies on the requirements of Senate Bill 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track to achieve the current GHG reduction goal. In 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update reflected the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32.

On December 15, 2022, CARB adopted the most recent 2022 Scoping Plan. The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB advocates for compliance with a local GHG reduction strategy consistent with CEQA Guidelines Section 15183.5.

Senate Bill 375 (Chapter 728, Statutes of 2008)

In August 2008, the Legislature passed, and on September 30, 2008, Governor Schwarzenegger signed, Senate Bill (SB) 375, which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan

planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375 provides incentives for streamlining CEQA requirements by substantially reducing the requirements for "transit priority projects," as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40 percent below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all State agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the State's 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor's Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

Senate Bill 32 (Chapter 249, Statutes of 2016)

SB 32 was signed on September 8, 2016, by Governor Jerry Brown. SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. A related bill that was also approved in 2016, AB 197 (Chapter 250, Statutes of 2016) creates a legislative committee to oversee regulators to ensure that CARB is not only responsive to the Governor, but also the Legislature.

Assembly Bill 398 – Extension of Cap-and-Trade Program to 2030 (Chapter 617, Statutes of 2017)

AB 398 was signed by Governor Brown on July 25, 2017, and became effective immediately as urgent legislation. AB 398, among other things, extended the cap-and-trade program through 2030.

Senate Bill 97 (Chapter 185, Statutes of 2007)

SB 97 (Health and Safety Code Section 21083.5) was adopted in 2007 and required the Office of Planning and Research to prepare amendments to the CEQA Guidelines for the mitigation of GHG impacts. The amendments became effective on March 18, 2010. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. A new section, CEQA Guidelines Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. CEQA Guidelines Section 15064.4 gives discretion to the lead agency whether to: (1) use a model of methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. However, SB 97 does not specify a fixed GHG threshold.

The 2018 amendments to the CEQA Guidelines provided expanded guidance to lead agencies in evaluating GHG impacts, as outlined in Sections 15064.4 and 15064.7. A lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to evaluate a project's incremental contribution to climate change, provided that the model or methodology is supported by substantial evidence.

CEQA Guidelines Section 15183.5 permits programmatic GHG analysis and later project-specific tiering, as well as the preparation of Greenhouse Gas Reduction Plans. Compliance with such plans can support a determination that a project's cumulative effect is not cumulatively considerable, according to Section 15183.5(b).

CARB Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium- and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales:** Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting:** Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The California Energy Commission anticipates that the 2022 Energy Code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons.

California Code of Regulations (CCR) Title 24 Part 11: The California Green Building Standards Code (CALGreen) is updated every three years. The most recent update was the 2022 California Green Building Code Standards that became effective on January 1, 2023.

The 2022 CALGreen standards that reduce GHG emissions and are applicable to the proposed Project include, but are not limited to, the following:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance,

readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (Section 5.106.4.1.1).

- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (Section 5.106.4.1.2).
- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (Section 5.106.5.2).
- **EV charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (Section 5.106.8).
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1., 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (Section 5.408.1).
- **Excavated soil and land clearing debris.** 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (Section 5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (Section 5.410.1).
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (Section 5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (Section 5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (Section 5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute at 80 psi (Section 5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (Section 5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (Section 5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute at 60 psi (Section 5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (Section 5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (Section 5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (Section 5.303.3.4.5).

- **Outdoor potable water uses in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (Section 5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is projected to consume more than 1,000 gallons per day (GPD) (Sections 5.303.1.1 and 5.303.1.2).
- **Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (Section 5.304.3).
- **Commissioning.** For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (Section 5.410.2).

5.8.2.2 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) Air Quality Element contains the following policies related to GHG emissions that are applicable to the proposed Project:

Policy AQ-1.10: Encourage job creation in job-poor areas as a means of reducing vehicle miles traveled.

Policy AQ-1.15: Establish land use patterns that reduce the number and length of motor vehicle trips and promote alternative modes of travel.

Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.

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

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

Policy AQ-8.17: Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

City of Riverside Economic Prosperity Action Plan and Climate Action Plan

The City adopted its Climate Action Plan (CAP) in 2016. The CAP includes an inventory of existing (2007) emissions from community-wide operations, which includes residents and businesses within the City, as well as emissions from governmental operations. The CAP also provides community-wide and government operations emissions forecasts for 2020 and 2035 based on growth associated with build-out of the City of Riverside 2025 General Plan. The CAP establishes a reduction goal of approximately 26 percent below 2007 baseline emission levels (3,024,066 $MTCO_2e$ community-wide, and 122,525 $MTCO_2e$ for government operations) by 2020 to reach the goals set forth in AB 32 (1990 levels by 2020). While the City's CAP is

not a qualified reduction plan as defined by the State CEQA Guidelines, it does propose measures and policies on community-wide and government levels that will support the City's reduction goals (City of Riverside, 2016). The following measures included in the CAP are applicable to the proposed Project:

Measure T-2: **Bicycle Parking.** Provide additional options for bicycle parking.

Measure T-3: **End of Trip Facilities.** Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.

Measure T-6: **Density.** Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.

Measure T-19: **Alternative Fuel & Vehicle Technology and Infrastructure.** Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.

Measure W-1: **Water Conservation and Efficiency.** Reduce per capita water use by 20% by 2020.

Measure SW-1: **Yard Waste Collection.** Provide green waste collection bins community-wide.

Measure SR-2: **2013 California Building Energy Efficiency Standards (Title 24, Part 6).** State's energy efficiency building standards as codified in the Code of Regulations, Title 24, Part 6 (referred to as Title 24).

5.8.3 ENVIRONMENTAL SETTING

5.8.3.1 Greenhouse Gases Overview

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, SF_6 is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF_6, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO_2. Therefore, an emission of one metric ton (MT) of SF_6 could be reported as an emission of 22,800 MT of CO_2e. Large emission sources are reported in million metric tons (MMT) of CO_2e. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide: Carbon dioxide (CO_2) is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.

Methane: Methane (CH_4) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide: Nitrous oxide (N_2O) (laughing gas) is a colorless GHG that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride: Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more wildfires, and more drought years. Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects:

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

There are also many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

5.8.3.2 Existing Conditions

State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total. CARB compiles GHG inventories for the State of California. Based upon the 2021 GHG inventory data (i.e., the latest year for which data are available), California emitted 381.3 million metric tons of CO_2e in the year ($MMTCO_2e/yr$).

Existing Project Site Conditions

The proposed Project is located within the South Coast Air Basin (SCAB), which incorporates all of Orange County, and parts of Los Angeles, Riverside, and San Bernardino Counties. The City of Riverside and the SCAB are under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

The 14.42-acre Project site is currently developed with commercial/industrial uses that are comprised of two structures on 2626 Kansas Avenue, one lot used for bus parking and storage on 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings on 1989 Massachusetts Avenue. GHG emissions are currently generated by the existing uses and the related vehicle trips. According to the *Air Quality, GHG, and Energy Impact Analysis* prepared for the Project, the existing emissions at the Project site are 1,785 $MTCO_2e$ (Appendix B).

5.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

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

5.8.5 METHODOLOGY

CEQA Guidelines Section 15064.4 provides discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. In addition, CEQA recommends that lead agencies consider several factors that may be used in the determination of significance of project related GHG emissions, including:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064(h)3 states that a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides requirements to avoid or lessen the cumulative problem.

The SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document, that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and commercial land use: 3,000 $MTCO_2e$ per year
    - Industrial land: 10,000 $MTCO_2e$ per year
    - Based on land use type:
        - Residential: 3,500 $MTCO_2e$ per year
        - Commercial: 1,400 $MTCO_2e$ per year
        - Mixed use: 3,000 $MTCO_2e$ per year
- Tier 4 consists of a decision tree approach that allows the lead agency to choose one of three compliance options based on performance standards. Tier 4 has the following options:
    - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
    - Option 3, 2020 Target: For service populations (SP), including residents and employees, 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans.
    - Option 3, 2035 Target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

Based on the foregoing guidance, the City of Riverside has elected to rely on compliance with a local air district threshold in the determination of significance of Project-related GHG emissions. Specifically, the City has selected the interim 10,000 $MTCO_2e$/year threshold recommended by SCAQMD staff for industrial land use projects against which to compare Project-related GHG emissions.

The City understands that the 10,000 $MTCO_2e$/year threshold for industrial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 10,000 $MTCO_2e$/year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document and subsequent Working Group meetings, the latest of which occurred in 2010 (SCAQMD, 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2025 and for purposes of this Draft EIR. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

Thus, for purposes of this analysis, if Project-related GHG emissions do not exceed the 10,000 $MTCO_2e$/year threshold, then Project-related GHG emissions would have a less than significant impact pursuant to Threshold A. On the other hand, if Project-related GHG emissions exceed 10,000 $MTCO_2e$/year,

the Project would be considered a substantial source of GHG emissions and would have a significant impact pursuant to Threshold A. CalEEMod Version 2022.1 was used to analyze the GHG impacts of the proposed Project.

5.8.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?

Construction

Implementation of the proposed Project would generate GHG emissions from demolition, construction activities, haul trips, vendor trips, and construction worker vehicle trips. For construction emissions, the SCAQMD recommends amortizing emissions over 30 years by calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions, which is done within this analysis. Table 5.8-1 provides the estimated construction emissions from the Project. As shown, the Project would emit a total of 844 Annual $MTCO_2e$ over the duration of construction, with 2026 having the highest emission level (821 $MTCO_2e$). Amortized over 30 years, the Project's construction emissions would be approximately 28 $MTCO_2e$ per year.

Table 5.8-1: Project Construction Greenhouse Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
2026	821
2027	23
Total Emissions	**844**
Total Emissions Amortized Over 30 Years	**28**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Operation

The proposed Project would construct two warehouse buildings with a combined total building square footage of 199,850 square feet (SF) that would accommodate approximately 194 employees. Operation of the proposed Project would generate GHG emissions from vehicle trips, electricity and natural gas consumption, water and wastewater transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the proposed Project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. GHG emissions from solid waste disposal are associated with the anaerobic breakdown of material.

The *Air Quality, Energy, and GHG Impact Analysis* prepared for the proposed Project (Appendix B) describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in Table 5.8-2. As shown, operation of the Project, including amortized construction emissions, would generate a net total of approximately 7,272 $MTCO_2e$ per year, which would not exceed the screening threshold of 10,000 $MTCO_2e$ per year. The existing operational GHG emissions from the existing buildings were estimated to be 1,785 $MTCO_2e$. As such, the net new emissions (proposed Project minus existing) from the proposed Project are 5,457 $MTCO_2e$ per year. The proposed Project's net and total GHG emission results are both below the SCAQMD significance threshold of 10,000 $MTCO_2e$ per year. Therefore, impacts would be **less than significant**.

Table 5.8-2: Project Greenhouse Gas Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Project Operational Emissions	
Mobile	5,426
Area	4
Energy	921
Water	127
Waste	74
Refrigeration	183
Off-Road	461
Stationary	18
Total Project Gross Operational Emissions	**7,214**
Amortized Construction Emissions	**28**
Total Project Emissions	**7,242**
Existing Emissions	1,785
Net New Emissions (Gross - Existing)	**5,457**
Significance Threshold	10,000
Threshold Exceeded?	**No**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

THRESHOLD B: WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?

The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures. The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as demonstrated below. CARB's 2022 Scoping Plan reflects the 2045 target of an 85 percent reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. In addition, the Project would be consistent with the following State policies that were adopted for the purpose of reducing GHG emissions:

- **Pavley Emissions Standards and Low Carbon Fuel Standard:** Pavley emissions standards (AB 1493) apply to all new passenger vehicles starting with model year 2009, and the Low Carbon Fuel Standard became effective in 2010 and regulates the transportation fuel used. The second phase of implementation of the Pavley regulations per AB 1493 is referred to as the Advanced Clean Cars program, which combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34 percent from 2016 levels by 2025. The proposed Project is consistent with these requirements as they apply to all new passenger vehicles and vehicle fuel purchased in California. As such, all passenger vehicles and vehicle fuel used for employees and visitors of the Project site during construction and operation would be consistent with pavley emission standards and low carbon fuel standards.
- **Medium/Heavy-Duty Vehicle Regulations:** Medium/heavy-duty vehicle regulations are implemented by the State to reduce emissions from trucks. Since the proposed Project has a large truck component, these regulations would aid in reducing GHG emissions from the Project. The proposed Project is consistent with this measure and its implementation as medium- and heavy-duty vehicles associated with

construction and operation of the Project would be required to comply with the requirements of this regulation.

- **Tractor-Trailer Greenhouse Gas Regulation:** Tractor-trailers subject to this State regulation are primarily 53-foot or longer box-type trailers, and are required to either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The proposed Project is consistent with this regulation, as it applies to specific trucks that are used throughout the State, including trucks would be used for the Project site during construction and/or operations.
- **Energy Efficiency – Title 24/CALGreen:** The proposed Project is subject to the CALGreen code (Part 11 of Title 24) building energy efficiency requirements that offer builders better windows, insulation, lighting, ventilation systems, and other features as listed in Section 5.4.2, *Regulatory Setting*, which reduces energy consumption. Compliance with the CALGreen standards would be verified by the City during the building permitting process.
- **Renewable Portfolio Standard:** As a customer of Riverside Public Utilities (RPU), the proposed Project would purchase from an increasing supply of renewable energy sources and more efficient baseload generations which reduce GHG emissions and would be consistent with this requirement. Furthermore, the Project buildings would each feature a solar-ready roof, consistent with Title 24 requirements.
- **Million Solar Roofs Program:** The proposed Project is consistent with this scoping plan measure as both Project buildings would include a solar-ready roof.
- **Water Efficiency and Waste Diversion:** Development and operation of the proposed Project would be implemented in consistency with water conservation requirements (as included in Title 24) and solid waste recycling and landfill diversion requirements of the State.

As detailed in Table 5.8-3, the Project is also consistent with the CARB 2022 Scoping Plan.

Table 5.8-3: Project Consistency with the CARB 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	**Consistent.** The Project would comply with the 2022 Title 24, Part 6 energy requirements, as well as Title 24, Part 11 building standards, along with other local and State initiatives that aim to achieve the 40% below 1990 levels by 2030 goal.
Smart Growth/Vehicle Miles Traveled (VMT)	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Consistent.** The proposed Project would provide bicycle racks and bicycle parking spaces to encourage alternative modes of transportation. The Project is consistent with the growth and land use assumptions in the Southern California Association of Government's 2022 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (which was utilized for growth estimates in the CARB Scoping Plan) including reductions in VMT per capita. The plan aims to reduce VMT per capita by 25% below 2019 levels by 2030 and 30% by 2045, which aligns with targets set in the CARB Scoping Plan. Thus, the Project would not interfere with VMT reduction targets and measures.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	**Consistent.** The proposed Project is a speculative industrial building that could potentially involve the manufacturing and storage of LDV ZEVs. The future tenant would be required to comply with the CARB's Advanced Clean Truck Regulation that requires truck manufacturers to transition from diesel

Action	Consistency
	trucks to zero emission trucks, and would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Truck ZEVs	
100% of medium- and heavy-duty vehicle (MHDV) sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	**Consistent.** The proposed Project is a speculative industrial building that could potentially involve the manufacturing and storage of MHDV ZEVs. The future tenant would be required to comply with the CARB's Advanced Clean Truck Regulation that would require truck manufacturers to transition from diesel trucks to zero emission trucks, and would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Aviation	
20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	**Not Applicable.** The proposed Project would not utilize aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	**Not Applicable.** The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	**Not Applicable.** The proposed Project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	**Not Applicable.** The proposed Project would not involve any rail operations.
Oil and Gas Extraction	
Not Applicable. The proposed Project would not involve oil and gas extraction operations.	**Not Applicable.** The proposed Project would not involve oil and gas extraction operations.
Petroleum Refining	
Carbon capture and sequestration (CCS) on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	**Not Applicable.** The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2030 and 30 $MTCO_2e$ in 2035. Retail sales load coverage134 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	**Consistent.** The Project would not generate electricity. The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
New Residential and Commercial Buildings	

Action	Consistency
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	**Not Applicable.** The proposed Project would not involve the operation any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The Project would be consistent and comply with Title 24 Section 6 requirements for commercial buildings, including complying with 100% electric appliances beginning in 2029, replacing an existing building that was not constructed to be consistent with the current 2022 Title 24 Building Code requirements.
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	**Consistent.** The Project would include up to 20% of the total building area for cold storage, which has the potential to store food products. The proposed Project would comply with the 2022 Title 24 Building Codes in Section 6 and would be required to meet increasing standards set by the State. Therefore, the Project would be consistent with meeting current and future policies concerning the storage of food products as speculative cold storage warehouses.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	**Consistent.** The proposed Project would be required to use construction equipment that is registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% in 2045.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	**Consistent.** As the Project proposes speculative industrial buildings, there is a potential for the Project to involve the production and/or storage of chemicals and allied products like pulp and paper. The Project would comply with the energy demands of the 2022 Title 24 Section 6 Building Codes and would comply with the electricity and hydrogen requirement by 2045 for the production of chemicals and allied products.
Stone, Clay, Glass, and Cement	
CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	**Consistent.** As the Project proposes speculative industrial buildings, there is a potential for the Project to involve the production and/or storage of stone, clay, glass and/or cement. The Project would comply with the energy demands of the 2022 Title 24 Section 6 Building Codes and would promote the implementation and use of CCS for operations by 2035 and on all operations and facilities by 2045.
Other Industrial Manufacturing	

Action	Consistency
0% energy demand electrified by 2030 and 50% by 2045.	**Consistent.** The proposed Project is a speculative industrial building that could allow for manufacturing. A future manufacturing tenant would be required to meet the energy demand goals of 50% by 2045, and the proposed Project would be constructed to comply with Title 24, Part 6 Building energy requirements, including increases in onsite energy generation requirements and improved insulation reducing energy consumption in industrial manufacturing operations.
Combined Heat and Power	
Facilities retire by 2040.	**Not Applicable.** The proposed Project would not involve any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	**Not Applicable.** The proposed Project would not involve any agricultural uses.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	**Not Applicable.** The proposed Project would not involve any production of biofuels.
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane135 blended in pipeline. Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	**Not Applicable.** The proposed Project would not involve any production of fuels for buildings and industry.
Non-Combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	**Not Applicable.** The proposed Project would not involve any production of non-combustion methane emissions or organic waste.
High Global Warming Potential (GWP) Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating hydrofluorocarbon (HFC) emissions.	**Consistent.** The proposed Project includes refrigeration and would be consistent with the 2022 Title 24 Section 6 Building Codes for 2022 and would be required to meet increasing standards set by the State. Therefore, the Project would be consistent with meeting current and future policies concerning the use of low GWP refrigerants.

It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Thus, the Project would be consistent with the State's requirements for GHG reductions.

In addition, as detailed in Table 5.8-4, the Project would not conflict with the City of Riverside 2025 General Plan (adopted 2007) goals and policies related to GHG emissions.

Table 5.8-4: Project Consistency with the City General Plan Policies Related to GHGs

General Plan Goal or Policy	Consistency
Policy AQ-1.10: Encourage job creation in job-poor areas as a means of reducing vehicle miles traveled.	**Consistent.** As discussed in Section 5.14, *Population and Housing*, the City of Riverside is housing-rich, meaning that more housing is provided than employment opportunities in the area. Implementation of the proposed Project would create up to an additional 194 jobs. Therefore, the proposed Project would create jobs in a job-poor area, consistent with this policy.
Policy AQ-1.15: Establish land use patterns that reduce the number and length of motor vehicle trips and promote alternative modes of travel.	**Consistent.** As discussed in Section 5.17, *Transportation*, existing bus services near the Project site would allow Project site residents convenient access to transit.
Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.	**Consistent.** The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
Policy AQ-5.6: Support the use of automated equipment for conditioned facilities to control heating and air conditioning.	**Consistent.** The Project will comply with the latest Title 24 and CALGreen code that support efficient heating and air conditioning systems.
Policy AQ-8.17: Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.	**Consistent.** The proposed Project would comply with the latest CALGreen code, which requires a minimum of 65 percent of construction waste be recycled.

As detailed in Table 5.8-5, the Project would not conflict with the City of Riverside CAP measures related to GHG emissions.

Table 5.8-5: Project Consistency with the City Climate Action Plan

General Plan Goal or Policy	Consistency
Measure T-2: Bicycle Parking. Provide additional options for bicycle parking.	**Consistent.** The proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project).
Measure T-3: End of Trip Facilities. Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.	**Consistent.** The proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project) for commuters to use.
Measure T-6: Density. Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.	**Consistent.** As discussed in Section 5.14, *Population and Housing*, the City of Riverside is housing-rich, meaning that more housing is provided than employment opportunities in the area. Implementation of the proposed Project would create up to an additional 194 jobs. Therefore, the proposed Project would create jobs in a job-poor area, consistent with this policy.

General Plan Goal or Policy	Consistency
Measure T-19: Alternative Fuel & Vehicle Technology and Infrastructure. Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.	**Consistent.** As discussed in Section 3.0, *Project Description*, the proposed Project would provide a total of 42 electric vehicle charging stations (EVCS) (38 EVCS, 2 EVCS Standard Accessible, and 2 EVCS Van Accessible), which will promote the use of electric vehicles by employees and visitors of the site.
Measure W-1: Water Conservation and Efficiency. Reduce per capita water use by 20% by 2020.	**Consistent.** Project would be designed and constructed to meet all applicable standards under the City's Municipal Code and CALGreen.
Measure SW-1: Yard Waste Collection. Provide green waste collection bins community-wide.	**Consistent.** The Project would comply with applicable solid waste requirements from the City and State.
Measure SR-2: 2013 California Building Energy Efficiency Standards (Title 24, Part 6). State's energy efficiency building standards as codified in the Code of Regulations, Title 24, Part 6 (referred to as Title 24).	**Consistent.** The proposed Project would be designed and constructed to meet all applicable standards under Title 24. The most recent update was the 2022 California Green Building Code Standards that became effective on January 1, 2023.

As discussed above, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, impacts would be **less than significant**.

5.8.7 CUMULATIVE IMPACTS

GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city, or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the State's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. CEQA Guidelines Section 15183.5(b) states that compliance with GHG-related plans can support a determination that a project's cumulative effect is not cumulatively considerable. As described previously, the estimated GHG emissions from development and operation of the Project would not exceed SCAQMD thresholds and the proposed Project would be consistent with relevant plans, policies, and programs adopted for the purpose of reducing the emissions of GHGs. Therefore, the Project would not result in cumulatively considerable GHG impacts and cumulative GHG impacts would be **less than significant**.

5.8.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Clean Car Standards – Pavley Assembly Bill 1493

- California Executive Order S-3-05
- Assembly Bill 32 (Global Warming Solutions Act of 2006)
- Senate Bill 375
- California Executive Order B-30-15
- Senate Bill 32
- California Energy Code (Code of Regulations, Title 24 Part 6)
- California Green Building Standards Code (Code of Regulations, Title 24 Part 11)

5.8.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would result in less-than-significant impacts related to Thresholds A and B.

5.8.10 MITIGATION MEASURES

No mitigation measures are required.

5.8.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable GHG impacts would occur.

5.8.12 REFERENCES

City of Riverside. (2016). *Riverside Restorative Growth: Economic Prosperity Action Plan and Climate Action Plan*. Retrieved February 10, 2025, from https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/other-plans/2016%20Riverside%20Restorative%20Growthprint%20Economic%20Proposerity%20Action%20Plan%20and%20Climate%20Action%20Plan.pdf

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EPD Solutions, Inc. (2025). *Air Quality, Energy, and GHG Impact Analysis*. (**Appendix B**)

South Coast Air Quality Management District (SCAQMD). (2008). *Final Localized Significance Threshold Methodology, Appendix C- LST Lookup Tables*. Retrieved February 19, 2025 from http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf

South Coast Air Quality Management District (SCAQMD). (2010). *2010 Minutes of the GHG CEQA Significance Threshold Stakeholder Working Group # 15*. Retrieved February 19, 2025 from http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf

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5.9 Hazards and Hazardous Materials

5.9.1 INTRODUCTION

This section considers the nature and range of foreseeable hazardous materials, airport hazards, and physical hazards and impacts that would be caused by the implementation of the Project. It identifies the ways that the Project's construction and operations may exacerbate or otherwise expose members of the public to existing hazardous materials, airport hazards, and other types of hazard conditions located in and around the Project site.

This section also describes routine hazardous materials that are likely to be used, handled, or processed within the Project area, and the potential for upset and accident conditions in which hazardous materials could be released. The impact analysis identifies ways in which hazardous materials might be routinely used, stored, handled, processed, or transported, and evaluates the extent to which existing and future populations could be exposed to hazardous materials based on such activities. This analysis also addresses ways in which the Project may result in safety hazards for the public or future employees on-site.

The term "hazardous material" is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (State of California, Health and Safety Code, Chapter 6.95, Section 25501(o)). The analysis in this section is based, in part, on the following documents and resources:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- *Geotechnical Investigation,* prepared by Southern California Geotechnical, July 2021, included as Appendix F
- *Phase I Environmental Site Assessment*, prepared by Geosyntec, November 2024, included as Appendix G
- *Site Summary Report (Hazards Report)* prepared by Geosyntec, June 2025, included as Appendix L

5.9.2 REGULATORY SETTING

5.9.2.1 Federal Regulations

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, the United States Environmental Protection Agency (USEPA) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a "cradle to grave" manner. RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources. The USEPA has largely delegated responsibility for implementing the RCRA program in California to the State, which implements this program through the California Hazardous Waste Control Law.

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows the USEPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 CFR Part 141, gives the USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the Project area, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows the USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Occupational Safety and Health Act of 1970

Federal and State occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by the U.S. Department of Labor Occupational Safety and Health Administration (OSHA). Title 29 of the Code of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of material safety data sheets (MSDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates the administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR Part 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Adherence to applicable hazard-specific OSHA standards is required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 with regard to worker exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport. Title 42, Part 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act, which is administered by the Research and Special Programs Administration (RSPA) of the United States Department of Transportation (USDOT). The Hazardous Materials Transportation Act provides the USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The USDOT has regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or are involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, the USDOT is responsible for developing curriculum to train for emergency response and administers grants to states and

Indian tribes for ensuring the proper training of emergency responders. The Hazardous Materials Transportation Act was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law (42 United States Code [USC] 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulations [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

Title 49, Code of Federal Regulations, Chapter I

Under Code of Federal Regulations (CFR) Title 49, Chapter I, the USDOT's Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials. Title 49, Chapter I sets forth regulations for response to hazardous materials spills or incidents during transport and requirements for shipping and packaging of hazardous materials.

Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act (SARA) authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (42 USC § 11001 et seq.) to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored on-site to state and local agencies; releases to the environment of more than 600 designated toxic chemicals; off-site transfers of waste; and pollution prevention measures and activities and to participate in chemical recycling. The USEPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by certain industry groups and federal facilities—the Toxics Release Inventory. To implement EPCRA, each state appointed a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divided their states into emergency planning districts and named a local emergency planning committee for each district. The federal EPCRA program is implemented and administered in California Governor's Office of Emergency Services (Cal OES), a state commission, 6 local committees, and 81 Certified Unified Program agencies. Cal OES coordinates and provides staff support for the commission and local committees.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 (15 USC § 2601 et seq.) gave the USEPA the ability to track the 75,000 industrial chemicals produced or imported into the United States. The USEPA repeatedly screens these chemicals; can require reporting or testing of any that may pose an environmental or human health hazard; and can ban the manufacture and import of chemicals that pose an unreasonable risk. The USEPA tracks the thousands of new chemicals each year with unknown or dangerous characteristics. The act supplements other federal statutes, including the Clean Air Act and the Toxics Release Inventory under EPCRA.

Code of Federal Regulations Title 29, Section 1926

CFR Title 29, Section 1926, provides federal regulations that establish health and safety health standards for construction activities. It includes standards for exposure assessment, worker protection, methods of compliance, biological monitoring, and medical surveillance. These regulations are enforced by the Occupational Safety and Health Administration (OSHA).

Code of Federal Regulations Title 14, Part 77

Federal Regulation Title 14 Part 77, Notification of Proposed Construction or Alteration on Airport Part 77, establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis to evaluate the effect of the construction or alteration on operating procedures, determine the potential hazardous effect of the proposed construction on air navigation, identify mitigating measures to enhance safe air navigation, and chart new objects. Notification allows the FAA to identify potential aeronautical hazards in advance thus preventing or minimizing the adverse impacts to the safe and efficient use of navigable airspace.

5.9.2.2 State Regulations

Hazardous Materials Management and Waste Handling

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary State agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and State hazardous waste laws. The California Department of Pesticide Regulation, which is a branch of CalEPA, regulates the sale, use, and cleanup of pesticides (CCR, Title 3).

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws and regulations are overseen by a variety of State and local agencies. The California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

The primary local agency in an area that has responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management is known as the Certified Unified Program Agency (CUPA). The Unified Program is the consolidation of six State environmental regulatory programs into one program under the authority of the CUPA. The CUPA is a local agency that has been certified by CalEPA to implement the six State environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures (SPCC) requirements)
- California Accidental Release Prevention (CalARP)

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

The CUPA program is designed to consolidate, coordinate, and uniformly and consistently administer permits, inspection activities, and enforcement activities throughout the CUPA's jurisdiction. This approach strives to reduce overlapping and sometimes conflicting requirements of different governmental agencies independently managing these programs.

The CUPA for the Project area is the Los Angeles County Fire Department.

California Accidental Release Prevention Program

This program aims to reduce risks involving regulated substances through the evaluation of hazards and consequences and the development of risk management plans and prevention programs. The program requires certain facilities (referred to as "stationary sources") that handle specified chemicals (termed "regulated substances") to take specified actions to prevent and prepare for chemical accidents.

Aboveground Petroleum Storage Act /Spill Prevention, Control, and Countermeasure Plan

Facilities that have cumulative aboveground storage capacities of petroleum products at or exceeding 1,320 gallons are subject to the Aboveground Petroleum Storage Act. Facilities that are subject to this act must prepare a Spill Prevention, Control, and Countermeasure Plan. Facilities handling petroleum or any other hazardous material require a business emergency/contingency plan. Both petroleum and nonpetroleum aboveground storage tanks are subject to the fire code requirements of the authority having fire code jurisdiction.

Hazardous Waste Generation and On-Site Treatment

The Hazardous Waste Inspection Program works to ensure that all hazardous waste generated by Los Angeles County facilities are properly managed. Specialists in this program inspect facilities that generate hazardous waste, investigate complaints of unlawful hazardous waste disposal, and participate in public education. These programs are designed to provide information about laws and regulations relating to safe management of hazardous waste.

Hazardous Materials Management Plans (HMMPs) and Hazardous Materials Inventory Statements (HMISs)

The Uniform Fire Code has a provision for the local fire agency to collect information regarding hazardous materials at facilities for purposes of fire code implementation. A fire chief may require additional information for a Business Plan to meet the California Fire Code Hazardous Materials Management Plans (HMMP)/Hazardous Materials Inventory Statements (HMIS) requirements.

Hazardous Waste Control Law

The Hazardous Waste Control Law was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program.

California's Hazardous Waste Control Law was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program.

California Government Code Section 65962.5

Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board as having underground storage tank (UST) leaks and which have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

California Code of Regulations (CCR), Title 22 – Hazardous Waste Control Law, Chapter 6.5

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle-to-grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies.

CCR, Title 27 – Solid Waste

Title 27 of the CCR contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the State and which therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or "Chisels") are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

CCR, Title 8 – Occupational Safety

CalOSHA administers federal occupational safety requirements and additional State requirements in accordance with CCR, Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under CCR Title 8, Section 1532.1, *Lead*, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the Project due to the potential hazards posed by on-site construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local government, and private agencies. The plan is administered by the California Emergency Management Agency and includes response to hazardous materials incidents. The California Emergency Management Agency coordinates the response of other agencies, including CalEPA, the California Highway Patrol, the California Department of Fish and Wildlife, the Regional Water Quality Control Boards, the regional Air Quality Management Districts, County Fire Departments, and County Environmental Health Departments.

California Emergency Services Act

The California Emergency Services Act (Government Code Section 8550 et seq.) was adopted to establish the State's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

5.9.2.3 Regional Regulations

AB 617, Community Air Protection Program

In Response to Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017), the California Air Resources Board (CARB) has established the Community Air Protection Program. AB 617 requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. Air districts are required to host workshops in order to help identify disadvantaged communities disproportionately affected by poor air quality. Once the criteria for identifying the highest priority locations has been identified and the communities have been selected, new community monitoring systems would be installed to track and monitor community-specific air pollution goals. Under AB 617, CARB must prepare an air monitoring plan by October 1, 2018, that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, CARB is also required to prepare a statewide strategy to reduce toxic air contaminants (TACs) and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology (BARCT), adopt new rules requiring the latest BARCT for all criteria pollutants for which an area has not achieved attainment of California AAQS, and provide uniform statewide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the air pollution impacted communities identified by CARB.

Riverside County Hazardous Waste Management Plan

The Riverside County Hazardous Waste Management Plan was adopted in 1989 and uses a framework of 24 programs to serve as the County's primary planning document for the management of hazardous substances. Its policies include compliance with federal and State laws pertaining to the management of hazardous wastes and materials; active public participation in hazardous waste and hazardous material management decisions in Riverside County; coordination of hazardous waste facility responsibilities on a regional basis through the Southern California Hazardous Waste Management Authority; and encouragement and promotion of the programs, practices, and recommendations contained in the county Hazardous Waste Management Plan, giving the highest waste management priority to the reduction of hazardous waste at its source (City of Riverside, 2021).

5.9.2.4 Local Regulations

City of Riverside Local Hazards Mitigation Plan

The purpose of the City of Riverside Local Hazard Mitigation Plan (LHMP) is to help reduce or remove long-term risk and protect people and property from the effects of events like earthquake, fire, flood, terrorism, etc. Under the Disaster Mitigation Act of 2000 (Public Law 106-390), State, local and tribal governments are required to develop a hazard mitigation plan to be eligible for certain federal disaster assistance.

City of Riverside General Plan 2025

The City of Riveside 2025 General Plan Public Safety Element (Adopted 2007) contains the following policies related to hazards and hazardous materials that are applicable to the Project:

Policy PSE-1: **Natural Hazards.** Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding, drought, and structural and wildland fires.

Policy PSE-2: **Hazardous Materials.** Minimize the risk of potential hazards associated with management and transport of hazardous materials.

Policy PSE-3: **Transportation.** Minimize the risk of potential hazards associated with air and ground transportation.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

City of Riverside Municipal Code

The City of Riverside Municipal Code, Chapter 9.48, *Unified Hazardous Materials Program*, consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the six unified hazardous waste and hazardous materials management regulatory programs in the City of Riverside.

According to Chapter 9.48 of the City of Riverside Municipal Code, a hazardous material is: a material, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment, or a material specified in an ordinance adopted pursuant to paragraph (f). Hazardous materials include any product or waste that has been abandoned, discarded, or recycled on the property and as a result represents a continuing hazard. A hazardous material also includes any contaminated soil or groundwater.

5.9.3 ENVIRONMENTAL SETTING

5.9.3.1 Overview

The Project site is currently fully developed. 2626 Kansas Avenue is developed with a commercial/industrial business that is comprised of two structures that total approximately 99,850 square feet (SF); 2626 Kansas Avenue is currently occupied by New Basis, a former plastic and current polymer concrete manufacturer. 2069 Massachusetts Avenue is currently a lot used for bus parking and storage; the surface of 2069 Massachusetts Avenue consists of imported gravel that has been compacted over time and has resulted in a

hardpacked ground surface that allows patchy vegetation to grow through cracks in the surface. 1989 Massachusetts Avenue currently operates as a bus parking and storage yard and contains two buildings that are approximately 11,000 SF. Ornamental landscaping that consists of trees and shrubbery exists along the perimeters of all three parcels.

The Phase I ESA states that currently, the Project site contains 15 groundwater monitoring wells, 16 soil vapor probes, and four soil vapor extraction (SVE) wells across the site. One groundwater monitoring well is also located on Roberta Street north of the 2626 Kansas Avenue parcel (Appendix G).

5.9.3.2 Phase I ESA Findings

Phase I ESA (Appendix G) identified the following findings:

Recognized Environmental Conditions

Chlorinated Volatile Organic Compounds (VOCs). The Site was historically used for trucking and transportation, plastics manufacturing, and copper and brass manufacturing since at least 1946. The Phase I ESA found that environmental site investigations related to VOCs were first conducted at the site in 2013. There are known subsurface impacts at the site. Soil vapor extraction remediation was performed at the site from 2019 to 2021 on 1989 Massachusetts Avenue to address VOC-impacted soil vapors, though the source of the impacted soil vapors had not yet been identified. Soil vapor and groundwater investigations are ongoing under the regulatory oversight of the Santa Ana Regional Water Quality Control Board (SARWQCB).

Elevated concentrations of trichloroethene (TCE) have been detected in shallow soil vapor on the northwest portion of the 2626 Kansas Avenue parcel, which are attributed to the early copper and brass manufacturing operations. Similarly, tetrachloroethene (PCE) and TCE have also been detected in southcentral and southeast exterior areas on the 2626 Kansas Avenue parcel at elevated concentrations in soil vapor that may also be indicative of a minor historical release in one or both areas. 1,1-Dichloroethene (1,1-DCE) has also been routinely detected in groundwater monitoring wells on the northwest portion of the 2626 Kansas Avenue parcel, which has been attributed to a hydraulically upgradient off-site source.

PCE and TCE in soil vapor have historically been detected on 2069 Massachusetts Avenue and 1989 Massachusetts Avenue, with the highest concentrations in deep soil vapor. PCE and TCE have also been detected in groundwater underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue. Soil vapor and groundwater PCE and TCE detected underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue is attributed to off-site sources on the adjoining 3016 Kansas Avenue property, where a significant use of chlorinated solvents is documented to have occurred associated with historical aluminum manufacturing operations conducted since the 1940s. Furthermore, Site screening assessments were conducted for the 3016 Kansas Avenue property by DTSC in 2006 and 2012, which concluded that the 3016 Kansas Avenue property required further investigation and/or remediation and groundwater monitoring. A more recent (September 2024) document submittal associated with the 3016 Kansas Avenue property identified known historical releases of TCE and PCE associated with historical operations at this facility (Appendix G).

The presence of subsurface chlorinated VOCs at the site is above current regulatory screening thresholds and is considered a recognized environmental condition (REC); however, these impacts do not appear to be adversely affecting current commercial/industrial operations. Indoor air sampling results do not exceed regulatory screening levels corresponding to the industrial use, which indicates that the VOCs in the underlying soil vapor do not currently present a risk of soil vapor intrusion.

Historical Recognized Environmental Conditions

Underground Storage Tank (UST) Closures in 1996. Three underground storage tanks (USTs) that consisted of one 10,000-gallon diesel fuel UST, one 5,000-gallon gasoline UST, and one 500-gallon "motor oil drain" (waste oil) UST, were installed by a prior tenant in 1986 at 1989 Massachusetts Avenue. These USTs were removed and disposed of off-site in 1996. Following soil sampling, the County of Riverside Department of Environmental Health (DEH) issued a letter stating that "no significant contamination exists and… no further site mitigation will be required." Due to the regulatory closure, the USTs removed in 1996 are considered an Historical Recognized Environmental Condition (HREC).

UST Closures in 2001. Two USTs that consisted of one 12,000-gallon gasoline UST and one 20,000-gallon diesel UST were installed at 1989 Massachusetts Avenue in 1997. These USTs were removed and disposed of off-site in 2001. During removal operations, soil was over-excavated to an approximate depth of 15 feet. Following confirmatory sampling, DEH issued a letter stating that no further assessment or remediation was required. In March 2008, DEH Hazardous Materials Management Division (HMMD) issued a letter of closure. Due to the regulatory closure, the USTs removed in 2001 are considered an HREC.

Additional Findings

Per- and Polyfluoroalkyl Substances (PFAS) Database Listing.

The 2626 Kansas Avenue parcel was identified on the Per- and Polyfluoroalkyl Substances (PFAS) Enforcement and Compliance History Online (ECHO) database made available by the USEPA. The ECHO database identifies industries that may handle PFAS based on an industry sector classification code. Inclusion in this database does not indicate that PFAS are or were historically manufactured, processed, used, or released by the facility. Listed facilities are included in the database based on their industrial profile but are unconfirmed by the USEPA as having used PFAS on-site. No evidence of the use or release of PFAS compounds was identified as part of the Phase I ESA. Furthermore, the site and surrounding properties are not listed on the GeoTracker PFAS map. Therefore, this finding is not a REC but rather an additional finding.

5.9.3.1 Setting Surrounding the Project Site

The vicinity surrounding the Project site is primarily commercial/industrial. The site is bounded to the north by Roberta Street followed by various commercial/industrial businesses that include an auto parts manufacturer, molding supplier, and industrial operations. One residential property is present to the north across Roberta Street. The site is bounded to the south by Massachusetts Avenue followed by industrial uses. The site is bounded to the east by office, commercial, and industrial buildings and a housing assistance services/shelter. The site is bounded to the west by Kansas Avenue followed by a recycling company and a motorcycle repair shop.

Schools

The closest schools to the Project site include:

- Springs Charter Schools, located at 3050 Chicago Avenue, Riverside, approximately 0.4 miles southeast of the Project site.
- Learn4Life Alta Vista Innovation High, located at 1695 Spruce Street, Riverside, approximately 0.5 miles northeast of the Project site.
- John W. North High School, located at 1550 3r5d Street, Riverside, approximately 0.5 miles southeast of the Project site.

- Longfellow Elementary School, located at 3610 Eucalyptus Avenue, Riverside, approximately 0.6 miles south of the Project site.
- Freemont Elementary School, located at 1925 Orange Street, Riverside, approximately 0.7 miles northwest of the Project site.
- University Heights Middle School, located at 1155 Massachusetts Avenue, Riverside, approximately 0.9 miles east of the Project site.

Airports

The Flabob Airport is located approximately 2.9 miles west of the Project site, the Riverside Municipal Airport is located approximately 4.9 miles southwest of the Project site, and the March Air Reserve Base/Inland Port Airport is located approximately 7.9 miles southeast of the Project site.

As shown in Figure 5.9-1, *Airport Land Use Compatibility Map*, the Project site located within Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area. Zone E prohibits uses that are hazards to flights, such as physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations (RCALUC, 2014).

Wildland Fire Zone

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Maps, the Project site is not located in an Fire Hazard Safety Zone (FHSZ) (CAL FIRE, 2025). The nearest FHSZ areas are designated as Moderate within Local Responsibility Areas. These zones are located approximately 2.41 miles east of the Project site, near the Box Spring Mountains, and approximately 1.5 miles west of the Project site, near Lake Evans. The nearest Very High FHSZ is located approximately 1.5 miles east of the Project site. This area is designated as a Local Responsibility Area and is associated with the Box Spring Mountains. Beyond this, a Very High FHSZ within a State Responsibility Area is also present in the same general vicinity.

According to the City of Riverside Local Hazards Mitigation Plan, the threat of wildland fires exists in the City in areas where the urban and suburban developments are adjacent to expanses of wildland areas; Specifically, this type of interface can be found in the City in the areas of the University of California, Riverside (UCR), Sycamore Canyon/Canyon Crest, Norco 32 Hills, and the regional nature parks (City of Riverside, 2023). As described above, the Project site is entirely developed/urbanized and surrounded by developed land and existing roads. As shown on Figure 4.4.6, *Fire Hazard Map*, of the City's Local Hazards Mitigation Plan, included as Figure 5.9-2, *City of Riverside Fire Wildlands Risk,* of this document, the Project site is not located in a fire wildlands risk area.

Evacuation Routes

The City of Riverside General Plan does not identify evacuation routes in the City. According to the City of Riverside General Plan 2021-2029 Public Safey Element, Programs and Action Items address identification and planning of evacuation routes, development of evacuation and shelter-in-place plans in coordination with CAL FIRE and other local and regional jurisdictions, and verification of compliance of private/public road emergency access routes to requirements of CCR Sections 1273 and 1274 [State Responsibility Area (SRA)/ Very High Fire Hazards Severity Zone (VHFHSZ) Fire Safe Regulations].

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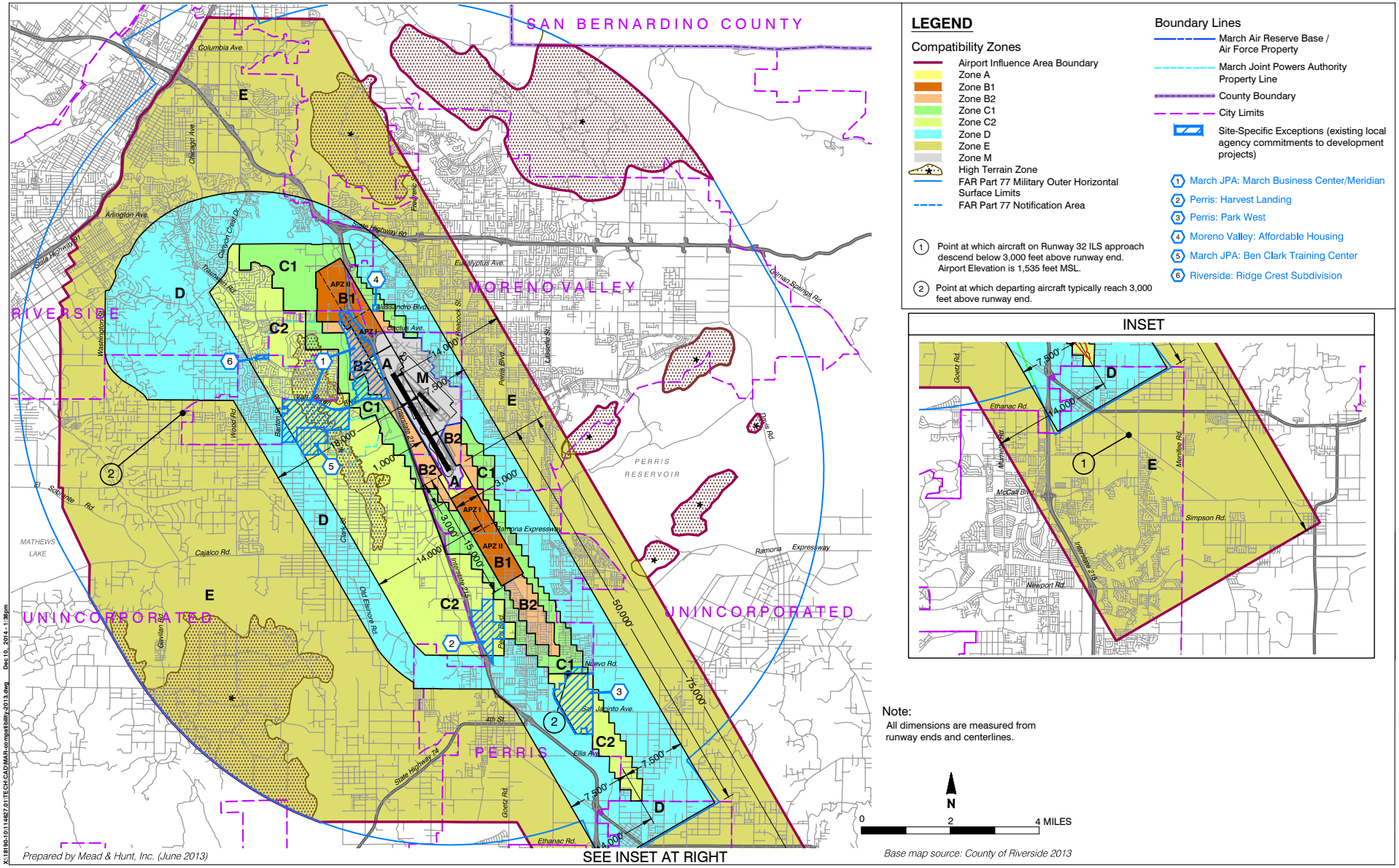
Airport Land Use Compatibility Map



Massachusetts Point Project
City of Riverside

Figure 5.9-1

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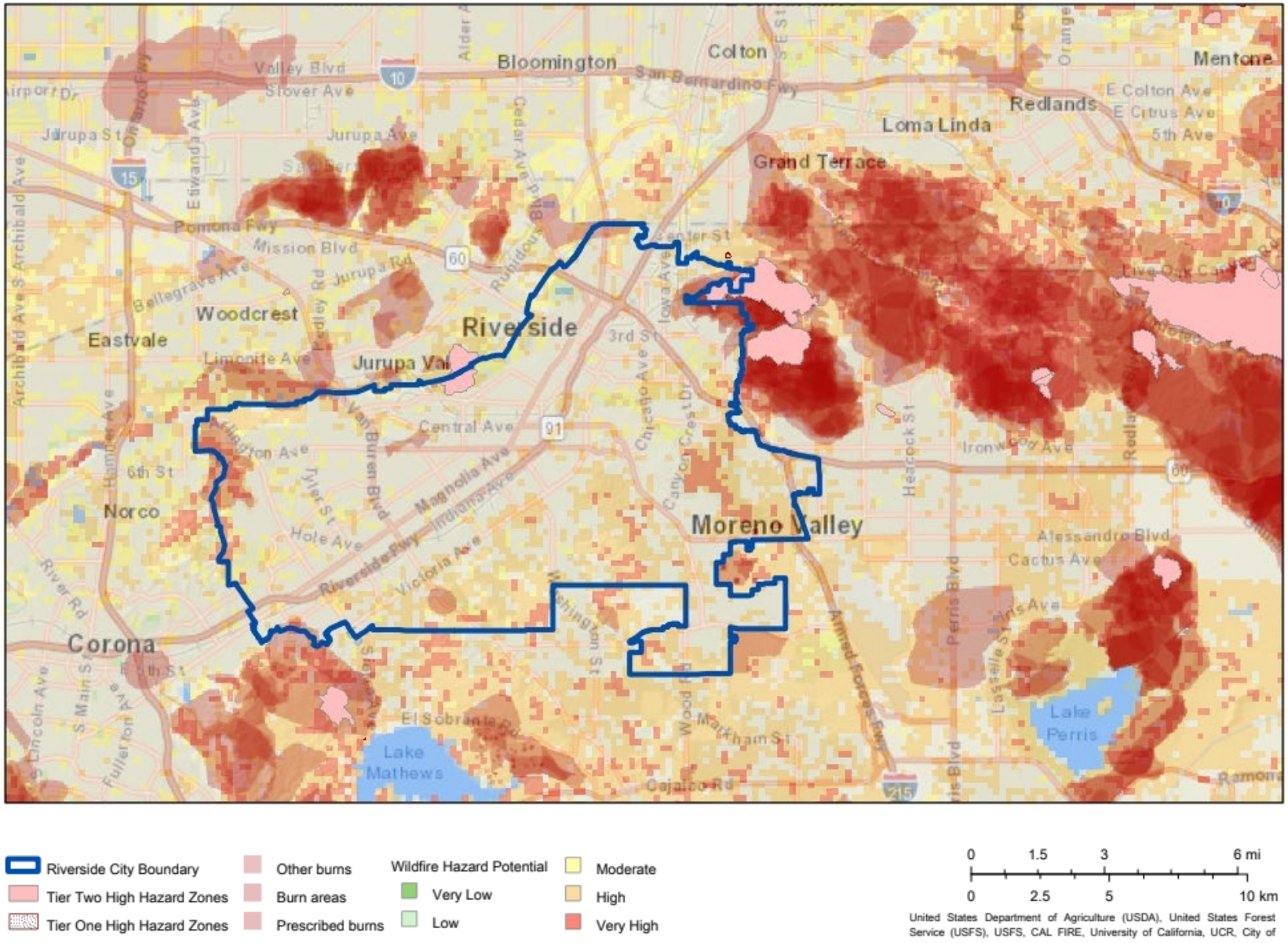
City of Riverside Fire Wildlands Risk



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5.9.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

Threshold 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.

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

Threshold D Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

Threshold 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.

Threshold F Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

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

5.9.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hazards and hazardous materials considers both direct effects to the resources at issue and indirect effects in a local or regional context. Potentially significant impacts would generally result in the loss or degradation of public health and safety or conflict with local, State, or federal agency regulations. Information for this section was obtained, in part, from the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, the Phase I ESA prepared for Project (Appendix G), and the Site Summary Report (Hazards Report) prepared for the Project (Appendix L). The Phase I ESA is based on reviews of historical aerial photographs, historical topographic maps, Environmental Data Resources (EDR) database records, City directories, historical site occupants, historical site ownership records, site visits, and/or interviews of owners and tenants of the Project site.

5.9.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS?

Development and long-term operation of the Project would require standard transport, use, and disposal of hazardous materials and wastes. If the use of these materials does not adhere to established federal, State, and local laws and regulations, workers, building occupants and residents, the public, and/or the environment could be exposed to hazards at the Project site.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be operated for development of the Project site. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored, handled, or transported. Other materials used—such as paints, adhesives, and solvents—could also result in accidental releases or spills that could pose risks to people and the environment. These risks are standard, however, on all construction sites, and the Project would not cause greater risks than would occur on other similar construction sites.

Construction contractors would be required to comply with federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Applicable laws and regulations include CFR, Title 29 – Hazardous Waste Control Act; CFR, Title 49, Chapter I; and Hazardous Materials Transportation Act requirements as imposed by the USDOT, CalOSHA, CalEPA, and DTSC. Additionally, construction activities would require a Stormwater Pollution Prevention Plan (SWPPP), which is mandated by the National Pollution Discharge Elimination System General Construction Permit (included as PPP HYD-1) and enforced by the SARWQCB. The SWPPP will include strict on-site handling rules and best management practices (BMPs) to minimize potential adverse effects to workers, the public, and the environment during construction, including, but not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Mandatory compliance with applicable laws and regulations related to the routine transport, use, and disposal of hazardous materials during construction activities at the Project site would limit potentially significant hazards to construction workers, the public, and the environment.

Contaminated Soils and Groundwater

As described previously, the Phase I ESA (Appendix G), found that the site contains VOCs at levels that exceed current regulatory screening thresholds. Specifically, at 2626 Kansas Avenue, elevated concentrations of TCE have been detected in shallow soil vapor on the northwest portion of the parcel, PCE and TCE have been detected in shallow soil vapor on southcentral and southeast exterior areas of the parcel, and 1,1-DCE has also been detected in groundwater monitoring wells on the northwest portion of the parcel. Soil vapor and groundwater PCE and TCE have also been detected underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue.

As described in Appendix G, there is no evidence of a historical release of PCE or TCE on 1989 Massachusetts Avenue or 2069 Massachusetts Avenue; rather, the presence of these compounds in soil vapor and groundwater are attributed to known and suspected offsite sources, including the south-adjoining property at 3016 Kansas Avenue. A soil vapor extraction (SVE) system was previously operated in 2020 and 2021 at 1989 Massachusetts Avenue to remove PCE and TCE impacted soil vapor, primarily vapor that had encroached from sources on the offsite 3016 Kansas Avenue property onto 1989 and 2069 Massachusetts Avenue. Soil vapor and groundwater investigations are ongoing under the regulatory oversight of the SARWQCB.

The Project would be required to implement SCAQMD Rule 1166 related to excavating and grading soil known or suspected to contain VOCs (included as PPP HAZ-1). These requirements were developed to protect human health and the environment from the hazards associated with exposure. Due to the potential for minor shallow VOC-impacted soils to exist at the 2626 Kansas Avenue property, a qualified consultant would be required to prepare and implement a Soil Management Plan (SMP), per SCAQMD Rule 1166 and SARWQCB requirements in areas where affected soils are suspected to potentially contain VOCs in order to identify "VOC Contaminated Soil" (as defined in SCAQMD Rule 1166), which require appropriate management and offsite disposal (included as Mitigation Measure HAZ-1). The SMP would require handling of contaminated materials be conducted pursuant to existing SCAQMD, SARWQCB, and DTSC standards (as applicable), soil sampling to ensure non-reusable contaminated soils are removed and that a certified hazardous waste hauler remove and transport all hazardous materials, as needed, per California Hazardous Waste Regulations to a landfill permitted to accept hazardous materials. Excavated soil containing hazardous substances would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). Non-hazardous materials containing contaminants would be disposed of in accordance with applicable regulatory requirements. The SMP would detail hazardous materials excavation and disposal methods and requirements pursuant to the regulation of Title 8 of the California Code of Regulations (CalOSHA) and DTSC that regulates the removal, transportation, and disposal of hazardous materials to protect human health and the environment. The SMP would be submitted to the SARWQCB for review and approval and would be implemented during grading activities.

In addition, a Health and Safety Plan (HSP) would also be required to be approved by SARWQCB prior to the issuance of a grading permit or other ground disturbing activities (included as Mitigation Measure HAZ-1) and implemented pursuant to OSHA Safety and Health Standards (29 Code of Federal Regulations [CFR] 1910.120). The HSP would outline health and safety requirements to minimize worker and public exposure to hazardous materials during construction, including vapor, water, and soil contamination. The HSP will provide compliance with OSHA safety and health standards and provide procedures in the event of a release or human contact with hazardous materials during all construction activities. The HSP would establish monitoring protocols, action levels, and response criteria to address potential risk to workers and the public from soils containing VOCs that may be encountered during earth working activities. VOC monitoring devices shall be in place to alert workers in the event that elevated ambient levels of VOCs are present when soil excavation is being performed in applicable areas (i.e., areas considered to have the potential for soils to be present that contain significant VOCs). Contingency procedures shall be in place in the event that elevated VOC concentrations are detected above applicable thresholds, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers will be trained to identify exposure symptoms and implement alarm response.

With implementation of Mitigation Measures HAZ-1 and compliance with SCAQMD Rule 1166 (included PPP HAZ-1), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), and CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) that would be verified by the City during Project permitting and inspections, impacts related to transport, use, or disposal of contaminated materials during construction would be less than significant. Therefore, construction-related impacts would be **less than significant with mitigation**.

Operation

The Project site would be developed with two industrial buildings that would support warehouse and office uses. Depending on the type of business that would occupy the proposed warehouse buildings, operations would require the use of various types and quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, and batteries (lead acid, nickel cadmium, nickel, iron, carbonate). These hazardous materials would be used, stored, and disposed of in

accordance with applicable regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263; and Los Angeles County Code Sections 105.5.22 and 12.64.030) that are enforced by the USEPA, USDOT, CalEPA, CalOSHA, and DTSC.

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with a regulated substance that exceeds a specified threshold quantity to register with a managing local agency, known as the Certified Unified Program Agency (CUPA). Should any future business that occupies the Project site handle acutely hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) the business would require a permit from the County of Riveside Fire Department as the CUPA. Such businesses are also required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County Fire Department as the CUPA and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. Any oil or gas spills from the incoming trucks would be reported, cleaned, and disposed of pursuant to County Fire Department requirements.

The routine transport, use, and disposal of acute hazardous materials is not anticipated during operations, and compliance with existing laws and regulations governing routinely used hazard and hazardous materials would reduce potential impacts to **less than significant**.

THRESHOLD B: WOULD THE PROJECT 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?

Construction

Equipment that would be used in construction of the proposed Project has the potential to release gas, oils, greases, solvents, and spills of paint and other finishing substances. However, the amount of hazardous materials on site would be limited, and construction activities would be required to adhere to all applicable regulations regarding hazardous materials storage and handling, as well as to implement construction BMPs (through implementation of a required SWPPP implemented by City conditions of approval) to prevent a hazardous materials release and to promptly contain and clean up any spills, which would minimize the potential for harmful exposures. Upon compliance with existing laws and regulations, which are mandated by the City through construction permitting, the proposed Project's construction-related impacts would be **less than significant.**

Contaminated Soils

The Phase I ESA found that soil vapor and groundwater investigations are ongoing under the regulatory oversight of the SARWQCB. Furthermore, due to the potential for minor shallow VOC-impacted soils to exist at the Project site, preparation and implementation of a SMP (through Mitigation Measure HAZ-1) for excavation, grading, and redevelopment activities pursuant to standard regulatory requirements would be required. As previously described, the SMP requires handling of contaminated soils be completed pursuant to existing SCAQMD Rules 1166 (included as PPP HAZ-1) and SARWQCB standards. A certified hazardous waste hauler is required to remove and transport all impacted soil and other potentially hazardous materials per California Hazardous Waste Regulations to a local landfill permitted by the State to accept the materials. In addition, an HSP per OSHA requirements is required to implement health and safety requirements to minimize worker and public exposure, and provide response to release and exposure, to hazardous materials during construction, including contaminated soils and vapors that could emanate from contaminated soils (included as Mitigation Measure HAZ-1). Therefore, with implementation of Mitigation Measures HAZ-1 and compliance with SCAQMD Rule 1166 (included as PPP HAZ-1), that would be verified through the City's development permitting process, potential impacts related to significant hazard to the

public or environment through the reasonably foreseeable release of contaminated soils or potential vapors from contaminated soils would be less than significant. Therefore, construction-related impacts would be **less than significant with mitigation**.

Contaminated Groundwater

As discussed in the Phase I ESA, 1,1-DCE, PCE, and TCE have routinely been detected in the groundwater underlying the Project site; soil vapor and groundwater investigations are ongoing under the regulatory oversight of the SARWQCB (Appendix G). However, as discussed in the Geotechnical Investigation prepared for the proposed Project (Appendix F), existing monitoring wells on-site indicate that groundwater at the Project site has depth of approximately 116 to 120 feet below ground surface (bgs). Groundwater was not encountered during the soil borings, which reached a maximum depth of 25 feet below the existing ground surface (Appendix F). Excavation for the proposed Project is anticipated to reach depths of approximately 15 feet below the ground surface, which would not encroach into groundwater; and there is no potential for contaminated groundwater to be encountered during construction.

Although not anticipated, should Project excavation encounter contaminated water, the proposed Project construction would be required to incorporate contaminated dewatering measures in compliance with the Groundwater Discharge Permit (General NPDES Permit No. CAG994004). This permit would require testing and treatment as necessary for water encountered prior to release to surface waters to ensure that discharges do not contain pollutants. Compliance with the requirements of the Groundwater Discharge Permit, which would be implemented through the SARWQCB and the City's development permitting process, would ensure that potential impacts related to a significant hazard to the public or environment through the reasonably foreseeable release of contaminated water would be **less than significant.**

Operation

The proposed Project would develop two new industrial warehouses on the site. Operation of the proposed Project is not anticipated to require regular use of hazardous materials. Limited quantities of diesel, automobile gas, automobile oil may be present on site from the hauling trucks. However, no fueling, maintenance, or other industrial activity would occur on the Project site. The proposed warehouse buildings would utilize limited volumes of cleaners, paints, and other typical office and consumer products that would not result in a significant hazard. In addition, development of the proposed Project would require a water quality management plan (WQMP) in compliance with the Santa Ana Region MS4 Permit (Order No. R8-2010-0033), as detailed in Section 5.10, *Hydrology and Water Quality*. BMPs would be incorporated in the WQMP that would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the proposed Project. Spills of hazardous materials would be required to be reported, cleaned, and disposed of in compliance with City Fire Department, State, and federal regulations.

As described in Section 5.9.3, *Environmental Setting*, soil vapor impacts on the 2069 Massachusetts Avenue and 1989 Massachusetts Avenue parcels are attributed to off-site sources south of the Project site. As such, a vapor intrusion mitigation system (VIMS) is included as part of the project design to avoid potential vapor intrusion risk to future site occupants associated with soil vapor encroachment from this offsite source (included as PDF HAZ-1). With implementation of a vapor intrusion system included as part of the Project design, the Project is expected to have no impacts related to hazardous materials in soil gas.

Therefore, with implementation of existing regulation and PDF HAZ-1, the proposed warehouse operations would not result in a significant hazard to the public or the environment through reasonably foreseeable upset and accident involving hazardous material. Impacts related to hazardous materials from operation of the proposed Project would be **less than significant**.

THRESHOLD C: WOULD THE PROJECT EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL.

The closest schools to the Project site are Springs Charter Schools, located at 3050 Chicago Ave., Riverside, approximately 0.4 miles southeast of the Project site. Therefore, there are no schools located within 0.25 miles of the Project site. Furthermore, as described previously, the use of hazardous materials related to the proposed industrial warehouse uses would be limited and used and disposed of in compliance with federal, State, and local regulations, which would reduce the potential of accidental release into the environment. Thus, the proposed Project would not emit hazardous or handle acutely hazardous materials, substances, or waste within 0.25 miles of school, and **no impacts** would occur.

THRESHOLD D: WOULD THE PROJECT BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE § 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT.

The Phase I ESA (Appendix G) that was conducted included database searches, including the State Water Resources Control Board (SWRCB) GeoTracker website or the DTSC EnviroStor websites, to determine if the Project site is identified as a hazardous materials site. The record searches determined that although the site has a history of various uses and there is currently an open SARWQCB Cleanup Program Site case due to PCE and TCE impacts in soil, soil vapor, and groundwater, the Project site is not included on a Cortese List of hazardous materials sites pursuant to Government Code Section 65962.5.

The Phase I ESA (Appendix G) and EnviroStor website did not identify any adjacent sites that are included on a Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that could result in impacts related to the proposed Project. One Federal Superfund site, Alark Hard Chrome, is located at 2777 Man Street, Riverside, approximately 0.6 miles northwest of the Project site. However, due to its distance and its hydraulically cross-gradient position relative to the site[1], the property was not subjected to further evaluation (Appendix G). As a result, impacts from implementation of the proposed Project related to hazards from being located on or adjacent to a hazardous materials site included on a Cortese List would be **less than significant**.

THRESHOLD 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?

The Project site is located approximately 2.9 miles east of the Flabob Airport, a small public-use airport in the City of Jurupa Valley. The Flabob Airport has an easterly runway elevation of 768 feet above mean sea level (AMSL). In June 11, 2024, an Application for Major Land Use Action Review was submitted to the Riverside County Airport Land Use Commission (ALUC) for the proposed Project pursuant to ALUC Review Procedures. On May 5, 2025, ALUC determined that FAA review is required for structures exceeding 1,039 feet AMSL at the project's distance from the Flabob Airport runway, however, the proposed building's top elevation is 935 feet AMSL, so FAA Obstruction Evaluation Service review is not warranted.

The Project site is also located approximately 7.9 miles northwest of March Air Reserve Base/Inland Port Airport. As shown in Figure 5.9-1, *Airport Land Use Compatibility Map*, the Project site located within Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area. Zone E prohibits uses that are hazards to flights, such as physical (e.g., tall objects), visual, and electronic forms of interference with the

[1] The Alark Hard Chrome property is neither upstream nor downstream of the site in terms of groundwater flow.

safety of aircraft operations (RCALUC, 2014). Zone E does not restrict residential density or non-residential intensity. The May 5, 2025, ALUC Determination Letter found the proposed Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to conditions that include requirement that outdoor lighting shall be installed in a downward facing position to prevent spillage, prohibit uses/activities that are incompatible with airport operations, requirement to provide a notice of airport in vicinity to prospective purchasers or tenants, and notification to March Air Reserve of any land use involving electromagnetic radiation. These conditions are included as Mitigation Measures HAZ-2 through HAZ-5. Through implementation of Mitigation Measures HAZ-2 through HAZ-5, the proposed Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Therefore, impacts are **less than significant with mitigation**.

THRESHOLD F: WOULD THE PROJECT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of the new driveways and connections to infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Kansas Avenue, Roberta Street, Massachusetts Avenue, or adjacent areas. Any temporary lane closures needed for utility connections or driveway and cul-de-sac construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and that construction-related emergency access or evacuation impacts would not occur. Therefore, the Project would result in **no impact**.

Operation

Direct access to the Project site would be provided by the proposed driveways at Kansas Avenue, Roberta Street, Massachusetts Avenue. The Project driveways and internal circulation would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with City Fire Department standards. The City's Building Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, operation of the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan, and there would be **no impact**.

THRESHOLD G: WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY, TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES?

According to CAL FIRE's Fire Hazard Severity Zone Maps, the Project site is not located within a Fire Hazard Severity Zone (FHSZ) (CAL FIRE, 2025). Because the Project Site and surrounding vicinity is an urbanized community, structural fires rather than wildland fires represent the greatest fire risk. The proposed Project is within an urban area that is adjacent to existing industrial uses and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. In addition, the proposed Project would be constructed in compliance with the California Fire Code and California Building Code. The safety measures under the California Fire Code include ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system, and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or

embers. The California Building Code requirements include CCR Title 24, Part 2, which provides specific requirements related to exterior fire exposure. Compliance with existing regulatory requirements for implementation of fire protection measures (e.g., ignition-resistant construction materials and measures) would further reduce impacts associated with fire spread. Thus, the proposed Project would not result in **no impact** related to exposure of people or structures to significant risk involving wildland fires.

5.9.7 CUMULATIVE IMPACTS

Cumulative land use changes within the City of Riverside would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. Thus, the proposed Project's contribution to cumulative impacts related to hazards and hazardous materials was analyzed in context with past and foreseeable future projects in the City that are similarly affected by VOCs and contaminated soils and groundwater conditions.

The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. As shown in Figure 5-1, *Cumulative Projects*, in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, the closest cumulative project is located at 2610 Durahart Street, approximately 0.25 miles east of the Project site.

The commencement of construction of the adjacent cumulative project is unknown; however, it is possible that construction activities involving hazardous materials from both the proposed Project and the adjacent cumulative project or other nearby cumulative projects would occur simultaneously that could have the potential to cumulatively contribute to an impact. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety, which are verified by the City during the construction and development permitting process.

Thus, if hazardous materials are found to be present on any of the cumulative or future project sites, appropriate remediation activities would be required pursuant to standard federal, State, and regional regulations that would reduce potential impacts, such as the activities which would be done by the proposed Project. In addition, regulatory compliance, the SMP and HSP would be implemented for the proposed Project to ensure that hazardous soil from the site would be handled and disposed of in a manner which would reduce the potential of the proposed Project to result in a hazard to the public or environment that could cumulatively combine. As such, the potential impacts from the proposed Project would be **less than significant** and **not cumulatively considerable**.

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Federal

- United States Code of Federal Regulations Title 42, Sections 6901 et seq.: Resource Conservation and Recovery Act
- United States Code of Federal Regulations Title 49, Parts 101 et seq.: Regulations implementing the Hazardous Materials Transportation Act (United States Code of Federal Regulations Title 49 Sections 5101 et seq.)
- United States Code of Federal Regulations Title 15, Sections 2601 et seq.: Toxic Substances Control Act

State

- California Health and Safety Code Chapter 6.95 and 19 California Code of Regulations Section 2729: Business Emergency Plans and chemical inventory reporting
- California Occupational Safety and Health Administration Regulation 29, CFR Standard 1926.62
- California Code of Regulations Title 24, Part 2: California Building Code
- California Code of Regulations Title 24, Part 9: California Fire Code

Regional

- South Coast Air Quality Management District Rule 403: Dust Control
- South Coast Air Quality Management District Rule 1466: Fugitive Dust Toxic Air Contaminants
- South Coast Air Quality Management District Rule 1166: VOCs

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) would reduce impacts related to hazards and hazardous materials. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain coverage under the construction general permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that the planned excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan. The excavation contractor's Rule 1166 plan would provide for compliance with these requirements provided the plan remains valid and is approved by SCAQMD:. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading in areas where VOCs are suspected to potentially be present and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.

5.9.9 PROJECT DESIGN FEATURES

PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.

5.9.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would result in no impact related to Threshold C, F, and G, less than significant impacts with respect to Threshold D, and potentially significant impacts related to Thresholds A, B, and E.

5.9.11 MITIGATION MEASURES

Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board.

The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities).

Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities.

As part of the SMP, the Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.

Mitigation Measure HAZ-2: Outdoor lighting. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

Mitigation Measure HAZ-3: Prohibited Uses/Activities. The following uses/activities are not included in the proposed project and shall be prohibited at this site:

1. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
2. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
3. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that

are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.

4. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
5. Any use which results in a hazard to flight.

Mitigation Measure HAZ-4: Notice of Airport in Vicinity. The "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property.

Mitigation Measure HAZ-5: Electromagnetic Component Notification. March Air Reserve Base shall be notified of any land use having electromagnetic radiation. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc. Level of Significance After Mitigation

No significant and unavoidable hazards and hazardous materials impacts would occur.

5.9.12 REFERENCES

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Geosyntec. (2024). *Phase I Environmental Site Assessment*. **(Appendix G)**

Riverside County Airport Land Use Commission (RCALUC). (2014). *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan*. Retrieved February 5, 2025, from https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf

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5.10 Hydrology and Water Quality

5.10.1 INTRODUCTION

This section describes the existing hydrology and water quality conditions and potential impacts from implementation of the proposed Project. The analysis in this section is based, in part, on the following:

- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code
- *City of Riverside 2020 Urban Water Management Plan (UWMP)*.
- *Preliminary Water Quality Management Plan*, prepared by Huitt Zollars, May 2024 (Appendix H H)
- *Preliminary Drainage Study*, prepared by Huitt Zollars, May 2024 (Appendix *I*)

5.10.2 REGULATORY SETTING

5.10.2.1 Federal Regulations

Clean Water Act

The Clean Water Act (CWA) established the basic structure for regulating discharges of pollutants into "waters of the U.S." The Act specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Key components of the Clean Water Act that are relevant to the proposed Project are:

- Sections 303 and 304, which provide for water quality standards, criteria, and guidelines. Section 303(d) requires the State to develop lists of water bodies that do not attain water quality objectives (are impaired) after implementation of required levels of treatment by point-source dischargers (municipalities and industries). Section 303(d) also requires that the State develop total maximum daily loads (TMDLs) for each of the listed pollutants. The TMDL is the amount of pollutant loading that the water body can receive and still be in compliance with water quality objectives. After implementation of the TMDL, it is anticipated that the contamination that led to the 303(d) listing would be remediated. Preparation and management of the Section 303(d) list is administered by the Regional Water Quality Control Boards (RWQCBs).
- Section 401 requires activities that may result in a discharge to a federal water body to obtain a water quality certification to ensure that the proposed activity would comply with applicable water quality standards.
- Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the local RWQCBs. The NPDES program provides both general permits (those that cover a number of similar or related activities) and individual permits.

National Pollutant Discharge Elimination System Permit Program

The NPDES permit program under the CWA controls water pollution by regulating point- and nonpoint-sources that discharge pollutants into "waters of the U.S." California has an approved State NPDES program. The United States Environmental Protection Agency (USEPA) has delegated authority for NPDES permitting to the SWRCB, which has nine regional boards. The Santa Ana RWQCB regulates water quality in Riverside to the Santa Ana River. Discharge of stormwater runoff from construction areas of one acre or more requires either an individual permit issued by the RWQCB or coverage under the statewide Construction General Stormwater Permit for stormwater discharges (discussed below). Specific industries and public facilities, including wastewater treatment plants that have direct stormwater discharges to navigable waters, are also required to obtain either an individual permit or obtain coverage under the statewide NPDES permit program.

5.10.2.2 State Regulations

Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969, codified as Division 7 of the California Water Code, authorizes the SWRCB to provide comprehensive protection for California's waters through water allocation and water quality protection. The SWRCB implements the requirement of CWA Section 303, establishing that water quality standards have to be set for certain waters by adopting water quality control plans under the Porter-Cologne Act. The Porter-Cologne Act establishes the responsibilities and authorities of the nine RWQCBs, including preparing water quality plans for areas in the region, and identifying water quality objectives and waste discharge requirements (WDRs). Water quality objectives are defined as limits or levels of water quality constituents and characteristics established for reasonable protection of beneficial uses or prevention of nuisance. Beneficial uses consist of all the various ways that water can be used for the benefit of people and/or wildlife. The Porter-Cologne Act has been amended to provide the authority delegated from the USEPA to issue NPDES permits regulating discharges to surface waters of the U.S.

California Anti-Degradation Policy

A key policy of California's water quality program is the State's Anti-Degradation Policy. This policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (SWRCB Resolution No. 68-16), restricts degradation of surface and ground waters. In particular, this policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. Under the Anti-Degradation Policy, any actions that can adversely affect water quality in surface and ground waters must (1) be consistent with maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of the water; and (3) not result in water quality less than that prescribed in water quality plans and policies (i.e., will not result in exceedances of water quality objectives).

California Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment was adopted on September 8, 2022. The Construction General Permit regulates construction site stormwater management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent (NOI), a Stormwater Pollution Prevention Plan (SWPPP), and other compliance-related documents, such as a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity, as well as requirements for qualified professionals to prepare and implement the plan.

The SWPPP must include a site map, description of stormwater discharge activities, and best management practices (BMPs) taken from the menu of BMPs set forth in the California Stormwater Quality Association (CASQA) BMP Handbook that will be employed to prevent water pollution. It must describe BMPs that will be used to control soil erosion and discharges of other construction-related pollutants (e.g., petroleum products, solvents, paints, cement) that could contaminate nearby water bodies. It must demonstrate compliance with local and regional erosion and sediment control standards, identify responsible parties, provide a detailed construction timeline, and implement a BMP monitoring and maintenance schedule. The Construction General Permit requires the SWPPP to identify BMPs that will be implemented to reduce controlling potential chemical contaminants from impacting water quality. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-stormwater management (e.g., water conservation), and waste management. The SWPPP must also include descriptions of BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs).

California Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of "sustainability" as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed NPDES Phase I Municipal Separate Storm Sewer System (MS4) permit.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was passed by the State of California in 2014 and sets forth a statewide framework to help protect groundwater resources over the long-term. The SGMA gives local agencies the power to sustainably manage groundwater. It requires the California Department of Water Resources (DWR) to establish priority levels for groundwater basins within the State based on their level of overdraft and requires Groundwater Sustainability Agencies (GSAs) to form and develop Groundwater Sustainability Plans (GSPs) for medium- and high-priority groundwater basins that would bring the basins into sustainability by 2040 or 2042. Basins determined to be in critical overdraft were required to develop and submit their GSPs by January 31, 2020; and all other high- and medium-priority basins were required to submit their GSPs by January 31, 2022. On January 18, 2024, the DWR completed the initial GSP reviews for all basins that were required to submit plans by January 31, 2022. Based on DWR's determinations, the current status of California's groundwater basins is as follows: 71 approved basins, 13 incomplete basins, and 6 inadequate basins (California Department of Water Resources, 2024).

5.10.2.3 Regional Regulations

Water Quality Control Plan for the Santa Ana River Basin (Basin Plan)

The Basin Plan contains the Santa Ana RWQCB's policies for managing water quality within its jurisdiction. The Basin Plan for the Santa Ana Region includes the upper and lower Santa Ana River watersheds, the San

Jacinto River watershed, and several other small drainage areas. The Santa Ana Region covers parts of southwestern San Bernardino County, western Riverside County (which includes the Project site), and northwestern Orange County. The Basin Plan establishes water quality standards for the ground and surface waters of the region; that is, standards for both beneficial uses of specific water bodies and the water quality levels that must be maintained to protect those uses. The Basin Plan includes an implementation plan describing actions by the Santa Ana RWQCB and others needed to achieve and maintain the water quality standards. The Santa Ana RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface waters. The Basin Plan lists water quality problems for the region, along with causes, where they are known. Plans for improving water quality are included for water bodies with quality below the levels needed to enable all the beneficial uses of the water (State Water Resources Control Board, 2019).

Santa Ana Region NPDES Permit

The Santa Ana RWQCB regulates portions of the Orange, Riverside, and San Bernardino counties located within the Santa Ana Region through separate MS4 permits for each county. On January 29, 2010, the Santa Ana RWQCB issued a fourth-term area wide NPDES MS4 Permit to the Riverside County Flood Control and Water Conservation District (RCFCWCD), the County of Riverside, and the cities of Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Moreno Valley, Menifee, Murrieta, Norco, Perris, Riverside, San Jacinto, and Wildomar (Permittees). The City of Riverside is a permittee under the Santa Ana RWQCB Order No. R8-2010-0033 (NPDES No. CAS618033). The NPDES MS4 Permit Order No. R8-2010-0033 (NPDES No. CAS618033) is expired but has been administratively extended until a new MS4 permit is adopted and thus remains in effect.

As a co-permittee in the NDPES MS4 Permit, the City is required to mandate that all new development projects and substantial redevelopment projects incorporate BMPs for operation. As a co-permittee, the City must require that most development projects prepare a site-specific Water Quality Management Plan (WQMP). WQMPs ensure that the land use approval and permitting process of the City will minimize the impact of urban runoff from the developed site, through the use of low-impact development (LID) principles in site design, source control measures, and treatment control BMPs.

5.10.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following policies related to hydrology and water quality that are applicable to the Project (City of Riverside, 2007a):

Open Space and Conservation Element

Policy OS-10.1 Support the development and promotion of water conservation programs.

Policy OS-10.6 Continue to enforce RWQCB regulations regarding urban runoff.

Policy OS-10.7 Work with the RWQCB in the establishment and enforcement of urban runoff water quality standards.

Policy OS-10.8 Cooperate with Riverside and San Bernardino Counties and adjacent jurisdictions in the review and approval of new developments which affect the quality and quantity of basin-wide groundwater and surface water resources.

Policy OS-10.9 Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in stormwater runoff and provide groundwater percolation zones.

Policy OS-10.10 Protect aquifer recharge features and areas of important aquifers from degradation of water quality and reduction of recharge.

Public Facilities and Infrastructure Element

Policy PF-1.7 Protect local groundwater resources from localized and regional contamination sources such as septic tanks, underground storage tanks, industrial businesses and urban runoff.

Policy PF-3.4 Continue to investigate and carry out cost-effective methods for reducing stormwater flows into the wastewater system and the Santa Ana River.

Policy PF-4.2 Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

Policy PF-4.3 Continue to routinely monitor and evaluate the effectiveness of the storm drain system and make adjustments as needed.

City of Riverside Phase I General Plan Update

The City of Riverside Phase I General Plan Update (adopted 2021) contains the following policies related to hydrology and water quality that are applicable to the Project (City of Riverside, 2021):

Public Safety Element

Policy PSE-1 Natural Hazards. Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding, drought, and structural and wildland fires.

City of Riverside Municipal Code

Chapter 14.12 Discharges of Wastes into the Public Sewer and Pollutants into the Storm Drain Systems. Chapter 14.12 of the City's Municipal Code regulates the discharge of wastes to the public sewer and pollutants into the storm drain systems. Section 14.12.315 prohibits the discharge of pollutants to the storm drainage system or any waterway, whether carrying water or not. Section 14.12.316 requires the preparation of a WQMP and installation of BMPs for new development and redevelopment projects in the City, and Section 14.12.319 outlines inspection and enforcement for post-construction requirements detailed in the project's WQMP.

Chapter 16.18 Flood Hazard Areas and Implementation of National Flood Insurance Program. Chapter 16.18 of the City's Municipal Code contains regulations pertaining to flood hazard areas in the City and implements the National Flood Insurance Program. Specifically, the ordinance outlines the process for development permit review by the Floodplain Administrator or designee as well as floodplain construction materials and standards.

Chapter 17.16 Grading Permit Application Requirements. This chapter describes regulations pertaining to grading, including those intended to minimize erosion and runoff. Section 17.16.010 outlines grading permit application requirements, including noticing requirements to the SWRCB for coverage under the Statewide Construction General Permit and preparation of a SWPPP.

Chapter 19.570 Water Efficient Landscaping and Irrigation. Chapter 19.570 of the City's Municipal Code contains the City's Water Efficient Landscaping and Irrigation Ordinance, which is intended to promote

quality landscaping as well as efficient use of water in the City. The ordinance requires preparation and implementation of a planting plan that identifies the Maximum Applied Water Allowance and the Estimated Annual Water Use of the project's landscaping as well as irrigation design and soil management plans.

5.10.3 ENVIRONMENTAL SETTING

5.10.3.1 Regional Hydrology

The City of Riverside is located within the Santa Ana Region (RWQCB Region 8). The Santa Ana Region encompasses approximately 2800 square miles and is located in Southern California, roughly between Los Angeles and San Diego. The Santa Ana Region covers parts of southwestern San Bernardino County, western Riverside County, and northwestern Orange County. It includes the upper and lower Santa Ana River watersheds, the San Jacinto River watershed, and several other small drainage areas. In very broad terms, the Santa Ana Region is a group of connected inland basins and open coastal basins drained by surface streams flowing generally southwestward to the Pacific Ocean (State Water Resources Control Board, 2019).

5.10.3.2 Watershed

The City of Riverside, including the Project site, is located in the Middle Santa Ana River Watershed. The Middle Santa Ana River Watershed covers approximately 488 square miles and lies largely in the southwestern corner of San Bernardino County and the northwestern corner of Riverside County (State Water Resources Control Board, 2024). The Middle Santa Ana River Watershed drains into the Santa Ana River. The Santa Ana River flows from the San Bernardino Mountains to the Pacific Ocean for over 100 miles. The Santa Ana River is the "receiving water" for over 2,700 square miles covering portions of San Bernardino, Riverside and Orange Counties (City of Riverside, 2007b). The mainstream of the Santa Ana River is divided into six reaches. Reach 3 of the Santa Ana River is the receiving water for the proposed Project site. Reach 3 includes the Santa Ana River from Mission Bridge to Prado Dam. In the Narrows, rising water feeds several small tributaries (Sunnyslope Channel, Tequesquite Arroyo, and Anza Park Drain) which are important breeding and nursery areas for native fish. Temescal, Chino, and Mill/Cucamonga Creeks in Prado Basin are also important river tributaries (State Water Resources Control Board, 2019). Reach 3 of the Santa Ana River is listed as an impaired water body for pathogens on the 2022 CWA Section 303(d) List of Water Quality Limited Segments Being Addressed by USEPA Approved TMDLS (Appendix H Appendix H).

5.10.3.3 Groundwater Basin

The City lies within the boundaries of the Upper Santa Ana Valley Groundwater Basin and is underlain by the adjudicated portion of the Riverside-Arlington Groundwater Subbasin. The Riverside-Arlington Subbasin encompasses 58,600 acres (92 square miles). The Riverside-Arlington Subbasin underlies part of the Santa Ana River Valley in northwest Riverside County and southwest San Bernardino County. Although the Riverside-Arlington Subbasin underlies portions of the City of Riverside, it does not directly underlie the Project site. However, the subbasin is regionally relevant, as it contributes to the broader hydrologic setting and water resource availability for the area.

The subbasin is bound by impermeable rocks of Box Springs Mountains on the southeast, Arlington Mountain on the south, La Sierra Heights and Mount Rubidoux on the northwest, and the Jurupa Mountains on the north. The northeast boundary is formed by the Rialto-Colton fault, and a portion of the northern boundary is a groundwater divide beneath the City of Bloomington. The Santa Ana River flows over the northern portion of the subbasin. The Riverside-Arlington Subbasin is replenished by infiltration from Santa Ana River flow,

underflow past the Rialto-Colton fault, intermittent underflow from the Chino Subbasin, return irrigation flow, and deep percolation of precipitation. The total storage capacity of the Riverside-Arlington Subbasin is estimated to be 243,000 acre-feet (AF) (California Department of Water Resources, 2004).

The Western Municipal Water District (WMWD) is one of the largest public agencies in Riverside County, providing water, wastewater (sewer), and recycled water services to nearly 1 million people, both wholesale and retail customers, across 527 square miles in western Riverside County (Western Municipal Water District, 2024). The WMWD manages groundwater within the Riverside-Arlington Subbasin.

The Western-San Bernardino Judgment of 1969 (*Western Municipal Water District of Riverside County v. East San Bernardino County Water District*) addresses groundwater management within the Riverside-Arlington Basin. The Riverside portion of the Riverside-Arlington Basin is split by the Western-San Bernardino Judgment based on county boundaries into Riverside North (San Bernardino County) and Riverside South (Riverside County). The City, including the Project site, is located within the Riverside South Basin. For the Riverside South Basin, the Western-San Bernardino Judgment set a 5-year base period extraction of 29,633 AF for use in Riverside County. In the Riverside South Basin, should extractions exceed the base period extraction over a 5-year period, or by more than 20 percent in a single year, the WMWD is responsible for replenishment in the following year equal to the excess extractions over a 20 percent peaking allowance, unless credits are available from previous years due to productions below the base period extraction or to importing water (Riverside Public Utilities, 2021).

5.10.3.4 Water Quality

Watershed. The Project site is within the Middle Santa Ana River watershed and under the jurisdiction of the Santa Ana RWQCB, which sets water quality standards for all ground and surface waters within its region. Water quality standards for all ground and surface waters overseen by the Santa Ana RWQCB are documented in its Basin Plan, and the regulatory program of the Santa Ana RWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Drainage. Water quality impairments vary by reach. Drainage from the Project site drains to the Santa Ana River Reach 3. According to the WQMP prepared for the proposed Project, water quality impairments for the Santa Ana River Reach 3 are pathogens (Appendix H Appendix H).

5.10.3.5 Water Supply

Riverside Public Utilities (RPU) provides water service to most of the City, including the Project site. RPU's primary source of water supply is local groundwater. RPU also distributes recycled water for non-potable uses, which is supplied from the City of Riverside Regional Water Quality Control Plant. RPU also has an agreement with the WMWD to access imported water when needed. This agreement can provide RPU with up to 21,700 AFY of imported water. RPU also has an exchange agreement with the City of Norco for the sale of up to 1,000 AFY and the exchange of water during emergencies (Riverside Public Utilities, 2021).

5.10.3.6 Existing Flood Zone Designation

The Project site is within "Zone X" of "Other Flood Areas," as determined by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map Number 06065C0726H). These areas are defined as areas of 0.2 percent annual chance of flood, areas of 1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile, and areas protected by levees from 1 percent annual chance of flood (Federal Emergency Management Agency,

2024). Zone X is outside the Special Flood Hazard Areas, which are subject to inundation by the 1 percent chance flood.

5.10.3.7 Existing Drainage

The Project site generally slopes in the northwest direction at an approximate grade of 1.9 percent with approximately 15 feet of fall. The Project site contains sparse vegetation consisting primarily of ornamental landscaping that consists of trees and shrubbery. The Project site does not contain any existing wetlands, drainages, or jurisdictional waters. The northern portion of the site is developed with a building that is surrounded by asphaltic concrete pavement in the parking lot and drive lane areas, with some landscaped planters scattered throughout the site. The southern portion of the site is a vacant lot that is comprised of barren, loosely compacted dirt/gravel. The southern portion of the site is currently used primarily to store cars, trucks, boats, and heavy machinery like semi-trailers and school buses. Due to the type of use, it is likely that the southern portion of the site is thoroughly compacted and does not infiltrate at a rate that natural ground cover would. Currently, the Project site is approximately 56 percent impervious (Appendix I).

The City of Riverside Public Works Department maintains and operates the City's stormwater system. Stormwater on the northern portion of the site is directed to existing on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue. Stormwater flow for the southern portion of the site is overland flow that is generally conveyed in the southeast-to-northwest direction towards Kansas Avenue. Off-site flows are directed to an existing gutter that runs along Kansas Avenue (Appendix I).

5.10.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold A Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Threshold B Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Threshold 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 result in a substantial erosion or siltation on- or off-site.

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

Threshold E 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 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.

Threshold F 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 impede or redirect flood flows.

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

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

5.10.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hydrology and water quality is based on a review of published information and reports regarding regional hydrology, groundwater conditions, and surface water quality, and a Project site-specific Preliminary Water Quality Management Plan (Appendix H) and Preliminary Drainage Study (Appendix I). The potential impacts on hydrology and water quality were evaluated by considering the general type of pollutants that operation of the Project would generate during construction and operation. In determining the level of significance, the analysis recognizes that development under the proposed Project would be required to comply with relevant federal, State, and regional laws and regulations that are designed to ensure compliance with applicable water quality standards and waste discharge requirements. Because the regional and local regulations related to water quality standards have been developed to reduce the potential of pollutants in the water resources (as described in Section 5.10.2, *Regulatory Setting*, above), and are implemented to specific waterbodies, such as 303(d) TMDL requirements, or development projects such as grading and construction permit regulations, implementation of relevant water quality and hydrology requirements would limit the potential of the proposed Project to a less-than-significant impact.

5.10.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY?

Construction

Implementation of the proposed Project includes development involving removal of existing buildings, site preparation, construction of two new buildings, and infrastructure improvements. Grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, pursuant to City of Riverside Municipal Code Chapter 14.12, each discharger associated with industrial/commercial activity or construction activity shall comply with all requirements of the NPDES permit, as may be issued by the USEPA, the SWRCB, or the Santa Ana RWQCB, and the City's development construction program. Construction activity resulting in a land disturbance of one acre or more, or less than one acre but part of a larger common plan of development or sale, must obtain coverage under the NPDES Construction General Permit. The existing NPDES Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer (QSD) for construction activities that disturb one acre or more of soil, included as existing Plans, Programs, and Policies PPP HYD-1 (see Section 5.10.8, *Existing Regulations and Plans, Programs, or Policies*). PPPs would reduce impacts related to hydrology and water quality and will be included in the Project's Mitigation Monitoring and Reporting Program. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. Common types of construction BMPs include:

- Concrete waste management;
- Hydroseeding;
- Material delivery and storage;
- Silt fencing, fiber rolls, or gravel bags;
- Solid waste management;
- Spill prevention and control;
- Stabilized construction entrance/exit;
- Stockpile management;
- Storm drain inlet protection;
- Street sweeping and vacuuming; and/or
- Vehicle and equipment maintenance, cleaning, and fueling.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would reduce construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities.

Compliance with the State Construction General Permit and the City of Riverside Municipal Code, as well as other applicable requirements, would be verified during the City's construction permitting process. Therefore, Project impacts related to degradation of water quality during construction would be **less than significant**.

Operation

As previously mentioned, the Project site is within the Middle Santa Ana River Watershed and drains to the Santa Ana River Reach 3. Reach 3 of the Santa Ana River is listed as an impaired water body for pathogens on the 2022 CWA Section 303(d) List of Water Quality Limited Segments Being Addressed by USEPA Approved TMDLS (Appendix H). Currently, the site is approximately 56 percent impervious (Appendix I). The proposed Project includes development of two Light Industrial Buildings. Building 1 would be 99,990 SF and Building 2 would be 99,950 SF. Additional improvements would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. The proposed Project would add 394,063 SF of impervious area, thereby resulting in an increase in impervious area on the site from 56 percent under existing conditions to 89 percent under post-Project conditions. The proposed Project would have approximately 5 percent of the Project site as pervious landscaping. Landscape and irrigation plans would be submitted to the City during the permitting process and must include

plants approved by the City in order to ensure the use of low-water plants and follow local and State requirements for efficient water use. Therefore, adherence to local and State requirements, as confirmed during the permitting process, would reduce the use of groundwater and maximize infiltration.

Increases in impervious surface area would result in an increase in the volume and flow rate of surface runoff and potential pollutants from vehicles. Operation of the proposed land uses could generate pollutants including trash, debris, oil residue, and other residue that could be deposited on streets, sidewalks, driveways, paved areas, and other surfaces and wash into receiving waters. The pollutants that could be released include bacteria, nutrients, oil and grease, metals, organics, and pesticides. Nutrients in post-construction stormwater include nitrogen and phosphorous from fertilizers from landscaping areas. Excess nutrients can impact water quality by promoting excessive and/or rapid growth of aquatic vegetation and algae growth, which reduces water clarity and results in oxygen depletion. Pesticides can be toxic to aquatic organisms and bioaccumulate in larger species such as birds and fish and result in harmful effects. Oil and grease may end up in stormwater from leaking vehicles, and metals may enter stormwater as surfaces corrode, decay, or leach and from roadway runoff. Pollutants have the potential to further exacerbate existing impairments of local water bodies.

Under existing conditions, stormwater on the northern portion of the site is directed to on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue, while stormwater flow for the southern portion of the site is overland flow that is generally conveyed towards Kansas Avenue. Thus, the existing on-site stormwater infrastructure transports flow to the stormwater drain with little to no infiltration or pollutant removal. The proposed Project would collect drainage via grate inlets and catch basins, which would convey storm water to an on-site underground storm drain system. The storm drain system would discharge to two proposed on-site underground detention/infiltration systems, which would filter the pollutants and infiltrate stormwater into the site soils. Detention/infiltration System A would be located underneath the passenger drive aisle in the northwest portion of the site and would direct overflow to Roberta Street. Detention/infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic feet per second (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing off-site flows (Appendix I, Page 5). Therefore, even with the potential increase in pollutants due the proposed Project, the proposed Project would provide improved infiltration compared to existing conditions.

The proposed storm drainage system would be designed to meet the regional low impact development (LID) structural treatment control best management practices. In compliance with the NPDES MS4 Permit and the City's Municipal Code Chapter 14.12, development projects are required to implement a WQMP, included as PPP HYD-2. Source control BMPs and LID BMPs included in the WQMP would avoid potential quality degradation of receiving waters resulting from the proposed Project. As part of the permitting approval process, construction plans would be required to demonstrate compliance with these regulations. Plans for grading, drainage, erosion control, and water quality would be reviewed by the City's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs in the WQMP are constructed during implementation of the Project. A WQMP (included as Appendix H) has been prepared per these requirements and it includes various BMPs that would be implemented as part of the Project, as shown in Table 5.10-1.

Table 5.10-1: Permanent and Operational Source Control Measures

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
On-site storm drain	Mark all inlets with the words "Only Rain Down the Storm Drain" or similar. Catch Basin Markers may be available from the	• Maintain and periodically repaint or replace inlet markings.

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
	Riverside County Flood Control and Water Conservation District, call 951.955.1200 to verify.	• Provide stormwater pollution prevention information to new site owners, lessees, or operators. • See applicable operational BMPs in Fact Sheet SC-44, "Drainage System Maintenance," in the CASQA Stormwater Quality Handbooks at www.cabmphandbooks.com. • Include the following in lease agreements: "Tenant shall not allow anyone to discharge anything to storm drains or to store or deposit materials so as to create a potential discharge to storm drains."
Landscape/ Outdoor Pesticide Use	• Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to stormwater pollution. • Where landscaped areas are used to retain or detain stormwater, specify plants that are tolerant of saturated soil conditions. • Consider using pest-resistant plants, especially adjacent to hardscape. • To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.	• Maintain landscaping using minimum or no pesticides. • See applicable operational BMPs in "What you should know for…..Landscape and Gardening" at http://rcflood.org/stormwater/. • Provide IPM information to new owners, lessees and operators.
Refuse areas	• State how site refuse will be handled and provide supporting detail to what is shown on plans. • State that signs will be posted on or near dumpsters with the words "Do not dump hazardous materials here" or similar.	• Provide adequate number of receptacles. • Inspect receptacles regularly; repair or replace leaky receptacles. • Keep receptacles covered. • Prohibit/prevent dumping of liquid or hazardous wastes. • Post "no hazardous materials" signs. • Inspect and pick up litter daily and clean up spills immediately. • Keep spill control materials available on-site. • See Fact Sheet SC-34, "Waste Handling and Disposal" in the CASQA Stormwater Quality

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
		Handbooks at www.cabmphandbooks.com.
Loading Docks	None	• Move loaded and unloaded items indoors as soon as possible. • See Fact Sheet SC-30, "Outdoor Loading and Unloading," in the CASQA Stormwater Quality Handbooks at www.cabmphandbooks.com.
Plazas, sidewalks, and parking lots	None	• Sweep plazas, sidewalks, and parking lots regularly to prevent accumulation of litter and debris. • Collect debris from pressure washing to prevent entry into the storm drain system. • Collect washwater containing any cleaning agent or degreaser and discharge to the sanitary sewer not to a storm drain.

Source: WQMP (Appendix H)

Overall, compliance with existing laws and regulations and implementation of the WQMP (included as PPP HYD-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality. Therefore, impacts related to degradation of water quality during operations would be **less than significant**.

THRESHOLD B: WOULD THE PROJECT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN?

The Project site lies within the boundaries of the Upper Santa Ana Valley Groundwater Basin and is underlain by the adjudicated portion (Riverside Basin) of the Riverside-Arlington Groundwater Subbasin. The Sustainable Groundwater Management Act (SGMA) of 2014 created a statewide framework to help protect groundwater resources over the long-term. SGMA is comprised from a three-bill legislative package, including AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), and subsequent statewide regulations. SGMA requires local agencies to form Groundwater Sustainability Agencies (GSAs) for high and medium priority basins. GSAs are required to then develop and implement Groundwater Sustainability Plans (GSPs) to avoid undesirable results and mitigate overdraft within 20 years. Low priority basins are not required to form GSAs or GSPs at this time. The Riverside-Arlington Groundwater Subbasin has been identified by the DWR as a very low-priority groundwater basin that is not required to form a GSA or GSP. Additionally, the Riverside Basin of the Riverside-Arlington Groundwater Subbasin is exempt from this requirement due to the adjudication. Therefore, the proposed Project would not conflict with the SGMA.

RPU provides water service to most of the City, including the Project site. RPU's primary source of water supply is local groundwater. Most of RPU's groundwater comes from basins that have already been adjudicated. The water that would be provided to the Project would be through RPU and at adjudicated quantities. Therefore, the proposed Project would not conflict with the groundwater basin adjudications and would not impede existing groundwater management. Thus, the proposed Project would not substantially decrease groundwater supplies.

As previously analyzed under Threshold A, development of the proposed Project would result in 394,063 SF of impervious area. This represents an increase in the impervious area of the site from 56 percent under existing conditions to 89 percent under post-Project conditions. Runoff from the site would be collected via grate inlets and catch basins and conveyed into a network of storm drain pipes that eventually connect to two on-site underground detention/infiltration systems, which would filter the pollutants and infiltrate stormwater into the site soils and potentially groundwater. Detention/infiltration System A would be located underneath the passenger drive aisle in the northwest portion of the site and would direct overflow to Roberta Street. Detention/infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cfs on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing off-site flows (Appendix I, Page 5). A WQMP (included as Appendix H) has been prepared for the proposed Project and it includes various BMPs to be incorporated into the Project design to protect water quality and increase the infiltration rate within the site. The proposed stormwater system would provide improved infiltration and groundwater recharge capabilities compared to existing conditions. Therefore, the Project would not substantially impede groundwater recharge of the Project site.

Compliance with the NPDES MS4 Permit requirements, the City's Municipal Code, and other applicable requirements implemented through the WQMP would be verified during the Project permitting process. Therefore, the Project would not decrease groundwater supplies or interfere with groundwater recharge, and impacts would be **less than significant**.

THRESHOLD C: WOULD THE PROJECT 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 RESULT IN A SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?

Construction

Construction of the Project would require site clearing and grading. Excavation, grading, and other site preparation activities would loosen soils, which has the potential to result in erosion and the loss of topsoil. Also, the Project site is generally flat and does not contain substantial slopes that could induce erosion or siltation, which refers to the accumulation of silt (fine particles of sand, mud, and other materials) in a body of water. As discussed above, the existing NPDES Construction General Permit, as included as PPP HYD-1, requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for construction activities that disturb one-acre or more of soils. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be **less than significant**.

Operation

The existing drainage pattern for the site generally flows from southeast to northwest. Runoff from the site would be collected via grate inlets and catch basins and conveyed into a network of storm drain pipes that eventually connect to two on-site underground infiltration systems. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be

conveyed to Kansas Avenue. In the post-Project condition, the drainage characteristics would be maintained as similar to the pre-Project condition.

The Project site would be mostly developed with impervious surfaces and on-site landscaping, which would reduce the potential for erosion or siltation on site. As previously discussed, the Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to NPDES MS4 Permit requirements, thereby reducing off-site stormwater flows. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that they meet the NPDES MS4 Permit and limit the potential for erosion and siltation. Therefore, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be **less than significant**.

THRESHOLD D: WOULD THE PROJECT 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 SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE?

Construction

Construction of the proposed Project would include activities that could temporarily alter the existing drainage pattern of the site, for example by constructing foundations and paved areas, and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of the Project requires a SWPPP that would address site-specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes diverting runoff from rooftops and other impervious surfaces to vegetated areas, when possible, to promote infiltration and controlling the perimeter of site using sandbags, berms, and silt fencing. These regulations would ensure that the rate or amount of surface runoff would not substantially increase during the construction phase relative to existing conditions. Therefore, impacts related to rate or amount of surface runoff would be **less than significant**.

Operation

As described previously, the proposed Project would result in an increase in impervious areas on-site. As a result, the Project would increase surface flows compared to existing conditions. However, the proposed Project includes installation of new stormwater drainage facilities, including two underground infiltration systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect on-site flows via grate inlets and catch basins.

Proposed on-site drainage infrastructure has capacity to retain peak flows from a 100-year storm event, consistent with the NPDES MS4 Permit requirements. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the on-site infiltration systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the off-site drainage system. In the current condition, the existing 100-year, 3-hour flow is 4.56 cfs on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing off-site flows (Appendix I, Page 5). As a result, the flow rates would be lower (improved) with the proposed Project as compared to existing conditions. As previously discussed, the Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to NPDES MS4 Permit requirements, thereby reducing off-site stormwater flows. Thus, the proposed Project is not

anticipated to result in flooding conditions to upstream or downstream properties with the implementation of BMPs identified in the WQMP (Appendix H). As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that they meet the NPDES MS4 Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the NPDES MS4 Permit requirements. Thus, implementation of the Project would not increase the rate or amount of surface runoff and impacts would be **less than significant**.

THRESHOLD E: WOULD THE PROJECT 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 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?

Currently, the Project site is approximately 56 percent impervious (Appendix I). Development of the proposed Project would add 394,063 SF of impervious area, resulting in an increase in the impervious area on the site from 56 percent under existing conditions to 89 percent under post-Project conditions. The existing drainage pattern for the site generally flows from southeast to northwest. Stormwater on the northern portion of the site is directed to on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue. Stormwater flow for the southern portion of the site is overland flow that is generally conveyed in the southeast-to-northwest direction towards Kansas Avenue.

The proposed underground infiltration systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the off-site drainage system. The proposed drainage facilities have been sized to adequately accommodate the stormwater flows from the proposed development and are consistent with the City's drainage plans and NPDES MS4 Permit requirements, with a capacity to retain peak flows from a 100-year storm event. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue.. Implementation of the Project would maintain existing drainage patterns of the Project site. As described above, the flow rates will be lower (improved) with the proposed Project as compared to existing conditions. As such, compared to the existing condition, the proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

The WQMP (Appendix H) prepared for the proposed Project includes various BMPs to be incorporated into the Project design to protect water quality. Therefore, the proposed Project is not anticipated to result in flooding conditions or substantial additional sources of polluted runoff to upstream or downstream properties with implementation of BMPs identified in the WQMP (Appendix H). In addition, as part of the permitting and approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the NPDES MS4 Permit requirements and would not result in flood impacts.

Overall, the proposed drainage improvements would be consistent with City standards and NPDES MS4 Permit requirements. Therefore, implementation of the Project would not substantially increase the rate or amount of surface runoff, such that flooding would occur and impacts would be **less than significant**.

THRESHOLD F: WOULD THE PROJECT 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 IMPEDE OR REDIRECT FLOOD FLOWS?

Construction

As described above, the Project site generally drains from southeast to northwest. Implementation of the Project would maintain existing drainage patterns of the Project site, for example by constructing foundations and paved areas, and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of the Project requires a SWPPP that would address site specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the NPDES MS4 Permit and a SWPPP, as verified by the City through the construction permitting process, would prevent construction-related impacts related to potential impediment or redirection of flood flows. Therefore, Project impacts would be **less than significant**.

Operation

Per the FEMA's Flood Map Service Center, the Project is within Zone X, an area determined to be outside of the 0.2 percent annual chance floodplain (Map Number 06065C0726H). As described previously, the proposed Project would result in an increase in impervious areas. As a result, the Project would increase surface flows compared to existing conditions. However, the proposed Project would include installation of new stormwater drainage facilities, including two underground infiltration systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect on-site flows via grate inlets and catch basins. Proposed on-site drainage infrastructure has capacity to retain peak flows from a 100-year storm event, consistent with the NPDES MS4 Permit requirement. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the underground infiltration systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the off-site drainage system. The proposed flowrate would be lower than the existing flowrate. In addition, the drainage system would be designed consistent with NPDES MS4 Permit standards. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that they meet the NDPDES MS4 Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the NPDES MS4 Permit requirements. The Project site is not within an existing floodplain and would not contribute to increased flooding. Thus, implementation of the Project would not impede or redirect flood flows and impacts would be **less than significant**.

THRESHOLD G: WOULD THE PROJECT, IN FLOOD HAZARD, TSUNAMI, OR SEICHE ZONES, RISK RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION?

According to the FIRM published by FEMA (06065C0726H), the Project site is located in "Zone X", which is an area located outside of the 100-year and 500-year flood plains (Federal Emergency Management Agency, 2024). Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur. Additionally, the Project site does not contain nor is it adjacent to any water bodies that could seiche. The nearest body of water is the Santa Ana River, approximately 1.8 miles to the west, which is not a contained body of water with seiche potential. Therefore, the Project would not result in release of pollutants due to Project inundation in flood hazards, tsunami, or seiche zones and there would be **no impact**.

THRESHOLD H: WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN?

The site is approximately 56 percent impervious under existing conditions (Appendix I). Development of the proposed Project would add 394,063 SF of impervious area, resulting in an increase in the impervious area on the site from 56 percent under existing conditions to 89 percent under post-Project conditions. As described above, the proposed storm drain system would be sized to adequately accommodate increased stormwater flows from the Project area and would maintain the existing drainage pattern of the site. Runoff would discharge and be treated into the two underground infiltration systems on-site that would filter and infiltrate stormwater into the site soils and potentially the groundwater.

The Project site lies within the Riverside Basin of the Riverside-Arlington Groundwater Subbasin. As discussed under Threshold B, the Riverside Basin of the Riverside-Arlington Groundwater Subbasin is adjudicated, and therefore, is exempt from SGMA's requirement to form a GSA or GSP. Therefore, the Project would not conflict with or obstruct implementation of the SGMA.

The City is within the jurisdiction of the Santa Ana RWQCB (Region 8). The Santa Ana RWQCB sets water quality standards for all ground and surface waters within its region through implementation of a Water Quality Control Plan (Basin Plan). This Basin Plan gives direction on the beneficial uses of the State waters within Region 8, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the established standards. The NPDES MS4 Permit, incorporated in the City's Municipal Code Chapter 14.12, requires development projects to prepare and implement a WQMP, which is included as PPP HYD-2. The WQMPs are required to include BMPs for source control, site design, and treatment control. The WQMP would be reviewed and approved by the City's Public Works Department prior to issuance of grading permits to ensure compliance. The City's permitting process would ensure that all BMPs in the WQMP are constructed during implementation of the Project. Therefore, the Project would not conflict with or obstruct implementation of the Basin Plan.

Overall, the Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan, resulting in a **less than significant impact**.

5.10.7 CUMULATIVE IMPACTS

The areas considered for cumulative impacts to hydrology and water quality are the Middle Santa Ana River Watershed for drainage and water quality impacts, and the Riverside-Arlington Groundwater Subbasin for groundwater impacts.

Water Quality: The geographic scope for cumulative impacts related to hydrology and water quality includes the Middle Santa Ana River watershed because cumulative projects and developments pursuant to the proposed Project could incrementally exacerbate the existing impaired condition and could result in new pollutant-related impairments.

Related developments located within the Middle Santa Ana River Watershed and the Riverside-Arlington Groundwater Subbasin, such as those listed in Table 5-1 of Chapter 5.0, *Environmental Impact Analysis*, would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a WQMP (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration. The NPDES permit requirements have been set by the SWRCB and implemented by the Santa Ana RWQCB (and Riverside Municipal Code) to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the

watershed would not be cumulatively considerable upon compliance with all applicable laws, permits, ordinances and plans. As detailed previously, the proposed Project would be implemented in compliance with all regulations, as would be verified during the permitting process. Therefore, the incremental effects of the proposed Project related to water quality would not be cumulatively considerable and impacts would be **less than significant**.

Drainage: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above the proposed Project includes installation of two underground infiltration systems that would retain, slow, filter, and infiltrate peak flows of a 100-year storm event. These facilities would retain runoff and reduce erosion and siltation. In addition, pursuant to State and regional regulations that require development projects to maintain pre-project hydrology, no net increase of off-site stormwater flows would occur. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively combine to impact erosion, siltation, flooding, and water quality. Thus, the incremental effects of the proposed Project related to drainage would not be cumulatively considerable and impacts would be **less than significant**.

Groundwater Basin: The geographic scope for cumulative impacts related to the groundwater basin is the Riverside-Arlington Groundwater Subbasin. As described above, the proposed Project includes installation of underground infiltration systems that would recharge stormwater into the groundwater basin. In addition, the volume of water that would be needed by the Project is within the anticipated groundwater pumping volumes since the basin is adjudicated. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. As a result, the proposed Project would not generate impacts related to the groundwater basin that have the potential to combine with effects from other projects to become cumulatively considerable. Therefore, the incremental effects of the proposed Project related to the groundwater basin would not be cumulatively considerable and impacts would be **less than significant**.

5.10.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- Construction General Permit, Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ
- California Water Resources Control Board Low Impact Development (LID) Policy
- Santa Ana Region MS4 permit (Order No. R8-2010-0033)
- City Municipal Code Chapter 14.12, *Discharges of Wastes into the Public Sewer and Pollutants into the Storm Drain Systems*, *Chapter* 16.18, *Flood Hazard Areas and Implementation of National Flood Insurance Program*, Chapter 17.16, *Grading Permit Application Requirements*, and Chapter 19.570*, Water Efficient Landscaping and Irrigation*.

Plans Programs and Policies

The following PPPs would reduce impacts related to hydrology and water quality. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by

developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: WQMP. Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.10.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Thresholds A, B, C, D, E, F, and H would be less than significant. Threshold G would have no impact.

5.10.10 MITIGATION MEASURES

No mitigation measures are required.

5.10.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts related to hydrology and water quality would occur. Impacts would be less than significant.

5.10.12 REFERENCES

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5.11 Land Use and Planning

5.11.1 INTRODUCTION

This section describes the existing land use and planning conditions of the Project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts. Information contained in this section is based on review of local, regional, and statewide policies and regulations encompassing the Project site, including:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code
- Southern California Association of Governments *Connect SoCal Regional Transportation Plan/Sustainable Communities Plan*, adopted 2020

5.11.2 REGULATORY SETTING

5.11.2.1 State Regulations

California Planning and Zoning Law

The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000-66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals.

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. An in-depth discussion of SB 743 is provided in Section 5.14, *Transportation*. In summary, SB 743 changes the focus of environmental review of transportation impacts. In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using levels of service (LOS). Under SB 743, LOS can no longer be used to determine

significant transportation impacts under CEQA. The State CEQA Guidelines were updated in 2018 to require use of the vehicle miles traveled (VMT) methodology for assessing transportation impacts.

5.11.2.2 Regional Regulations

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization (MPO) for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City of Riverside is one of the many jurisdictions that fall under SCAG. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (also known as *Connect SoCal*) was adopted on September 3, 2020, and presents the land use and transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region's challenges (Southern California Association of Governments, 2020). The RTP/SCS explicitly lays out goals related to housing, transportation, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The RTP/SCS development process involved working closely with local governments throughout the region to collect and compile data on land use and growth trends. The core vision of the RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan

The March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP) was adopted by the Riverside County Airport Land Use Commission (RCALUC) in November 2014 (Riverside County Airport Land Use Commission, 2014). The purpose of the ALUCP is to promote compatibility between March Air Reserve Base/Inland Port (March ARB/IP) Airport and the land uses that surround the joint-use airport, to the extent such areas are not already devoted to incompatible land uses. The basic function of the airport land use compatibility plans is to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development.

5.11.2.3 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following policies related to land use and planning that are applicable to the Project (City of Riverside, 2007a):

Land Use and Urban Design Element

Policy LU-4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.

Policy LU-7.4: Continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Policy LU-9.3 Designate areas for urban land uses where adequate urban levels of public facilities and services exist or are planned, in accordance with the public facilities and service provisions policies of this General Plan.

Policy LU-22.5: Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted in the Public Safety Element (Figure PS-6A – Riverside Municipal and Flabob Airport Safety Zones and Influence Areas; and Figure PS-6B – March ARB/IPA Airport Safety Zones and Influence Areas) for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.

Policy LU-22.9: All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.

Policy LU-27.1: Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.

Policy LU-27.4: Encourage trees on private property to add to the City's urban forest.

Circulation and Community Mobility Element

Policy CCM-5.1: Coordinate impacts of new roadway connections with adjacent cities and Riverside County to ensure consistency in design and operations of the new facilities and connections.

Policy CCM-5.2: Support implementation of the SCAG Regional Transportation Plan.

Policy CCM-6.1: Encourage the reduction of vehicle miles, reduce the total number of daily peak hour vehicular trips, increase the vehicle occupancy rate and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD and County of Riverside TDM Guidelines.

Policy CCM-7.4: Limit local roadway improvements to those that are necessary to support proposed General Plan land uses.

Policy CCM-9.1: Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors.

Policy CCM-9.5: Incorporate facilities for transit and other alternative modes of transportation, such as park-and-ride lots and bus turnouts, in the design of future developments.

Policy CCM-10.2: Incorporate bicycle and pedestrian trails and bicycle racks in future development projects.

Policy CCM-10.3: Provide properly designed pedestrian facilities for the disabled and senior population to ensure their safety and enhanced mobility as users of streets, roads and highways emphasizing "complete streets" principles.

Policy CCM-10.5: Promote the health benefits of using a bicycle or walking as a means of transportation.

Policy CCM-10.6: Encourage pedestrian travel through the creation of sidewalks and street crossings.

Policy CCM-11.1: Protect flight paths from encroachment by inappropriate development using the Riverside County Airport Land Use Compatibility Plan and the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan to determine the consistency of proposed development.

Policy CCM-11.2: Limit building heights and land use intensities beneath airport approaches and departure paths to protect public safety consistent with the Riverside County Airport Land Use Compatibility Plan, the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, and all other applicable State and Federal regulations.

Policy CCM-12.1: Discourage the use of public streets for heavy freight loading and unloading.

Policy CCM-12.2: Ensure that new development projects provide adequate truck loading and unloading facilities.

Policy CCM-12.4: Strive to minimize through truck traffic in residential areas, and enforce City codes that restrict trucks on certain streets.

Policy CCM-13.1: Ensure that new development provides adequate parking.

Noise Element

Policy N-1.2: Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code.

Policy N-1.3: Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.

Policy N-1.4: Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.

Policy N-1.8: Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.

Policy N-2.1: Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Figure N–10 – Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions.

Policy N-2.5: Utilize the Airport Protection Overlay Zone, as appropriate, to advise landowners of special noise considerations associated with their development.

Policy N-4.1: Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).

Open Space and Conservation Element

Policy OS-1.6: Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections.

Policy OS-5.1: Preserve significant habitat and environmentally sensitive areas, including hillsides, rock outcroppings, creeks, streams, viewsheds and arroyos through application of the RC Zone standards and the Hillside/Arroyo standards of the City's Grading Code.

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.

Policy OS-5.4: Protect native plant communities in the General Plan Area, including sage scrub, riparian areas and vernal pools, consistent with the MSHCP.

Policy OS-8.1: Support the development and use of non-polluting, renewable energy sources.

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

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

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

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

Policy OS-10.6: Continue to enforce RWQCB regulations regarding urban runoff.

Policy OS-10.9: Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in stormwater runoff and provide groundwater percolation zones.

Air Quality Element

Policy AQ-1.3: Separate, buffer and protect sensitive receptors from significant sources of pollution to the greatest extent possible.

Policy AQ-1.20: Create the maximum possible opportunities for bicycles as an alternative work transportation mode.

Policy AQ-1.21: Cooperate and participate in regional air quality management plans, programs and enforcement measures.

Policy AQ-1.22: Implement the required components of the Congestion Management Plan (CMP) and continue to work with Riverside County Transportation Commission on annual updates to the CMP.

Policy AQ-2.3: Cooperate with local, regional, State and Federal jurisdictions to reduce vehicle miles traveled (VMT) and motor vehicle emissions through job creation in job-poor areas.

Policy AQ-2.4: Monitor and strive to achieve performance goals and/or VMT reduction which are consistent with SCAG's goals.

Policy AQ-2.24: Support full compliance with the SCAQMD's Clean Fleet Rules.

Policy AQ-3.4: Require projects to mitigate, to the extent feasible, anticipated emissions which exceed AQMP Guidelines.

Policy AQ-3.6: Support "green" building codes that require air conditioning/filtration installation, upgrades or improvements for all buildings, but particularly for those associated with sensitive receptors.

Policy AQ-3.7: Require use of pollution control measures for stationary and area sources through the use of best available control activities, fuel/material substitution, cleaner fuel alternatives, product reformulation, change in work practices and of control measures identified in the latest AQMP.

Policy AQ-4.1: Identify and monitor sources, enforce existing regulations and promote stronger controls to reduce particulate matter (e.g., require clean fuels for street sweepers and trash trucks, exceed the AQMD requirements for fleet rules).

Policy AQ-4.2: Reduce particulate matter from agriculture (e.g., require use of clean non-diesel equipment and particulate traps), construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way and off-road vehicles to the extent possible, as provided in SCAQMD Rule 403.

Policy AQ-4.3: Support the reduction of all particulates potential sources.

Policy AQ-4.5: Require the suspension of all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

Policy AQ-4.6: Cooperate with local, regional, State and Federal jurisdictions to better control particulate matter.

Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.

Policy AQ-7.1: Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.

Policy AQ-7.9: Adhere with Federal, State and regional air quality laws, specifically with Government Code Section 65850.2, which requires that each owner or authorized agent of a project indicate, on the development or building permit for the project, whether he/she will need to comply with the requirements for a permit for construction or modification from the SCAQMD.

Policy AQ-7.10: Incorporate, to the extent applicable and permitted by law, current and proposed AQMP measures.

Public Facilities and Infrastructure Element

Policy PF-1.1: Coordinate the demands of new development with the capacity of the water system.

Policy PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.

Policy PF-1.5: Implement water conservation programs aimed at reducing demands from new and existing development.

Policy PF-1.7: Protect local groundwater resources from localized and regional contamination sources such as septic tanks, underground storage tanks, industrial businesses and urban runoff.

Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system.

Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.

Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

Policy PF-6.1: Continue to support the development of green power and expand the use of green power in the City's energy portfolio.

Policy PF-6.3: Promote and encourage energy conservation.

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

Policy PF-6.5: Promote green building design.

Historic Preservation Element

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

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

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

City of Riverside Phase I General Plan Update

The City of Riverside Phase I General Plan Update (adopted 2021) contains the following policies related to land use and planning that are applicable to the Project (City of Riverside, 2021):

Public Safety Element

Policy PSE-1: Natural Hazards. Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding, drought, and structural and wildland fires.

Policy PSE-2: Hazardous Materials. Minimize the risk of potential hazards associated with management and transport of hazardous materials.

Policy PSE-3: Transportation. Minimize the risk of potential hazards associated with air and ground transportation.

Environmental Justice Element

Policy N-EJ-1.0: Noise. With a particular focus on environmental justice communities, reduce noise pollution by enforcing noise reduction and control measures within and adjacent to residential neighborhoods.

Policy AQ-EJ-1.0 Air Quality. Ensure that land use decisions, including enforcement actions, are made in an equitable fashion to protect residents and workers in environmental justice communities from the short- and long-term effects of air pollution.

City of Riverside Municipal Code

Title 16 – Building and Construction. The purpose of Title 16 is to provide minimum standards to safeguard life or limb, health, property and public welfare by regulating the design, construction, quality of materials, use and occupancy, location and maintenance of buildings, equipment, structures and grading within the City; the electrical, plumbing, heating, comfort cooling and certain other equipment specifically regulated in the City.

Title 17 – Grading Code. This title sets forth rules and regulations placed on grading to control erosion, grading, and earthwork construction, including fills and embankments. One of the purposes of the Grading Code is to regulate grading in a manner that minimizes the adverse effects of grading on natural landforms, soil erosion, dust control, water runoff, and construction equipment emissions.

Title 19 – Zoning Code. Title 19, Zoning Code, is a key tool to implement the policies of the 2025 General Plan. Many of the goals, policies, and actions of the 2025 General Plan are achieved through zoning, which regulates public and private development. The Zoning Code contains the regulatory framework that specifies allowable uses for property and development intensities; the technical standards such as site layout, building setbacks, heights, lot coverage, parking, etc.; and the aesthetic impacts related to physical appearance, landscaping, lighting; site design, building design are aspects of the Zoning Code.

Riverside Citywide Design Guidelines and Sign Guidelines

The City of Riverside adopted the Citywide Design Guidelines and Sign Guidelines in November 2007 which was later amended in January 2019 (City of Riverside, 2007b). The purpose of these guidelines is to reinforce the physical image of Riverside, which reflects the prosperity, well-being, and the value and contribution of agriculture, cultural diversity, industry and manufacturing, education, and architectural heritage of the City. The physical image of Riverside provides an aesthetic that attracts the City's work force, employers, residents, and visitors. The guidelines work to reinforce this physical image of Riverside and are intended to promote quality, well-designed development throughout Riverside that enhances existing neighborhoods, creates identity, and improves the overall quality of life within the City by promoting a desired level of future development within the City.

5.11.3 ENVIRONMENTAL SETTING

5.11.3.1 Existing Project Site Conditions

The 14.42-acre Project site is identified by Assessor's Parcel Numbers (APNs) 210-130-015, -16, and -20. APN 210-130-015 (2626 Kansas Avenue) is currently developed with a commercial/industrial business, NewBasis, Inc., which is a concrete, polymer, and fiberglass products manufacturing business. APN 210-130-015 includes two structures that total approximately 99,850 square feet (SF). APN 210-130-016 (2069 Massachusetts Avenue) is currently used for bus parking and storage. The surface of APN 210-130-016 consists of imported gravel that has been compacted over time and has resulted in a hardpacked ground surface that allows patchy vegetation to grow through cracks in the surface. APN 210-130-020 (1989 Massachusetts Avenue) currently operates as a bus parking and storage yard and contains two buildings totaling approximately 11,000 SF. Ornamental landscaping that consists of trees and shrubbery exists along the perimeters of all three parcels. The Project site is relatively flat and has an elevation of approximately 904 feet above mean sea level (AMSL) at the southeast corner to approximately 889 feet AMSL at the northwest corner.

5.11.3.2 Current General Plan Land Use and Zoning Designation

The Project site has a General Plan Land Use designation of Industrial (I). The City of Riverside 2025 General Plan states that the primary intent of the Industrial (I) land use designation is to allow for manufacturing and wholesaling; support commercial uses; and warehouse and distribution facilities only at specific locations. Table LU-3 of the City of Riverside 2025 General Plan identifies the Industrial (I) designation as allowing a maximum floor area ratio (FAR) of 0.6.

The Project site is zoned I – General Industrial. The purpose of the I – General Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities.

The site is also within the Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is located within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The EE promotes high-intensity vertical mix of office, clean and green industrial, educational, and hospitality uses to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. The HE accommodates primarily residential housing development supported by ground-floor neighborhood-serving commercial uses and live work opportunities, with limited industrial functions.

The Project's site existing land use designation and zoning are shown in Figure 3-5, *Existing Land Use*, Figure 3-6, *Existing Zoning*, and Figure 3-7, *Existing Innovation District Overlay Zoning Designation*, in Section 3.0, *Project Description*.

5.11.3.3 Airports

The Project site is approximately 2.9 miles east of the Flabob Airport, approximately 4.9 miles northeast of the Riverside Municipal Airport, and approximately 7.9 miles northwest of March ARB/IP Airport. As shown in Figure 5.9-1, *Airport Land Use Compatibility Map*, in Section 5.9, *Hazards and Hazardous Materials*, the Project site located within Zone E of the March ARB/IP Airport Influence Area. Zone E prohibits uses that are hazards to flights, such as physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations (Riverside County Airport Land Use Commission, 2014).

5.11.3.4 Surrounding Land Uses

The Project site is located within a developed area. Specific land uses located in the immediate vicinity of the Project site include the following:

- North: Industrial (manufacturing) uses and a former single-family residence.
- East: Housing assistance services/shelter and a manufacturing use.
- South: Industrial (manufacturing) uses.
- West: Industrial (manufacturing) uses.

5.11.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold A Physically divide an established community.

Threshold 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.

5.11.5 METHODOLOGY

The evaluation of impacts to land use and planning is based on the potential of the Project to physically divide an established community and a comparison of the Project to the applicable plans, policies, and regulations to determine if implementation of the Project would conflict with a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

5.11.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?

The physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development were built that was inconsistent with the land uses in the community such that it divided the community.

As described previously, the Project site is currently developed with commercial/industrial business and a bus storage yard. The site includes ornamental landscaping that consists of trees and shrubbery along the perimeters of all three parcels. The Project site is bordered by Roberta Street followed by industrial and manufacturing uses and a former single-family residence to the north, a homeless shelter and services building and a manufacturing use to the east, Massachusetts Avenue followed by industrial (manufacturing) warehouses to the south, and Kansas Avenue followed by a recycling center to the west.

The Project would demolish the existing buildings on the site and redevelop 10.21 acres of the site with two industrial warehouse buildings at 99,900 SF and 99,950 SF. As described previously, the Project includes an amendment to the City's zoning code and zoning map to change the site's ID Overlay Zoning subdistrict from EE and HE to Industrial Emphasis (IE) so that the zone is consistent with the proposed industrial buildings and the General Plan. As described under Threshold B below, the proposed Project would be consistent with the existing land use designation and proposed zoning designation. In addition, the proposed Project would not change roadways in a manner that would inhibit access or install any infrastructure that would result in a physical division. The proposed Project includes development of internal roadways and infrastructure that would connect to existing roadways and infrastructure that are adjacent to the site. The proposed Project

also includes sidewalks that would facilitate connections with the surrounding land uses. Therefore, the proposed Project would not physically divide an established community, resulting in **no impact**.

THRESHOLD B: WOULD THE PROJECT 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?

City of Riverside Land Use Plans, Policies, and Regulations. The Project site has a General Plan Land Use designation of Industrial (I). The City of Riverside 2025 General Plan and City of Riverside Phase I General Plan Update contain several goals and policies related to land use and planning that are applicable to the Project. An analysis of the Project's consistency with these goals and policies is provided in Table 5.11-1.

Table 5.11-1: Project Consistency with General Plan Land Use Policies

General Plan Policies	Project Consistency
Land Use and Urban Design Element	
Policy LU-4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.	**Consistent.** As discussed in Section 5.18, *Tribal Cultural Resources*, the City of Riverside engaged in meaningful consultation with Native American Tribes, as required by AB 52. As a result of tribal consultation, the Project includes Mitigation Measure TCR-1 through TCR-4. Mitigation Measure TCR-1 requires that, in the event that there are changes to the Project design, the City contacts the consulting tribes prior to grading permit issuance. Mitigation Measure TCR-2 requires that the developer retains an on-call Project archaeologist. Mitigation Measure TCR-3 sets out procedures for the event that Native American cultural resources are inadvertently discovered. Mitigation Measure TCR-4 requires that a certified archaeologist provides Cultural Sensitivity Training for all construction personnel. With implementation of mitigation measures, impacts to tribal cultural resources were determined to be less-than-significant.
Policy LU-7.4: Continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).	**Consistent.** The Project site is located within the Western Riverside County MSHCP boundaries. As described in Section 5.4, *Biological Resources*, the proposed Project is consistent with the Western Riverside County MSHCP requirements. With the payment of the Local Development Mitigation Fee, the proposed Project would continue to participate in the Western Riverside County MSHCP.
Policy LU-9.3: Designate areas for urban land uses where adequate urban levels of public facilities and services exist or are planned, in accordance with the public facilities and service provisions policies of this General Plan.	**Consistent.** The proposed Project is located with an urban area in the City of Riverside. As described in Section 5.15, *Public Services*, the Project site is adequately served by public services and facilities.
Policy LU-22.5: Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted in the Public Safety Element (Figure PS-6A – Riverside Municipal and Flabob Airport Safety Zones and Influence Areas; and Figure PS-6B – March ARB/IPA Airport Safety Zones and Influence Areas) for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside	**Consistent.** The Project site is approximately 2.9 miles east of the Flabob Airport, approximately 4.9 miles northeast of the Riverside Municipal Airport, and approximately 7.9 miles northwest of March ARB/IP Airport. The Flabob Airport has an easterly runway elevation of 768 feet AMSL. As described in Section 5.9, *Hazards and Hazardous Materials*, on June 11, 2024, an Application for Major Land Use Action Review was submitted to the

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County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.	ALUC for the proposed Project pursuant to ALUC Review Procedures. On July 2, 2024, ALUC determined that FAA review is required for structures exceeding 1,052 feet AMSL at the project's distance from the Flabob Airport runway; however, the proposed building's top elevation is 935 feet AMSL, so FAA Obstruction Evaluation Service review is not warranted. As shown in Figure 5.9-1, *Airport Land Use Compatibility Map*, in Section 5.9, *Hazards and Hazardous Materials*, the Project site is located within Zone E of the March ARB/IP Airport's Airport Influence Area. Zone E prohibits uses that are hazards to flights, such as physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Zone E does not restrict residential density or non-residential intensity. The ALUC Determination Letter dated July 2, 2024, found that the proposed Project is consistent with the ALUCP, subject to conditions. These conditions are included as Mitigation Measures (MMs) HAZ-4 through HAZ-7. With implementation of MMs HAZ-4 through HAZ-7, the proposed Project is consistent with the ALUCP.
Policy LU-22.9: All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.	**Consistent**. As described previously, the Project site is located within Zone E of the March ARB/IP Airport Influence Area. The ALUC Determination Letter dated July 2, 2024, found that the proposed Project is consistent with the ALUCP, subject to conditions. These conditions are included as MMs HAZ-4 through HAZ-7. With implementation of MMs HAZ-4 through HAZ-7, the proposed Project is consistent with the ALUCP.
Policy LU-27.1: Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.	**Consistent**. The Project would include approximately 22,240 SF of ornamental landscaping around the perimeter of the site and in-between parking areas. Landscaping would include 24-inch and 36-inch box trees, 5-gallon shrubs, accents, and groundcover as shown in Figure 3-4, *Conceptual Landscape Plan*.
Policy LU-27.4: Encourage trees on private property to add to the City's urban forest.	**Consistent**. As shown in Figure 3-11, *Conceptual Landscape Plan*, the proposed landscaping would include 24-inch and 36-inch box trees.
Circulation and Community Mobility Element	
Policy CCM-5.1: Coordinate impacts of new roadway connections with adjacent cities and Riverside County to ensure consistency in design and operations of the new facilities and connections.	**Consistent**. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. As described in Section 3.0, *Project Description*, access to the Project site would be provided via five proposed driveways, including two on Roberta Street, two on Kansas Avenue, and one on Massachusetts Avenue. The Project would design and construct internal access roads in accordance with the standards and guidelines contained in the City of Riverside General Plan and the Riverside Municipal Code.
Policy CCM-5.2: Support implementation of the SCAG Regional Transportation Plan.	**Consistent**. As described in Section 5.3, *Air Quality*, the proposed Project would generate growth consistent with the SCAG's growth forecasts contained in the Regional Transportation Plan. Therefore, the Project would not conflict with the SCAG's Regional Transportation Plan.

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Policy CCM-6.1: Encourage the reduction of vehicle miles, reduce the total number of daily peak hour vehicular trips, increase the vehicle occupancy rate and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD and County of Riverside TDM Guidelines.	**Consistent.** The proposed Project is located within walking distance of RTA Bus Routes 1, 10, 13, 14, and 22. The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. In addition, the proposed Project would provide a total of 42 electric vehicle charging station (EVCS) parking spaces (38 EVCS, 2 EVCS Standard Accessible, and 2 EVCS Van Accessible), which will promote the use of electric vehicles by employees and visitors of the site. Therefore, the proposed Project would encourage alternative modes of transportation and electric vehicles, thereby reducing VMT and daily peak hour trips.
Policy CCM-7.4 Limit local roadway improvements to those that are necessary to support proposed General Plan land uses.	**Consistent.** The Project site has a General Plan land use designation Industrial (I). The Project would construct two new industrial buildings that would support warehouse and office uses, consistent with the General Plan land use designation of the site. As described above, the Project would design and construct internal access roads in accordance with the standards and guidelines contained in the City of Riverside General Plan and the Riverside Municipal Code.
Policy CCM-9.1: Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors.	**Consistent.** As described in Section 5.17, *Transportation*, the RTA provides transit services in the City, including the Project site. RTA Bus Route 10 has a stop located 0.4-mile walking distance from the Project site at the intersection of Kansas Avenue and 3rd Street. RTA Bus Routes 1, 14, and 22 have a stop located 0.9-mile walking distance from the Project site at the intersection of Kansas Avenue and University Avenue. RTA Bus Route 13 has a stop located 0.9-mile walking distance from the Project site at the intersection of Atlanta Avenue and Spruce Street. The existing RTA service would allow Project employees and visitors convenient access to public transit.
Policy CCM-9.5: Incorporate facilities for transit and other alternative modes of transportation, such as park-and-ride lots and bus turnouts, in the design of future developments.	**Consistent.** The proposed Project is located within walking distance of RTA Bus Routes 1, 10, 13, 14, and 22. The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. The proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project). Therefore, the proposed Project would encourage alternative modes of transportation.
Policy CCM-10.2: Incorporate bicycle and pedestrian trails and bicycle racks in future development projects.	**Consistent.** The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Additionally, the proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities

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	located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project)for employees and visitors to use.
Policy CCM-10.3: Provide properly designed pedestrian facilities for the disabled and senior population to ensure their safety and enhanced mobility as users of streets, roads and highways emphasizing "complete streets" principles.	**Consistent**. The proposed Project would provide ADA-compliant sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. The proposed sidewalk improvements would be developed in accordance with the City of Riverside General Plan and the Riverside Municipal Code standards and guidelines.
Policy CCM-10.5: Promote the health benefits of using a bicycle or walking as a means of transportation.	**Consistent**. The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Additionally, the proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project) for employees and visitors to use. Therefore, the proposed Project would encourage walking and bicycle use as a means of transportation.
Policy CCM-10.6: Encourage pedestrian travel through the creation of sidewalks and street crossings.	**Consistent**. The proposed Project would provide ADA-compliant sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue.
Policy CCM-11.1: Protect flight paths from encroachment by inappropriate development using the Riverside County Airport Land Use Compatibility Plan and the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan to determine the consistency of proposed development.	**Consistent**. As described previously, the Project site is located within Zone E of the March ARB/IP Airport's Airport Influence Area. Zone E prohibits uses that are hazards to flights, such as physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. The ALUC Determination Letter dated July 2, 2024, found that the proposed Project is consistent with the ALUCP, subject to conditions. These conditions are included as MMs HAZ-4 through HAZ-7. With implementation of MMs HAZ-4 through HAZ-7, the proposed Project is consistent with the ALUCP.
Policy CCM-11.2: Limit building heights and land use intensities beneath airport approaches and departure paths to protect public safety consistent with the Riverside County Airport Land Use Compatibility Plan, the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, and all other applicable State and Federal regulations.	**Consistent**. The Project site is approximately 2.9 miles east of the Flabob Airport. The Flabob Airport has an easterly runway elevation of 768 feet AMSL. As described in Section 5.9, *Hazards and Hazardous Materials*, on June 11, 2024, an Application for Major Land Use Action Review was submitted to the ALUC for the proposed Project pursuant to ALUC Review Procedures. On July 2, 2024, ALUC determined that FAA review is required for structures exceeding 1,052 feet AMSL at the project's distance from the Flabob Airport runway; however, the proposed building's top elevation is 935 feet AMSL, so FAA Obstruction Evaluation Service review is not warranted.
Policy CCM-12.1: Discourage the use of public streets for heavy freight loading and unloading.	**Consistent**. Loading and unloading activities would occur along the southern side of Building 1 and along the northern side of Building 2, within the interior of the Project site and would limit visibility of such activities from the public street, and would not utilize public streets.

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Policy CCM-12.2: Ensure that new development projects provide adequate truck loading and unloading facilities.	**Consistent.** Building 1 would include 17 dock doors located along the southern side of the building and Building 2 would include 22 dock doors located along the northern side of the building. As described in Section 3, *Project Description*, the Project would include more dock doors than are needed for receiving and shipping volumes.
Policy CCM-12.4: Strive to minimize through truck traffic in residential areas, and enforce City codes that restrict trucks on certain streets.	**Consistent.** The Project's truck routes would be consistent with the City of Riverside Municipal Code (§10.56.020 - *Commercial vehicles exceeding 10,000 pounds (5 tons) gross weight prohibited from using certain streets*) which specifies the limits of prohibition for roadway segments within the City of Riverside and would not be residential (EPD Solutions, 2025).
Policy CCM-13.1: Ensure that new development provides adequate parking.	**Consistent.** The Project proposes a total of 261 parking spaces. Building 1 would have 130 spaces and Building 2 would have 131 spaces. As shown in Table 5.1-1, *Project Consistency with Development Standards*, in Section 5.1, *Aesthetics*, the proposed parking spaces would be consistent with the required parking spaces per Riverside Municipal Code Section 19.170.070.
Noise Element	
Policy N-1.2: Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code.	**Consistent.** As described in Section 5.13, *Noise*, the proposed Project would comply with City of Riverside Municipal Code Section 7.25.010, which sets exterior noise level limits; Section 7.30.15, which sets interior noise level limits; and Section 7.35.020, which sets construction noise standards.
Policy N-1.3: Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.	**Consistent.** Construction would occur within the hours allowable by the City of Riverside Municipal Code Section 7.35.020, which states that construction shall occur only between the hours of 7:00 AM and 7:00 PM on weekdays and between the hours of 8:00 AM and 5:00 PM on Saturdays. Construction is not permitted on Sundays or any federal holidays.
Policy N-1.4: Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.	**Consistent.** The proposed Project is designed so that the loading docks would be located between buildings 1 and 2, as shown in Figure 3-8, *Conceptual Site Plan*. Furthermore, after a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible.
Policy N-1.8: Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.	**Consistent.** As discussed in Section 5.13, *Noise*, a Project-specific Noise and Vibration Impact Analysis (Appendix J) was prepared and approved by the City. The Noise and Vibration Impact Analysis (Appendix J) concluded that, with implementation of existing City of Riverside Municipal Code, the Project would result in less-than-significant impact related to noise.
Policy N-2.1: Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Figure N–10 – Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the Riverside County	**Consistent.** The project site is located within Zone E of the March Air Reserve Base/Inland Port Airport Influence Area but outside the 65 dBA CNEL noise contour. Because the Project site is located outside the 65 dBA CNEL airport noise contours, the Project would not be

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Airport Land Use Compatibility Plans) as guides to future planning and development decisions.	adversely affected by airport/airfield noise, nor would the project contribute to or result in adverse airport/airfield noise impacts (Appendix J).
Policy N-4.1: Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).	**Consistent.** As discussed in Section 5.13, Noise, traffic noise levels were analyzed for the proposed Project. The proposed Project would increase noise levels by up to 1.5 dBA CNEL along the road segments in the Project vicinity. A noise level increase of less than 3 dBA would not be perceptible to the human ear and would not exceed the 5 dBA threshold. Therefore, impacts related to vehicular sources of noise would be less-than-significant and mitigation would not be required.
Open Space and Conservation Element	
Policy OS-1.6: Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections.	**Consistent.** The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue to facilitate pedestrian connections. The buildings would establish an architectural presence with the use of landscaping, building layout, finish materials, and accenting. As described in Section 5.1, *Aesthetics*, the proposed Project would be consistent with the existing surrounding visual character.
Policy OS-5.1: Preserve significant habitat and environmentally sensitive areas, including hillsides, rock outcroppings, creeks, streams, viewsheds and arroyos through application of the RC Zone standards and the Hillside/Arroyo standards of the City's Grading Code.	**Consistent.** As described in Section 5.4, *Biological Resources*, the Project site is comprised of disturbed/developed areas that do not include riparian habitats or other sensitive natural communities. Additionally, no sensitive natural communities were observed during the field investigation and presumed to be absent due to lack of suitable habitat.
Policy OS-5.2: Continue to participate in the MSHCP Program and ensure all projects comply with applicable requirements	**Consistent.** The Project site is located within the Western Riverside County MSHCP boundaries. As described in Section 5.4, *Biological Resources*, the proposed Project is consistent with the Western Riverside County MSHCP requirements. With the payment of the Local Development Mitigation Fee, the proposed Project would continue to participate in the Western Riverside County MSHCP.
Policy OS-5.3: Continue to participate in the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan including collection of mitigation fees.	**Consistent.** The City of Riverside is located within the boundary of the SKR HCP. The Project site is not located within a Core Reserve established by the SKR HCP; however, it is within the SKR fee assessment area. The Project applicant is required to pay the SKR Preservation fee in effect at the time a grading permit is issued which is collected per Riverside Municipal Code Section 16.40.040.
Policy OS-5.4: Protect native plant communities in the General Plan Area, including sage scrub, riparian areas and vernal pools, consistent with the MSHCP.	**Consistent.** As described in Section 5.4, *Biological Resources*, no special-status plant species were observed on the Project site during the field investigation. Due to the disturbed and developed nature of the Project site, it does not support suitable habitat for special-status plant species and they are presumed to be absent.
Policy OS-8.1: Support the development and use of non-polluting, renewable energy sources.	**Consistent.** The proposed buildings would be solar ready in compliance with current Title 24 requirements,

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	which would allow for the future installation of rooftop solar.
Policy OS-8.2: Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in existing developments	**Consistent.** As described in Section 5.6, *Energy*, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City of Riverside's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures and occurs during the permitting process, which ensures that all requirements are met.
Policy OS-8.6: Require all new development to incorporate energy efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24.	**Consistent.** As described in Section 5.6, *Energy*, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights.
Policy OS-8.10: Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.	**Consistent.** The proposed Project is located within walking distance of RTA Bus Routes 1, 10, 13, 14, and 22. The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Furthermore, the proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project). Therefore, the proposed Project would encourage alternative modes of transportation to reduce consumption of non-renewable energy supplies.
Policy OS-8.12: Require bicycle parking in new non-residential development.	**Consistent.** The proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project).
Policy OS-10.6: Continue to enforce RWQCB regulations regarding urban runoff.	**Consistent.** As described in Section 5.10, *Hydrology and Water Quality*, the Project would comply with all requirements of the NPDES permit issued by the RWQCB. Compliance with the NPDES requirements would be verified by the City Public Works Department during the permitting process.

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Policy OS-10.9: Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in stormwater runoff and provide groundwater percolation zones.	**Consistent.** The Project would include ornamental landscaping around the perimeter of the site and in-between parking areas. As described in Section 5.10, *Hydrology and Water Quality*, the proposed Project would have approximately 5 percent of the Project site as pervious landscaping.
Air Quality Element	
Policy AQ-1.3: Separate, buffer and protect sensitive receptors from significant sources of pollution to the greatest extent possible.	**Consistent.** The closest sensitive receptors to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site, as shown on Figure 5.3-1, Sensitive Receptors in Section 5.3, Air Quality. As described in Section 5.3, *Air Quality*, Project generated emissions and health risks would not exceed SCAQMD thresholds. Therefore, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations.
Policy AQ-1.20: Create the maximum possible opportunities for bicycles as an alternative work transportation mode.	**Consistent.** The proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project).
Policy AQ-1.21: Cooperate and participate in regional air quality management plans, programs and enforcement measures.	**Consistent.** As described in Section 5.3, *Air Quality*, the Project would be consistent with SCAG's regional growth forecasts, and Project-generated air quality emissions would not exceed thresholds. Therefore, the proposed Project would not result in a conflict with implementation of the AQMP.
Policy AQ-1.22: Implement the required components of the Congestion Management Plan (CMP) and continue to work with Riverside County Transportation Commission on annual updates to the CMP.	**Consistent.** As described previously, the proposed Project is located within walking distance of RTA Bus Routes 1, 10, 13, 14, and 22. The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Furthermore, the proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project). In addition, the proposed Project would provide a total of 42 EVCS parking spaces (38 EVCS, 2 EVCS Standard Accessible, and 2 EVCS Van Accessible). As such, the proposed Project would promote alternative modes of transportation and zero emission vehicles, thereby reducing VMT and associated air quality impacts.
Policy AQ-2.3: Cooperate with local, regional, State and Federal jurisdictions to reduce vehicle miles traveled (VMT) and motor vehicle emissions through job creation in job-poor areas.	**Consistent.** As described in Section 5.14, *Population and Housing*, the City of Riverside is a housing-rich community meaning that more housing is provided than employment opportunities in the area. The proposed Project would create up to 194 jobs in the area.

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Policy AQ-2.4: Monitor and strive to achieve performance goals and/or VMT reduction which are consistent with SCAG's goals.	**Consistent.** As described previously, the proposed Project is located within walking distance of RTA Bus Routes 1, 10, 13, 14, and 22. The proposed Project would provide sidewalks along the Project frontage on Kansas Avenue, Roberta Street, and Massachusetts Avenue. The proposed Project would provide two short-term bicycle parking spaces at each building entrance (for a total of four short-term bicycle parking spaces for the Project) and 6 long-term bicycle parking facilities located on the interior of each building (for a total of 12 long-term bicycle parking facilities for the Project). In addition, the proposed Project would provide a total of 42 EVCS parking spaces (38 EVCS, 2 EVCS Standard Accessible, and 2 EVCS Van Accessible). As such, the proposed Project would promote alternative modes of transportation and zero emission vehicles, thereby reducing VMT.
Policy AQ-2.24: Support full compliance with the SCAQMD's Clean Fleet Rules.	**Consistent.** The SCAQMD Clean Fleet Rules are aimed at reducing emissions from diesel engines and encourage fleet operators to purchase low or zero emission vehicles. The proposed Project would be required to comply with all applicable SCAQMD rules and regulations.
Policy AQ-3.4: Require projects to mitigate, to the extent feasible, anticipated emissions which exceed AQMP Guidelines.	**Consistent.** As discussed in Section 5.3, *Air Quality*, construction and operational emissions generated by the proposed Project would not exceed the SCAQMD's significance thresholds. In addition, the Project would be consistent with SCAG's regional growth forecasts. Therefore, the proposed Project would not conflict with implementation of the AQMP.
Policy AQ-3.6: Support "green" building codes that require air conditioning/filtration installation, upgrades or improvements for all buildings, but particularly for those associated with sensitive receptors.	**Consistent.** As described in Section 5.6, *Energy*, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights.
Policy AQ-3.7: Require use of pollution control measures for stationary and area sources through the use of best available control activities, fuel/material substitution, cleaner fuel alternatives, product reformulation, change in work practices and of control measures identified in the latest AQMP.	**Consistent.** The Project would implement control measures to reduce potential impacts to air quality, including but not limited to limiting idling times of construction vehicles to no more than 5 minutes in accordance with CCR, Title 13, Motor Vehicles, section 2449(d)(3) Idling.
Policy AQ-4.1: Identify and monitor sources, enforce existing regulations and promote stronger controls to reduce particulate matter (e.g., require clean fuels for street sweepers and trash trucks, exceed the AQMD requirements for fleet rules).	**Consistent.** Pursuant to CCR, Title 13, Motor Vehicles, section 2449(d)(3) Idling, the proposed Project would limit idling times of construction vehicles to no more than 5 minutes. In addition, the proposed Project would be required to comply with all applicable SCAQMD rules and regulations, including but not limited to, Clean Fleet Rules.
Policy AQ-4.2: Reduce particulate matter from agriculture (e.g., require use of clean non-diesel	**Consistent.** As described in Section 5.3, *Air Quality*, the proposed Project would comply with the provisions of

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equipment and particulate traps), construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way and off-road vehicles to the extent possible, as provided in SCAQMD Rule 403.	SCAQMD Rule 403, included as PPP AQ-1. SCAQMD Rule 403 requires the use of best available control measures to minimize fugitive dust during construction. Compliance with this rule is achieved through application of measures, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.
Policy AQ-4.3: Support the reduction of all particulates potential sources.	**Consistent.** SCAQMD Rule 403 governs emissions of fugitive dust through application of control measures. As described in Section 5.3, *Air Quality*, the proposed Project would comply with SCAQMD Rule 403, included as PPP AQ-1.
Policy AQ-4.5: Require the suspension of all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.	**Consistent.** As described in Section 5.3, *Air Quality*, the proposed Project would comply with SCAQMD Rule 403, included as PPP AQ-1. In accordance with SCAQMD Rule 403, the proposed Project would suspend all grading activities when wind speeds exceed 25 miles per hour.
Policy AQ-4.6: Cooperate with local, regional, State and Federal jurisdictions to better control particulate matter.	**Consistent.** As described in Section 5.3, *Air Quality*, the proposed Project would comply with SCAQMD Rule 403, included as PPP AQ-1. Compliance with this rule is achieved through application of measures, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.
Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.	**Consistent.** The proposed Project would generate solid waste during construction and operations. All solid waste-generating activities within the City are subject to the requirements set forth in the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the City's development project permitting process.
Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.	**Consistent.** The proposed buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar.
Policy AQ-7.1: Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.	**Consistent.** SCAQMD has adopted rules and regulations to protect and improve air quality. As described in Section 5.3, *Air Quality*, the proposed Project would be required to comply with all applicable SCAMQD rules.
Policy AQ-7.9: Adhere with Federal, State and regional air quality laws, specifically with Government Code Section 65850.2, which requires that each owner or authorized agent of a project indicate, on the	**Consistent.** The proposed Project would be required to obtain all necessary permits from SCAQMD, including a Permit to Construct (SCAQMD Rule 201), and permits for

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development or building permit for the project, whether he/she will need to comply with the requirements for a permit for construction or modification from the SCAQMD.	the proposed diesel pumps and emergency generators (SCAMQD Rule 1470).
Policy AQ-7.10: Incorporate, to the extent applicable and permitted by law, current and proposed AQMP measures.	**Consistent.** As described in Section 5.3, *Air Quality*, the proposed Project would not conflict with implementation of the AQMP measures.
Public Facilities and Infrastructure Element	
Policy PF-1.1: Coordinate the demands of new development with the capacity of the water system.	**Consistent.** Water is supplied to the Project site by Riverside Public Utilities (RPU). The 2020 Urban Water Management Plan (UWMP) assumed that the parcels comprising the Project site would be developed with industrial uses. Consistent with the assumptions in the UWMP, the Project would redevelop a 10.21-acre portion of the Project site with two industrial warehouse buildings totaling 199,850 SF. As described in Section 5.19, *Utilities and Service Systems*, the UWMP found that RPU has an adequate water supply to meet the water demands within its service area through 2045.
Policy PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.	**Consistent.** The Project would be served by RPU and would pay any applicable fees/costs associated with the Project's water service.
Policy PF-1.5: Implement water conservation programs aimed at reducing demands from new and existing development.	**Consistent.** As described in Section 5.19, *Utilities and Service Systems*, the proposed buildings would include plumbing/landscaping fixtures that are compliant with the CALGreen Code for efficient use of water.
Policy PF-1.7: Protect local groundwater resources from localized and regional contamination sources such as septic tanks, underground storage tanks, industrial businesses and urban runoff.	**Consistent.** The Project does not include septic tanks or underground storage tanks. As described in Section 5.10, *Hydrology and Water Quality*, runoff from the site would discharge to two proposed underground detention/infiltration systems, which would filter the pollutants and infiltrate stormwater into the site soils and potentially groundwater.
Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system.	**Consistent.** Wastewater service is provided to the Project site by the City of Riverside Public Works Department and wastewater treatment is provided at the Regional Water Quality Control Plant (RWQCP). The RWQCP has a rated capacity of approximately 46 MGD and a daily average flow of 26 MGD, leaving approximately 20 MGD of wastewater treatment capacity. As described in Section 5.19, *Utilities and Service Systems*, the Project is anticipated to generate 0.01874 million gallons per day (MGD) of wastewater. Implementation of the Project would utilize a nominal percentage of the daily treatment capacity.
Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.	**Consistent.** The Project would be served by the City of Riverside Public Works Department and would pay any applicable fees/costs associated with the Project's wastewater service.
Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.	**Consistent.** As described in Section 5.10, *Hydrology and Water Quality*, the Project would comply with all requirements of the NPDES permit issued by the RWQCB. Compliance with the NPDES requirements would be

General Plan Policies	Project Consistency
	verified by the City Public Works Department during the permitting process.
Policy PF-6.1: Continue to support the development of green power and expand the use of green power in the City's energy portfolio.	**Consistent.** The proposed buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar.
Policy PF-6.3: Promote and encourage energy conservation.	**Consistent.** As described in Section *5.6*, *Energy*, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City of Riverside's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures and occurs during the permitting process, which ensures that all requirements are met.
Policy PF-6.4: Encourage energy-efficient development through its site plan and building design standard guidelines.	**Consistent.** As described in Section *5.6*, *Energy*, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. In compliance with Title 24 requirements, the proposed buildings would be solar ready to allow for the future installation of rooftop solar.
Policy PF-6.5: Promote green building design.	**Consistent.** As described in Section *5.6*, *Energy*, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards. Furthermore, in compliance with Title 24 requirements, the proposed buildings would be solar ready to allow for the future installation of rooftop solar.
Historic Preservation Element	
Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.	**Consistent.** As described in Section *5.5*, *Cultural Resources*, the Project site is relatively low in sensitivity for archaeological resources. Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource. In the event that archaeological resources are encountered during ground-disturbing activities, implementation of MM CUL-1 would reduce impacts to archaeological resources to a less than significant level. As described in Section *5.7*, *Geology and Soils*, the Project site has been heavily disturbed due to past

General Plan Policies	Project Consistency
	grading and development. However, according to the Riverside County Land Information Service Map My County, the Project site is in an area with high paleontological sensitivity. If an unanticipated on-site fossil is encountered during construction, MM GEO-1 would be implemented to reduce impacts to paleontological resources to a less than significant level.
Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.	**Consistent.** The Project site has been heavily disturbed due to past grading and development and does not include any unique geologic features. Currently, the Project site includes non-native ornamental trees along the perimeter. The Project would adhere to the City's Urban Forest Tree Policy Manual for removal and installation of trees on the site.
Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.	**Consistent. .** As discussed in Section 5.18, *Tribal Cultural Resources*, the City of Riverside engaged in meaningful consultation with Native American Tribes, as required by AB 52. As a result of tribal consultation, the Project includes Mitigation Measure TCR-1 through TCR-4. Mitigation Measure TCR-1 requires that, in the event that there are changes to the Project design, the City contacts the consulting tribes prior to grading permit issuance. Mitigation Measure TCR-2 requires that the developer retains an on-call Project archaeologist. Mitigation Measure TCR-3 sets out procedures for the event that Native American cultural resources are inadvertently discovered. Mitigation Measure TCR-4 requires that a certified archaeologist provides Cultural Sensitivity Training for all construction personnel. With implementation of mitigation measures, impacts to tribal cultural resources were determined to be less-than-significant
Public Safety Element	
Policy PSE-1 Natural Hazards: Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding, drought, and structural and wildland fires.	**Consistent**. As described in Section *5.7*, *Geology and Soils*, the risk of seismic hazards would be reduced because the proposed Project would be required to be constructed in compliance with the California Building Standards Code and the City's Municipal Code, which would be verified through the City's plan check and permitting process (PPP GEO-1). As described in Section 5.10, *Hydrology and Water Quality*, the Project is located outside the 100-year and 500-year floodplains and would not result in a flood hazard. As discussed in Section 5.19, *Utilities and Service Systems*, RPU has an adequate water supply to meet demands under all climatic conditions (normal, single-dry, and multiple-dry years) within its service area, which includes the Project site, through 2045. As discussed in Section 5.20, *Wildfire*, the Project is not located within a very high fire hazard severity zone and would not exacerbate wildfire risks.
Policy PSE-2 Hazardous Materials: Minimize the risk of potential hazards associated with management and transport of hazardous materials.	**Consistent**. According to Section *5.9*, *Hazards and Hazardous Materials*, implementation of MMs HAZ-1 through HAZ-3 and mandatory compliance with applicable laws and regulations would reduce impacts related to the routine transport, use, and disposal of

General Plan Policies	Project Consistency
	hazardous materials during construction to a less than significant level. During operations, the routine transport, use, and disposal of acute hazardous materials is not anticipated. Compliance with existing laws and regulations governing routinely used hazardous materials would ensure impacts during Project operations are less than significant.
Policy PSE-3 Transportation: Minimize the risk of potential hazards associated with air and ground transportation.	**Consistent**. The Project site is approximately 2.9 miles east of the Flabob Airport, approximately 4.9 miles northeast of the Riverside Municipal Airport, and approximately 7.9 miles northwest of March ARB/IP Airport. As described in Section 5.9, *Hazards and Hazardous Materials*, with implementation of MMs HAZ-4 through HAZ-7, the proposed Project would not result in safety hazards from being located close to public airports. As described in Section 5.13, *Noise*, the project site is located outside the 65 dBA CNEL airport noise contours; therefore, the Project would not be adversely affected by airport/airfield noise, nor would the project contribute to or result in adverse airport/airfield noise impacts. Furthermore, as described in Section 5.17, *Transportation*, the proposed Project would not conflict with existing transit, bicycle, and pedestrian facilities in the area. Further, the proposed Project would not result in adverse impacts on the City's level of service requirements and would be within the capacity of the existing circulation system.
Environmental Justice	
Policy N-EJ-1.0 Noise: With a particular focus on environmental justice communities, reduce noise pollution by enforcing noise reduction and control measures within and adjacent to residential neighborhoods	**Consistent**. As described in Section 5.13, *Noise*, the proposed Project would comply with City of Riverside Municipal Code Section 7.25.010, which sets exterior noise level limits; Section 7.30.15, which sets interior noise level limits; and Section 7.35.020, which sets construction noise standards. Through implementation of the existing City of Riverside Municipal Code, impacts related to noise would be less-than-significant.
Policy AQ-EJ-1.0 Air Quality: Ensure that land use decisions, including enforcement actions, are made in an equitable fashion to protect residents and workers in environmental justice communities from the short- and long-term effects of air pollution.	**Consistent**. As described in Section 5.3.4, Thresholds of Significance, the closest sensitive receptor to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site. However, this receptor has a maximum stay limit of 90 days. The next closest sensitive receptors to the Project site is a single-family residence, located approximately 212 meters northeast of the Project site. As described in Section 5.3, *Air Quality*, Project generated emissions and health risks would not exceed SCAQMD thresholds. Therefore, the proposed Project would not expose sensitive receptors, including residents and workers in environmental justice communities, to substantial pollutant concentrations.

Source: (City of Riverside, 2007 and 2021)

SCAG Regional Transportation Plan/ Sustainable Communities Strategy Policies. SCAG's RTP/SCS policies focus largely on regional transportation and the efficiency of transportation, which are implemented by counties and cities within the SCAG region, as part of the overall planning and maintenance of the

regional transportation system. The policies are not directly applicable to the Project. An analysis of the Project's consistency with SCAG's goals and policies is provided in Table 5.11-2.

Table 5.11-2: SCAG RTP/SCS Consistency Analysis

RTP/SCS Goal Statements	Project Consistency Discussion
1. Encourage regional economic prosperity and global competitiveness.	**Consistent.** The Project would increase employment opportunities within the City of Riverside and enhance the region's overall economic development and competitiveness.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** As an individual development, the Project is limited in its ability to maximize mobility and access for people and goods in the SCAG region. The Project would not create substantial traffic impediments to the improvement of the accessibility of goods in the region.
3. Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent.** As an individual development, the Project is limited in its ability to ensure security and resilience of the regional transportation system. There are no components of the Project that would result in the deterioration of the transportation system.
4. Increase person and goods movement and travel choices within the transportation system.	**Consistent.** As an individual development, the Project is limited in its ability to maximize the goods movement and travel choices within the SCAG region. The Project would not create substantial traffic impediments and would improve the accessibility of goods to the surrounding area.
5. Reduce greenhouse gas emissions and improve air quality.	**Consistent.** While the Project would not improve air quality, it would not prevent SCAG from implementing actions that would improve air quality within the region. Regulatory requirements are specified to reduce the Project's air quality impacts to the maximum extent feasible, and the Project would incorporate various measures related to building design, landscaping, and energy systems to promote the efficient use of energy, pursuant to Title 24 CALGreen Code and Building Energy Efficiency Standards. Furthermore, the Project could result in potential benefits in the form of contribution to a closer place of employment for Riverside residents, which may reduce significant commuting times in the area.
6. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Consistent.** This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system.

Source: (Southern California Association of Governments, 2020)

As shown in Tables 5.11-1 and 5.11-2, the Project would not conflict with the City's General Plan and SCAG's RTP/SCS and impacts would be **less than significant**.

5.11.7 CUMULATIVE IMPACTS

Cumulative projects in the City of Riverside would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Cumulative projects in the City of Riverside would utilize

regional planning documents such as SCAG's RTP/SCS during planning, and the City of Riverside 2035 General Plan would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in this jurisdiction would be required to comply with the applicable land use plan or they would not be approved without a general plan amendment.

The proposed Project would be consistent with the City of Riverside 2035 General Plan land use designation. Furthermore, the proposed zone change would provide consistency with the General Plan land use designation and development standards of the Overlay Zone subdistrict. Past and present cumulative projects do not involve amendments that would eliminate application of policies that were adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant.

5.11.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- City of Riverside Municipal Code

Plans, Programs, or Policies

- City of Riverside 2025 General Plan
- City of Riverside Phase I General Plan Update
- SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

5.11.9 PROJECT DESIGN FEATURES

None.

5.11.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

There would be no impact under Threshold A. Impacts under Threshold B would be less than significant.

5.11.11 MITIGATION MEASURES

No mitigation measures are required.

5.11.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts related to land use and planning would occur. Impacts would be less than significant.

5.11.13 REFERENCES

City of Riverside. (2007a, November). *Riverside General Plan 2025*. https://riversideca.gov/cedd/planning/city-plans/general-plan-0

City of Riverside. (2007b, November). *Riverside Citywide Design Guidelines and Sign Guidelines*. https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/Citywide_Design_and_Sign_Guidelines_web%20version_Amended%2001-15-19_1.pdf

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Riverside County Airport Land Use Commission. (2014, November). *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan*. https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-PDFGeneral-plan-2014-17---Vol.-1-March-Air-Reserve-Base-Final.pdf

Southern California Association of Governments. (2020, September). *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*. https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020

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5.12 Mineral Resources

5.12.1 INTRODUCTION

This section addresses potential impacts to mineral resources from implementation of the proposed Project. The analysis in this section is based, in part, on the following documents and resources:

- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code

5.12.2 REGULATORY SETTING

5.12.2.1 Federal Regulations

There are no federal regulations concerning mineral resource impacts that are applicable to the Project.

5.12.2.2 State Regulations

Surface Mining and Reclamation Act

The California Department of Conservation has identified sites to which continuing access is important for satisfying mineral production needs of the region and the State, pursuant to the Surface Mining and Reclamation Act of 1975. The relative importance of potential mineral resource sites is indicated by inclusion in one of four mineral resource zones (MRZ) (California Department of Conservation, 2000):

- MRZ-1: Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2a: Areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present. Areas classified as MRZ-2a contain discovered mineral deposits that are either measured or indicated reserves. Land included in MRZ-2a is of prime importance because it contains known economic mineral deposits.
- MRZ-2b: Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present. Areas classified as MRZ-2b contain inferred mineral resources as determined by their lateral extension from proven deposits or their similarity to proven deposits. Further exploration could result in upgrading areas classified MRZ-2b to MRZ-2a.
- MRZ-3a: Areas containing known mineral occurrences of undetermined economic significance.
- MRZ-3b: Areas containing inferred mineral occurrences of undetermined economic significance.
- MRZ-4: Areas in which there is not enough information to assign it to another MRZ.

5.12.2.3 Regional Regulations

There are no regional regulations applicable to the proposed Project.

5.12.2.4 Local Regulations

City of Riverside 2025 General Plan

There are no policies that are applicable to the proposed Project in the City of Riverside 2025 General Plan (adopted 2007).

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

City of Riverside Municipal Code

Chapter 5.46, Surface Mining and Reclamation. Chapter 5.46 of the City's Municipal Code regulates surface mining operations in the city as required by California's Surface Mining and Reclamation Act of 1975.

5.12.3 ENVIRONMENTAL SETTING

According to the Final Program Environmental Impact Report for the City of Riverside General Plan and Supporting Documents (SCH #2004021108) (GP PEIR), the city of Riverside is primarily designated as MRZ-4, which are areas with insufficient data to assign any other MRZ designation (City of Riverside, 2007b). The area located between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans is designated as MRZ-2, a State-classified mineral resource zone (City of Riverside, 2007b).

The Project site is currently developed with industrial uses. The Project site is not currently used for mining or mineral extraction operations. The Project site has a General Plan Land Use designation of Industrial (I) and is zoned General Industrial. According to the General Plan EIR, the Project site is in an area designated as MRZ-4. As such, the Project site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.

5.12.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold A Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Threshold 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.

5.12.5 METHODOLOGY

The impact analysis contained within this section is based on review of the MRZ mapping within the city of Riverside, included in the City's General Plan EIR, to determine the MRZ classification of the Project site. In addition, the General Plan Land Use map was used to determine potential areas designated for mineral resource production.

5.12.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT 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?

As stated above, the Project site is not currently used for mining or mineral extraction operations. The site is currently developed with a commercial/industrial building and bus parking and storage. According to the GP PEIR, the Project site is in an area designated as MRZ-4. The nearest State classified mineral resources zone (MRZ-2) to the Project site is located between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans, approximately 0.75 miles north of the Project site (City of Riverside, 2007b). As such, the Project site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, the proposed Project would have **less than significant impact** to mineral resources.

THRESHOLD B: WOULD THE PROJECT 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?

The Project site has a General Plan land use designation of Industrial (I). The primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, support commercial uses, and limit large warehouse and distribution facilities only at specific locations (City of Riverside, 2007a). The Industrial land use designation does not support mineral resource related uses. Furthermore, the site is currently developed with a commercial/industrial building and bus parking and storage. As such, the Project site land use designation is not compatible with the extraction of mineral resources. Therefore, the proposed Project would result in **no impact** to mineral resource recovery sites delineated on a land use plan.

5.12.7 CUMULATIVE IMPACTS

The proposed Project's potential to result in cumulatively considerable impacts to mineral resources are analyzed in conjunction with other projects (see Figure 5-1: Cumulative Projects) located in the City of Riverside General Plan area. A majority of the land within the city is designated as MRZ-4, which are areas with insufficient data to determine if there are significant mineral resources in the area (City of Riverside, 2007b). The nearest State classified mineral resource zone (MRZ-2) to the Project site is located between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans, approximately 0.75 miles north of the Project site (City of Riverside, 2007b). As stated above under Threshold A and Threshold B, the proposed Project would not result in significant impacts to mineral resources. Therefore, the proposed Project would not combine with other cumulative projects in the area and result in cumulatively considerable impacts related to loss of a mineral resources.

5.12.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- Surface Mining and Reclamation Act of 1975

Plans, Programs, or Policies

- City of Riverside General Plan

5.12.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would have a less than significant impact under Threshold A. The Project would have no impact under Threshold B.

5.12.10 MITIGATION MEASURES

No mitigation measures are required because impacts are less than significant.

5.12.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable mineral resource impacts would occur.

5.12.12 REFERENCES

California Department of Conservation. (2000). *California Surface Mining and Reclamation Policies and Procedures – Guidelines for Classification and Designation of Mineral Lands*. https://www. *General Plan 2025*. https://riversideca.gov/cedd/planning/city-plans/general-plan-0 conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf

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5.13 Noise

5.13.1 INTRODUCTION

This EIR section evaluates the potential noise and vibration impacts that would result from implementation of the proposed Project. It discusses the existing noise environment within and around the Project site, as well as the regulatory framework for regulation of noise. This section analyzes the effect of the proposed Project on the existing ambient noise environment during demolition, construction, and operational activities; and evaluates the Project's noise effects for consistency with relevant local agency noise policies and regulations. The analysis also evaluates the potential of vibration related effects from the Project. This section is based, in part, on the following documents and resources:

- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code
- *Noise and Vibration Impact Analysis*, prepared by LSA, May 2025, included as Appendix J

Noise and Vibration Terminology

Various noise descriptors are utilized in this EIR analysis, and are summarized as follows:

dB: Decibel, the standard unit of measurement for sound pressure level.

dBA: A-weighted decibel, an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

Lx: The sound level that is equaled or exceeded "x" percent of a specified time period. The "x" thus represents the percentage of time a noise level is exceeded. For instance, L50 and L90 represents the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

Ldn: Also termed the "day-night" average noise level (DNL), Ldn is a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of nighttime noises.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between

the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

The "ambient noise level" is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be by those hearing it. With regard to increases in A-weighted noise levels, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3-dBA change in noise levels is considered to be a barely perceivable difference.
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of approximately 6 dBA and up to approximately 7.5 dBA per doubling of distance from the source over hard surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a noise measured at 90 dBA 50 feet from the source would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as urban traffic corridors or dispersed industrial operations, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. In addition

to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.

Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Vibration decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

5.13.2 REGULATORY SETTING

5.13.2.1 Federal Regulations

Federal Transit Administration Transit Noise and Vibration

Neither the City General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers. Therefore, a numerical construction threshold based on *Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts. According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use.

5.13.2.2 State Regulations

Title 24, California Building Code

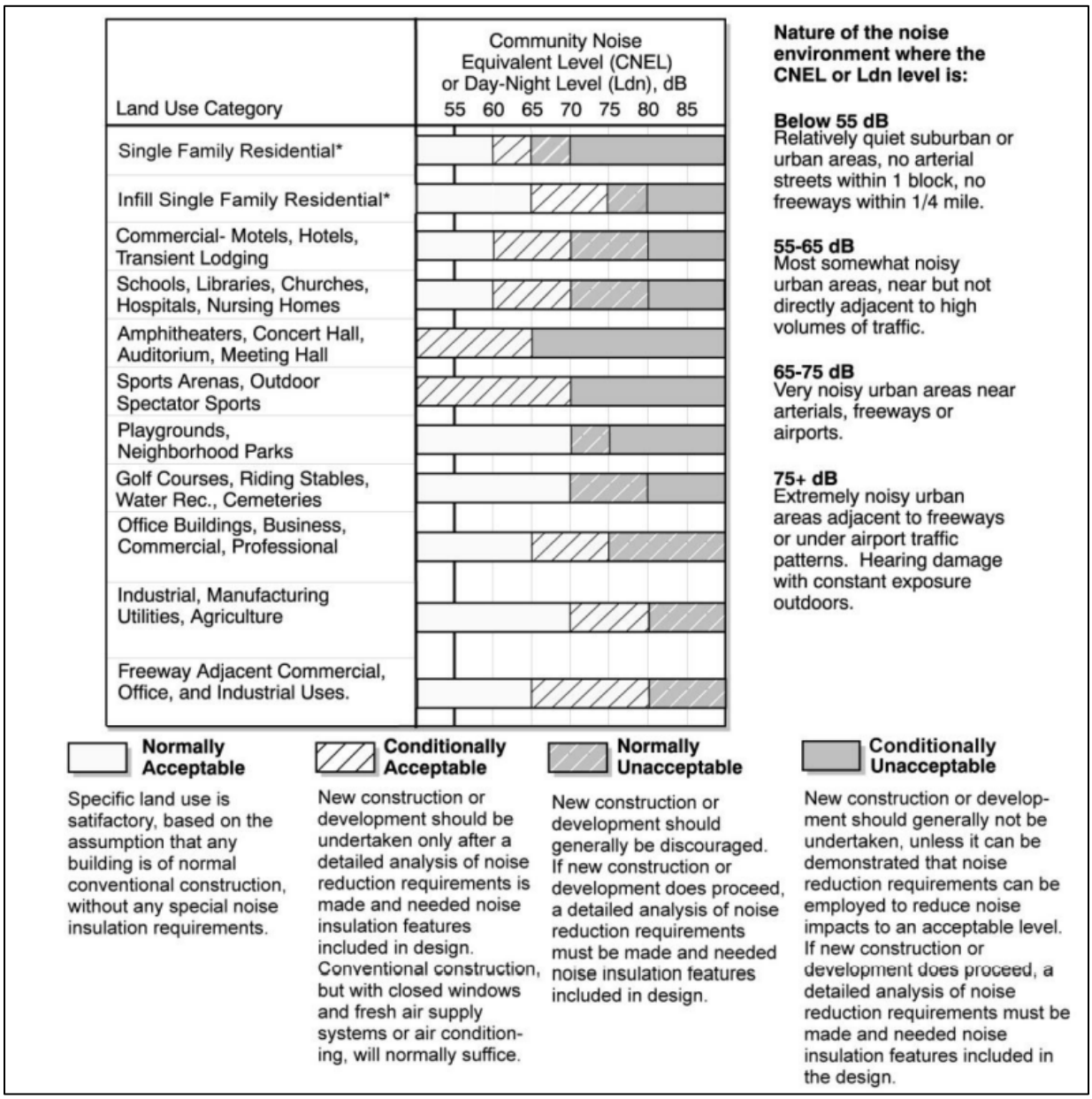
Mandatory measures for non-residential buildings included in Title 24 of the California Building Code state that new construction shall provide an interior noise level that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation. Title 24 standards are included in the City's Municipal Code in Title 7, *Noise Control*, and are enforced through the building permit application process in the City.

5.13.2.3 Local Regulations

City of Riverside 2025 General Plan

The Noise Element of the City of Riverside 2025 General Plan (adopted 2007) includes a Noise Land Use Compatibility Matrix (included below as Table 5.13-1) that establishes standards for outdoor noise levels that are normally acceptable, conditionally acceptable, normally unacceptable, and conditionally unacceptable for a variety of land uses. For example, for industrial land uses , noise levels of up to 70 dBA CNEL are "normally acceptable" and levels between 70 bBA and 80 dBA CNEL are "conditionally acceptable."

Table 5.13-1: City of Riverside General Plan Noise Compatibility Guidelines



Source: (City of Riverside, 2007)

The Noise Element of the City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies that are relevant to the proposed Project (City of Riverside, 2007a):

Objective N-1: Minimize noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment.

Policy N-1.1: Continue to enforce noise abatement and control measures particularly within residential neighborhoods.

Policy N-1.2: Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code.

Policy N-1.3: Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.

Policy N-1.4: Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.

Policy N-1.5: Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas.

Policy N-1.8: Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.

Policy N-3.1: Avoid placing noise-sensitive land uses (e.g., residential uses, hospitals, assisted living facilities, group homes, schools, day care centers, etc.) within the high noise impact areas (over 65 dB CNEL) for March Air Reserve Base/March Inland Port in accordance with the Riverside County 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

Objective N-4: Minimize ground transportation-related noise impacts.

Policy N-4.1: Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

City of Riverside Municipal Code

Title 24 standards are included in the City's Municipal Code in Title 7, *Noise Control* . Municipal Code Section 7.25.010, Exterior Noise Level Limits:

A. Unless a variance has been granted as provided in this title, it shall be unlawful for any person to cause or allow the creation of any noise which exceeds the following:

   1. The exterior noise standard of the applicable land use category, up to five decibels, for a cumulative period of more than 30 minutes in any hour (L_{50}); or
   2. The exterior noise standard of the applicable land use category, plus five decibels, for a cumulative period of more than 15 minutes in any hour (L_{25}); or
   3. The exterior noise standard of the applicable land use category, plus ten decibels, for a cumulative period of more than five minutes in any hour (L_8); or
   4. The exterior noise standard of the applicable land use category, plus 15 decibels, for the cumulative period of more than one minute in any hour (L_2); or
   5. The exterior noise standard for the applicable land use category, plus 20 decibels or the maximum measured ambient noise level, for any period of time (L_{max}).

B. If the measured ambient noise level exceeds that permissible within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five decibel increments in each

category as appropriate to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

C. If possible, the ambient noise level shall be measured at the same location along the property line with the alleged offending noise source inoperative. If for any reason the alleged offending noise source cannot be shut down, then the ambient noise must be estimated by performing a measurement in the same general area of the source but at a sufficient distance that the offending noise is inaudible. If the measurement location is on the boundary between two different districts, the noise shall be the arithmetic mean of the two districts.

D. Where the intruding noise source is an air-conditioning unit or refrigeration system which was installed prior to the effective date of this title, the exterior noise level when measured at the property line shall not exceed 60 dBA for units installed before 1-1-80 and 55 dBA for units installed after 1-1-80.

Table 5.13-2: City of Riverside Municipal Code Exterior Noise Standards

Land Use Category	Time Period	Noise Level
Residential	Night (10:00 p.m. - 7:00 a.m.)	45 dBA
Residential	Day (7:00 a.m. - 10:00 p.m.)	55 dBA
Office/Commercial	Any time	65 dBA
Industrial	Any time	70 dBA
Community Support	Any time	60 dBA
Public Recreation Facility	Any time	65 dBA
Nonurban	Any time	70 dBA

Source: City of Riverside, 2025.

Municipal Code Section 7.30.015, Interior Noise Level Limits:

A. No person shall operate or cause to be operated, any source of sound indoors which causes the noise level, when measured inside another dwelling unit, school or hospital, to exceed:

1. The interior noise standard for the applicable land category area, up to five decibels, for a cumulative period of more than five minutes in any hour;
2. The interior noise standard for the applicable land use category, plus five decibels, for a cumulative period of more than one minute in any hour;
3. The interior noise standard for the applicable land use category, plus ten decibels or the maximum measured ambient noise level, for any period of time.

B. If the measured interior ambient noise level exceeds that permissible within the first two noise limit categories in this section, the allowable noise exposure standard shall be increased in five decibel increments in each category as appropriate to reflect the interior ambient noise level. In the event the interior ambient noise level exceeds the third noise limit category, the maximum allowable interior noise level under said category shall be increased to reflect the maximum interior ambient noise level.

C. The interior noise standard for various land use districts shall apply, unless otherwise specifically indicated, within structures located in designated zones with windows opened or closed as is typical of the season.

Table 5.13-3: City of Riverside Municipal Code Interior Noise Standards

Land Use	Time Period	Noise Level
Residential	Night (10:00 p.m. - 7:00 a.m.)	35 dBA
Residential	Day (7:00 a.m. - 10:00 p.m.)	45 dBA
School	7:00 a.m. – 10:00 p.m. (while school is in session)	45 dBA
Hospital	Any time	45 dBA

Source: City of Riverside, 2025.

Municipal Code Section 7.35.020 Exemptions: Construction. Noise sources associated with construction, repair, remodeling, or grading of any real property are exempt from noise level limit standards; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday.

Neither the City General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts. The FTA considers a daytime exterior construction noise level of 80 dBA Leq averaged over an 8-hour period as a reasonable threshold for noise sensitive residential land uses.

Where the City did not have applicable construction standards, the following supplemental construction noise standards were applied.

- ***Federal Transit Administration***: The construction noise threshold from the *Transit Noise and Vibration Impact Assessment* (Federal Transit Administration, 2018), identifies a significant construction noise impact if construction noise exceeds 80 dBA Leq over an 8-hour period during the daytime at the nearby sensitive receivers (e.g. residential, etc.).
- ***Caltrans Transportation and Construction Vibration Guidance Manual***: The City does not have numeric vibration standards that are applicable to the proposed Project. Hence, the California Department of Transportation's (Caltrans) Transportation and Construction Vibration Guidance Manual (Caltrans 2020) guidelines are used as a screening tool for assessing the potential for adverse vibration effects related to structural damage and human perception.

Caltrans identifies a building damage vibration level threshold for older residential structures of 0.3 in/sec PPV; and a distinctly perceptible human annoyance vibration level threshold of 0.04 in/sec PPV at nearby sensitive receiver locations.

5.13.3 ENVIRONMENTAL SETTING

5.13.3.1 Existing Noise Levels

The existing ambient noise in the Project area is characterized by traffic noise from Roberta Street, Kansas Avenue and Massachusetts Avenue, and industrial noises in the vicinity of the Project site. To assess the existing noise levels of the environment, long-term (24-hour) noise measurements were conducted on February 3, 2025, through February 4, 2025, at two locations. Figure 5.13-1, *Noise Measurement Locations*, shows the long-term noise monitoring locations. Table 5.13-4 provides a summary of the measured hourly daytime, evening, and nighttime noise levels at each noise measurement location. As shown in Table 5.13-4, hourly noise levels at the noise measurement locations are as low as 54.2 dBA Leq during nighttime hours and 60.8 dBA Leq during daytime hours.

Table 5.13-4: Summary of 24-Hour Ambient Noise Level Measurements

Location		Daytime Noise Levels[1] (dBA Leq)	Evening Noise Levels[2] (dBA Leq)	Nighttime Noise Levels[3] (dBA Leq)	Daily Noise Levels (dBA CNEL)
LT-1	2053 Roberta Street, Riverside. In a tree on the southeast corner of the property, approximately 27 feet from the Roberta Street centerline.	62.6-67.4	64.0–66.0	60.7–66.5	70.5
LT-2	On a utility pole at the south side of the project site, approximately 34 feet from the Massachusetts Avenue centerline.	60.8-64.5	60.8–62.9	54.2–62.5	66.7

Notes: Noise measurements were conducted from February 3 to February 4, 2025, starting at 1:00 p.m.
[1] Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 7:00 p.m.
[2] Evening Noise Levels = noise levels during the hours from 7:00 p.m. to 10:00 p.m
[3] Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level
Source: Noise and Vibration Impact Analysis (Appendix J).

5.13.3.2 Existing Airport Noise

The closest airport to the Project site are the Flabob Airport located approximately 3.1 miles west of the Project site, and the Riverside Municipal Airport, located approximately 5.4 miles southwest of the project site. The Project site is located outside the 65 dBA CNEL noise contour of the Flabob Airport and Riverside Municipal Airport.

Additionally, March Air Reserve Base/Inland Port Airport is located approximately 7.8 miles southeast of the project site. The project site is located within Zone E of the March Air Reserve Base/Inland Port Airport Influence Area but outside the 65 dBA CNEL noise contour.

5.13.3.3 Existing Vibration

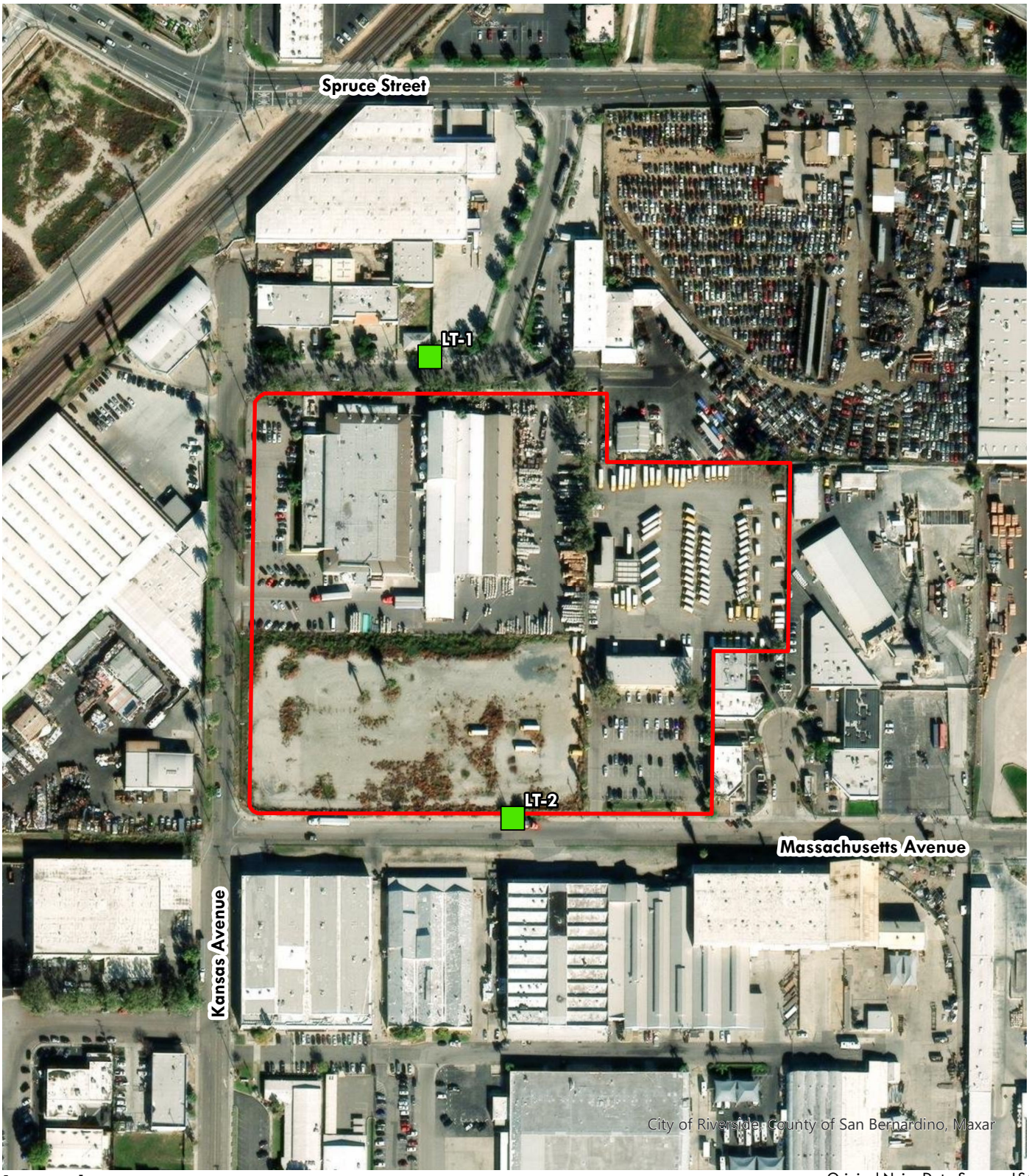
Aside from periodic construction work that may occur in the vicinity of the Project area, other sources of groundborne vibration include heavy-duty trucks, such as garbage trucks, on area roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (Federal Transit Administration, 2006).

5.13.3.4 Sensitive Receptors

The Project site is surrounded by industrial uses to the north, industrial uses and a homeless shelter to the east, and industrial uses to the south and to the west. Noise sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residences, schools, hospitals, and recreation areas. The closest sensitive receptor to the Project site is

the existing housing assistance shelter located at 2801 Hulen Place, approximately 220 feet away from the eastern project construction boundary (Appendix J).

Noise Measurement Locations



Original Noise Data Source: LSA

Legend

Project Boundary

Noise Monitoring Locations

0 250 500 US Feet

N

Massachusetts Point Project
City of Riverside

Figure 5.13-1

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5.13.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to result in:

Threshold 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.

Threshold B Generation of excessive groundborne vibration or groundborne noise levels.

Threshold 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, expose people residing or working in the project area to excessive noise levels.

5.13.5 METHODOLOGY

The analysis within this EIR section is based on the Noise and Vibration Impact Analysis prepared for the Project, included as Appendix J. The assessment is based on noise modeling conducted for the Project. Noise monitoring was performed from February 3 to February 4, 2025. The noise monitoring locations were selected in order to obtain noise measurements of the current noise sources impacting the vicinity of the Project site and to provide a baseline for any potential noise impacts that may be created by development of the proposed Project. Project impacts were then evaluated based on the thresholds established for construction and operational noise impacts. Additionally, construction and operational groundborne vibration was estimated for the Project and evaluated based on applicable vibration impact thresholds.

5.13.5.1 Construction Noise

To identify the temporary construction noise contribution to the existing ambient noise environment, the construction noise levels anticipated from usage of construction equipment needed to implement the proposed Project were identified. The City of Riverside Municipal Code limits construction hours to reduce noise but does not establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a *substantial temporary or periodic noise increase*. Therefore, a numerical construction threshold based on the Transit Noise and Vibration Impact Assessment Manual (Federal Transit Administration, 2018) is used for analysis of daytime construction impacts and has been used in past City CEQA documents for noise analysis purposes. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use, 85 dBA Leq for commercial uses, and 90 dBA Leq for industrial uses. The construction noise levels are compared against the FTA thresholds to assess the level of significance associated with temporary construction noise level impacts.

A potentially significant noise impact would occur if Project related construction activities:

- Occur between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday (City of Riverside Municipal Code Section 7.35.020(G)); or
- Create noise levels which exceed the acceptable noise level thresholds of 80 dBA Leq at the nearby sensitive receiver locations(FTA Transit Noise and Vibration Impact Assessment Manual criteria). The nearest sensitive receiver to the Project site is the housing assistance shelter located at 2801 Hulen Place.

5.13.5.2 Operational Noise

The primary source of noise associated with the operation of the proposed Project would be from vehicle and truck trips. The expected roadway noise level increases from vehicle and truck traffic were calculated using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA RD-77-108) and the average daily traffic volumes that would be generated by the proposed Project from the Traffic Impact Analysis prepared for the proposed Project (Appendix X).

As detailed in Section 5.17, *Transportation,* the proposed Project is anticipated to generate a total of 974 daily trips, with 148 during the AM peak hour (130 inbound and 18 outbound) and 132 during the PM peak hour (20 inbound and 112 outbound). When converted to passenger vehicle trips, the proposed Project is anticipated to generate approximately 632 daily trips. The increase in noise levels generated by the vehicle and truck trips has been quantitatively estimated and compared to the applicable noise thresholds of significance listed below.

The Project would result in a potential noise impact if the existing ambient noise levels at the nearby noise-sensitive receivers increase by 5 dBA because an increase of at least 5 dBA is required for a noticeable change in community response. This threshold was identified in the City's General Plan EIR (City of Riverside, 2007b).

The Project would also generate noise from stationary sources. Stationary sources of noise would include heating, ventilation, and air conditioning (HVAC) equipment, trash bin emptying activities, and truck deliveries and loading and unloading activities. SoundPLAN, a three-dimensional noise model, was used to determine future noise impacts from Project operations to noise sensitive uses. To provide a conservative analysis (worst case scenario), the Noise and Vibration Impact Analysis for the Project (Appendix J) assumed that operations would occur equally during all hours of the day and that half of the loading docks would be active at all times. Additionally, the Noise and Vibration Impact Analysis assumed that within any given hour, 32 heavy trucks, including 3-axle and 4-axle trucks during the peak period, would maneuver to park near or back into one of the proposed loading docks. The increase in noise levels generated by these activities has been quantitatively estimated and compared to the applicable noise standards listed below.

The Project would also result in a potential noise impact if Project related operational (stationary source) noise levels exceed the exterior 55 dBA Leq daytime or 45 dBA Leq nighttime noise level standards at nearby sensitive residential receiver locations (City of Riverside Municipal Code, Section 7.25.010).

5.13.5.3 Groundborne Vibration

Aside from noise levels, groundborne vibration would also be generated during construction of the Project by various construction-related activities and equipment; and could be generated by truck traffic traveling to and from the Project site. The potential groundborne vibration levels resulting from construction activities occurring from the proposed Project were estimated by data published by the FTA. Thus, the groundborne vibration levels generated by these sources have also been quantitatively estimated and compared to the applicable thresholds of significance listed below.

There are no City vibration standards applicable to the proposed Project. As such, available guidelines from the FTA and Caltrans are utilized to assess impacts due to groundborne vibration. The FTA has adopted standards associated with human annoyance for groundborne vibration. As shown in Table 5.13-5, the threshold for office type uses is 84 VdB and for daytime residential uses is 78 VdB.

Table 5.13-5: Vibration Criteria for Human Annoyance

Land Use	Maximum Lv (VdB)	Description of Use
Workshop	90	Vibration that is distinctly felt. Appropriate for workshops and similar areas not as sensitive to vibration.
Office	84	Vibration that can be felt. Appropriate for offices and similar areas not as sensitive to vibration.
Residential Day	78	Vibration that is barely felt. Adequate for computer equipment and low-power optical microscopes (up to 20x).
Residential Night and Operating Rooms	72	Vibration is not felt, but ground-borne noise may be audible inside quiet rooms. Suitable for medium-power microscopes (100x) and other equipment of low sensitivity.

Notes:
[1] As measured in 1/3-octave bands of frequency over a frequency range of 8 to 80 Hertz.
Lv = velocity in decibels
VdB = vibration velocity decibels
Source: Noise and Vibration Impact Analysis (Appendix J).

Caltrans has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. As shown in Table 5.13-6, a vibration level of up to 0.5 in/sec in PPV is considered safe for newer residential structures and modern industrial or commercial buildings.

Table 5.13-6: Vibration Criteria for Building Damage

Structure/Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
Newer residential structures	0.50
Modern industrial/commercial buildings	0.50

Notes:
in/sec = inch or inches per second
PPV = peak particle velocity
Source: Noise and Vibration Impact Analysis (Appendix J).

5.13.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT RESULT IN GENERATION OF A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROJECT IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?

Construction

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the site for the proposed project would incrementally increase noise levels on access roads leading to the site. Although construction-related truck trips may result in temporarily elevated noise levels (passing trucks at 50 feet would generate up to 84 dBA Lmax), the effect on longer-term ambient noise levels would be small when compared to the existing average daily traffic (ADT) volume on Massachusetts Avenue. During the demolition

phase, approximately 5,956 acoustically equivalent[1] trips would occur during an average day from worker and delivery activities resulting in a traffic noise increase of approximately 8.0 dBA. As discussed in Section 5.13.2.3, per the City's Noise Ordinance (City of Riverside Municipal Code Section 7.35.020(G)) construction activities that do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday are exempt from noise limits. The proposed Project's construction activities would occur pursuant to these regulations.

Demolition would occur over a short duration of 15 days. The phase of construction with the greatest duration is the building construction phase. Over the period of approximately 200 days, the expected noise increase would be 1.7 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, with adherence to the City's Noise Ordinance, short-term construction-related impacts associated with worker commutes and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to the use of construction equipment during construction activities. Table 5.13-7 lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the FHWA Roadway Construction Noise Model.

Table 5.13-7: Typical Construction Equipment Noise Levels

Equipment	Acoustical Usage Factor (%)[1]	Maximum Noise Level (Lmax) at 50 feet[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (Ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front End Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85

[1] The acoustically equivalent traffic volume is used in order to account for the additional noise a heavy truck creates as compared to automobile traffic and does not represent the actual number of vehicles associated with construction activities.

Equipment	Acoustical Usage Factor (%)[1]	Maximum Noise Level (Lmax) at 50 feet[2]
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Notes:
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
Lmax = maximum instantaneous sound level
Source: Noise and Vibration Impact Analysis (Appendix J).

Each piece of construction equipment operates as an individual point source. A composite noise level was calculated when multiple sources of noise operate simultaneously. The composite noise levels for each construction phase were calculated based on the methodology described in Appendix J using the construction equipment list and reference information from Table 5.13-7. The Project construction composite noise levels at a distance of 50 feet would range from 74 dBA Leq to 88 dBA Leq, with the highest noise levels occurring during the site preparation and grading phases.

Table 5.13-8 shows the nearest sensitive uses to the project site, their distance from the center of construction activities, and composite noise levels expected during construction.

Table 5.13-8: Construction Noise Levels at Nearest Receptors

Receptor (Location)	Composite Noise Level (dBA Leq) at 50 feet[1]	Distance (feet)	Construction Noise Level Standard (dBA Leq)	Composite Noise Level (dBA Leq)
Industrial (West)	88	435	90	70
Industrial (North)		450	90	69
Industrial (South)		500	90	68
Residential (Shelter) (East)		530	80	68

Notes:
The assessment distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.
[1] The composite construction noise level represents the site preparation and paving phases which are expected to result in the greatest noise level as compared to other phases.dBA Leq = average A-weighted hourly noise level
Source: Noise and Vibration Impact Analysis (Appendix J).

While construction noise will vary, it is expected that composite noise levels during construction would reach 70 dBA Leq at the nearest industrial uses to the west and 68 dBA Leq at the nearest residential use to the east during daytime hours. These predicted noise levels would only occur when all construction equipment is operating simultaneously and, therefore, are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once Project construction is completed.

Construction activities would be regulated by the City's Noise Ordinance (City of Riverside Municipal Code Section 7.35.020(G)), which prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the proposed Project would be in compliance with the City's construction-related noise standards.

Construction noise levels from the proposed Project at the nearest receptors would range from 68 to 70 dBA Leq and would remain below the 80 dBA Leq and 90 dBA Leq 1-hour construction noise level criteria for daytime construction noise for residential and industrial uses. Therefore, construction noise impacts would be **less than significant.**

Operation

Potential noise impacts associated with the operations of the proposed Project would be from project-generated vehicular traffic on the nearby roadways and from on-site activities, which have been analyzed separately below.

Traffic Noise Impacts

The noise traffic noise levels that would be generated by the Project were calculated using the FHWA's Highway Traffic Noise Prediction Model (FHWA RD-77-108). Tables 5.13-9 shows traffic noise levels for the existing year (2025) and the opening year (2027) without and with the proposed Project. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn.

Table 5.13-9: Existing Year and Opening Year Traffic Noise Levels Without and With Proposed Project

Roadway Segment	Existing Year (2025) – CNEL at 50 feet from Centerline of Outermost Lane (dBA)			Opening Year (2027) – CNEL at 50 feet from Centerline of Outermost Lane (dBA)		
	Without Project	With Project	Project Addition	Without Project	With Project	Project Addition
Roberta Street East of Kansas Street	57.5	57.6	0.1	57.7	57.7	0.0
Kansas Street South of Roberta Street	57.5	57.6	0.1	57.7	57.8	0.1
Kansas Street South of Massachusetts Avenue	58.8	58.9	0.1	59.1	59.2	0.1
Massachusetts Avenue East of Kansas Street	52.7	54.2	1.5	53.3	54.6	1.3
Massachusetts Avenue East of Chicago Avenue	49.8	49.9	0.1	49.9	50.0	0.1
Chicago Avenue North of Massachusetts Avenue	67.6	67.6	0.0	68.1	68.1	0.0
Chicago Avenue between Massachusetts Avenue and 3rd Street	67.6	67.7	0.1	68.0	68.2	0.2
Chicago Avenue South of 3rd Street	67.3	67.3	0.0	68.0	68.0	0.0
3rd Street West of Chicago Street	66.4	66.4	0.0	67.8	67.8	0.0
3rd Street East of Chicago Street	67.3	67.6	0.3	68.6	68.8	0.2

Notes:
CNEL = community noise equivalent level
dBA = A-weighted decibels
Source: Noise and Vibration Impact Analysis (Appendix J)

As shown in Table 5.13-9, the proposed Project would increase noise levels by up to 1.5 dBA CNEL along the road segments in the Project vicinity. A noise level increase of less than 3 dBA would not be perceptible to the human ear and would not exceed the 5 dBA threshold. Therefore, impacts related to traffic noise would be **less than significant**.

On-site Stationary Noise Impacts

Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site HVAC equipment, trash bin emptying activities, and truck deliveries and loading and unloading activities.

HVAC Equipment. The Project would have various rooftop mechanical equipment, including HVAC units, atop the proposed buildings. The Project is assumed to have eight rooftop HVAC units atop each proposed building and assumed to operate 24 hours per day. The HVAC equipment would generate sound power levels (Lw) of up to 87 dBA Lw or a sound pressure level of 72 dBA Leq at 5 feet based on manufacturing data (Appendix J).

Trash Bin Emptying Activities. The Project is estimated to have two trash dumpsters: one near the southeastern corner of Building 1 and one at the western side of the parking between the two buildings. The trash emptying activities would take place for a period of less than 1 minute and would generate a sound power level of up to 118.6 dBA Lw or a sound pressure level of 84 dBA Leq at 50 feet, based on reference information within SoundPLAN (Appendix J).

Cold Storage Fan Units. The proposed Project would include 20 percent cold storage. Noise levels generated by the cold storage fan units would generate a noise level of 57.5 dBA Leq at 60 feet, based on previosyuly gathered reference noise level measurements (LSA, 2016). (Appendix J).

Truck Arrival and Departure Activities. Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA Leq at 20 feet based on measurement taken for the Noise and Vibration Impact Analysis (Appendix J). Trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than 5 minutes). After a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible. It is assumed that truck arrivals and departure activities could occur at 32 spaces (16 at each building) for a period of less than 5 minutes each.

Truck Loading and Unloading Activities. Noise levels generated by delivery trucks being loaded and unloaded for the proposed Project are assumed to be 75 dBA Leq at 20 feet based on the noise levels taken for a similar type of project (Appendix J). It is assumed that unloading activities could occur at half of the total docks (20 docks) simultaneously for a period of 30 minutes in a given hour.

Operations Noise. Tables 5.13-10 and 5.13-11 present the noise levels from all the on-site stationary sources at the closest sensitive uses during daytime and nighttime, respectively. As shown in Tables 5.13-10 and 5.13-11, noise levels at the closest sensitive use to the north of the Project site would experience noise level impacts that would not exceed existing ambient noise levels at the nearby noise-sensitive receiver and would not exceed the residential use daytime and nighttime noise standards of 55 dBA Leq and 45 dBA Leq, respectively. Therefore, operational noise impacts would be **less than significant**.

Table 5.13-10: Daytime Noise Level Impacts

Receptor	Direction	Existing Quietest Daytime Noise Level (dBA Leq)	Project-Generated Noise Levels (dBA Leq)	Potential Operational Noise Impact?[1]
Residence	East	60.8	53.3	No

Notes:
[1] A potential operational noise impact would occur if (1) the quietest daytime ambient hour is less than 55 dBA Leq and project noise impacts are greater than 55 dBA Leq, OR (2) the quietest daytime ambient hour is greater than 55 dBA Leq and project noise impacts are 3 dBA greater than the quietest daytime ambient hour.
dBA = A-weighted decibels
Leq = equivalent continuous noise level
Source: Noise and Vibration Impact Analysis (Appendix J).

Table 5.13-11: Nighttime Noise Level Impacts

Receptor	Direction	Existing Quietest Nighttime Noise Level (dBA Leq)	Project-Generated Noise Levels (dBA Leq)	Potential Operational Noise Impact?[1]
Residence	East	54.2	53.1	No

Notes:
[1] A potential operational noise impact would occur if (1) the quietest nighttime ambient hour is less than 45 dBA Leq and project noise impacts are greater than 45 dBA Leq, OR (2) the quietest nighttime ambient hour is greater than 45 dBA Leq and project noise impacts are 3 dBA greater than the quietest nighttime ambient hour.
dBA = A-weighted decibels
Leq = equivalent continuous noise level
Source: Noise and Vibration Impact Analysis (Appendix J).

THRESHOLD B: WOULD THE PROJECT RESULT IN GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?

Construction

Construction activities for development of the proposed Project would include demolition, excavation, and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

The construction activities required for the Project can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the receptors, and soil type. The use of heavy construction equipment, particularly large bulldozers, and large loaded trucks hauling materials to or from the site generate construction-period vibration impacts. Table 5.13-12 shows the PPV and VdB values at 25 feet from the construction vibration source. This reference distance is based on the FTA Manual and is provided for informational purposes only; it is not used in the project-specific vibration impact analysis. As shown in Table 5.13-12, bulldozers and other heavy-duty construction equipment anticipated to be used for the proposed Project would generate approximately 0.089 PPV in/sec or 87 VdB of groundborne vibration when measured at 25 feet.

Table 5.13-12: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet	Lv at 25 feet (VdB)[1]
Pile Driver (Impact), Typical	0.644	104

Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer[2]	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks[2]	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Notes:
[1] RMS vibration velocity in decibels (VdB) is 1 µin/sec.
[2] Equipment expected to be used on site.
PPV = peak particle velocity
RMS = root mean square
in/sec = inch or inches per second
µin/sec = microinches per second
Lv = velocity in decibels
VdB = vibration velocity decibels
Source: Noise and Vibration Impact Analysis (Appendix J)

Table 5.13-13 shows the construction vibration annoyance impacts at the nearest receptors. As shown in Table 5.13-13, vibration levels are expected to approach 50 VdB at the closest industrial uses to the west and 47 VdB at the nearest residential use to the east and would not exceed the annoyance thresholds of 78 VdB and 84 VdB for daytime residential uses and office type uses, respectively.

Table 5.13-13: Construction Vibration Annoyance Levels at Nearest Receptors

Receptor (Location)	Reference Vibration Level (VdB) at 25 feet[1]	Distance (feet)[2]	Vibration Level (VdB)
Industrial (West)	87	435	50
Industrial (North)		450	49
Industrial (South)		500	48
Residential (Shelter) (East)		530	47

Notes:
[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.
[2] The assessment distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.
VdB = vibration velocity decibels
Source: Noise and Vibration Impact Analysis (Appendix J).

Table 5.13-14 shows the construction vibration damage impacts at the nearest receptors. As shown in Table 5.13-14, vibration levels are expected to approach 0.037 in/sec PPV at the nearest surrounding structures to the north and would not exceed the 0.1 PPV in/sec damage threshold considered safe for fragile buildings. Vibration levels at all other buildings would be lower.

Table 5.13-14: Construction Vibration Damage Levels at Nearest Receptors

Receptor (Location)	Reference Vibration Level (PPV) at 25 feet[1]	Distance (feet)[2]	Vibration Level (PPV)
Industrial (West)	0.089	60	0.024
Industrial (North)		45	0.037
Industrial (South)		105	0.010

Receptor (Location)	Reference Vibration Level (PPV) at 25 feet[1]	Distance (feet)[2]	Vibration Level (PPV)
Residential (Shelter) (East)		220	0.003

Notes:
[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.
[2] The assessment distance is associated with the peak condition, identified by the distance from the perimeter of construction activities to surrounding structures.
PPV = peak particle velocity
Source: Noise and Vibration Impact Analysis (Appendix J).

Construction activities would be regulated by the City's Noise Ordinance (City of Riverside Municipal Code Section 7.35.020(G)), which prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. The proposed Project's construction activities would occur pursuant to these regulations. As such, vibration impacts would not occur during the more sensitive nighttime hours.

As described above, construction vibration levels from the proposed Project at the nearest receptors would remain below the vibration annoyance and vibration damage threshold. Therefore, construction groundborne impacts would be **less than significant**.

Operation

The proposed Project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from Project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.076 in/sec PPV, structures greater than 20 feet from the roadways that contain Project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV. Therefore, operational groundborne vibration impacts would be **less than significant**.

THRESHOLD C: WOULD THE PROJECT, 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, EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?

The closest airports to the Project site are the Flabob Airport, located approximately 3.1 miles west of the Project site, and the Riverside Municipal Airport located approximately 5.4 miles southwest of the Project site. Based on Map FL-3, Noise Compatibility Contours, of Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located outside of the 65 dBA CNEL noise contour of the Flabob Airport; Based on Exhibit RI-5, Future Noise Impacts, of Riverside County ALUCP – West County Airports Background data, the project is located outside the 65 dBA CNEL noise contour for Riverside Municipal Airport (Appendix J).

Additionally, the March Air Reserve Base/Inland Port Airport is located approximately 7.8 miles southeast of the project site. As shown in Figure 5.9-1, *Airport Land Use Compatibility Map*, in Section 5.9, *Hazards and Hazardous Materials*, the Project site is located within Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area. However, the Project site is outside of the 65 dBA CNEL noise contour of the March Air Reserve Base/Inland Port Airport (Appendix J). Because the Project site is located outside the 65 dBA CNEL airport noise contours, the Project would not be adversely affected by airport/airfield noise, nor would the project contribute to or result in adverse airport/airfield noise impacts. Therefore, the proposed Project would not expose people working in the Project area to excessive airport-related noise levels, and impacts would be **less than significant**.

5.13.7 CUMULATIVE IMPACTS

Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project site. As noise and vibration are localized phenomenon and drastically reduce in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts.

As shown in Figure 5-1, *Cumulative Projects*, included in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, the closest cumulative projects are located along Durahart Street. Cumulative projects 20 and 23 located at 2610 Durahart Street consist of an outdoor storage facility. The commencement of construction of the adjacent cumulative projects is unknown; however, it is possible that construction activities from both the proposed Project and the adjacent cumulative projects or other nearby cumulative projects would occur simultaneously and could have the potential to cumulatively contribute to a noise impact. However, cumulative noise increases due to construction would be temporary and localized. In addition, development of the proposed Project and other nearby cumulative projects would be subject to the requirements of the City's Noise Ordinance. The City of Riverside Municipal Code Section 7.35.020(G)) prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. Thus, cumulative noise and vibration impacts would not occur during the more sensitive nighttime/evening hours. As discussed previously, construction noise levels from the proposed Project at the nearest receptors would range from 68 to 70 dBA Leq and would remain below the 80 dBA Leq and 90 dBA Leq 1-hour construction noise level criteria for daytime construction noise for residential and industrial uses. Therefore, the Project's noise and vibration impacts during daytime when combined with existing and future development would not result in a cumulatively considerable impact. Cumulative noise and vibration impacts associated with construction activities would be **less than significant.**

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project traffic volumes on the roadways in the Project vicinity. The increase in noise levels associated with the traffic volumes of the proposed Project were identified previously in Table 5.13-9, *Existing Year and Opening Year Traffic Noise Levels Without and With Proposed Project*. As detailed, the proposed Project would increase noise levels by a maximum of 1.5 dBA CNEL, which would not exceed the 5 dBA threshold. Therefore, the Project would not result in a cumulatively considerable impact when combined with existing and future development. Cumulative impacts associated with traffic noise would be **less than significant.**

5.13.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Riverside Municipal Code

- Section 7.25.010, *Exterior Noise Level Limits*
- Section 7.30.015, *Interior Noise Level Limits*
- Section 7.35.020(G), *Construction Noise*

5.13.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Thresholds A through C were determined to have less-than-significant impacts.

5.13.10 MITIGATION MEASURES

No mitigation measures are required.

5.13.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts related to noise would occur. Impacts would be less than significant.

5.13.12 REFERENCES

Caltrans. (2020). *Transportation and Construction Vibration Guidance Manual*. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

City of Riverside. (2007a, November). *Riverside General Plan 2025*. https://riversideca.gov/cedd/planning/city-plans/general-plan-0

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City of Riverside. (2025). *City of Riverside Municipal Code Title 7 Noise Control*. https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT7NOCO

Federal Transit Administration. (2006). *Transit Noise and Vibration Impact Assessment*. https://docs.vcrma.org/images/pdf/planning/ceqa/FTA_Noise_and_Vibration_Manual.pdf

Federal Transit Administration. (2018, September). *Transit Noise and Vibration Impact Assessment Manual*. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

LSA. (2025). *Noise and Vibration Impact Analysis Massachusetts Point Project*. (**Appendix J**)

LSA. 2016. *Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center*.

5.14 Population and Housing

5.14.1 INTRODUCTION

This section examines the existing population, housing, and employment conditions in the City of Riverside and assesses the Project's impacts on regional growth and potential displacement of people and housing. The demographic data and analysis in this section is based, in part, on the following documents and resources:

- *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy*, Southern California Association of Governments (SCAG), May 2024
- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, certified November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* certified September 2021
- City of Riverside Municipal Code

Although evaluation of population, housing, and employment typically involves economic and social, rather than physical environmental issues, population, housing, and employment growth are often precursors to physical environmental impacts. According to Section 15382 of the CEQA Guidelines, "[a]n economic or social change by itself shall not be considered a significant impact on the environment." Socioeconomic characteristics may be considered in an EIR only to the extent that they create adverse impacts on the physical environment.

5.14.2 REGULATORY SETTING

5.14.2.1 Federal Regulations

There are no federal regulations concerning population and housing impacts that are applicable to the Project.

5.14.2.2 State Regulations

Housing Crisis Act of 2019 - Senate Bill 330 (SB 330)

Commonly known as Senate Bill (SB) 330 (Chapter 654, Statutes of 2019), this law was passed to respond to the California housing crisis. Effective January 1, 2020, and slated to sunset on January 1, 2025, SB 330 aims to increase residential unit development, protect existing housing inventory, and expedite permit processing. This law makes a number of modifications to existing legislation, such as the Permit Streamlining Act and the Housing Accountability Act and institutes the Housing Crisis Act of 2019. Under this legislation, municipal and county agencies are restricted in how they can apply certain ordinances and polices to residential development.

While many of SB 330's provisions (including those related to vested rights and permit streamlining) apply to all cities and counties, the restrictions on local actions contained in Government Code Section 66300 apply only in "affected" cities and counties as defined by the California Department of Housing and Community Development (HCD). In the case of counties, it is areas within counties and not necessarily an entire county that is affected. Per Government Code section 66300, affected cities include all cities in urbanized areas

and all cities with a population greater than 5000 in an urban cluster (California HCD, 2023).. Riverside is considered an affected city, as defined by Government Code Section 66300(a)(1)(A)[1] and included in California HDC most recent (2023) list of affected cities (California HCD, 2023).

Government Code Section 65863 (No Net Loss Law)

The purpose of Government Code Section 65863 (No Net Loss Law), is to ensure development opportunities remain available throughout the planning period to accommodate a jurisdiction's Regional Housing Need Allocation (RHNA), especially for lower- and moderate- income households. A jurisdiction may not take any action to reduce a parcel's residential density unless it makes findings that the remaining sites identified in its Housing Element sites inventory can accommodate the jurisdiction's remaining unmet RHNA by each income category, or if it identifies additional sites so that there is no net loss of residential unit capacity.

Regional Housing Needs Assessment (RHNA)

State Housing Law (California Government Code Article 10.6, Sections 65580-65590) mandates that local governments through Councils of Governments (COGs) identify existing and future housing needs in a RHNA. The RHNA is used in land use planning for prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The City of Riverside addresses RHNA through its Housing Element as part of the General Plan. The Southern California Association of Governments (SCAG), as the regional planning agency for Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties, is responsible for distributing the RHNA to individual jurisdictions within the six-county region. SCAG has allocated the City 18,458 units for the 2021-2029 housing cycle. Additionally, the City chose to provide a "No Net Loss" buffer of 14.9 percent, creating a target of 21,219 units for the 2021-2029 Cycle, as shown in Table 5.14-1.

Table 5.14-1:City of Riverside RHNA 2021-2029

Income Category	RHNA Allocation (Units)	Adopted Opportunity Sites Inventory (Units)
Very Low- and Low-Income	7,925	8,644
Moderate-Income	3,139	12,519
Above Moderate-Income	7,394	56
Subtotal	**18,458**	**21,219**
No Net Loss Buffer Units	**-**	**2,761**
No Net Loss Buffer Percentage	**-**	**14.9%**

AMI = Area Median Income
Source: City of Riverside, 2022

The Housing Element Background Report describes that with the anticipated accessory dwelling units (ADUs), entitled projects, and projects under review as of 2021, the City's remaining RHNA is 13,679 and that the City has the capacity to accommodate the remaining RHNA (City of Riverside, 2021a).

The Project site is not identified within the Housing Element as a RHNA site.

[1] HCD SB 330 Affected Cities and Counties Map Viewer: https://gis.hcd.ca.gov/portal/apps/webappviewer/index.html?id=c9a033c33669429a86b8c47d82e0f2e4

5.14.2.3 Regional Regulations

SCAG Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2024, SCAG adopted *Connect SoCal*, the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with State greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375. The RTP/SCS is updated every four years as required by federal and State regulations.

According to the RTP/SCS, by 2050, the population of Southern California is projected to increase by two million people, with an increase of 1.6 million housing units, and 1.3 million jobs. However, growth is not expected to be uniform across the region's counties or cities. During that time, transportation infrastructure will need to substantially expand while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. The determination of each city's and county's share of regional housing needs that is required by law to be reflected in municipal general plan housing elements is based on the growth projections of the RTP/SCS.

SCAG Regional Growth Projections

SCAG is responsible for producing socioeconomic forecasts and developing, refining, and maintaining macro and small-scale forecasting models. The forecasts are developed in five-year increments. The current SCAG projections are provided through the year 2050. Consistency with the growth forecast, at the sub-regional level, is one criterion that SCAG uses in exercising its federal mandate to review "regionally significant" development projects for conformity with regional plans.

SCAG's *Connect SoCal* projects that the number of local employment opportunities in the City of Riverside will increase from 158,600 in 2019 to 204,500 in 2050. Additionally, SCAG projects the City's housing units will increase from 94,200 in 2019 to 137,200 in 2050 (SCAG, 2024).

5.14.2.4 Local Regulations

City of Riverside Phase I General Plan Update

In 1969, the State of California required jurisdictions to prepare Housing Elements as part of their General Plans in order to ensure adequate housing can be developed. The City of Riverside adopted their 6th cycle 2021-2029 Housing Element in 2021. The 2021-2029 Housing Element provides the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing throughout the community. The City's Housing Element includes policies to promote the maintenance of existing housing and increase capacity for additional housing options. Additionally, the Housing Element includes policies and related programs that will assist in meeting the housing needs of residents in the City. The Housing Element ensures that the current and future housing needs of people living and working in the City of Riverside are met (City of Riverside, 2021b).

5.14.3 ENVIRONMENTAL SETTING

5.14.3.1 Population

According to the California Department of Finance (DOF), the City of Riverside had a population of 316,690 in January of 2024 (California Department of Finance, 2024). The SCAG estimates that the City of Riverside had a population of 311,100 persons in 2019 and estimates that the City's population will increase to 386,537 in 2050[2], which is a 24.2 percent increase. In comparison, the SCAG projects the County of Riverside will have a 25.4 percent increase in population between 2019 and 2050, as shown on Table 5.14-2.

Table 5.14-2: City and County Existing and Projected Population, 2019-2050

Year	City of Riverside Population	County of Riverside Population
2019	311,100	2,386,000
2050	386,537	2,992,000
Projected Change	75,437	606,000
Projected Percent Change	24.2	25.4

Source: SCAG, 2024

5.14.3.2 Housing

The California DOF estimates that the City of Riverside contained 101,922 housing units in January of 2024 (California Department of Finance, 2024). In addition, the California DOF details that the City had an average household size of 3.06 persons per household. In comparison, the County had an average household size of 3.03 persons per household. The California DOF population and housing estimates for 2024 detail that the City of Riverside has a vacancy rate of 4.0 percent. In comparison, the vacancy rate Countywide is higher at 10.1 percent. As shown in Table 5.14-3, SCAG estimates that between 2019 and 2050, the number of housing units in the City will increase by 45.6 percent while the number of housing units in the County will increase by 42.7 percent.

Table 5.14-3: City and County Existing and Projected Housing Units, 2019-2050

Year	City of Riverside Housing Units	County of Riverside Housing Units
2019	94,200	744,000
2050	137,200	1,062,000
Projected Change 2019-2050	43,000	318,000
Projected Percent Change 2019-2050	45.6	42.7

Source: SCAG, 2024

5.14.3.3 Employment

The SCAG estimates the City of Riverside had 158,600 employment opportunities in 2019. The SCAG regional growth projections anticipate the number of jobs in the City of Riverside to increase by 28.9 percent

[2] The 2050 population estimate was derived using the methodology presented in Section 4.5 of the SCAG Demographics & Growth Forecast which states an estimate of the future City-level population based on Connect SoCal's household forecast can be derived using a county-level Population:Housing ratio from TABLE 12 and applying it to the City's future household growth (Southern California Association of Governments, 2024).

to 204,500 jobs in the year 2050. In comparison, the County is projected to see a 39.9 percent increase in the number of jobs by 2050, as shown in Table 5.14-4.

Table 5.14-4: City and County Existing and Projected Employment, 2019-2050

Year	City of Riverside Employment	County of Riverside Employment
2019	158,600	847,000
2050	204,500	1,185,000
Projected Change 2019-2050	45,900	338,000
Projected Percent Change 2019-2050	28.9	39.9

Source: SCAG, 2024

Table 5.14-5 shows the City's total employed civilian residents by occupation and industry in 2023. According to the estimates calculated by the US Census, Riverside had an employed civilian labor force (16 years and older) of 161,069 in 2023. The four largest occupational categories were educational services and health care and social assistance; professional, scientific, and management, and administrative and waste management services; and retail trade.

Table 5.14-5: Industry by Occupation for the City of Riverside, 2023

Occupation	Number of Individuals Employed	Percent
Agriculture, forestry, fishing and hunting, and mining	912	0.6
Construction	14,945	9.3
Manufacturing	15,899	9.9
Wholesale trade	2,799	1.7
Retail trade	16,787	10.4
Transportation and warehousing, and utilities	12,519	7.8
Information	2,521	1.6
Finance and insurance, and real estate and rental and leasing	5,874	3.6
Professional, scientific, and management, and administrative and waste management services	17,916	11.1
Educational services, and health care and social assistance	40,578	25.2
Arts, entertainment, and recreation, and accommodation and food services	13,453	8.4
Other services, except public administration	8,468	5.3
Public administration	8,398	5.2
Total	**161,069**	**100**

Source: U.S. Census Bureau, 2023a

Jobs – Housing Ratio

The jobs-housing ratio is a general measure of the total number of jobs and housing units in a defined geographic area, without regard to economic constraints or individual preferences. SCAG applies the jobs-to-housing ratio at the regional and subregional levels to analyze the fit between jobs, housing, and infrastructure. A major focus of SCAG's regional planning efforts has been to improve this balance. SCAG defines the jobs-housing balance as follows:

> Jobs and housing are in balance when an area has enough employment opportunities for most of the people who live there and enough housing opportunities for most of the people who work there. The region as a whole is, by definition, balanced…. Job-rich subregions have ratios greater than the regional average; housing-rich subregions have ratios lower than the regional average. Ideally, job-housing balance would… assure not only a numerical match of jobs and housing but also an economic match in type of jobs and housing.

There is no ideal ratio adopted in State, regional, or City policies. However, the American Planning Association recommends a target ratio of 1.5 jobs per housing unit. Thus, communities with more than 1.5 jobs per dwelling unit are considered jobs-rich, meaning that more employment opportunities are provided than housing in the area, and those with fewer than 1.5 jobs per dwelling unit are considered housing-rich, meaning that more housing is provided than employment opportunities in the area (Weitz, 2003). A job-housing imbalance can indicate potential air quality and traffic problems associated with commuting. Table 5.14-6 provides the projected jobs-to-housing ratios for the City, based on SCAG's 2024-2050 RTP/SCS.

Table 5.14-6: Jobs – Housing Trends in the City of Riverside

	Employment in 2019	Number of Dwelling Units in 2019	2019 Jobs to Housing Ratio	Employment in 2050	Number of Dwelling Units in 2050	2050 Jobs to Housing Ratio
City of Riverside	158,600	94,200	1.68	204,500	137,200	1.49
County of Riverside	847,000	744,000	1.34	1,185,000	1,062,000	1.12

Source: SCAG, 2024

As shown in Table 5.14-6, the projected 2050 jobs-to-housing ratios for the City of Riverside and the County of Riverside are 1.49 and 1.12, respectively. This indicates that both the City of Riverside and the County of Riverside are housing-rich, though the City just slightly.

5.14.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold 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).

Threshold B Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

5.14.5 METHODOLOGY

CEQA Guidelines Section 15064(e) states that a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical adverse change. Additionally, CEQA Guidelines Appendix G indicates that a project could have a significant effect if it would induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Therefore, population impacts are considered potentially significant if growth associated with a project would exceed projections for the area and if such an exceedance would have the potential to create a significant adverse physical change to the environment.

The methodology used to determine population, housing, and employment impacts includes data collection on population and housing trends, which was obtained from the City of Riverside General Plan, California DOF, and SCAG. If projected growth from the Project exceeds SCAG and City of Riverside growth projections, and as a result could create a significant change to the environment, the resulting growth would be considered "substantial," and a significant impact would result.

The methodology used to determined displacement of substantial numbers of existing people or housing includes whether the project site contains or allows for population and housing. If existing or planned population and housing are to be displaced as a result of a project and would necessitate the construction of replacement housing elsewhere, a significant impact could occur.

5.14.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT 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)?

The Project proposes to develop a 10.21-acre portion of the site with two new warehouse buildings totaling 199,850 square feet (SF). The proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. Because the future tenant of the proposed warehouse is unknown, the number of jobs generated from operation of the Project cannot be precisely determined. However, based on employment generation rates listed in Table 3.G of the *Riverside County General Plan EIR*, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF, implementation of the proposed Project would create up to an additional 194 jobs (County of Riverside, 2015).

Construction

Construction of the proposed Project would result in a temporarily increased demand for construction workers. This Draft EIR assumes that construction of the Project would commence in April 2026. Based on construction estimates from the CalEEMod outputs listed in the Air Quality, Energy, and Greenhouse Gas Impact Analysis (included as Appendix B), construction would require approximately 117 construction workers during this 14-month period. Workers are anticipated to come from the City and surrounding jurisdictions and commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be minimal due to the temporary nature of construction and the relative number of existing construction workers in the region. The construction industry differs from most other industry sectors because (1) there is no regular place of work and job sites change many times in the course of a year; and (2) many construction workers are highly specialized (e.g. crane operators, steelworkers, etc.) and move from job site to job site as dictated by the demand for their skills. Thus, it is reasonable to assume, based on these factors, that Project-related construction workers would not relocate their households' places of residence as a direct consequence of the construction of the Project.

Approximately 14,945 individuals are employed in the construction industry in the City of Riverside and 101,257 individuals are employed in the construction industry in Riverside County as a whole (U.S. Census Bureau, U.S. Department of Commerce, 2023a, 2023b). Additionally, due to the City's location within Riverside County and its proximity to many jurisdictions in San Bernardino County, this analysis also considers the pool of construction workers available in neighboring jurisdictions in San Bernardino County. Approximately 80,549 individuals are employed in the construction industry in San Bernardino, 9,010 individuals are employed in the construction industry in Fontana, and approximately 4,511 individuals are

employed in the construction industry in Ontario (U.S. Census Bureau, U.S. Department of Commerce, 2023c, 2023d, 2023e). Due to the temporary nature of construction projects, the supply of general construction labor in the vicinity of the Project area is not expected to be constrained. As such, the existing individuals that are employed in the construction industry in Riverside County could meet the construction needs of the Project, and this labor pool would increase with the continued projected growth of the City of Riverside and the County of Riverside. Therefore, implementation of the proposed Project would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment. Construction impacts would be **less than significant.**

Operation

Implementation of the proposed nonresidential Project would result in long-term employment opportunities in the Project region. As described above, the Project is estimated to generate approximately 194 employees. As shown in Table 5.14-4, employment in the City of Riverside is expected to increase by 45,900 jobs between 2019 and 2050. Based on these growth projections, full buildout of the Project would represent approximately 0.4 percent of projected employment growth within the City of Riverside. Thus, the employment growth that would occur from the proposed Project is within the growth projections used to prepare SCAG's 2024-2050 RTP/SCS.

The employees that would fill these roles are anticipated to come from within the City or the region, as the number of individuals employed in manufacturing, transportation, and warehousing is 27,377 in the City of Riverside, 169,172 in Riverside County, 196,819 in the City of San Bernardino, 27,266 in Fontana, and 20,567 in Ontario (U.S. Census Bureau, U.S. Department of Commerce, 2023a,b,c,d,e). Due to these numbers of skilled industrial laborers in the region, it is anticipated that new employees at the Project site would already reside within commuting distance and would not generate substantial needs for any housing. Thus, direct impacts related to population growth would be **less than significant.**

Infrastructure

Development of the proposed Project would require expansion of infrastructure to serve the proposed uses at the site, including installation of new onsite water, sewer, stormwater drainage lines, and improved roadways as outlined in Section 3.0, *Project Description*. The onsite improvements would serve only the operations of the proposed development. They have not been sized to accommodate developments offsite. The proposed Project would include development of driveways as well as roadway improvements within the site frontage to provide adequate access and circulation for passenger automobiles and truck traffic. The Project does not directly propose any off-site roadway expansions. Thus, the infrastructure proposed by the Project would not induce unplanned population growth either directly or indirectly that could cause substantial adverse physical changes in the environment, and impacts would be **less than significant.**

THRESHOLD B: WOULD THE PROJECT DISPLACE SUBSTANTIAL NUMBERS OF EXISTING PEOPLE OR HOUSING, NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?

The Project site is currently developed with an existing industrial facility, and does not contain any housing units. The Project site has a General Plan Land Use designation of Industrial (I) and is zoned General Industrial, which do not permit residential development. The site is also within the Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The Project includes a zone change to change the site's ID Overlay Zone subdistrict from EE and HE to Industrial Emphasis (IE), which would allow for the proposed industrial buildings. While the Project would change the site's ID Overlay Zone subdistrict from a designation that allows housing as one of the uses to a designation that does not allow housing, the Project would not be subject to the No Net Loss Law (Government Code Section 65863). Pursuant to California Government Code Section

66300(b)(1)(A), the residential development capacity of a parcel is measured by "what was allowed under the land use designation or zoning ordinances… as in effect on January 1, 2018." The Project site was historically zoned and used as Industrial since October 19, 2021, when the City adopted the ID Overlay Zone. Because the Project site was zoned Industrial pursuant to Municipal Code Chapter 19.130 as of January 1, 2018, the Property's residential development capacity was zero and therefore, rezoning the Project site to Industrial Emphasis pursuant to Municipal Code Chapter 19.170 today would not violate No-Net Loss Rule. In addition, the City's 2021-2029 Housing Element determined that the City has adequate capacity to accommodate the City's 2021-2029 RHNA (City of Riverside, 2021a). Therefore, the Project would not displace any housing and would not necessitate the construction of replacement housing. Impacts would be **less than significant.**

5.14.7 CUMULATIVE IMPACTS

The cumulative population and housing impact assessment considers the development of the proposed Project in conjunction with other development projects in the context of the City of Riverside General Plan area. Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. As discussed, the Project site is designated by the Riverside General Plan for industrial development and is zoned Industrial. Additionally, the Project site is within the ID Overlay Zone and is within the EE and HE subdistricts. The Project includes a zone change to change the site's ID Overlay Zone subdistrict from EE and HE to IE so that the zone is consistent with the proposed industrial buildings and the General Plan. The proposed Project would not exceed the SCAG population, housing, and employment growth projections for the City and would represent a nominal percentage of SCAG's overall projections for the City of Riverside. The proposed Project would result in a generation of approximately 194 permanent jobs at full buildout, which is 0.4 percent of the growth projection anticipated by SCAG's 2024-2050 RTP/SCS, to occur between 2019 and 2050. The proposed Project is within the growth projections used to prepare the RTP/SCS, thus, impacts related to cumulative growth would be **less than significant and not cumulatively considerable.**

5.14.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

California Government Code Sections 65300, 65580–65589

5.14.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Thresholds A and B would be less than significant.

5.14.10 MITIGATION MEASURES

No mitigation measures are required.

5.14.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts related to population and housing would occur.

5.14.12 REFERENCES

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5.15 Public Services

5.15.1 INTRODUCTION

This section of the Draft EIR addresses impacts of the Project to public services, including fire protection and emergency services, police protection, school services, parks, and other public services, such as library and health services.

This section addresses whether there would be significant adverse physical environmental effects from new or expanded public facilities constructed in order to maintain acceptable service levels due to increased demand resulting from the proposed Project. Thus, an increase in staffing associated with public services, or an increase in calls for services, would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs resulting from the Project could constitute a significant impact. The analysis in this section is based, in part, on the following documents and resources:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* certified September 2021
- City of Riverside Municipal Code

5.15.2 REGULATORY SETTING

5.15.2.1 State Regulations

Fire Protection

California Building Code

The California Building Code (CBC) (California Code of Regulations [CCR] Title 24, Part 2) includes fire safety requirements, including the installation of sprinklers in all commercial and residential buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CBC is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023). Development under the Project would be subject to applicable regulations of the CBC.

California Fire Code

The California Fire Code (CFC) (CCR Title 24, Part 9) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of wildland-urban interface areas, among other issues. The CFC is updated every three years by the California Building Standards Commission and was last updated in 2022 (adopted January 1, 2023).

The CFC sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. Development under the Project would be subject to applicable regulations of the CFC.

Police Protection

There are no State regulations related to police protection that are applicable to the proposed Project.

Schools

California Government Code (Section 65995(b)) and Education Code (Section 17620)

California Senate Bill 50 (SB 50), which passed in 1998, amended California Government Code Sections 65995 through 65998, which contains limitations on Education Code Section 17620. The statute authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments.

California Government Code Section 65995 establishes limits on he fees that local agencies and school districts can charge developers to mitigate the impact of new construction projects on local schools. According to California Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities." The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

California State Assembly Bill (AB) 2926: School Facilities Act of 1986

In 1986, AB 2926 was enacted to authorize the levy of statutory fees on new residential and commercial/industrial development in order to pay for school facilities. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 *et seq.* to the Government Code. Under this statute, payment of statutory fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

Parks

Quimby Act

The Quimby Act (California Government Code Section 66477) states that "the legislative body of a City or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map." Requirements of the Quimby Act apply only to the acquisition of new parkland and do not apply to the physical development of new park facilities or associated operations and maintenance costs. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. The Quimby Act requires the provision of 3 acres of park area per 1,000 persons residing within a subdivision,

unless the amount of existing neighborhood and community park area exceeds that limit, in which case a city may adopt a higher standard not to exceed 5 acres per 1,000 residents.

Mitigation Fee Act

The California Mitigation Fee Act, Government Code Section 66000, *et seq.*, allows cities to establish fees to be imposed upon development projects for the purpose of mitigating the impact that the development projects have upon a city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act, a city must follow four primary requirements (California Department of Housing and Community Development, 2025):

1. Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee;
2. Segregate fee revenue from other municipal funds in order to avoid commingling of capital facilities fees and general funds;
3. For fees that have been in the possession of the city for five years or more and for which the dollars have not been spent or committed to a project, the city must make findings each fiscal year describing the continuing need for the money; and
4. Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

Other Public Facilities

There are no State regulations related to other public facilities that are applicable to the proposed Project.

5.15.2.2 Local Regulations

Fire Protection

City of Riverside Fire Department Strategic Plan

The *City of Riverside Fire Department Strategic Plan 2023-2028* identifies Riverside Fire Department's (RFD) key goals and objectives and articulates the agency's core responsibilities, mission, and guiding principles. The objective of the plan is to identify how to tailor RFD services to satisfy the changing needs of Riverside residents while aligning with the City's 2025 Strategic Plan, *Envision Riverside*, and the 10th Edition Commission on Fire Accreditation International Accreditation Model (City of Riverside, 2024a). The plan includes emergency planning goals and objectives for RFD's Emergency Services Division.

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to fire services that are applicable to the Project.

Objective PS-6: Protect property in urbanized and nonurbanized areas from fire hazards.

Policy PS-6.1: Ensure that sufficient fire stations, personnel and equipment are provided to meet the needs of the community as it grows in size and population.

Policy PS-6.2: Endeavor to meet/maintain a response time of five minutes for Riverside's urbanized areas.

Policy PS-6.3: Integrate fire safety considerations in the planning process.

Policy PS-6.4: Promote the use of buildings, setbacks, walls, landscaping, and other design features to buffer and reduce conflicts between adjacent properties.

Policy PS-6.5: Promote green building design.

Policy PS-6.7: Continue to involve the City Fire Department in the development review process.

Policy PS-7.1: Deploy human and financial resources to ensure adequate and equitable distribution of police services.

Objective PS-10: Improve the community's ability to respond effectively to emergencies.

Policy PS-10.1: Ensure that Police and Fire service facilities are strategically located to meet the needs of all areas of the City.

Policy PS-10.3: Ensure that public safety infrastructure and staff resources keep pace with new development planned or proposed in Riverside and the Sphere of Influence.

Policy PS-10.4: Continue to ensure that each development or neighborhood in the City has adequate emergency ingress and egress, and review neighborhood access needs to solve problems, if possible.

City of Riverside Phase I General Plan Update

The City of Riverside Phase I General Plan Update (adopted 2021) contains the following policies related to fire protection that are applicable to the Project.

Policy PSE-4: **Emergency Services.** Provide high-quality and responsive police, fire, and emergency services to all residents and businesses in Riverside.

City of Riverside Municipal Code

Municipal Code Chapter 16.32, *Fire Prevention,* adopts the CFC (CCR Title 24, Part 9) as published by the California Building Standards Commission and the International Code Council. The CFC regulates new structures, alterations, additions, changes in use or changes in structures. Municipal Code Chapter 16.32 includes specific information regarding safety provisions, emergency planning, fire-resistant construction, fire protection systems, means of egress and hazardous materials

Municipal Code Chapter 16.52, *Development Fees for Fire Stations*, provides for payment of development fees to be used for the purchase of land for and construction of fire stations, and acquisition of equipment and furnishings to equip fire stations. However, to date, the City has not adopted a resolution establishing fees for fire stations, so no fees are being collected.

Police Protection

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to police services that are applicable to the Project.

Objective PS-7: Provide high-quality police services to all residents and businesses in Riverside.

Policy PS-7.2: Support the transition of the Riverside Police Department from a centralized agency to one built around precincts as a means of providing more rapid, equitable and proactive community policing services.

Policy PS-7.5: Endeavor to provide minimum response times of seven minutes on Priority 1 calls and twelve minutes on all Priority 2 calls.

Objective PS-8: Improve community safety and reduce opportunities for criminal activity through appropriate physical design.

Policy PS-8.1: Maximize natural surveillance in all new development through physical design features that promote visibility.

Policy PS-8.2: Promote land use and design policies and regulations which encourage a mixture of compatible land uses to promote and increase the safety of public use areas and pedestrian travel.

Policy PS-8.3: Involve the Police Department in the development review process of public areas relative to building and site plan vulnerabilities to criminal activities.

Policy PS-8.4: Coordinate efforts between the Police Department and Planning Division to develop guidelines for implementation of CPTED-related issues.

City of Riverside Phase I General Plan Update

The City of Riverside Phase I General Plan Update (adopted 2021) contains the following policies related to police protection that are applicable to the Project.

Policy PSE-4: **Emergency Services.** Provide high-quality and responsive police, fire, and emergency services to all residents and businesses in Riverside.

Schools

City of Riverside General Plan Education Element

The Education Element addresses the educational resources that serve the City and surrounding region and touches on the City's public library system and municipal museum. The Education Element includes objectives and policies intended to ensure the needs of all sectors of education are met (City of Riverside, 2007b).

City of Riverside Municipal Code

Municipal Code Chapter 16.56, *School Development Fee*, establishes coordination between the City and the applicable school district to develop a school development fee for mitigating the impact of residential development on local school districts.

Riverside Unified School District

The Riverside Unified School District (RUSD) requires new development within the district's boundaries to pay developer fees for the purpose of offsetting the impact to school facilities created by new development. New residential development and additions are required to pay $5.17 per square foot while commercial and industrial developments are required to pay $0.84 per square foot (Riverside Unified School District, 2025).

Parks

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to parks that are applicable to the Project.

Open Space and Conservation Element

Objective OS-1: Preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.

Policy OS-1.1: Protect and preserve open space and natural habitat wherever possible.

Historic Preservation

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

City of Riverside Phase I General Plan Update

There are no policies related to parks that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

Riverside Municipal Code

Riverside Municipal Code Title16 contains several chapters establishing park-related development fees that apply to specific development projects. Chapter 16.44 *Regional Parks and Reserve Parks Development Fee* provides for the payment of a development fee to be utilized for the acquisition and development of regional parks and reserve parks, and if necessary, to be utilized for interfund borrowing for local parks.

Municipal Code Chapter 16.60 *Local Park Development Fees* was created to enable the acquisition, development, or improvement of neighborhood and community parks to provide both passive and active recreational opportunities to the residents of the City of Riverside in order to improve the quality of life for the public. The amount of the Local Park Development Fee is to be calculated based upon the following adopted minimum standards: that the public interest, convenience, health, welfare and safety requires the provision of three acres of local parks per thousand population, consisting of 0.75 acres of Community Park per thousand population and 2.25 acres of Neighborhood Park per thousand population. The Local Park Development Fees also apply to development of aquatic facilities.

Chapter 16.76: *Trails Development Fee* provides for the payment of a development fee to be utilized for the acquisition and development of trails. The required development fee for regional parks, reserve parks, local parks, and trails are required to be paid prior to the issuance of a building permit for new developmentor an initial mobile home setup permit.

Park, Recreation & Community Services Master Plan

The City of Riverside *Comprehensive Park, Recreation & Community Services Master Plan* was adopted in 2020 and serves as a guide and implementation tool for the management and development of parks and recreational facilities and programs for the City. The Plan describes the regulation of development impact

fees for all new development. The Plan builds on previous planning efforts and provides an overview of the current and future park and recreation needs within the City, in accordance with the City's General Plan.

Other Public Facilities

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to libraries that are applicable to the Project.

Objective ED-5: Ensure that the library system remains a premier information and independent learning resource for the Riverside residents and a complement to formal education.

Policy ED-5.1: Provide ample and convenient library facilities.

City of Riverside Phase I General Plan Update

There are no policies related to other public facilities that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.15.3 ENVIRONMENTAL SETTING

5.15.3.1 Fire Services

The Project site would be served by the City of Riverside Fire Department (RFD). RFD provides fire suppression, emergency medical services (paramedic and non-paramedic), ambulance services, hazardous materials (HAZMAT) response, arson investigation, technical rescue, hazard abatement, acts of terrorism and natural disaster response. The RFD maintains 14 fire stations throughout the City which house 212 sworn firefighter personnel and 72 emergency services personnel including Basic Life Support and Advanced Life Support personnel (City of Riverside, 2021b). RFD staff also includes 23 civilian personnel including administrative, inspector, engineering, and support staff. The RFD also contracts with the California Department of Forestry and Fire Protection (CAL FIRE) to provide mutual aid to the City and fire protection to unincorporated areas within the City's Sphere of Influence.

As described in the Public Safety Element Technical Background Report, RFD has established a performance goal for emergency response to arrive within 8 minutes of dispatch over 90 percent of the time (City of Riverside, 2021b). Between 2018 and 2022, RFD's average response time was 8:34 (RFD, 2023).

As described in RFD's C*ommunity Risk Assessment and Standards of Cover* (2023), the City is divided into 14 geographical planning zones, identified as fire districts, in order to ensure effective distribution of fire resources throughout the City. Each fire district is served by a fire station which serves as the first in response for the area. The first response station for the Project site is Station 4, which is located at 3501 Cranford Avenue, approximately 1.4 roadway miles southeast of the Project site (RFD, 2023). Station 4 is staffed by one captain, one engineer, one firefighter, and one firefighter paramedic and is equipped with one fire engine and one water tender (RFD, 2023).

Communities are given an Insurance Services Office (ISO) Public Protection Classification (PPC) rating to score their fire protection capabilities. ISO ratings range on a scale of 1 to 10, with a Class 1 rating representing the highest level of fire protection and ISO Class 10 representing the lowest level of protection. A community's ISO rating takes into account various factors such as fire department operations, water supply, emergency communications, and fire prevention programs. The RFD was last surveyed by the ISO in 2020 and was awarded a Class 1 rating (RFD, 2023).

5.15.3.2 Law Enforcement Services

The Riverside Police Department (RPD) is responsible for law enforcement and public safety activities in Riverside. RPD maintains three police stations throughout the City as listed in Table 5.15-1.

Table 5.15-1: Riverside Police Stations

Police Station	Distance from Site	Station Responsibility	Staffing
Orange Station 4102 Orange Street	1.9 roadway miles	Administrative Support Division	Chief of Police, two Deputy Police Chiefs, one Captain, three Lieutenants, two Sergeants, and civilian support staff
Lincoln Station 8181 Lincoln Avenue	7.4 roadway miles	Field Operations Division – provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services for the City	115 patrol officers, 24 Sergeants, six Lieutenant Watch Commanders, one Executive Lieutenant, one Traffic Lieutenant, and civilian support staff position
Magnolia Station 10540 Magnolia Avenue	10.1 roadway miles	Investigative Units – conducts investigative work provided by patrol officers	Two captains, six Lieutenants, approximately 60 detectives and civilian support staff

Source: Lieutenant Brandy Merrill, Riverside Police Department, personal email communication, December 5, 2024.

As described in the Public Safety Technical Report, RPD has a standard response time of 7 minutes for Priority One calls, which are typically of life-threatening nature, and 12 minutes for Priority Two calls, which are non-life-threatening (City of Riverside, 2021b). Historically, each RPD station provided police services to the entire City. However, the City has implemented a decentralized Neighborhood Policing Center model in an effort to provide more equitable and responsive services across the City. Funding for RPD comes from the City of Riverside's Measure Z which provides funding for sworn officer and non-sworn public safety positions, dispatcher positions, and vehicle maintenance positions, including hiring incentives and recruitment costs (City of Riverside, 2021b). RPD does not use a formula for calculating the number of officers per capita, but instead utilizes adequate staffing to meet operational needs per the RPD Policy Manual (Lieutenant Brandy Merrill, Riverside Police Department, personal email communication, December 5, 2024).

5.15.3.3 School Services

The Project site is within the Riverside Unified School District (RUSD) boundary. The RUSD currently operates 55 schools, including: 31 elementary schools, 9 middle schools, 7 high schools, and 8 specialty schools (RUSD 2024a). As of the 2023/2024 school year, the RUSD had a total enrollment of 39,505 students (California Department of Education, 2024). The closest schools to the site are Longfellow Elementary School, located at 3610 Eucalyptus Avenue (approximately 0.6 miles south of the Project site), University Heights Middle School, located at 1155 Massachusetts Avenue (approximately 1.2 miles east of the Project site), and Lincoln High School, located at 4341 Victoria Avenue (approximately 1.2 miles south of the Project site).

5.15.3.4 Park Services

The City of Riverside has approximately 3,010.53 acres of developed parks and 340.59 acres of undeveloped/planned parks, which when constructed would bring the total park acreage in the City to 3,351.12 acres (C. Assadzadeh, City of Riverside Senior Planner, personal email communication, December 17, 2024). Additionally, there are seven Riverside County parks, regional County-owned parks and reserves,

and State park facilities available for use in the region. The closest existing park and recreation facilities to the Project site (within 2 miles) in the City of Riverside are listed in Table 5.15-2. As shown, the City currently has seven parks and recreation facilities that would provide 500.53 acres of parkland and recreation space within two miles of the Project site.

Table 5.15-2: Riverside Park and Recreation Facilities Within Two Miles of the Project Site

Park and Address	Amenities	Acreage	Distance from Project Site	Travel Time from Project Site[1]
Patterson Park 1846 W Linden St	Lighted softball field and sports field, playground, picnic shelters, snack bar, restrooms and on-site parking	4.27	0.62 mile	Walking: 22 minutes Driving: 3 minutes
North Park 3172 Mission Inn	Historic site with arbor structure	1.23	0.78 mile	Walking: 24 minutes Driving: 3 minutes
Bobby Bonds Park (Ceazar Chavez Community Center) 2060 University	Lighted softball field, lighted basketball/tennis courts, sports field, soccer field, social service center, olympic pool, picnic tables, and childcare	13.67	0.81 mile	Walking: 22 minutes Driving: 5 minutes
Hunter Hobby Park 1404 Iowa Ave	Softball fields, picnic facilities, miniature steam locomotives (Riverside Live Streamers)	32.20	1.06 miles	Walking: 37 minutes Driving: 6 minutes
Lincoln Park 4261 Park Ave	Lighted basketball court, horseshoe courts, community center, playground, and picnic facilities.	3.25	1.16 miles	Walking: 32 minutes Driving: 5 minutes
White Park 3936 Chestnut St	Senior center, administration offices, Asian garden, picnic tables, restrooms, on-site parking and botanical garden (historic site)	5.27	1.23 miles	Walking: 42 minutes Driving: 9 minutes
Fairmount Park 2601 Fairmount Blvd	Lighted tennis courts, two playgrounds, horseshoe pits, picnic tables, Barbeques, covered picnic areas, Historic site, Boathouse, Izaak Walton Building, Bandshell nine-hole golf course, 50 acre lake system, fishing, boat launch, rose garden, basketball court, hiking and walking trails, restrooms, and lawn bowling	209.58	1.27 miles	Walking: 36 minutes Driving: 6 minutes
Bordwell Park 2008 Martin Luther King Blvd	Lighted softball field, lighted basketball court, community center, senior activity area, childcare center, playground, picnic tables, and barbeques	22.76	1.35 miles	Walking: 36 minutes Driving: 5 minutes

Park and Address	Amenities	Acreage	Distance from Project Site	Travel Time from Project Site[1]
Highland Park 786 Glenhill Dr	Basketball court, two playgrounds, picnic facilities, covered picnic area and on-site parking	5.05	1.54 miles	Walking: 44 minutes Driving: 6 minutes
Reid Park (Ruth Lewis Community Center) 701 Orange St	Lighted softball fields, basketball, tennis, and lighted sports field, soccer field, community center with gym, playground, pool, picnic tables, snack bar, Barbeques, restrooms and on-site parking	42.24	1.67 miles	Walking: 51 minutes Driving: 8 minutes
Mountain Rubidoux Park 4076 Mount Rubidoux Dr	Open space with rock formations, jogging/running paths, over three miles of trails and historic site	161.01	1.71 miles	Walking: 54 minutes Driving: 9 minutes
Total Acreage of Parkland		500.53		

Source: City of Riverside, General Plan and Supporting Documents EIR, Section 5.14 – Recreation, Table 5.14-B (2007).
[1]Per Google Maps

5.15.3.5 Other Public Facilities

Other governmental services include a variety of public and quasi-public services including libraries, medical clinics, urgent care facilities, hospitals, social service centers, senior centers, and other facilities. The library closest to the Project site and surrounding area is the Riverside Main Library, located at 3900 Mission Inn Avenue, approximately 1.7 roadway miles west of the Project site.

5.15.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to result in 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 any of the public services:

Threshold A Fire protection services;

Threshold B Police protection services;

Threshold C School services;

Threshold D Parks services; or

Threshold E Other public facilities.

5.15.5 METHODOLOGY

The evaluation of impacts to public services is based on whether the existing public services can meet the demands of the Project, based on established thresholds, including maintaining acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives or if the Project

results in the need for new or expanded government services and facilities, including fire and police stations, schools, parks, libraries, community recreation centers, public health facilities and other public facilities.

5.15.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, NEED FOR NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR OTHER PERFORMANCE OBJECTIVES FOR FIRE PROTECTION SERVICES?

Impacts to fire services are considered significant if Project implementation would result in increased demand for services that would require the construction of new or expanded fire facilities. Development of the proposed Project would consist of the construction of two warehouse buildings, totaling 199,850 SF on 10.21 acres. Construction and operation of the Project would increase the number of structures and employees in the Project area, which may increase demand for fire protection and emergency medical services. However, the Project is an infill project on a site which is already developed with an existing industrial use which is already served by nearby RFD stations. As described above, RFD Station 4 is the first response station for the Project area. Additionally, RFD Station 1 is within 1.4 roadway miles of the Project site and RFD Station 6 is within 1.8 roadway miles of the Project site.

Proposed access to the Project site would be reviewed by the City and the RFD to ensure compliance with fire protection standards. Additionally, the proposed Project would be required to adhere to the CFC, which would minimize the demand upon fire stations, personnel, and equipment. The proposed buildings would be equipped with fire extinguishers, sprinkler systems, fire alarm systems, fire pumps, and backflow devices pursuant to the CFC and CBC.

As described above, Riverside Municipal Code Chapter 16.52, allows the City to collect development fees for the construction and purchase of land for fire stations as well as for the acquisition of equipment and furnishings to equip fire stations. However, to date, the City has not adopted a resolution establishing those development fees, so no fees are currently being collected. In the meantime, the City's Measure Z continues to provide funding for RFD staff positions, training, and vehicle replacement and maintenance.

As described above, the existing Project site is served by RFD Station 4. While the increase in square footage from the proposed Project relative to existing conditions may increase demand for fire protection services, there are a total of three existing fire stations within 2 miles of the Project site. As such, due to the existing site already being served by RFD Station 4, and the location of 2 additional facilities near the Project site, the Project site has adequate nearby fire facilities to serve the proposed Project in addition to the existing service needs of the area; and construction of a new or expanded fire station would not be required as a result of the proposed Project. Thus, the proposed Project would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection facilities. Therefore, Project impacts to fire services would be **less than significant.**

THRESHOLD B: WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, NEED FOR NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE

SERVICE RATIOS, RESPONSE TIMES, OR OTHER PERFORMANCE OBJECTIVES FOR POLICE PROTECTION SERVICES?

Impacts to police services are considered significant if Project implementation would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction of new or expansion of existing police facilities. Implementation of the proposed Project would result in the development of two warehouses, totaling 199,850 SF on a site that is currently developed with an existing industrial use. The proposed Project would result in an incremental increase in the need for police protection services in an area already served by the RPD. Crime and safety issues during Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. During operation, the proposed Project may generate a typical range of police service calls, such as burglaries, thefts, and employee disturbances. The proposed Project would address typical operational security concerns through implementing Crime Prevention Through Environmental Design (CPTED) measures such as providing low-intensity security lighting, fencing, and security cameras.

Although the proposed Project would generate additional long-term employees within the Project site, this increase in employment is not anticipated to result in an increase in population that would generate an additional need for law enforcement services. As discussed in Section 5.14, *Population and Housing*, operation of the proposed Project is estimated to generate a need of up to 194 employees at full build-out; however, it is anticipated that these employees would come from within the region and thus would not contribute to a large increase in population. In addition, the proposed Project is consistent with the General Plan land use designation of Industrial (I); thus, buildout of the Project site has been accounted for and would not result in unanticipated growth within the City. Since the Project would not contribute to a large population increase, the Project would not result in the need for new or expanded police facilities to support additional residents.

In addition, a service letter was sent to the RPD requesting information regarding the department's ability to service the Project. On December 5, 2024, the department responded stating that the development of the proposed Project would not result in the need for expansion of existing or construction of new police stations (Lieutenant Brandy Merrill, Riverside Police Department, personal email communication, December 5, 2024). Therefore, Project impacts to police services would be **less than significant.**

THRESHOLD C: 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 SCHOOL SERVICES?

The Project site is within the RUSD boundary. As discussed previously, the Project would result in the development of two warehouses totaling 199,850 SF. No residential development is planned as a part of this Project. As such, the Project would not result in a direct demand for new or expanded school services within the area. As described previously, the proposed Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region as discussed in Section 5.14, *Population and Housing,* and substantial in-migration of employees that could generate new students is not anticipated to occur.

Additionally, under State law, development projects are required to pay school impact fees in accordance with SB 50 at the time of building permit issuance (included as PPP PS-1). The funding program established by SB 50 allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs and has been found by the legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school

facilities" (Government Code Section 65995[h]). The school impact fee for commercial/industrial developments within the RUSD boundary is $0.84 per SF, which would equal approximately $167,874 for the Project (RUSD, 2025). The school impact fees would offset any costs associated with an increase in school capacity due to the Project. As such, impacts on school services would be **less than significant.**

THRESHOLD D: 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 PARKS SERVICES?

Typically, residential development increases the need for new parks and increases the use of existing citywide park facilities. The proposed warehouse development would not directly provide new housing opportunities. Although the proposed Project is anticipated to generate 194 new employees, these employees are anticipated to come from within the City and surrounding jurisdictions , as described in Section 5.14, *Population and Housing*. Although new employees may occasionally use local parks, such an increase in use would be limited and would not result in deterioration of facilities such that the construction or expansion of recreational facilities would be necessary. Therefore, any increased demand for public parks within the City due to Project implementation would be considered a **less than significant impact.**

THRESHOLD E: 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 OTHER PUBLIC FACILITIES?

Other governmental and public services generally refer to libraries, medical services, and other public facilities. The closest library facility to the Project site is the Riverside Main Library located at 3900 Mission Inn Avenue, approximately 1.7 roadway miles west of the Project site. Demand placed on libraries is based on the generation of a resident population associated with a person's place of residence, and not typically their place of employment. The closest public health care facility to the Project site is the Riverside Community Hospital, located at 4445 Magnolia Avenue, approximately 2.3 roadway miles southwest of the Project site. As discussed previously, the Project would result in the development of two industrial warehouses totaling 199,850 SF and would not directly result in a direct increase in the City's population as no residential uses are proposed. In addition, as discussed in Section 5.14, *Population and Housing*, the proposed Project is not anticipated to generate a population increase, as the employees needed to operate the Project are anticipated to come from within the Project region. While it is possible that employees may occasionally utilize medical services while at work, the Project would not result in a substantial increase in demand for public health care facilities given the limited scale of employment, approximately 194 employees, and the absence of increase in residential population. As such, the proposed Project would not directly create a demand for public library facilities, nor would it directly result in the need to modify existing or construct new public service facilities. Therefore, the Project would result in a **less than significant impact** related to public facilities.

5.15.7 CUMULATIVE IMPACTS

The cumulative setting for public services is areas that are served by the RFD, RPD, and RUSD. The proposed Project is consistent with the General Plan land use designation of Industrial (I); thus, buildout of the Project site has been accounted for and would not result in unanticipated growth within the City. The Project would not significantly increase the need for public services in the Project area or in the City of Riverside. Additionally, as discussed above, the Project would not impact acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives or result in the need for new or the expansion of existing government services and facilities. Related projects in the region would be required to demonstrate their level of impact on public services and also pay their proportionate development fees, as appliable. Therefore, the incremental impact of the proposed Project would not combine with other projects in the area to result in a cumulative impact related to the provision of public services. There would be **no significant cumulative environmental impact** on public services from Project implementation.

5.15.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Fire Code (CFC; California Code of Regulations, Title 24, Part 9)
- Government Code Section 65995(b)

Plans, Programs, or Policies

- **PPP PS-1:** The Project is required to pay school impact fees in accordance with SB 50 at the time of building permit issuance. The school impact fee for commercial/industrial developments within the RUSD boundary is $0.84 per SF, which would equal approximately $167,874 for the Project.

5.15.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Thresholds A through E would be less than significant.

5.15.10 MITIGATION MEASURES

No mitigation measures are required.

5.15.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable adverse impacts related to public services would occur.

5.15.12 REFERENCES

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5.16 Recreation

5.16.1 INTRODUCTION

Pursuant to the requirements of CEQA, this section of the EIR analyzes whether the proposed Project would (1) increase the use of existing parks and recreational facilities such that substantial physical deterioration or degradation of the facilities would occur or be accelerated or that new or expanded facilities would be required; or (2) result in substantial adverse construction-related effects associated with the provision of new or physically altered parks and recreational facilities, whether on-site or off-site. Information within this section is based on the following:

- *City of Riverside General Plan 2025*, adopted 2007
- *City of Riverside General Plan Program Environmental Impact Report,* certified 2007
- City of Riverside Municipal Code

5.16.2 REGULATORY SETTING

5.16.2.1 Federal Regulations

There are no federal regulations related to recreation that are applicable to the Project.

5.16.2.2 State Regulations

Quimby Act

The Quimby Act (California Government Code Section 66477) states that "the legislative body of a City or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map." Requirements of the Quimby Act apply only to the acquisition of new parkland and do not apply to the physical development of new park facilities or associated operations and maintenance costs. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. The Quimby Act requires the provision of 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case a city may adopt a higher standard not to exceed 5 acres per 1,000 residents.

Mitigation Fee Act

The California Mitigation Fee Act, Government Code Section 66000, et seq., allows cities to establish fees to be imposed upon development projects for the purpose of mitigating the impact that the development projects have upon a city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act, a city must follow four primary requirements (California Department of Housing and Community Development, 2025):

1. Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee;

2. Segregate fee revenue from other municipal funds in order to avoid commingling of capital facilities fees and general funds;
3. For fees that have been in the possession of the city for five years or more and for which the dollars have not been spent or committed to a project, the city must make findings each fiscal year describing the continuing need for the money; and
4. Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

5.16.2.3 Regional Regulations

There are no regional regulations applicable to the proposed Project.

5.16.2.4 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to recreation that are applicable to the Project.

Open Space and Conservation Element

Objective OS-1: Preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.

Policy OS-1.1: Protect and preserve open space and natural habitat wherever possible.

Historic Preservation

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

Riverside Municipal Code

Riverside Municipal Code Title 16 contains several chapter establishing park-related development fees that apply to specific development projects. Chapter 16.44 *Regional Parks and Reserve Parks Development Fee* provides for the payment of a development fee to be utilized for the acquisition and development of regional parks and reserve parks, and if necessary, to be utilized for interfund borrowing for local parks.

Municipal Code Chapter 16.60 *Local Park Development Fees* was created to enable the acquisition, development, or improvement of neighborhood and community parks to provide both passive and active recreational opportunities to the residents of the City of Riverside in order to improve the quality of life for the public. The amount of the Local Park Development Fee is to be calculated based upon the following adopted minimum standards: that the public interest, convenience, health, welfare and safety requires the provision of three acres of local parks per thousand population, consisting of 0.75 acres of Community Park per thousand population and 2.25 acres of Neighborhood Park per thousand population. The Local Park Development Fees also apply to development of aquatic facilities.

Chapter 16.76: *Trails Development Fee* provides for the payment of a development fee to be utilized for the acquisition and development of trails. The required development fee for regional parks, reserve parks, local parks, and trails are required to be paid prior to the issuance of a building permit for new development or an initial mobile home setup permit.

Park, Recreation & Community Services Master Plan

The City of Riverside *Comprehensive Park, Recreation & Community Services Master Plan* was adopted in 2020 and serves as a guide and implementation tool for the management and development of parks and recreational facilities and programs for the City. The Plan describes the regulation of development impact fees for all new development. The Plan builds on previous planning efforts and provides an overview of the current and future park and recreation needs within the City, in accordance with the City's General Plan.

5.16.3 ENVIRONMENTAL SETTING

The City of Riverside has approximately 3,010.53 acres of developed parks and 340.59 acres of undeveloped/planned parks, which when constructed would bring the total park acreage in the City to 3,351.12 acres (C. Assadzadeh, City of Riverside Senior Planner, personal email communication, December 17, 2024). Additionally, there are seven Riverside County parks, regional County-owned parks and reserves, and State park facilities available for use in the region. The closest existing park and recreation facilities to the Project site (within 2 miles) in the City of Riverside are listed in Table 5.16-1. As shown, the City currently has seven parks and recreation facilities that would provide 500.53 acres of parkland and recreation space within two miles of the Project site.

Table 5.16-1: Riverside Park and Recreation Facilities Within Two Miles of the Project Site

Park and Address	Amenities	Acreage	Distance from Project Site	Travel Time from Project Site[1]
Patterson Park 1846 W Linden St	Lighted softball field and sports field, playground, picnic shelters, snack bar, restrooms and on-site parking	4.27	0.62 mile	Walking: 22 minutes Driving: 3 minutes
North Park 3172 Mission Inn	Historic site with arbor structure	1.23	0.78 mile	Walking: 24 minutes Driving: 3 minutes
Bobby Bonds Park (Ceazar Chavez Community Center) 2060 University	Lighted softball field, lighted basketball/tennis courts, sports field, soccer field, social service center, olympic pool, picnic tables, and childcare	13.67	0.81 mile	Walking: 22 minutes Driving: 5 minutes
Hunter Hobby Park 1404 Iowa Ave	Softball fields, picnic facilities, miniature steam locomotives (Riverside Live Streamers)	32.20	1.06 miles	Walking: 37 minutes Driving: 6 minutes
Lincoln Park 4261 Park Ave	Lighted basketball court, horseshoe courts, community center, playground, and picnic facilities.	3.25	1.16 miles	Walking: 32 minutes Driving: 5 minutes
White Park 3936 Chestnut St	Senior center, administration offices, Asian garden, picnic	5.27	1.23 miles	Walking: 42 minutes Driving: 9 minutes

Park and Address	Amenities	Acreage	Distance from Project Site	Travel Time from Project Site[1]
	tables, restrooms, on-site parking and botanical garden (historic site)			
Fairmount Park 2601 Fairmount Blvd	Lighted tennis courts, two playgrounds, horseshoe pits, picnic tables, Barbeques, covered picnic areas, Historic site, Boathouse, Izaak Walton Building, Bandshell nine-hole golf course, 50 acre lake system, fishing, boat launch, rose garden, basketball court, hiking and walking trails, restrooms, and lawn bowling	209.58	1.27 miles	Walking: 36 minutes Driving: 6 minutes
Bordwell Park 2008 Martin Luther King Blvd	Lighted softball field, lighted basketball court, community center, senior activity area, childcare center, playground, picnic tables, and barbeques	22.76	1.35 miles	Walking: 36 minutes Driving: 5 minutes
Highland Park 786 Glenhill Dr	Basketball court, two playgrounds, picnic facilities, covered picnic area and on-site parking	5.05	1.54 miles	Walking: 44 minutes Driving: 6 minutes
Reid Park (Ruth Lewis Community Center) 701 Orange St	Lighted softball fields, basketball, tennis, and lighted sports field, soccer field, community center with gym, playground, pool, picnic tables, snack bar, Barbeques, restrooms and on-site parking	42.24	1.67 miles	Walking: 51 minutes Driving: 8 minutes
Mountain Rubidoux Park 4076 Mount Rubidoux Dr	Open space with rock formations, jogging/running paths, over three miles of trails and historic site	161.01	1.71 miles	Walking: 54 minutes Driving: 9 minutes
Total Acreage of Parkland		500.53		

Source: City of Riverside, General Plan and Supporting Documents EIR, Section 5.14 – Recreation, Table 5.14-B (2007).
[1]Per Google Maps

5.16.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

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

5.16.5 METHODOLOGY

The City's maintains a park standard of 3 acres of park and recreation facilities per 1,000 residents. The Project evaluated herein is an industrial development which is not anticipated to result in the generation of new residents in the City; therefore, the analysis below considers the increase in use of parks and recreation facilities that would be generated by the proposed Project in relation to the ability of existing park and recreation facilities to accommodate the increased use. The analysis considers whether an increase in use would result in the substantial physical deterioration of existing recreational facilities, such as accelerated wear on sports facilities and fields, or in the need for new or expanded facilities.

5.16.6 ENVIRONMENTAL IMPACTS

THRESHOLD 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?

The Project would construct and operate two warehouse buildings on a site that is currently developed with industrial uses. As previously discussed, the proposed Project would not develop any residential facilities and would not directly increase housing or population, which typically causes an increase in the demand for, and use of, existing neighborhood parks and other citywide recreational facilities. As described in Section 5.14, *Population and Housing*, employees needed to operate the proposed Project are anticipated to come from the existing labor force in the region. Thus, there would be no increase in residents that would cause an increase in demand for existing parks or other recreational facilities, and the proposed Project would not cause nor accelerate physical deterioration of these facilities. Although new employees may occasionally increase the use of existing local, neighborhood, and regional parks, employees' limited use would not result in accelerated deterioration to facilities such that the construction or expansion of recreational facilities would be necessary. Additionally, the Project applicant would be required to pay local park development fees to contribute to the construction or expansion of recreational facilities (including local, aquatic, regional/reserve and trail facilities) pursuant to Riverside Municipal Code Chapters 16.44, 16.60, and 16.76 (PPP R-1).

Additionally, as listed in Table 5.16-1, there are 500.53 acres of park and recreation facilities within two miles of the Project site available for use by the proposed employees. Further, there is also an abundance of existing recreational facilities within the region, such as the Santa Ana River Wildlife Area, Lake Perris State Recreational Area, and Box Springs Mountain Reserve, that would be available for use by future employees. Therefore, due to the limited increase of Project employees that would occur from implementation of the proposed Project and the amount of available park space within the vicinity of the Project site, future employees are not anticipated to increase the use of existing parks and recreation facilities to the degree that substantial physical deterioration of such parks and facilities would occur. Therefore, **impacts would be less than significant.**

THRESHOLD B: WOULD THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?

The Project would construct and operate two warehouse buildings on a site that is currently developed with industrial uses, and would not construct any residential facilities, nor create an additional need for housing. The Project would not directly increase the residential population of the City or generate additional need for parkland. The Project does not include or require the construction or expansion of recreational facilities which could negatively impact the environment, and no off-site parks or recreational improvements are proposed or required as part of the Project. Additionally, the Project applicant would be required to pay local park development fees to contribute to the construction or expansion of recreational facilities (including

local, aquatic, regional/reserve and trail facilities) pursuant to Riverside Municipal Code Chapters 16.44, 16.60, and 16.76 (PPP R-1). Any new or expanded facilities would be constructed by the City, since they are the responsible party that acquires, constructs, and maintains new parks and recreation areas. Thus, **the Project would result in less than significant impacts** related to the construction or expansion of recreational facilities or services.

5.16.7 CUMULATIVE IMPACTS

The cumulative assessment for parks and recreation considers the development of the Project in conjunction with other development projects in the City of Riverside, as listed in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR. As described under Impacts A and B, the Project would not increase the use of existing recreational facilities within the vicinity such that physical deterioration would occur and the Project would not include or require the construction or expansion of recreational facilities. Additionally, cumulative projects subject to Municipal Code Chapters 16.44, 16.60, and 16.76 would be required to provide park and recreational facilities and/or pay in-lieu fees as required by the Riverside Municipal Code and as described in the General Plan. Therefore, **the proposed Project would not result in a cumulatively considerable impact** related to parks and recreational facilities.

5.16.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Code Sections 66000 (Mitigation Fee Act)
- Riverside Municipal Code, Title 16, Chapter 16.44, Regional Parks and Reserve Parks Development Fee
- Riverside Municipal Code, Title 16, Chapter 16.60, Local Park Development Fees
- Riverside Municipal Code, Title 16, Chapter 16.76, Trails Development Fee

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) would apply to the proposed Project. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP R-1: Park and Recreation Development Fees. Pursuant to Municipal Code Chapters 16.44, 16.60, and 16.76, park development fees are imposed on the construction or placement of applicable nonresidential construction in accordance with the schedule of fees adopted by the City Council.

5.16.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Threshold A and B would be less than significant.

5.16.10 MITIGATION MEASURES

No mitigation measures are required.

5.16.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable impacts would occur from implementation of the Project.

5.16.12 REFERENCES

California Department of Housing and Community Development. (2025). *Fees and Exactions*. Retrieved February 11, 2025, from https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions

City of Riverside. (July 2007a). *City of Riverside General Plan and Supporting Documents EIR*. Retrieved November 15, 2024, from https://riversideca.gov/cedd/planning/city-plans/general-plan-0

City of Riverside. (November 2007b). *Riverside General Plan 2025*. Retrieved November 15, 2024, from https://riversideca.gov/cedd/planning/city-plans/general-plan-0

City of Riverside. (September 2021). *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report State Clearinghouse No. 2021040089*. Retrieved February 12, 2025, from https://www.riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach

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5.17 Transportation

5.17.1 INTRODUCTION

This section describes the existing transportation and circulation conditions of the Project site, identifies applicable regulations, evaluates the Project's consistency with applicable goals and policies, and identifies and analyzes potential environmental impacts. This analysis in the section is based, in part, on the following resources:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase I General Plan Update*, adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report*, 2021
- City of Riverside Municipal Code
- *Vehicle Miles Traveled (VMT) Screening Analysis Memorandum*, prepared by EPD Solutions, Inc., *March* 2025, included as Appendix K
- *Traffic Impact Analysis (TIA)*, prepared by EPD Solutions, Inc., April 2025

5.17.2 REGULATORY SETTING

5.17.2.1 State Regulations

Senate Bill 743

Senate Bill 743 (SB 743) was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

5.17.2.2 Regional Regulations

SCAG 2024– 2050 Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2024-2050 Regional Transportation Plan/Sustainable Communities

Strategy (RTP/SCS), also known as Connect SoCal, which was adopted in April 2024. The RTP/SCS integrates transportation planning with economic development and sustainability planning and aims to comply with State GHG emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates in the RTP/SCS that the six-county region will have to accommodate 20,909,000 residents by 2050 while also meeting the GHG emissions reduction targets set by the California Air Resources Board. SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. In addition, SCAG has taken on the role of planning for regional growth management.

5.17.2.3 Local Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) Circulation and Community Mobility Element contains the following policies related to transportation that are applicable to the proposed Project:

Policy CCM-2.2: Balance the need for free traffic flow with economic realities and environmental and aesthetic considerations, such that streets are designed to handle normal traffic flows with tolerances to allow for potential short-term delays at peak-flow hours.

Policy CCM-2.3: Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.

Policy CCM-2.4: Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.

Policy CCM-2.7: Limit driveway and local street access on Arterial Streets to maintain a desired quality of traffic flow. Wherever possible, consolidate driveways and implement access controls during redevelopment of adjacent parcels.

Policy CCM-5.2: Limit driveway and local street access on Arterial Streets to maintain a desired quality of traffic flow. Wherever possible, consolidate driveways and implement access controls during redevelopment of adjacent parcels.

Policy CCM-5.5: Participate in programs to mitigate regional traffic congestion.

Policy CCM-6.2: Encourage the reduction of vehicle miles, reduce the total number of daily peak hour vehicular trips, increase the vehicle occupancy rate and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD and County of Riverside TDM Guidelines.

Policy CCM-9.10: Promote Neighborhood Electric Vehicles (NEV) including participation in and support of the Western Riverside Council of Governments (WRCOG) 4-City Neighborhood Electric Vehicle Plan to provide a clean transportation option, particularly for short trips on low-speed and low-volume roads and to create near term and long range transportation network plans and scalable implementation strategies for deployment of NEVs.

Policy CCM-10.12: Encourage bicycling as a commute mode to school, work, etc.

Policy CCM-12.1: Discourage the use of public streets for heavy freight loading and unloading.

Policy CCM-12.2: Ensure that new development projects provide adequate truck loading and unloading facilities.

Policy CCM-13.1: Ensure that new development provides adequate parking.

Policy CCM-13.3: Work with developers to provide additional parking to mitigate area-wide parking shortages whenever feasible.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.17.3 ENVIRONMENTAL SETTING

5.17.3.1 This section outlines the existing transportation infrastructure serving the Project site, including roadways, transit services, and bicycle and pedestrian facilities. It also examines existing traffic conditions and vehicle miles traveled (VMT) in the area.Existing Roadway Network

State Route 91 (SR-91), also known as the Riverside Freeway and the Artesia Freeway, is an east-west highway in the state of California that connects Los Angeles County to Orange County. Regional access to the Project site is provided by SR-91, which is located approximately 0.15 miles to the west.

State Route 60 (SR-60) is an east-west highway in the state of California and a primary link between Los Angeles and Riverside Counties. Regional access to the Project site is provided by SR-60, which is located approximately 0.30 miles to the east and northeast.

Interstate 215 (I-215) is a north-south Interstate Highway in the Inland Empire region of Southern California. Regional access to the Project site is provided by SR-60, which is located approximately 0.45 miles to the east and southeast.

Massachusetts Avenue is an east-west road located directly south of the Project site. The posted speed limit is 25 miles per hour (mph). There are no existing or planned bicycle facilities along this roadway.

Kansas Avenue is a north-south collector street that is located directly west of the Project site. The posted speed limit is 35 mph. South of the Project site, starting on Linden Street (approximately 0.5 miles south of the Project site), Kansas Avene is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways.

Roberta Street is an east-west road that is located directly north of the Project site. There are no existing or planned bicycle facilities along this roadway.

Spruce Street is an east-west arterial road that is located approximately 0.10 miles north of the Project site. The posted speed limit is 40 mph. Spruce Street is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways and there are existing bike facilities along the roadway.

Chicago Avenue is a north-south arterial road that is located approximately 0.35 miles east of the Project site. The posted speed limit is 45 mph. Chicago Avenue is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways, and there are existing bike facilities along a portion of the roadway.

3rd Street is an east-west arterial road that is located approximately 0.25 miles south of the Project site. The posted speed limit is 40 mph. 3rd Street is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways, and there are existing bike facilities along the roadway.

5.17.3.2 Existing Site Access

Regional access to the Project site is provided via Interstate 215 (I-215), State Route 60 (SR-60), and State Route 91 (SR-91). Local access to the Project site is provided via Kansas Avenue, Massachusetts Avenue, and Roberta Street. Regional location and local vicinity maps are provided in Figure 3-1, *Regional Location*, Figure 3-2, *Local Vicinity*, and Figure 3-3, *Aerial View*.

5.17.3.3 Existing Transit Services

The Riverside Transit Agency (RTA) currently provides bus services in the city and western Riverside County. In addition to bus route services, RTA also provides CommuterLink and Dial-A-Ride services. CommuterLink routes travel to major transit centers and Metrolink stations in Riverside, San Diego, and San Bernardino counties. Dial-A-Ride is a curb-to-curb transportation services for seniors and persons with disabilities. Dial-A-Ride vehicles travel to areas within three-quarters of a mile of an RTA local fixed bus route.

RTA operates 47 bus routes. Bus Route 10 is located along 3rd Street, approximately 0.25 miles south of the Project site with one stop located near the intersection of 3rd Street and Chicago Avenue. Route 13 is located along Chicago Avenue approximately 0.35 miles east of the Project site, with one stop located near the intersection of Chicago Avenue and Spruce Street.

5.17.3.4 Existing Bicycle and Pedestrian Facilities

There are no existing bicycle lanes or pedestrian facilities adjacent to the Project site.

5.17.3.5 Existing Vehicle Miles Traveled

Vehicle miles traveled (VMT) is defined as one vehicle traveling on a road for one mile. Per the Western Riverside Council of Governments Low VMT Area Screening Tool, the Project site is located within a low-VMT generating area. Low-VMT generating areas are defined as traffic analysis zones (TAZs) with a daily VMT/employee that is less than the baseline level for the City of Riverside. The proposed Project is located in TAZ 2101(Appendix K).

5.17.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

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

Threshold B Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

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

Threshold D Result in inadequate emergency access.

City LOS Standards. The City of Riverside Traffic Impact Analysis (TIA) Preparation Guide (July 2020) provides the City's level of service (LOS) standards and acceptable delay increases for use in preparing traffic analysis. The standards identify that LOS D is the minimum acceptable LOS for intersections and roadways of collector or higher classification. However, LOS E is allowed during peak hours at arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges.

City VMT Screening Thresholds. The City's TIA Preparation Guide includes VMT screening criteria to identify projects that would have a less-than-significant impact on VMT and would therefore not require further VMT analysis. The screening criteria includes the following:

- Step 1: Transit Priority Area (TPA) Screening. Projects located within a TPA may be presumed to have a less-than-significant impact.
- Step 2: Low VMT Area Screening. Low VMT-generating area is defined as traffic analysis zones (TAZs) with a daily VMT per employee that is less than the baseline level for the City of Riverside (baseline year is 2025 for this analysis). Projects located within a low VMT-generated area and are consistent with the existing General Plan land use designation and zoning are presumed to have a less-than-significant impact.
- Step 3: Project Type Screening. Local serving projects such as K-12 schools, local parks, daycare centers and retail projects less than 50,000 square feet may be presumed to have a less-than-significant impact. This screening criteria also includes projects which generate fewer than 110 daily vehicle trips.
- Step 4: Mixed-Use Projects. The City of Riverside may evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail).
- Step 5: Redevelopment Projects. Where a project replaces existing VMT generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to less-than-significant transportation impacts.

Projects not screened through the steps above are required to complete a VMT analysis and forecasting through the Riverside County Transportation Analysis Model (RIVTAM) to determine if they have a significant VMT impact pursuant to the following impact thresholds.

5.17.5 METHODOLOGY

To determine whether the potential future buildout of the Project would result in a significant impact related to conflict with a program, plan, ordinance, or policy related to the effectiveness of the circulation system, the extent to which the proposed Project would provide facilities to enhance the use of public transit, pedestrian, and bicycle mobility, the proposed Project was compared to adopted plans for public transit, pedestrian mobility, and bicycle facilities. A significant impact would result if the proposed Project resulted in a conflict that could result in an impact on the environment. Project Trip Generation

The proposed Project trip generation was prepared using trip rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021). The existing and proposed industrial buildings were analyzed under the General Light Industrial (GLI) land use (Land Use Code 110). The existing and proposed industrial buildings were analyzed as GLI. However, a conservative approach was taken by applying the warehouse truck split, which is higher than the truck split typically associated with GLI. Therefore, the vehicle splits from the South Coast Air Quality Management District (SCAQMD) and the passenger vehicle/truck split from the ITE warehouse rate (Land Use code 150) were applied in the analysis.

Vehicle Miles Traveled Analysis Methodology

The City's VMT Preparation Guidelines describe that if the Project meets one of the screening criteria detailed previously in Section 5.17.4, *Thresholds of Significance*, then the Project would be considered to have a less-than-significant impact on VMT and therefore could be screened out from further VMT analysis. Therefore, the Project was analyzed against the screening criteria described previously to determine if the Project screens out from further analysis.

Level of Service Methodology

The LOS screening criteria in the City's TIA Preparation Guidelines, detailed previously in Section 5.17.4, *Thresholds of Significance*, was applied to the Project to identify if the Project would be inconsistent or result in an exceedance of the TIA Preparation Guidelines or General Plan policy related criteria.

The TIA included an analysis of signalized intersections, all-way stop controlled (AWSC) intersections, and two-way stop controlled (TWSC) intersections. The following twelve study area intersections were evaluated during the AM and PM peak hours, which are defined as the hours with the highest traffic volumes during the 7 AM to 9 AM and 4 PM to 6 PM peak commute periods. AM and PM peak hour traffic operations were evaluated under the following scenarios: existing conditions, Background without Project Conditions[1], and Background with Project Conditions.[2]

1. Kansas Avenue (South Leg)/Roberta Street (TWSC)
2. Kansas Avenue/Massachusetts Avenue (TWSC)
3. Kansas Avenue (North Leg)/Roberta Street (AWSC)
4. Chicago Avenue/Massachusetts Avenue (TWSC)
5. Chicago Avenue/3rd Street (Signalized)
6. I-215 SB Ramps/Blaine Street (Signalized)
7. I-215 NB Ramps/Blaine Street (Signalized)
8. Project Driveway 1/Roberta Street (TWSC)
9. Project Driveway 2/Roberta Street (TWSC)
10. Project Driveway 3/Kansas Avenue (TWSC)
11. Project Driveway 4/Kansas Avenue (TWSC)
12. Project Driveway 5/Massachusetts Avenue (TWSC)

To determine if the proposed Project would increase hazards due to a geometric design feature or incompatible use, the analysis below reviewed the site plan, access points, and circulation design to identify potential hazards from geometric features or incompatible uses. Evaluation was based on City standards, truck routes, and sight distance requirements.

Emergency access was evaluated based on the Project site's access, roadway connectivity, and construction impacts. The analysis considered compliance with the California Fire Code and City requirements.

[1] Defined as Opening Year (2027) Conditions with an ambient growth rate of 2% and traffic from approved projects in the area.
[2] Defined as Background Without Project Conditions with the addition of traffic from the proposed Project.

5.17.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES?

Transit, Bicycle, and Pedestrian Facilities

Transit. As described previously, the RTA currently provides bus services in the city and western Riverside County. Bus Route 10 is located along 3rd Street, approximately 0.25 miles south of the Project site with one stop located near the intersection of 3rd Street and Chicago Avenue. Bus Route 13 is located along Chicago Avenue approximately 0.35 miles east of the Project site, with one stop located near the intersection of Chicago Avenue and Spruce Street. The existing bus services would allow convenient access for employees of the Project site and may reduce VMT. The proposed Project would not alter or conflict with existing bus stops and schedules, and impacts related to RTA transit services would not occur.

Bicycle Facilities. There are no existing or planned bicycle lanes adjacent to the Project site. As previously described, the existing and planned pedestrian facilities closest to the Project site are as follows:

- South of the Project site, starting on Linden Street (approximately 0.5 miles south of the Project site), Kansas Avenue is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways. However, there are no existing bike facilities along the roadway.
- Spruce Street, located approximately 0.10 miles north of the Project site, is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways, and there are existing bike facilities along Spruce Street.
- Chicago Avenue, located approximately 0.35 miles east of the Project site, is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways. There are existing bike facilities along a portion of the roadway.
- 3rd Street, located approximately 0.25 miles south of the Project site, is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways. There are existing bike facilities along the roadway.

The proposed Project would not conflict with existing or planned bicycle facilities as there are no existing or planned bicycle facilities adjacent to the Project site, and impacts related to bicycle facilities would not occur.

Pedestrian Facilities. Under the existing conditions, there is an 8-foot-wide sidewalk along the soutehrh Project frontage on Massachusetts Avenue. However, no sidewalk currently exists along the western Project frontage on Kansas Avenue. Additionally, there is currently no sidewalk along the northern Project frontage on Roberta Street.

As detailed in Section 3.0, *Project Description*, the Project includes construction of 6-foot wide sidewalks at a minimum along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue. The proposed street improvements would be developed in accordance with the City of Riverside General Plan and the Riverside Municipal Code standards and guidelines. As a result, the Project would provide new pedestrian facilities and expand pedestrian circulation. Thus impacts related to pedestrian facilities would not occur.

The Project would provide additional facilities and would not conflict with any existing facilities. Therefore, impacts to transit, bicycle, and pedestrian facilities would be **less than significant**.

City of Riverside General Plan

The proposed Project is also consistent with the General Plan designations of the site. The Project site has a General Plan land use designation Industrial (I). The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling; support commercial uses; and warehouse and distribution facilities only at specific locations. Once approved by the Development Agreement, the Project site would be within one of these specific locations. The Project proposes to construct two new industrial buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) that would support warehouse and office uses. No development is proposed on 1989 Massachusetts Avenue. As described in Section 3.0, *Project Description*, a warehouse is used for the storage, receiving, shipping or wholesaling of goods and merchandise, and any incidental or accessory activities. The proposed light industrial warehouses are consistent with the intended uses of the Industrial land use designation. As such, the proposed Project would not conflict with the City of Riverside General Plan, and **no impact** would occur.

Roadway Facilities

Construction. Construction of the proposed Project is anticipated to occur over a 14-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials. It is anticipated that Project construction would generate haul trips distributed throughout the day. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday AM peak period is 7:00 AM to 9:00 AM., and the weekday PM peak period is 4:00 PM to 6:00 PM. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day. As shown in Table 5.17-1, the demolition construction phase would generate the most vehicular trips per day from approximately 15 workers and 311 hauling trips, which would result in a total of 326 daily trips.

Table 5.17-1: Daily Construction Vehicle Trips

Construction Activity	Workers Per Day	Vendors Per Day	Hauling Trips Per Day
Demolition	15	0	311
Site Preparation	18	0	0
Grading	20	0	38
Building Construction	84	33	0
Paving	15	0	0
Architectural Coating	17	0	0

Source: Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix B)

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period. In addition, as part of the grading plan and building plan review processes, the City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be **less than significant.**

Operation. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project vicinity. As discussed in Section 3.0, *Project Description*, access to the Project site would be provided from five proposed driveways.

The northwestern driveway on Roberta Street would be limited to passenger vehicles while the northeastern driveway would provide both passenger vehicle and truck access. The northernmost driveway on Kansas

Avenue would provide access to both passenger vehicles and trucks. The southernmost driveway on Kansas Avenue would be limited to passenger vehicles. The driveway on Massachusetts Avenue would provide both passenger vehicle and truck access. Table 5.17-4, *Proposed Project Trip Generation*, identifies the number of trips that would be generated by the Project. The trip rates for General Light Industrial (Land Use Code 110) from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (ITE, 2021) were used to evaluate the existing and proposed land use. As shown in Table 5.17-4, *Proposed Project Trip Generation*, the existing site is estimated to generate 487 daily trips, with 74 trips during the AM peak hour (65 inbound and 9 outbound), and 66 during the PM peak hour (10 inbound and 56 outbound). The proposed Project would generate a total of 974 daily trips, with 148 during the AM peak hour (130 inbound and 18 outbound) and 132 during the PM peak hour (20 inbound and 112 outbound). When converted to passenger vehicle trips, the existing site is estimated to generate approximately 462 daily trips, and the proposed Project is anticipated to generate approximately 632 daily trips (Appendix K).

As described previously, SB 743 does not prevent a city or county from continuing to analyze delay or LOS; but delay/LOS metrics may no longer constitute the basis for CEQA impacts. In addition, Section 21099 (b)(4) of the PRC states that SB 743 does not preclude the application of local general plan policies, zoning codes, conditions of approval, thresholds, or any other planning requirements pursuant to the police power or any other authority." Thus, the City requires projects to identify potential impacts to the LOS standards designated in its general plan, and requires LOS improvements for congestion relief, as needed.

The 12 study area intersections included in Section 5.17.5, *Methodology*, were evaluated during the AM and PM peak hours, which are defined as the hours with the highest traffic volumes during the 7 AM to 9 AM and 4 PM to 6 PM peak commute periods. Of the 12 study intersections, one intersection (Chicago Ave/Massachusetts Ave) was found to operate at deficient LOS (LOS F) during existing conditions during the AM and PM peak commute periods; two intersections (Chicago Avenue/Massachusetts Avenue and Chicago Avenue/3rd Street) are forecasted to operate at deficient LOS (LOS F) under Background Without Project Conditions[3] during the AM and PM peak commute periods; and two intersections (Chicago Avenue/Massachusetts Avenue and Chicago Avenue/3rd Street) are forecasted to operate at deficient LOS (LOS F) under Background With Project Conditions[4] during the AM and PM peak commute periods.

The Project would cause two intersections, Chicago Avenue/Massachusetts Avenue and Chicago Avenue/3rd Street, to deteriorate. Therefore, the Project would be required to provide improvements on these intersections to offset the increase in delay under the Background with Project condition, as detailed in Section 5.17.9, *Project Design Features*. Project Design Feature TRA-1 (PDF TRA-1) states that the Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop control (AWSC). PDF TRA-2 states that the Project would implement protected-permissive left-turn phasing for the westbound and eastbound left-turn approaches by installing flashing yellow signal head and "Left Turn Yield On Flashing" sign. With implementation of PDF TRA-1 and PDF TRA-2, the proposed Project would not exceed the City's LOS-related screening criteria. Therefore, operational impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be **less than significant.**

[3] Defined as Opening Year (2027) Conditions with an ambient growth rate of 2% and traffic from approved projects in the area (EPD Solutions, 2025b).
[4] Defined as Background Without Project Conditions with the addition of traffic from the proposed Project (EPD Solutions, 2025b).

Table 5.17-2: Proposed Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
110 - General Light Industrial[1]		TSF	4.87	0.65	0.09	0.74	0.09	0.56	0.65
Existing Project Trip Generation									
Total Building Square Footage	99.850	TSF							
Existing General Light Industrial[1]	99.850	TSF	487	65	9	74	10	56	66
Vehicle Mix [2]		***Percent***							
Passenger Vehicles		94.90%	462	62	9	71	10	54	64
2-Axle Trucks		0.85%	4	1	0	1	0	0	0
3-Axle Trucks		1.06%	5	0	0	0	0	0	0
4+-Axle Trucks		3.19%	16	2	0	2	0	2	2
		100%	487	65	9	74	10	56	66
Total Existing Passenger Trip Generation			462	62	9	71	10	54	64
Total Existing Trip Generation			487	65	9	74	10	56	66
Proposed Project Trip Generation									
Total Building Square footage	199.850	TSF							
Building 1	**99.900**	TSF							
Proposed General Light Industrial[1]	99.900	TSF	487	65	9	74	10	56	66
Vehicle Mix [3]		**Percent**							
Passenger Vehicles		64.90%	316	42	6	48	6	36	42
2-Axle Trucks		12.18%	59	8	1	9	1	7	8
3-Axle Trucks		3.86%	19	3	0	3	1	2	3
4+-Axle Trucks		19.09%	93	12	2	14	2	11	13
		100%	487	65	9	74	10	56	66
Building 2	**99.950**	TSF							
Proposed General Light Industrial[1]	99.950	TSF	487	65	9	74	10	56	66
Vehicle Mix [3]		***Percent***							
Passenger Vehicles		64.90%	316	42	6	48	6	36	42
2-Axle Trucks		12.18%	59	8	1	9	1	7	8
3-Axle Trucks		3.86%	19	3	0	3	1	2	3
4+-Axle Trucks		19.09%	93	12	2	14	2	11	13
		100%	487	65	9	74	10	56	66
Total New Passenger Trip Generation			632	84	12	96	12	72	84
Total New Trip Generation			974	130	18	148	20	112	132
Net New Passenger Trip Generation			170	22	3	25	2	18	20
Net New Trip Generation			487	65	9	74	10	56	66

TSF = Thousand Square Feet

[1] Trip rates from the Institute of Transportation Engineers, Trip Generation Manual,11th Edition, 2021. Land Use Code 110 - General Light Industrial.

[2] Passenger Vehicle and Truck Rate from ITE Land Use 110 - General Light Industrial. Note that Daily Truck Rates were used for analysis. Truck Rates were normalized using truck splits from SQAMD Warehouse Truck Trip Study, July 17, 2014. Without Cold Storage.

[3] Passenger Vehicle and Truck Rate from ITE Land Use 150 - Warehouse. Note that Daily Truck Rates were used for analysis. Truck Rates were normalized using truck splits from SQAMD Warehouse Truck Trip Study, July 17, 2014. With Cold Storage.

* The table might contain minor rounding errors due to multiple rates and or percentages being applied. Priority was placed on the total trips and total PCE trips. The minor rounding errors would not impact the overall analysis.

THRESHOLD B: WOULD THE PROJECT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES § 15064.3, SUBDIVISION (B)?

The City's VMT screening thresholds previously described under Section 5.17.5, *Methodology*, were applied to the proposed Project to determine if a VMT analysis is required. The screening thresholds and their applicability to the Project site are as follows:

- **Transit Priority Area Screening:** The Project is not located in a Transit Priority Area, therefore this screening criteria does not apply.
- **Low VMT Area Screening:** As shown in Figure 5.17-1, *Low VMT Generating Area Output from WRCOG VMT Screening Tool*, the proposed Project is located in in a low VMT-generating area (TAZ 2101) and would not exceed the City's VMT baseline (baseline is 2025 for this Project). Furthermore, the proposed Project is consistent with the applicable General Plan land use designation. Therefore, the proposed Project meets Screening Criteria 2.
- **Project Type Screening:** The proposed Project does not propose a local serving land use and would generate more than 110 daily net new vehicle trips. Therefore, the proposed Project would not satisfy the requirements of Screening Criteria 3.
- **Mixed-Use Projects:** The proposed Project does not include a mix of uses. Therefore, the proposed Project would not satisfy the requirements of Screening Criteria 4.
- **Redevelopment Projects:** The proposed Project results in a net increase in daily trips and would have a comparable trip type (industrial VMT/employee). Therefore, the proposed Project does not satisfy the requirements of Screening Criteria 5.

As detailed above, the proposed Project meets the Low VMT Area screening criteria. Therefore, per the City's VMT screening criteria, the proposed Project would have **less than significant impact** on VMT and no further VMT analysis is required.

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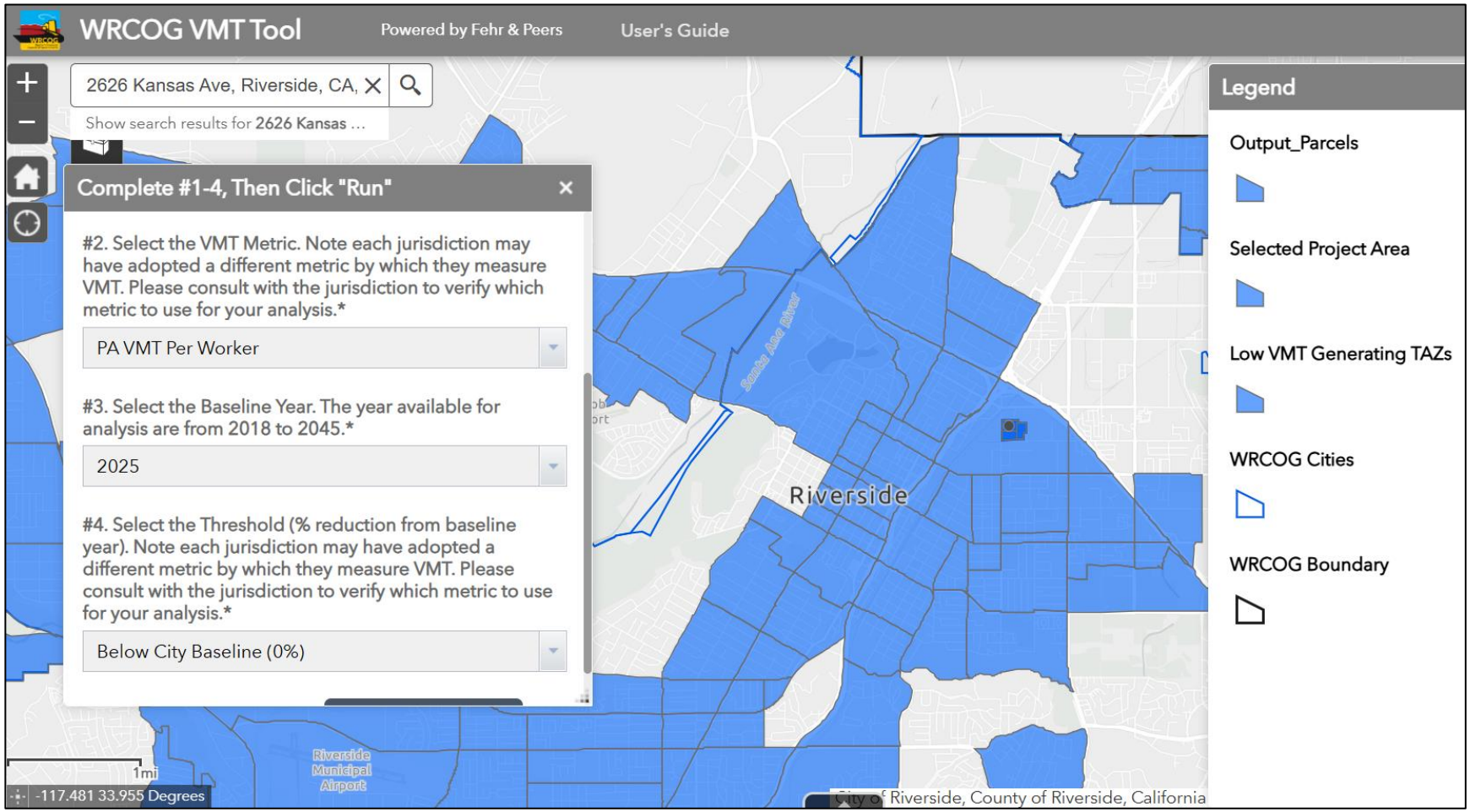
Low VMT Generating Area Output from WRCOG VMT Screening Tool



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THRESHOLD C: WOULD THE PROJECT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?

Construction

The Project proposes redevelopment of the site with construction lasting approximately 14 months. During construction, worker vehicles, haul trucks, and vendor trucks would be staged on the portion of the Project site under construction for the duration of the construction period. As part of the grading plan and building plan review processes, City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures and measures to properly route heavy-duty construction vehicles entering and leaving the site (as applicable). As a result, impacts related to vehicular circulation design features and incompatible uses during construction of the proposed Project would be **less than significant**.

Operation

As previously stated, access to the Project site would be provided via five proposed driveways, including two on Roberta Street, two on Kansas Avenue, and one on Massachusetts Avenue. The proposed northeastern driveway on Roberta Street would be a cul-de-sac driveway. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site. Trucks traveling to the Project site would be expected to travel via SR-91 to spruce Street and I-215 to 3rd Street. Trucks are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3rd Street to access the site. As stated in Section 3.0, *Project Description*, the Project would include construction of a minimum of six-feet wide sidewalks along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue.

On-site traffic signage and stripping would also be implemented in conjunction with detailed construction plans with implementation of the Project. Additionally, sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the City of Riverside General Plan Circulation and Community Mobility Element. Compliance with existing regulations would be ensured through the City's construction permitting process. As a result, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses and would be **less than significant**.

THRESHOLD D: WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within and adjacent to the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. The roadway improvements and installation of sidewalks and utilities could require the temporary closure of travel lanes, but full roadway closure and traffic detours are not expected to be necessary. In addition, construction activities would be required to implement measures to facilitate the passage of persons and vehicles through/around any required temporary road restrictions and ensure the safety of passage in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a **less than significant** level.

Operation

Operation of the proposed Project would also not result in an inadequate emergency access. Direct access to the Project site would be provided from Massachusetts Avenue, Kansas Avenue, and Roberta Street, which are adjacent to the Project site. The Project is required to design and construct internal access roads of sufficient size to accommodate emergency vehicles and provide fire suppression facilities (e.g., hydrants, fire sprinklers and fire-resistant construction materials) in conformance with the City Municipal Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Compliance with appropriate code specifications would be verified by the City's Building and Safety Department during the construction and occupancy permitting process. Thus, potential impacts related to inadequate emergency access during Project operation would be **less than significant**.

5.17.7 CUMULATIVE IMPACTS

Conflict with Circulation Plan or Program

The cumulative traffic study area for the proposed Project is the City of Riverside, including the foreseeable development Projects within the traffic study area of roadways and intersections identified in Table 5-1, *Cumulative Projects List*, of Section 5, *Environmental Impact Analysis*. The cumulative traffic study area is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Threshold A concluded that the proposed Project would not result in significant impacts related to transportation or policies addressing the circulation system. The proposed Project was determined to not impact transit and roadway facilities. The truck route usage and roadway operations of the Project were determined to not conflict with the City's circulation system. Cumulative development in the City, including the Projects listed on Table 5-1, *Cumulative Projects List*, would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would reduce the potential for cumulatively considerable impacts. As the Project would result in a less-than-significant impact and cumulative projects require compliance with existing circulation regulations, potential impacts from the Project would not cumulatively combine with other projects to result in cumulatively considerable impacts. Thus, cumulative impacts related to conflicts with circulation plans and programs would be less than significant.

Vehicle Miles Traveled

The cumulative traffic study area for the proposed Project includes the TAZ where the Project is located, TAZ 2101, because the RIVTAM modeling that determines impacts is based on the TAZ. The proposed Project site is located within a Low VMT area and meets Screening Criteria 2. Therefore, the proposed Project meets the City's VMT screening criteria and therefore has a **less than significant VMT impact**. In addition, as described previously, the proposed Project is consistent with the existing General Plan, and thus, would be consistent with the cumulative volume of anticipated traffic on the area roadways. Thus, cumulative VMT transportation related impacts would be **less than significant**.

Design and Roadway Hazards

The cumulative traffic study area for the proposed Project is the City of Riverside, including the foreseeable development Projects within the traffic study area of roadways and intersections identified in Table 5-1, *Cumulative Projects List*, of Section 5, *Environmental Impact Analysis*. The cumulative traffic study area is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Threshold C concluded that the proposed Project would not result in significant impacts related to incompatible uses or hazards due to roadway design. The proposed circulation layout would be required to be installed in conformance with City design standards to ensure that no potentially hazardous design

features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects. In addition, cumulative development in the City, including the Projects listed on Table 5-1, *Cumulative Projects List*, and surrounding jurisdictions would be subject to site-specific reviews, including reviews by police and fire protection authorities, and the City of Riverside's own traffic safety engineers, that would reduce the potential of cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

Emergency Access

The cumulative traffic study area for the proposed Project is the City of Riverside, including the foreseeable development Projects within the traffic study area of roadways and intersections identified in Table 5-1, *Cumulative Projects List*, of Section 5, *Environmental Impact Analysis*. The cumulative traffic study area is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Threshold D concluded that the proposed Project would not result in significant impacts related inadequate emergency access. The proposed Project would provide direct access to the site via Massachusetts Avenue, Kansas Avenue, and Roberta Street, which are adjacent to the Project site. The proposed Project would be designed in accordance with the City Municipal Code and California Fire Code standards which would be verified during the construction and occupancy permitting process. Cumulative development in the City, including the Projects listed on Table 5-1, *Cumulative Projects List*, would be subject to site-specific reviews. Therefore, potential impacts related to inadequate emergency access would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

5.17.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- SB 743
- City of Riverside Municipal Code

Plans, Programs, or Policies

- City of Riverside 2025 General Plan
- City of Riverside Phase I General Plan Update
- SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

5.17.9 PROJECT DESIGN FEATURES

The Project would include the following Project Design Features:

PDF TRA-1: Chicago Avenue/Massachusetts Avenue Intersection Improvements: The Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop (AWSC) control.

PDF TRA-2: Chicago Avenue/3rd Street Intersection Improvements: The Project would implement protected-permissive left-turn phasing for the northbound and southbound left-turn approaches by installing flashing yellow signal head and "Left Turn Yield On Flashing" sign on Chicago Avenue/3rd Street intersection.

5.17.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would result in **less-than-significant** impacts related to Thresholds A through D.

5.17.11 MITIGATION MEASURES

No mitigation measures are required.

5.17.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable transportation impacts would occur.

5.17.13 REFERENCES

City of Riverside. (July 2007a). *City of Riverside General Plan and Supporting Documents EIR*. Retrieved November 15, 2024, from https://riversideca.gov/cedd/planning/city-plans/general-plan-0

City of Riverside. (November 2007b). *Riverside General Plan 2025*. Retrieved November 15, 2024, from https://riversideca.gov/cedd/planning/city-plans/general-plan-0

EPD Solutions, Inc. (2025a). *Vehicle Miles Traveled (VMT) Screening Analysis Memorandum*. (**Appendix K**)

EPD Solutions, Inc. (2025b). *Traffic Impact Analysis*.

EPD Solutions, Inc. (2025c). *Air Quality, Energy, and Greenhouse Gas Impact Analysis*. **(Appendix B)**

Institute of Transportation Engineers (ITE). (2021). *ITE Trips Generation Manual, 11th Edition*. Retrieved February 7, 2025, from https://www.itetripgen.org/?ReturnUrl=%2fQuery

Riverside Transit Agency. (2025). *January 2025 system map* (Version F1). Retrieved February 4, 2025, from https://www.itetripgen.org/?ReturnUrl=%2fQueryhttps://www.riversidetransit.com/images/DOWNLOADS/PUBLICATIONS/SYSTEM_MAPS/2025%20January%20System%20Map%20vF1.pdf

5.18 Tribal Cultural Resources

5.18.1 INTRODUCTION

This section addresses potential impacts to tribal cultural resources (TCRs) from implementation of the Project. The primary source of this analysis is based upon Project-specific coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project region. The analysis in this section is also based, in part, on the following documents and resources:

- *Historical/Archaeological Resources Survey Report Kansas Massachusetts Industrial Project*, prepared by CRM Tech, December 31, 2024, included as Appendix E
- *City of Riverside 2025 General Plan*, adopted 2007
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Phase I General Plan Update*, adopted 2021
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report*, certified September 2021
- City of Riverside Municipal Code

5.18.2 REGULATORY SETTING

5.18.2.1 Federal Regulations

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Native American lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; and required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants or culturally affiliated Indian tribes. This act ensures that Native American human remains and cultural items be treated with respect and dignity.

5.18.2.2 State Regulations

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (CalNAGPRA) was passed in in 2001. The CalNAGPRA was passed with the intent to cover gaps in the federal NAGPRA specific to the State of California. In 2020, Assembly Bill (AB) 275 was passed and signed to strengthen CalNAGPRA for non-federally recognized California Native American tribes and elevate the status of tribal traditional

knowledge in determining cultural affiliation and identifying cultural items, among other changes to the law. CalNAGPRA runs concurrently with federal NAGPRA.

California Senate Bill 18

Senate Bill (SB) 18 (California Government Code Section 65352.3) sets forth requirements for local governments to consult with California Native American tribes identified by the NAHC to aid in the protection of TCR. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning to protect or mitigate impacts on TCR. The Tribal Consultation Guidelines: Supplement to General Plan Guidelines (Governor's Office of Planning and Research, 2005), identifies the following contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

The Project does not include a General Plan Amendment or a Specific Plan Amendment; therefore, the Project is not subject to the statutory requirements of SB 18 Tribal Consultation Guidelines.

California Assembly Bill 52

AB 52 established a new requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Public Resources Code (PRC) Section 21074(a) defines "tribal cultural resources" (TCRs) as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either "[i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources" or "in a local register of historical resources." Additionally, defined cultural landscapes, historical resources, and archaeological resources may be considered TCRs. (PRC § 21074(b), (c)). The lead agency may also in its discretion treat a resource as a TCR if it is supported with substantial evidence.

Projects for which a Notice of Preparation of a Draft EIR was filed on or after July 1, 2015, are required to have lead agencies offer California Native American tribes traditionally and culturally affiliated with the project area consultation on CEQA documents prior to submitting an EIR in order to protect TCRs. PRC Section 21080.3.1(b) defines "consultation" as "the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement." Consultation must "be conducted in a way that is mutually respectful of each party's sovereignty [and] recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance." The consultation process is outlined as follows:

1. California Native American tribes traditionally and culturally affiliated with the project area submit written requests to participate in consultations.

2. Lead agencies are required to provide formal notice to the California Native American tribes that requested to participate within 14 days of the lead agency's determination that an application package is complete or decision to undertake a project.
3. California Native American tribes have 30 days from receipt of notification to request consultation on a project.
4. Lead agencies initiate consultations within 30 days of receiving a California Native American tribe's request for consultation on a project.
5. Consultations are complete when the lead agencies and participating California Native tribes have agreed on measures to mitigate or avoid a significant impact on a TCR, or after a reasonable effort in good faith has been made and a party concludes that a mutual agreement cannot be reached (PRC §§ 21082.3(a), (b)(1)-(2); 21080.3.1(b)(1)).

AB 52 requires that the CEQA document disclose significant impacts on TCRs and discuss feasible alternatives or mitigation to avoid or lessen an impact.

California Health and Safety Code Section 7050.5

Health & Safety Code Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he/she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC).

California Public Resources Code Sections 5097.9 to 5097.991

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the NAHC. These sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

5.18.2.3 Regional Regulations

There are no regional regulations related to TCRs that are applicable to the proposed Project.

5.18.2.4 Local Regulations

City of Riverside 2025 General Plan

The Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to TCRs that are appliable to the proposed Project.

Land Use and Urban Design Element

Policy LU-4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.

Historic Preservation Element

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

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

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

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

Policy HP-2.1: The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

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

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

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

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

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

City of Riverside Phase I General Plan Update

There are no objectives or policies related to TCRs included in the City of Riverside Phase I General Plan Update (adopted 2021).

5.18.3 ENVIRONMENTAL SETTING

The Historical/Archaeological Resources Survey Report (Appendix E) prepared for the proposed Project describes that the City of Riverside lies in an area where the traditional territories of three Native American groups have overlapped since at least the Late Prehistoric and Protohistoric Periods: the Serrano of the San Bernardino Mountains, the Luiseño of the Perris-Elsinore region, and the Gabrielino of the San Gabriel Valley. The discussion below is from the Historical/Archaeological Resources Survey Report and describes the ethnohistoric context of the tribes traditionally affiliated with the City and the Project area (Appendix E).

> All four tribal groups speak Takic languages from the Uto-Aztecan family, and they shared many common features in their social organization and resource procurement strategies prior to European arrival. As with most southern California Indians, autonomous lineages or kin groups represented the basic political unit. The traditional societies were structured around villages based on the clan or lineage groups, with evidence of their home/base sites marked by midden deposits and often by

bedrock mortar features. During seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies often left behind signs of special use sites, usually grinding slicks on bedrock boulders at the locations of the resources.

Subsistence was defined by the surrounding landscape, with the Native people exploiting nearly all of the resources available in a highly developed seasonal mobility system, including cultivating and gathering wild plants, fishing, and hunting. The Native diet in the region included acorns, piñon nuts, seeds, roots, wild fruits and berries, and wild onions, among a myriad of other cultivated plants. Medicinal and ceremonial plants such as California sagebrush, yerba buena, white sage, and elderberry were typically cultivated near villages. They hunted with throwing sticks, clubs, nets, traps, and snares, as well as bows and arrow. Other common tools of daily life included manos and metates, mortars and pestles, hammerstones, fire drills, awls, arrow-straighteners, and stone knives and scrapers. They also used wood, horn, and bone spoons and stirrers; baskets for winnowing, leaching, grinding, transporting, parching, storing, and cooking; and pottery vessels for carrying water, storage, cooking, and serving food and drink.

As the landscape defined their subsistence practices, the tending and cultivation practices of the tribes helped shape the landscape as well. All of them utilized controlled burns to create an open countryside with more accessible foraging material for animals, which in turn led to more successful hunting. It also increased the ease with which plant foods could be gathered and prevented out-of-control wildfires by eliminating dead undergrowth before it accumulated to dangerous levels. Coppicing, or trimming plants to the ground, resulted in straighter growth for basketry and arrow-making materials. Granitic rock outcrops were used for pounding and grinding nuts and seeds, which left their mark in the resulting bedrock milling features, one of the most common types of prehistory archaeological remains found in the region.

The traditional territory of the Luiseño extended from present-day Riverside to Escondido and Oceanside, with the Temecula Valley at its geographical center. The homeland of the Gabrielino was centered in the Los Angeles Basin, while the Serrano homeland was centered in the San Bernardino Mountains but also included the slopes and lowlands on the flanks of the mountain range and the southern portion of the Mojave Desert. The Cahuilla are generally divided by anthropologists into three groups according to their geographic locations at the time of European contact: the Pass Cahuilla of the San Gorgonio Pass-Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains and the Cahuilla Valley, and the Desert Cahuilla of the eastern Coachella Valley.

As early as 1542, the coastal Gabrielino were in contact with the Spanish during the historic expedition of Juan Rodríguez Cabrillo, but it was not until 1769 that the Spaniards took steps to colonize what is now the State of California. Shortly afterwards, most of the Gabrielino and Luiseño people were incorporated into Mission San Gabriel, Mission San Luis Rey, and other Franciscan missions in southern California. The Serrano were brought into the mission system during the 1810s, when an asistencia of Mission San Gabriel was established in the San Bernardino Valley. The Cahuilla, farthest from the coast, experienced less direct impact from the Spanish mission system and, later, the establishment of large ranchos on Mexican land grants, with many of their villages remaining viable well after the American annexation of Alta California.

Despite the different levels of involvement with the Spanish-, Mexican-, and finally American-dominated "mainstream" society, the populations of all four groups dwindled rapidly during the late 18th, 19th, and early 20th centuries due to introduced diseases, dietary deficiencies, forceful reduction, and harsh living conditions at the missions and the ranchos, where the Native people often worked as seasonal ranch hands. Today, most of the Native people of Luiseño, Cahuilla, and Serrano

heritage are affiliated with one of the many Indian reservations in southern California. Meanwhile, the Gabrielino, caught in the phenomenal growth of what would become one of the nation's leading metropolises, had almost ceased to exist as a culturally identifiable group by the early 20th. In recent decades, however, there has been a renaissance in traditional cultural practice and cultural identity among Gabrielino descendants, much as among other Native American tribes in the region (Appendix E, pp. 4-5).

5.18.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Threshold A Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Threshold B Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.18.5 METHODOLOGY

Records Searches

On August 31, 2021, a record search request was submitted to the California Historical Resource Information System (CHRIS) from the Eastern Information Center (EIC), located on the campus of University of California, Riverside. The CHRIS search included areas within a half-mile radius of the Project site and included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Riverside County Historic Landmarks list, and the California Historical Resources Inventory.

The records search of EIC identified 120 previously recorded cultural resources within a half-mile radius of the Project site. All but three of the 120 known resources were buildings from the historic period, and the other three represented the Riverside Upper Canal, the Riverside Lower Canal, and a segment of the Southern Pacific Railroad (Appendix E). None of the previously recorded resources are located within the Project site.

Additionally, the EIC records search identified 20 previous studies conducted within one-half mile of the Project site. One of the 20 previous studies, completed in 2003 for the Hunter Park Redevelopment Plan, overlaps the Project site (Appendix E). The 2003 study covered a total of 2,625 acres and inventoried previously identified cultural resources and included an overall archaeological sensitivity assessment. The 2003 study did not include a field survey of the entire 2,625-acre study area and did not include a field survey of the current Project site area. The results of the 2003 study suggest that the current Project site is

relatively low in sensitivity for archaeological resources of either prehistoric or historical origin (Appendix E).

A Sacred Lands File search was requested from the NAHC on June 23, 2021. The NAHC responded on August 5, 2021, stating that there are no known sacred lands within the Project vicinity and provided a list of 22 Native American tribes who may also have knowledge of cultural resources in the Project area.

AB 52 Compliance

In accordance with AB 52, on November 7, 2024, the City of Riverside sent a notice to the California Native American tribes that have requested such notice of a project application within a geographic area with which the tribe is traditionally and culturally affiliated. Responses from five tribes were received within the 30-day noticing period between November 7, 2024, and December 7, 2024. Table 5.18-1 summarizes the consultation details of the five responding tribes. In addition to the five responding tribes, three tribes responded to the City's request for consultant outside of the 30 day response period. The City declined to consult with the late responding tribes.

Table 5.18-1: Tribal Communications

Native American Tribe (Contact)	Comments
Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) (Alexandra McCleary)	• Consultation not requested; however tribe provided mitigation measures to be included in the Project.
Gabrieleno Band of Mission Indians - Kizh Nation (Andrew Salas)	• Response for tribal consultation initiated on 11/7/24. • Consultation meeting was scheduled for 1/14/25, but canceled by the tribe on 1/13/24. Tribe advised that consultation would be via email, and expressed that the Project site is within their ancestral territory and provided mitigation for Tribal monitoring, without providing substantial evidence that monitoring was warranted. • City provided standard mitigation measures for review on 3/6/25. Tribe responded on 3/10/25 requesting modifications to the City's standard mitigation measures, the Tribe asked that Kizh Nation be the only tribe named in the mitigation measures. • City responded via email on 3/26/25 declining the tribe's request to modify the standard measures, noting City acted in good faith and reasonable effort, but mutual agreement could not be reached. City provided copy of the final mitigation measures. • Consultation closed on 3/26/25. • Tribe responded on 4/7/25 declining the City's standard mitigation measures and requested a meeting to discuss. • The City reached out to the Tribe on April 9th, April 10th, and April 15th, to schedule a follow-up consultation meeting. • The Tribe responded on 4/15/25, requesting a couple of days to determined a day and time that would work best. • The City reached out to the Tribe on 4/21/25 to schedule a follow-up consultation meeting, without response.

	• The City reached out to the Tribe on 4/29/25 and offered revisions to the City's standard mitigation measures in an effort to address the Tribe's concerns. • The Tribe responded on 5/7/25 declining the revisions to the mitigation measures. • The City responded via email on 5/19/25 noting that City of Riverside has determined that mutual agreement cannot be reached and considers that the City has acted in good faith and a reasonable effort has been made; therefore, allowing the City to move forward with this project pursuant to Section 21080.3.2(b) of the Public Resources Code. • Consultation closed on 5/19/25.
Rincon Band of Luiseño Indians (Cheryl Madrigal)	• Response for tribal consultation initiated on 12/3/24 • Consultation meeting occurred on 1/9/25. During consultation, tribe expressed that due to the previous disturbed nature of the site, Tribal Monitoring was not necessary, but rather archaeological monitor for inadvertent discoveries would be preferred. • City provided standard mitigation measures for review on 3/6/25. Tribe responded on 3/11/25 with requested modifications to standard mitigation measures. • City accepted requested modifications to standard mitigation measures and requested a letter of consultation closure. • Consultation closed on 4/7/25
Soboba Band of Luiseño Indians (Joseph Ontiveros)	• Response for tribal consultation initiated on 12/5/24. • Consultation meeting occurred on 1/14/25. During consultation, tribe expressed that due to the previous disturbed nature of the site, Tribal Monitoring was not necessary, but rather archaeological monitor for inadvertent discoveries would be preferred. • City provided standard mitigation measures on 1/14/25. No response was received. • City followed up on 1/28/25, 2/10/25, and 2/24/25. No responses were received. • Consultation closed by the City on 3/3/25, as the City acted in good faith and reasonable effort.
Cahuilla Band of Indians (BobbyRay Esparza)	• Response for tribal consultation initiated on 11/15/24. • Consultation meeting occurred on 1/6/25. During consultation, the tribe deferred to other consulting tribes regarding potential mitigation measures. • City provided standard mitigation measures on 3/6/25. • Consultation closed on 3/7/25.

Source: City of Riverside

Field Survey

A pedestrian reconnaissance survey was conducted across the Project site on September 10, 2021. The Project site is almost completely covered by buildings, asphalt pavement, gravel, and material storage, thus, the survey was conducted by meandering across the property and opportunistically inspecting the ground surface wherever it was exposed, which was mostly limited to the perimeter and a large area of hard-pack ground in the southwestern portion (Appendix E). Considering the extensive ground disturbance from past

development, the survey procedures were deemed adequate for the study. No TCRs were identified as part of the records search or the site survey of the Project site.

5.18.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE § 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K)?

As detailed previously in Section *5.5, Cultural Resources*, the Project site does not meet any of the historic resource criteria and does not meet the definition of a historical resource pursuant to CEQA. Therefore, the proposed Project would not result in impacts to historical resources that are listed or eligible for listing. As such, the proposed Project would result in no impacts related to historical resources that are listed or eligible for listing and have cultural value to a California Native American tribe. **No impact would occur.**

THRESHOLD B: WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE § 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE § 5024.1. IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCE CODE § 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE?

Construction of the proposed Project would involve ground disturbance activities such as demolition, site preparation, and grading that may unearth an unknown archeological resource, including TCRs. However, the Project site has been previously disturbed; therefore, there is reduced potential for the Project to impact archaeological resources. Additionally, as described above, neither the records search nor the field survey identified any evidence of archaeological resources on the site (Appendix E). Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource.

AB 52 requires meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on TCRs. As described above, on November 7, 2024, the City sent notices pursuant to AB 52 to the Native American tribes regarding the Project. Responses were received within the 30-day response window from a total of five tribes. Of the responding tribes, the City consulted with the following four: Gabrieleno Band of Mission Indians – Kizh Nation, Rincon Band of Luiseño Indians, Soboba Band of Luiseño Indians, and Cahuilla Band of Indians. The Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) responded to the AB 52 letter request and provided mitigation measures for consideration by the City but declined to consult. Following the City's consultation meetings with the tribes, the City and the consulting tribes agreed on the mitigation measures to be incorporated into the

Project. As discussed in Table 5.18-1, after consultation with Gabrieleno Band of Mission Indians – Kizh Nation, the City of Riverside determined that mutual agreement cannot be reached and considers that the City has acted in good faith and a reasonable effort has been made; therefore, allowing the City to move forward with this project pursuant to Section 21080.3.2(b) of the Public Resources Code. As a result, MM TCR-1 through TCR-4 are incorporated into the Project. MM TCR-1 requires that, prior to issuance of grading permits, if changes are made to the Project site design, the Applicant and the City must contact the consulting tribes to provide and discuss any potential changes in the Project site design. MM TCR-2 requires the Project Developer to retain a Project archaeologist and paleontologist to be on call during all grading and other significant ground-disturbing activities in native sediments. MM TCR-3 requires procedures to follow in case of inadvertent discovery of tribal resources during the grading process. MM TCR-4 requires that the Project archaeologist and Native American monitors to attend the pre-grade meeting with the Project Developer and provide Cultural Sensitivity Training for all construction personnel.

Additionally, as discussed in Section 5.5, *Cultural Resources,* MM CUL-1 is incorporated into the Project to require work to be halted within 50 feet of an inadvertent archaeological find until it can be evaluated by a qualified archaeologist. Implementation of MMs CUL-1, TCR-1, TCR-2, TCR-3, and TCR-4 would ensure that potential impacts on TCRs would be **less than significant with mitigation.**

5.18.7 CUMULATIVE IMPACTS

The cumulative TCR impact assessment considers the development of the Project in conjunction with other development projects, as listed in Section 5.0 of this EIR, in the context of the influence areas of the tribes in the Riverside County region. There is potential for TCRs to be uncovered during construction activities from the Project. Other development projects within the region would have a similar potential to uncover TCRs. Cumulative impacts would be reduced by each development project's compliance with applicable regulations, consultations required by AB 52, and project-specific mitigation. Project implementation of MMs TCR-1 through TCR-4 and MM CUL-1 would reduce project-level impacts to less than significant. Therefore, the incremental impacts of the proposed Project would not combine with other projects and create a cumulatively considerable impact related to TCRs. **Cumulative impacts related to TCRs would be less than significant**.

5.18.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Government Code Sections 5097.9-5097.99
- California Health and Safety Code Section 7050.5

5.18.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Threshold A would have no impact and Threshold B would be potentially significant.

5.18.10 MITIGATION MEASURES

Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. As listed in Section 5.5, *Cultural Resources*.

MM-TCR-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of

the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

MM-TCR-2: Project Archaeologist: Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on site during all grading and other significant ground-disturbing activities.

MM-TCR-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. **Consulting Tribes Notified:** Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
2. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need approval of the consulting tribe(s); and
3. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources to the consulting tribe(s). The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:

    a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
    b. Upon consultation with the tribe(s) and if parties agree that reburial on project site is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79, if agreed upon by the tribe(s), and therefore will be professionally curated. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
    c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and
    d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix,

include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

MM-TCR-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

5.18.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of MMs CUL-1 and TCR-1 through TCR-4, impacts related to Threshold B would be reduced to less than significant.

5.18.12 REFERENCES

City of Riverside. (July 2007a). *City of Riverside General Plan and Supporting Documents EIR*. Retrieved February 12, 2025, from https://riversideca.gov/cedd/planning/city-plans/general-plan-0

City of Riverside. (November 2007b). *Riverside General Plan 2025*. Retrieved February 12, 2025, from https://riversideca.gov/cedd/planning/city-plans/general-plan-0

City of Riverside. (September 2021). *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report State Clearinghouse No. 2021040089*. Retrieved February 12, 2025, from https://www.riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach

CRM Tech. (December 31, 2024). *Historical/Archaeological Resources Survey Report Kansas Massachusetts Industrial Project Assessor's Parcel Numbers 210-130-015, -016, and -020 City of Riverside, Riverside County, California*. **(Appendix E).**

Governor's Office of Planning and Research (OPR). November 14, 2005. *State of California Tribal Consultation Guidelines: Supplement to General Plan Guidelines*. Retrieved February 1, 2025, from https://lci.ca.gov/docs/011414_Updated_Guidelines_922.pdf

5.19 Utilities and Service Systems

5.19.1 INTRODUCTION

This section of the Draft EIR evaluates the potential effects on utilities and service systems from implementation of the proposed Project by identifying anticipated demand and existing and planned utility availability. This includes infrastructure related to water supply, wastewater, stormwater, solid waste, electric power, natural gas, and telecommunications. Impacts related to energy use are further described in Section 5.6, *Energy*, and impacts related to hydrology and water quality are discussed in Section 5.9, *Hydrology and Water Quality*. Information in this section is based, in part, on the following sources:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, prepared July 2007, certified November 2007
- *City of Riverside Phase I General Plan Update,* adopted 2021
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* certified September 2021
- City of Riverside Municipal Code
- Riverside Public Utilities *2020 Urban Water Management Plan*
- City of Riverside *2022 Sewer System Management Plan.*

Because CEQA focuses on physical environmental effects, this section analyzes whether increases in demand for utilities would result from implementation of the proposed Project that would result in significant adverse physical environmental effects. For example, an increase in wastewater generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities could constitute a significant impact under CEQA.

5.19.2 WATER

5.19.2.1 Water Regulatory Setting

Federal Regulations

Clean Water Act

The Clean Water Act (CWA), enacted by Congress in 1972, requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). The California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB) administer NPDES permitting authority. The Project site is within RWQCB Region 8 (Santa Ana Region).

Safe Drinking Water Act

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act, which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The State Water Resources Control Board, Division of Drinking Water (DDW)

implements the requirements of the Act and oversees public water system quality statewide. The USEPA establishes legal drinking water standards for contaminants that could threaten public health.

State Regulations

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA). CUWMPA requires urban water suppliers to initiate planning strategies to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the required contents of an Urban Water Management Plan (UWMP) as well as methods for urban water suppliers to adopt and implement UWMPs. As described below, Riverside Public Utilities, the City department responsible for providing water and electricity service within Riverside, has an updated 2020 UWMP that addresses water supply and demand through 2045.

Senate Bill 610

Senate Bill (SB) 610 requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a certain size. It further requires the public water system to prepare a specified water supply assessment (WSA) for projects that meet the following criteria:

a) A proposed residential development of more than 500 dwelling units;
b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 SF of floor space;
c) A commercial office building employing more than 1,000 persons or having more than 250,000 SF of floor space;
d) A hotel or motel, or both, with more than 500 rooms;
e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 SF of floor area; and
f) A mixed-use project that includes one or more of the projects above.

The components of a WSA include a summary of existing water demand, future water demand by the project, and confirmation that water is available for the project during normal years, a single dry year, and multiple dry years during a 20-year future projection period. The WSA must also describe whether the project's water demand is accounted for in the water supplier's UWMP.

The proposed Project would construct two Class A light industrial buildings at 99,900 SF and 99,950 SF (for a total of 199,850 SF on approximately 10.21 acres. As discussed in Section 5.14, *Population and Housing*, based on employment generation rates listed in Table 3.G of the *Riverside County General Plan EIR*, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF, implementation of the proposed Project would create up to an additional 194 jobs (County of Riverside, 2015). Therefore,the proposed Project does not meet the criteria listed above, and a WSA was not prepared.

CALGreen Building Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Standards Code, or "CALGreen." The CALGreen Code is updated every three years and sets forth water efficiency standards

(i.e., maximum flow rates) for all new plumbing and irrigation fittings and fixtures. Riverside Municipal Code Chapter 16.07.020 adopts the 2022 CALGreen Code by reference.

Sustainable Groundwater Management Act of 2014

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority[1] basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The Department of Water Resources (DWR) categorizes the priority of groundwater basins. For critically over-drafted basins, sustainability should be reached by 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSP) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. If a basin is adjudicated, then a GSA does not need to be formed, nor does a GSP need to be prepared. [2]

Local and Regional Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) Open Space and Conservation Element and Public Facilities and Infrastructure Element contains the following objectives and policies related to water resources that are applicable to the Project.

Objective OS-10: Preserve the quantity and quality of all water resources throughout Riverside.

Policy OS-10.6: Continue to enforce RWQCB regulations regarding urban runoff.

Policy OS-10.8: Cooperate with Riverside and San Bernardino Counties and adjacent jurisdictions in the review and approval of new developments which affect the quality and quantity of basin-wide groundwater and surface water resources.

Policy OS-10.9: Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in stormwater runoff and provide groundwater percolation zones.

Objective PF-1: Provide superior water service to customers.

Policy PF-1.1: Coordinate the demands of new development with the capacity of the water system.

Policy PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.

Policy PF-1.5: Implement water conservation programs aimed at reducing demands from new and existing development.

Policy PF-1.7: Protect local groundwater resources from localized and regional contamination sources such as septic tanks, underground storage tanks, industrial businesses and urban runoff.

[1] The City lies within the boundaries of the Upper Santa Ana Valley Groundwater Basin, which is a medium priority basin (https://gispublic.waterboards.ca.gov/portal/apps/storymaps/stories/35d50036fbfe44e5ac3b1a6e8c1e8d21)
[2] The City is underlain by the adjudicated portion of the Riverside-Arlington Groundwater Subbasin.

Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

Riverside Municipal Code

Chapter 14.22: Water Conservation. This chapter establishes procedures for implementing and enforcing water conservation measures. Section 14.22.020 establishes a Water Conservation program which uses five stages to address conditions and needs. The Water Conservation Stage is set by City Council action. Stage One represents normal conditions whereas Stages Two, Three, Four, and Five represent potential and actual shortages. Stages Two, Three, Four, and Five may be triggered by a local or regional water supply shortage; production, treatment, transmission, or delivery infrastructure problems; limited or unavailable alternative water supplies; or other circumstances. Stage One conservation measures are voluntary, and are encouraged through public outreach, education, and awareness measures by the City. Stages Two, Three, Four, and Five conservation measures are mandatory, and violations may be subject to criminal, civil, and administrative enforcement.

Chapter 19.570: Water Efficient Landscaping and Irrigation. The purpose of this chapter is to ensure efficient use of water for landscaping within the City. The Ordinance applies to new landscape projects 500 square feet or greater and rehabilitated landscape projects 2,500 square feet or greater. The code section provides implementation procedures and water use standards for the purpose of providing water efficient landscapes in compliance with State law.

5.19.2.2 Water Environmental Setting

Water is supplied to the Project site by Riverside Public Utilities (RPU). RPU's service area is approximately 75 square miles, of which approximately 70 square miles are located in Riverside's City limits and the remaining 5 square miles consist of unincorporated land within the County of Riverside (RPU, 2021).

Water Supply and Demand

As described in RPU's 2020 UWMP, RPU's primary source of supply is local groundwater (RPU, 2021). Additionally, RPU has an agreement with Western Municipal Water District (WMWD) to access imported water when needed. The agreement between WMWD and RPU can provide RPU with up to 21,700 acre-feet per year (AFY) of imported water. RPU also has an exchange agreement with the City of Norco for the sale of up to 1,000 AFY and the exchange of water during emergencies. Since 2009, RPU has been imported-water independent by relying solely on local water supplies to meet the water demands of its service area. Table 5.19-1 shows RPU's actual water supplies for the year 2020.

Table 5.19-1: RPU Actual Water Supply Volumes (AF)

Water Supply	Source	2020	
		Actual Volume (AF)	Water Quality
Groundwater	Bunker Hill	50,911	Drinking Water
Groundwater	Bunker Hill	7,035	Raw Water
Groundwater	Riverside North	7,686	Drinking Water
Groundwater	Riverside North	1,190	Raw Water

Groundwater	Riverside South	15,665	Drinking Water
Groundwater	Riverside South	3,622	Raw Water
Groundwater	Rialto-Colton	2	Raw Water
Recycled water	Regional Water Quality Control Plant (RWQCP)	213	Recycled Water
Purchased or Imported Water	From WMWD	0	Drinking Water
Total Production		**86,324**	

AF = acre-feet
Source: Table 6-9 from RPU's 2020 UWMP (RPU, 2021)

Table 5.19-2 provides RPU's total projected supply capacities expected to be available to RPU through 2045. As shown in Table 5.19-2, RPU estimates that water supplies in the future are anticipated to be obtained through a similar mix of groundwater, purchased or imported water, and recycled water. The 2020 UWMP anticipates that RPU's water supply will increase from 114,923 AF in 2025 to 129,693 AF in 2045 (increase of 14,770 AF) to meet RPU's anticipated growth in water demands.

Table 5.19-2: Projected Water Supply Volumes (AF)

Water Supply	Source	Projects Water Supply (AFY)				
		2025	2030	2035	2040	2045
Groundwater	Bunker Hill	55,263	55,263	55,263	55,263	55,263
Groundwater	Seven Oaks Enhanced Phase II	1,000	1,000	1,000	1,000	1,000
Groundwater	BH Active Recharge 2025	750	1,000	1,500	1,500	1,500
Groundwater	Riverside North	10,902	10,902	10,902	10,902	10,902
Groundwater	RHASR	-	2,000	2,000	2,000	2,000
Groundwater	Riverside South	16,880	16,880	16,880	16,880	16,880
Groundwater	Box Springs	-	-	2,800	2,800	2,800
Groundwater	Columbia, Etc. Stormwater	-	-	-	1,500	1,500
Groundwater	Rialto-Colton	2,728	2,728	2,728	2,728	2,728
Recycled water	RWQCP	5,700	13,420	13,420	13,420	13,420
Purchased or Imported Water	From WMWD	21,700	21,700	21,700	21,700	21,700
	Total	**114,923**	**124,893**	**128,193**	**129,693**	**129,693**

AFY = acre-feet per year
Source: Table 6-10 from RPU's 2020 UWMP (RPU, 2021)

The 2020 UWMP describes that water demands per capita have been decreasing in recent years due to new State and local regulations related to water conservation. The 2020 UWMP also describes that the calculated water use in the RPU service area is 189 gallons per capita per day in 2020, which is below the target of 213 gallons per capita per day for 2020 (RPU, 2021). Water demands within RPU are summarized below in Table 5.19-3.

Table 5.19-3: Actual and Projected Water Demands (AF)

Use Type	Actual 2020	Projected 2025	Projected 2030	Projected 2035	Projected 2040	Projected 2045
Single Family	34,250	35,069	36,349	37,677	39,053	40,479
Multi-Family	6,159	6,306	6,537	6,775	7,023	7,279
Commercial/Institutional	12,067	12,355	12,807	13,274	13,759	14,262

Use Type	Actual 2020	Projected 2025	Projected 2030	Projected 2035	Projected 2040	Projected 2045
Landscape	4,166	4,266	4,421	4,583	4,750	4,924
Agricultural Irrigation	1,394	1,427	1,479	1,533	1,589	1,648
Other (Fire, Temporary, Special Services)	289	296	307	318	330	342
Wholesale WMWD	3,163	2,000	2,000	2,000	2,000	2,000
Wholesale Norco	477	1,000	1,000	1,000	1,000	1,000
Potable Losses	7,382	5,193	5,383	5,579	5,783	5,994
Subtotal - Potable	69,347	67,912	70,283	72,739	75,287	77,928
GCC	9,958	13,500	13,500	13,500	13,500	13,500
Overlying Uses	867	1,000	1,000	1,000	1,000	1,000
WMWD	428	2,000	2,000	2,000	2,000	2,000
Irrigation Water Losses	597	600	600	600	600	600
Subtotal – Non-potable	11,850	17,100	17,100	17,100	17,100	17,100
Total Water Use	**81,338**	**85,012**	**87,383**	**89,839**	**92,387**	**95,028**

AF = acre-feet
Source: Table 4-2 and Table 4-3 from RPU's 2020 UWMP (RPU, 2021)

Groundwater: RPU has facilities to extract groundwater from five groundwater basins: Bunker Hill, Rialto-Colton, Riverside North, Riverside South, and Arlington Basins. RPU currently has 53 active wells (46 producing potable water and 7 producing non-potable water), 20 inactive wells that are being used as monitoring wells and 13 other monitoring wells, for a total of 33 dedicated monitoring wells. The Western-San Bernardino Judgment addresses groundwater management within the Rialto-Colton Basin, Riverside-Arlington basin, and the San Bernardino Basin Area (SBBA), which contains the Lytle Basin and the Bunker Hill Basin. The Western-San Bernardino Judgment provides a determination of the safe yield of the SBBA and established specific amounts of water that can be extracted from the SBBA.

Purchased or Imported Water: RPU is able to purchase up to 19.4 million gallons per day (MGD) of imported State Water Project water from WMWD. Additionally, as described above, RPU and the City of Norco have an agreement for the sale of up to 1,000 AFY and the exchange of water during emergencies.

Surface Water: RPU is not reliant on surface water flows to directly meet demands because reliability of surface water can fluctuate depending on hydrologic conditions in the Santa Ana Watershed. RPU plans to utilize surface water as a natural recharge in the Bunker Hill and Riverside basins through conjunctive use projects. However, the exact scope and expected return of these projects has not been determined (RPU, 2021).

Recycled Water: RPU distributes recycled water for nonpotable uses and has planned projects to increase the use of recycled water throughout its service area. The 2020 UWMP describes that the 2015 UWMP anticipated the completion of additional recycled water infrastructure projects in order to increase the use of recycled water. However, these projects have not been implemented; therefore, the actual recycled water use in 2020 was lower than previously projected. The 2020 UWMP includes methods to expand future recycled water use; however, an implementation year for these projects has not been set.

Water Infrastructure

A 10-inch diameter water line currently exists under Massachusetts Avenue adjacent to the Project site.

5.19.2.3 Water Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Threshold A Require or result in the relocation or construction of new or expanded water facilities, , the construction or relocation of which could cause significant environmental effects; or

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

5.19.2.4 Water Service Methodology

The evaluation of water supply considers the amount of water that would be required to support operation of the proposed Project and compares the demand to RPU's available water supply to identify if sufficient water supplies are available to serve the proposed Project and reasonably foreseeable development during normal, dry, and multiple dry years. Additionally, the water supply infrastructure in the Project area was identified and evaluated to ensure design capacity would be adequate to supply the Project site, or to identify if expansions would be required to serve the proposed development.

5.19.2.5 Water Environmental Impacts

THRESHOLD A: WOULD THE PROJECT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?

The proposed Project would redevelop a 10.21-acre portion of the 14.42-acre Project site, which is currently served by RPU's water infrastructure, with two industrial warehouses totaling 199,850 SF. Massachusetts Avenue contains a 10-inch domestic water line which currently provides water supplies to the Project site and surrounding adjacent areas. The proposed Project would construct new on-site water service lines that would connect to the 10-inch water line within Massachusetts Avenue. Additional off-site water infrastructure would not be required to be constructed to serve the proposed Project.

The new and existing on-site water system would convey water supplies to the proposed industrial warehouses and landscaping through plumbing/landscaping fixtures that are compliant with the CALGreen Code for efficient use of water. The construction activities related to the new on-site water infrastructure that would be needed to serve the proposed warehouses are included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. The analysis this this Draft EIR has evaluated all potential environmental impacts of the proposed on-site water lines. The analysis in this Draft EIR has determined that the proposed Project would not result in significant environmental effects. Since the Project proposes to connect to existing water infrastructure, it would not result in the construction of new off-site water facilities or expansion of existing off-site facilities. Therefore, the proposed Project would not require or result in the relocation or construction of new water facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be **less than significant.**

THRESHOLD B: WOULD THERE BE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT AND REASONABLY FORESEEABLE FUTURE DEVELOPMENT DURING NORMAL, DRY, AND MULTIPLE DRY YEARS?

The Project site is currently developed with an existing industrial use which is served by RPU's water infrastructure. The Project would redevelop a 10.21-acre portion of the Project site with two industrial

warehouses totaling 199,850 SF. Based on the General Plan land use, the 2020 UWMP assumed that the parcels comprising the Project site would be developed with industrial uses. The UWMP used 2020 Census data, SCAG population growth projections, and updates to the City's General Plan in order to calculate future water demands within RPU's service area.

The UWMP assessed the projected water demand and supply in the service area and concluded that RPU has an adequate water supply to meet demands under all climatic conditions (normal, single-dry, and multiple-dry years) within its service area through 2045 (RPU, 2021). The 2020 RPU UWMP anticipates that RPU's water supply will increase from 114,923 AF in 2025 to 129,693 AF in 2045 (increase of 14,770 AF) to meet the RPU's anticipated growth in water demands.

Based on the above, it is anticipated that existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand at buildout, in addition to forecast demand for RPU's entire service area. Thus, impacts related to the availability of sufficient water supplies to serve the proposed Project and reasonably foreseeable development during normal, dry, and multiple dry years would be **less than significant.**

5.19.2.6 Water Cumulative Impacts

The geographic scope of cumulative analysis for water service is the service area of RPU. Cumulative water supply impacts are associated with the adequacy of PUR's primary sources of water which include groundwater, purchased or imported water, and recycled water. As described above, water supplies have been planned through RPU's 2020 UWMP, which identifies the ability to meet a majority of future water demands through groundwater and imported supplies, despite the current deficiency in recycled water. RPU's UWMP provides projections for water supply and demand through 2045, and shows that in normal, dry, and multiple dry year conditions with anticipated growth in RPU's service area, RPU would be able to meet water demand. Therefore, the incremental impacts associated with the proposed Project would not combine with other cumulative projects in the area to create a cumulatively considerable impact on RPU's water supplies. As a result, **cumulative impacts would be less than significant.**

5.19.2.7 Water Existing Regulations and Plans, Programs, or Policies

Existing Regulations

California Code of Regulations Title 24, Part 11, the California Green Building Standards Code (CALGreen)

5.19.2.8 Water Levels of Significance Before Mitigation

Thresholds A and B would be less than significant.

5.19.2.9 Water Mitigation Measures

No mitigation measures are required.

5.19.2.10 Water Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to water supplies or water infrastructure would occur.

5.19.3 WASTEWATER

5.19.3.1 Wastewater Regulatory Setting

Federal Regulations

National Pollution Discharge Elimination System Permit

The NPDES permit system was established in the Federal Clean Water Act to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the U.S. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

State Regulations

State Water Resources Control Board Statewide General Waste Discharge Requirements for Sewer Systems

The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SWRCB Order No 2022-0103-DWQ) applies to sanitary sewer systems that are greater than one mile long and collect or convey untreated or partially treated wastewater to a publicly owned treatment facility. The goal of Order No. 2022-0103-DWQ is to provide a consistent statewide approach for reducing Sanitary Sewer Overflows (SSOs), which are accidental releases of untreated or partially treated wastewater from sanitary sewer systems, by requiring that:

1. In the event of an SSO, all feasible steps be taken to control the released volume and prevent untreated wastewater from entering storm drains, creeks, etc.
2. If an SSO occurs, it must be reported to the SWRCB using an online reporting system developed by the SWRCB.
3. All publicly owned collection system agencies with more than one mile of sewer pipe in the state must develop a Sewer System Management Plan (SSMP), which must be updated every five years.

RPU updated its SSMP in 2022 in compliance with these requirements

Local and Regional Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) Public Facilities and Infrastructure Element contains the following objectives and policies related to wastewater resources that are applicable to the Project.

Objective PF-3: Maintain sufficient levels of wastewater service throughout the community.

Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system.

Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.19.3.2 Wastewater Environmental Setting

Wastewater service is provided to the Project site by the City of Riverside Public Works Department which owns and operates a sanitary sewer collection system consisting of over 830 miles of sewer lines (City of Riverside, 2022). There are 19 pump stations located throughout the City that range in size from 100 gallons per minute (gpm) up to 2,000 gpm providing service to those areas of geographic need (City of Riverside, 2022). Wastewater treatment is provided at the Regional Water Quality Control Plant (RWQCP), which provides preliminary, primary, secondary, and tertiary wastewater treatment. The RWQCP has a flow rated capacity of approximately 46 MGD and treats approximately 26 MGD per day (Candice Assadzadeh, City of Riverside Senior Planner, personal email communication, December 5, 2024). According to the City's Wastewater Integrated Master Plan, the historic average wastewater flow in the City is 96.6 gallons per capita per day (City of Riverside, 2008).

5.19.3.3 Wastewater Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Threshold C Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; or

Threshold D 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.

5.19.3.4 Wastewater Service Methodology

The evaluation of wastewater infrastructure quantifies the amount of wastewater that would be generated from operation of the proposed Project and compares the demand to the existing and planned sewer infrastructure in the City of Riverside and wastewater treatment plant that treats flows from the Project site. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.19.3.5 Wastewater Environmental Impacts

THRESHOLD C: WOULD THE PROJECT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WASTEWATER TREATMENT FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?

The proposed Project would redevelop a 10.21-acre portion of the 14.42-acre Project site, which is currently served by the City's wastewater infrastructure, with two industrial warehouses totaling 199,850 SF. Massachusetts Avenue and Roberta Street contain an 8-inch wastewater line which currently provides sewer collection for the Project site and surrounding adjacent areas. The proposed Project would install on-site sewer infrastructure that would connect to the existing 8-inch sewer lines in Massachusetts Avenue and

Roberta Street. Additional off-site wastewater infrastructure would not be required to be constructed to serve the proposed Project.

As previously described, installation of the proposed on-site sewer infrastructure is part of construction of the proposed Project and would not result in any physical environmental effects beyond those described throughout this EIR. The analysis this this Draft EIR has evaluated all potential environmental impacts of the proposed Project and off-site sewer infrastructure. The analysis in this Draft EIR has determined that the proposed Project would not result in significant environmental effects. Therefore, the proposed Project would not require or result in the relocation or construction of new wastewater treatment facilities, the construction of which could cause significant environmental effects, and impacts would be **less than significant.**

THRESHOLD D: WOULD THE PROJECT 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?

Based on the City's average wastewater flow of 96.6 gallons per capita per day, the proposed Project would result in 18,740 gallons per day or 0.01874 MGD of wastewater (96.6 gallons per capita per day × 194 employees = 18,740 gallons per day). Under existing conditions, the RWQCP, which would serve the site, has a rated capacity of approximately 46 MGD and a daily average flow of 26 MGD, leaving approximately 20 MGD of wastewater treatment capacity. Implementation of the Project would utilize a nominal percentage of the daily treatment capacity.

In addition to treatment plant capacity, the local sewer mains serving the Project site are part of an established wastewater treatment network. The proposed Project would connect to the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street. Based on the existing fixture count and typical flow rates, the increase in wastewater generation would not exceed the capacity of the existing sewer lines at the point of connection and downstream. Furthermore, no known constraints or deficiencies have been identified in the local system that would impede service to the Project.

5.19.3.6 Thus, the wastewater treatment provider has ample capacity, and the proposed Project would not create the need for any new or expanded wastewater facility. Therefore, the proposed Project would result in **less than significant** impacts related to wastewater treatment capacity. Wastewater Cumulative Impacts

Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes the sewer system and the conveyance system through wastewater disposal at the RWQCP. As described previously, with the proposed Project, the sewer system would have sufficient capacity to handle the increased flows resulting from implementation of the proposed Project. The continued regular assessment, maintenance, and upgrades of the sewer system by Riverside Public Works would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a **less than significant cumulative impact.**

5.19.3.7 Wastewater Existing Regulations and Plans, Programs, or Policies

Existing Regulations

California Code of Regulations Title 24, Part 11, the California Green Building Standards Code (CALGreen)

5.19.3.8 Wastewater Levels of Significance Before Mitigation

Thresholds C and D would be less than significant.

5.19.3.9 Wastewater Mitigation Measures

No mitigation measures are required.

5.19.3.10 Wastewater Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to wastewater infrastructure would occur.

5.19.4 STORMWATER DRAINAGE

5.19.4.1 Stormwater Drainage Regulatory Setting

Local and Regional Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) Public Facilities and Infrastructure Element and Open Space and Conservation Element contains the following objectives and policies related to storm drainage that are applicable to the Project.

Objective PF-4: Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows.

Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

Objective OS-10: Preserve the quantity and quality of all water resources throughout Riverside.

Policy OS-10.6: Continue to enforce RWQCB regulations regarding urban runoff.

Policy OS-10.8: Cooperate with Riverside and San Bernardino Counties and adjacent jurisdictions in the review and approval of new developments which affect the quality and quantity of basin-wide groundwater and surface water resources.

Policy OS-10.9: Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in stormwater runoff and provide groundwater percolation zones.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.19.4.2 Stormwater Drainage Environmental Setting

The northern portion of the site is developed with two buildings which are surrounded by asphaltic concrete pavement in the parking lot and drive lane areas, with some landscaped planters scattered throughout the site. The southern portion of the site contains a vacant lot that is comprised of barren, loosely compacted dirt/gravel. Stormwater on the developed, northern portion of the site is directed to on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue whereas stormwater flow for the unpaved, southern portion of the site flows over the surface and is generally conveyed to Kansas Avenue. Off-site flows are directed to the gutter that runs along Kansas Avenue. Because the site is currently only partially paved, future development would increase intensity of development and would result in additional impervious surfaces that could increase the volume and velocity of stormwater runoff.

5.19.4.3 Stormwater Drainage Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Threshold E Require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction of which could cause significant environmental effects.

5.19.4.4 Stormwater Drainage Service Methodology

The evaluation of stormwater drainage infrastructure quantifies the amount of impervious surfaces and stormwater runoff that would be generated from the proposed Project and identifies if runoff from the proposed Project would be accommodated by the existing stormwater drainage infrastructure. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.19.4.5 Stormwater Drainage Environmental Impacts

THRESHOLD E: WOULD THE PROJECT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED DRAINAGE FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?

As stated above, the northern portion of the Project site is developed with two buildings and asphalt concrete while the southern portion of the site is undeveloped and pervious. In the existing condition, stormwater on the northern portion of the site is directed to existing on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue. Stormwater flow for the southern portion of the site is overland flow that is generally conveyed in the southeast-to-northwest direction to Kansas Avenue. Off-site flows are directed to an existing gutters that runs along Kansas Avenue. The proposed Project would collect drainage via proposed grate inlets and catch basins, which would convey storm water to an on-site underground storm drain system. The storm drain system would discharge to one proposed on-site underground detention/infiltration system. This detention/infiltration system would be located under the passenger drive aisle in the southwest portion of the site adjacent to Building 2 and would direct overflow to Kansas Avenue. Detention/Infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic square feet (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing on-site flows (Appendix I, Page 5). Therefore, the proposed stormwater system would provide improved infiltration compared to existing conditions.

Impacts associated with the Project's proposed on-site stormwater drainage infrastructure, such as air quality, greenhouse gas, and noise, are included as part of the construction of the Project and would not result in any physical environmental effects beyond those identified in their respective sections of this Draft EIR. As such, there are no environmental impacts that would occur specifically related to the Project's proposed stormwater drainage infrastructure. Therefore, Project impacts due to stormwater drainage infrastructure would **be less than significant.**

5.19.4.6 Stormwater Drainage Cumulative Impacts

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above, the proposed Project would not cause a substantial change in the amount of stormwater runoff from the Project site. As a result, the proposed Project would not generate additional runoff that could combine with runoff from cumulative projects that could cumulatively combine to impact drainage.

The existing State and regional regulations require development projects to maintain pre-project hydrology, thus no net increase of offsite stormwater flows would occur. RWQCB permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the project sites at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur. Thus, cumulative impacts related to drainage would be **less than significant.**

5.19.4.7 Stormwater Drainage Existing Regulations and Plans, Programs, or Policies

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to hydrology and water quality. These actions will be included in the Project's Mitigation Monitoring and Reporting Program.

PPP HYD-1: NPDES/SWPPP. As listed in Section 5.10, *Hydrology and Water Quality*.

PPP HYD-2: WQMP. As listed in Section 5.10, *Hydrology and Water Quality*.

5.19.4.8 Stormwater Drainage Levels of Significance Before Mitigation

Threshold E would be less than significant.

5.19.4.9 Stormwater Drainage Mitigation Measures

No mitigation measures are required.

5.19.4.10 Stormwater Drainage Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to drainage would occur.

5.19.5 SOLID WASTE

5.19.5.1 Solid Waste Regulatory Setting

Federal Regulations

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act of 1976 (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

State Regulations

California Assembly Bill 939

The California Integrated Waste Management Act (AB 939) made all California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 25 percent of their solid waste by 1995 and 50 percent by year 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year.

California Assembly Bill 341

On October 6, 2011, Governor Brown signed AB 341, amending AB 939 and enacting a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring the Department of Resources Recycling and Recovery (CalRecycle) to provide a report to the Legislature that recommends strategies to achieve the policy goal. AB 341 also requires businesses and multi-family residential dwellings of five units or more, that generate four or more cubic yards of commercial solid waste per week to implement recycling programs.

California Assembly Bill 1826

On September 28, 2014, Governor Brown signed AB 1826 requiring businesses to recycle their organic waste on and after April 1, 2016, dependent on the amount of waste generated per week. This law requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings that consist of five or more units.

California Assembly Bill 827

Signed into law by Governor Newsom in 2019, AB 827 requires businesses subject to AB 1826 and AB 341 starting July 1, 2020, to provide customers with easily accessible recycling and organics collection bins or containers to collect these materials generated from products purchased on the premises.

California Green Building Standards Code (CALGreen)

Section 5.408.1 Construction waste diversion. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste.

Section 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling,

including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals, or meet a lawfully enacted local recycling ordinance, if more restrictive.

Local and Regional Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following objectives and policies related to solid waste that are applicable to the Project.

Public Facilities and Infrastructure Element

Objective PF-5: Minimize the volume of waste materials entering regional landfills.

Policy PF-5.1: Develop innovative methods and strategies to reduce the amount of waste materials entering landfills. The City should aim to achieve 100% recycling citywide for both residential and nonresidential development.

Air Quality Element

Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.19.5.2 Solid Waste Environmental Setting

The *City of Riverside General Plan 2025 Program EIR* describes that solid waste in the City is disposed of at the Badlands Landfill, the Lamb Canyon Landfill, the El Sobrante Landfill, and the Mid-Valley Sanitary Landfill (City of Riverside, 2021). The daily throughput and average daily capacity of each landfill is provided below.

- The Badlands Landfill is permitted to accept 5,000 tons of solid waste per day and is permitted to operate until January 2059 (CalRecycle, n.d.-a). In December 2024, the average daily tonnage received was 3,010.6 tons (CalRecycle, 2025a). Thus, the facility had additional capacity of approximately 1,989.4 tons per day.
- The Lamb Canyon Landfill is permitted to accept 5,000 tons of solid waste per day and is permitted to operate until April 2032 (CalRecycle, n.d.-b). In December 2024, the average daily tonnage received was 2,044 tons. Thus, the facility had additional capacity of approximately 2,956 tons per day (CalRecycle, 2025b).
- The El Sobrante Landfill is permitted to accept 16,054 tons of solid waste per day and is permitted to operate until January 2051 (CalRecycle, n.d.-c). In November 2024, the average daily tonnage received was 10,732.4 tons. Thus, the facility had additional capacity of approximately 5,321.6 tons per day (CalRecycle, 2024).

5.19.5.3 Solid Waste Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Threshold F 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.

Threshold G Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

5.19.5.4 Solid Waste Service Methodology

Solid waste generation from construction and operation of the proposed Project was estimated using CalEEMod version 2022.1.1, USEPA and CalRecycle solid waste generation factors derived for multi-family residential and commercial uses. Solid waste volumes were then compared with recent estimates of remaining disposal capacity of the landfill serving the City. In addition, potential impacts related to compliance with solid waste regulations were evaluated by identifying how the proposed Project would implement the relevant requirements.

5.19.5.5 Solid Waste Environmental Impacts

THRESHOLD F: WOULD THE PROJECT 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?

Construction

The proposed Project involves the demolition of two existing buildings and hardscape. Additionally, Project construction would generate solid waste from construction packing and discarded materials. As included within the *Air Quality, Energy, and GHG Impact Analysis* prepared for the Project (Appendix B), CalEEMod version 2022.1.1 estimated that demolition as part of Project construction would result in approximately 24,902 tons of solid waste. Utilizing a construction waste factor of 3.89 pounds per square foot (USEPA, 1998), construction of the proposed Project would generate approximately 389 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, demolition would generate approximately 8,716 tons of solid waste to be disposed of at the landfills, and construction activities would generate approximately 136 tons of solid waste to be disposed of at the landfills. As described above, the landfills serving the Project area have a combined average daily capacity of 10,267tons. Therefore, construction waste generated by the proposed Project would be accommodated by the landfills and would not result in excess waste.

Operation

The proposed Project would operate approximately 199,850 SF of warehousing. Using the default CalEEMod operational solid waste generation factor of 0.94 tons per 1,000 SF per year for warehouses, the Project would generate approximately 188 tons of solid waste per year (California Air Pollution Control Officers Association, 2022). Pursuant to the California Integrated Waste Management Act, at least 75 percent of solid waste is required to be recycled, which would reduce the volume of landfilled solid waste to approximately 47 tons per year, or approximately 0.13 tons (or 257.6 pounds) per day.

As described above, the landfills serving the Project area have a combined average daily capacity of 10,267tons. Therefore, operational waste generated by the proposed Project would be accommodated by the landfills and the proposed Project would not result in excess solid waste.

As described above, the Lamb Canyon Landfill is scheduled to close in April 2032. The Badlands Landfill and the El Sobrante Landfill have a combined daily capacity of 7,311 tons. As such, the approximate 0.13 tons (or 257.6 pounds) operational waste generated by the proposed Project would be accommodated by the Badlands Landfill and El Sobrante Landfill, and the proposed Project would not result in excess solid waste.

Construction and operational impacts related to solid waste would be **less than significant.**

THRESHOLD G: WOULD THE PROJECT COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?

The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the City are subject to the requirements set forth in the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the City's development project permitting process. Therefore, the proposed Project would comply with all solid waste statutes and regulations; and **impacts would not occur.**

5.19.5.6 Solid Waste Cumulative Impacts

Cumulative projects in the area would increase solid waste generation and decrease the available capacity of the nearby landfills. However, as with the proposed Project, cumulative projects have been or would be required to conduct an environmental review and would be required to adhere to solid waste regulations, which are aimed at reducing overall solid waste levels. Furthermore, the Badlands Landfill, the Lamb Canyon Landfill, and the El Sobrante Landfill are forecasted to have sufficient capacity to serve current and future needs until their scheduled closures in January 2059, April 2032, and January 2051, respectively. Therefore, the increase in solid waste from future buildout of the proposed Project would be less than cumulatively considerable and would be **less than significant.**

5.19.5.7 Solid Waste Existing Regulations and Plans, Programs, or Policies

Existing Regulations

- California Code of Regulations Title 24, Part 11, the California Green Building Standards Code (CALGreen)
- Assembly Bill 939 (Chapter 1095, Statutes of 1989)
- Assembly Bill 341 (Chapter 476, Statutes of 2011)
- Assembly Bill 1826 (Chapter 727, Statutes of 2014)
- Assembly Bill 827
- Senate Bill 1383 (Chapter 395, Statutes of 2016)

5.19.5.8 Solid Waste Levels of Significance Before Mitigation

Threshold F would be less than significant and no impact would occur related to Threshold G.

5.19.5.9 Solid Waste Mitigation Measures

No mitigation measures are required.

5.19.5.10 Solid Waste Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to solid waste would occur.

5.19.6 DRY UTILITIES

5.19.6.1 Dry Utilities Regulatory Setting

State Regulations

Title 24 Energy Efficiency Standards and California Green Building Standards

The California Energy Commission's Building Energy Efficiency Standards serve to reduce wasteful, uneconomical, and unnecessary uses of energy for the state. They include requirements in the Energy Code (California Code of Regulations [CCR] Title 24, Part 6) and voluntary energy efficiency provisions in CALGreen (CCR Title 24, Part 11). The Building Energy Efficiency Standards are updated every three years. The most recent update occurred in 2022 and became effective January 1, 2023. The 2022 Energy Efficiency standards that are applicable to the proposed Project include, but are not limited to, the following:

- Electric vehicle charging stations. Facilitate the future installation of electric vehicle supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Title 24 Part 6 Table 5.106.8.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads).
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.

Local and Regional Regulations

City of Riverside 2025 General Plan

The City of Riverside 2025 General Plan (adopted 2007) contains the following goals related to dry utilities that are applicable to the proposed Project.

Open Space and Conservation Element

Objective OS-8	Encourage the efficient use of energy resources by residential and commercial uses.
Policy OS-8.1	Support the development and use of non-polluting, renewable energy sources.
Policy OS-8.2	Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in existing developments.
Policy OS-8.6	Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24.

Air Quality Element

Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.

City of Riverside Phase I General Plan Update

There are no policies that are applicable to the proposed Project in the City of Riverside Phase I General Plan Update (adopted 2021).

5.19.6.2 Dry Utilities Environmental Setting

Electricity

Electricity in the City limits is provided by Riverside Public Utilities (RPU) (City of Riverside, 2021). RPU's Power Content Label provides an overview of the various resources that make up the State of California's and RPU's electric power make up. Table 5.19-4 below shows RPU's 2023 power mix in comparison to the State's power mix.

Table 5.19-4: RPU 2023 Power Content Label

Energy Resource	RPU General Power Mix	RPU 100% Renewable Energy Mix	2023 State of California Power Mix
Eligible Renewable	46.4%	100.0%	36.9%
Biomass & Biowaste	*0.0%*	*0.0%*	*2.1%*
Geothermal	*35.4%*	*50.0%*	*4.8%*
Eligible Hydroelectric	*0.0%*	*0.0%*	*1.8%*
Solar	*10.0%*	*30.0%*	*17.0%*
Wind	*1.1%*	*20.0%*	*11.2%*
Coal	16.3%	0.0%	1.8%
Large Hydroelectric	1.1%	0.0%	11.7%
Natural Gas	3.3%	0.0%	36.6%
Nuclear	5.0%	0.0%	9.3%
Other	0.0%	0.0%	0.1%
Unspecified Power[1]	27.9%	0.0%	3.7%
Total	**100.0%**	**100.0%**	**100.0%**

[1] Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.
Source: City of Riverside, 2023

Natural Gas

Natural gas services in the City are provided by Southern California Gas Company (SoCalGas). SoCalGas delivers energy to roughly 21 million consumers across a service area spanning approximately 24,000 square miles in Central and Southern California, utilizing a network of pipelines extending over 3,600 miles and serving more than 500 communities (SoCalGas, 2024).

Telecommunications

The majority of the City's telecommunication and fiber optics services are provided by AT&T (City of Riverside, 2021). There are over 45 cellular towers throughout the City and RPU maintains a 120-mile fiber optic network on which internet service providers or wireless operators can lease to deliver connectivity to customers throughout the City (City of Riverside, 2021).

5.19.6.3 Dry Utilities Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Threshold H Require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

5.19.6.4 Dry Utilities Service Methodology

The evaluation of dry utilities identifies if dry utility demand from the Project would be accommodated via existing dry utility infrastructure available to the Project. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in a significant environmental impact.

5.19.6.5 Dry Utilities Environmental Impacts

THRESHOLD H: WOULD THE PROJECT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?

Implementation of the proposed Project would generate demand for electricity, natural gas, and communication systems. Electricity would be provided to the Project by RPU. Adequate commercial electricity supplies are presently available to meet the incremental increase in demand attributed to the Project. The Project would connect to existing overhead electrical utilities located on Kansas Avenue and Roberta Street (along the northeast boundary). The extended electrical utilities would be undergrounded within the sidewalk and/or parkway along Roberta Street (north side) and Kansas Avenue (west side of the project site). Provision of electricity to the Project site is not anticipated to require or result in the construction of new facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental impacts to electricity. Impacts would be less than significant.

The Project would connect to the existing natural gas lines in Kansas Avenue and Massachusetts Avenue and natural gas would be provided by Southern California Gas. As such, the proposed Project is not anticipated to require or result in the construction of new gas facilities or the expansion of existing facilities. Impacts would be less than significant.

Communication systems for the Project could be provided by existing providers such as AT&T. AT&T is a private company that provides connection to the communication system on an as-needed basis. As such, the proposed Project is not anticipated to require or result in the construction of new communications facilities or the expansion of existing facilities. Impacts would be less than significant.

The Project Applicant would be responsible for coordinating with each utility company to ensure utility improvements occur according to standard construction and operation procedures administered by the California Public Utilities Commission. Each of the dry utility systems is available along Kansas Avenue and Massachusetts Avenue, and excavation would be required to underground these lines and interconnect to the Project site, which would be done as part of roadway, driveway, and sidewalk improvements that are included in the proposed Project. The analysis presented in this Draft EIR has evaluated all potential environmental impacts associated with installation of utility infrastructure and connection to existing infrastructure. . Therefore, potential impacts associated with utilities, including electricity, natural gas and communication systems would be **less than significant.**

Dry Utilities Cumulative Impacts

The geographic scope of cumulative analysis for dry utilities is the service area for RPU, SoCalGas, , and AT&T, which serve the Project area. Cumulative impacts related to the provision of facilities for electricity, natural gas and communications systems, have been evaluated throughout this EIR and were determined to be less than significant. As described above, there are adequate dry utilities available for use by the Project in the Project area. Therefore, the incremental impacts of the proposed Project would not combine with other cumulative projects in the area to create a cumulatively-considerable impact. Therefore, cumulative impacts associated with the provision of utility facilities to serve the Project would be **less than significant.**

5.19.6.6 Dry Utilities Existing Regulations and Plans, Programs, or Policies

Existing Regulations

California Code of Regulations Title 24, Part 11, the California Green Building Standards Code (CALGreen)

5.19.6.7 Dry Utilities Levels of Significance Before Mitigation

Threshold H would be less than significant.

5.19.6.8 Dry Utilities Mitigation Measures

No mitigation measures are required.

5.19.6.9 Dry Utilities Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to dry utilities would occur.

5.19.7 REFERENCES

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5.20 Wildfire

5.20.1 INTRODUCTION

This section addresses potential impacts to wildfire and potential wildfire hazards associated with implementation of the proposed Project. The analysis in this section is based, in part, on the following documents and resources:

- *City of Riverside General Plan 2025*, adopted November 2007
- *City of Riverside Phase 1 General Plan Update*, adopted 2021
- *City of Riverside General Plan 2025 Program Environmental Impact Report*, certified November 2007
- *City of Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Environmental Impact Report,* 2021
- City of Riverside Municipal Code

5.20.2 REGULATORY SETTING

5.20.2.1 Federal Regulations

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) requires utilities to adopt and maintain minimum clearance standards between vegetation and transmission voltage power lines. These clearances vary depending on voltage. In most cases, the minimum clearances required in State regulations are greater than the federal requirement.

National Fire Protection Association Codes, Standards, Practices, and Guides

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute (ANSI). This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or "codes" unless adopted as such or referenced as such by the California Fire Code or the Local Fire Agency.

Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995 and updated in 2001 by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. The Federal Wildland Fire Management Policy and its implementation are founded on the following guiding principles:

- Firefighter and public safety is the first priority in every fire management activity.
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process.
- Fire management plans, programs, and activities support land and resource management plans and their implementation.
- Sound risk management is a foundation for all fire management activities.

- Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives.
- Fire management plans and activities are based upon the best available science.
- Fire management plans and activities incorporate public health and environmental quality considerations.
- Federal, State, tribal, local, interagency, and international coordination and cooperation are essential.
- Standardization of policies and procedures among federal agencies is an ongoing objective (National Wildfire Coordinating Group, 2001).

National Fire Plan

The National Fire Plan was established in 2000 as a response to severe wildfires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and assurance for sufficient firefighting capacity in the future. There are five key areas addressed under the National Fire Plan:

- Firefighting and Preparedness
- Rehabilitation and Restoration
- Hazardous Fuels Reduction
- Community Assistance
- Accountability (U.S. Department of the Interior & U.S. Forest Service, 2000).

5.20.2.2 State Regulations

California Fire Code

The California Fire Code (CFC) is Chapter 9 of Title 24 of the California Code of Regulations (CCR). It was created by the California Building Standards Commission based on the International Fire Code created by the International Code Council. It is the primary means for setting and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety in California. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the California Building Code use a hazards classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is updated every three years by the California Building Standards Commission.

CCR Title 14 Division 1.5

Title 14 of the CCR, Division 1.5, establishes the regulations for the California Department of Forestry and Fire Protection (CAL FIRE) and is applicable in all State Responsibility Areas. State Responsibility Areas are areas where CAL FIRE is responsible for wildfire protection. Any development in a State Responsibility Area must comply with these regulations. Among other things, Title 14, Section 1270 *et seq*. establishes minimum standards for emergency access, fuel modification, setback to property lines, signage, and water supply.

State Responsibility Areas

Pursuant to Public Resources Code (PRC) Sections 4125-4128, the California Board of Forestry and Fire Protection classifies all lands in the state in order to determine which areas are under the financial responsibility of the State for preventing and suppressing wildfire. Lands under the financial responsibility of the State are classified as State Responsibility Areas.

Fire Hazard Severity Zones

California PRC Sections 4201 provides classification of lands within State Responsibility Areas in accordance with the severity of fire hazard present for the purpose of identifying measures to be taken to slow the rate of spreading and to reduce the potential intensity of uncontrollable fires that threaten to destroy life, resources, or property. Such areas are classified under Fire Hazard Severity Zones (FHSZ), which are geographical areas designated through California PRC Sections 4201 through 4204 and are classified as Very High, High, or Moderate in State Responsibility Areas or as High, Very High, and Moderate in Local Responsibility Area. Each level reflects how likely an area is to experience wildfire and how intense those fires could be. FHSZs are designated pursuant to California Government Code Sections 51175 through 51189.

5.20.2.3 On March 24, 2025, CAL FIRE released the 2025 Recommended Fire Hazard Severity Zone (FHSZ) maps for Southern California, including the City of Riverside. State law mandates that local agencies must not reduce the FHSZ level recommended by the State.Local and Regional Regulations

City of Riverside 2025 General Plan

There are no policies that are applicable to the proposed Project in the City of Riverside 2025 General Plan (adopted 2007).

City of Riverside Phase I General Plan Update

The City of Riverside Phane 1 General Plan Update (adopted 2021) contains the following goals and policies related to wildfire that are applicable to the Project:

Policy PSE-1 **Natural Hazards.** Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding, drought, and structural and wildland fires.

Policy PSE-4 **Emergency Services.** Provide high-quality and responsive police, fire, and emergency services to all residents and businesses in Riverside.

City of Riverside Municipal Code

Chapter 9.20 of the City of Riverside Municipal Code provides for the preparation and carrying out of plans for the protection of persons and property within this City in the event of extraordinary emergencies or disasters; the direction of the City emergency organization; and the coordination of the emergency functions of this City with all other public agencies, corporations, organizations and affected private persons.

Riverside Municipal Code Chapter 6.15 and Title 13 require residents to maintain their properties in good condition at all times, as to alleviate the risk of wildfires. Outdoor areas on private property must be kept free of public nuisances. This includes addressing issues such as overgrown vegetation, accumulated debris, or other materials that may pose a risk to health, safety, or the community's appearance.

Riverside Public Utilities Wildfire Mitigations Plan

piverside Public Utilities Wildfire Mitigation Plan (WMP) incorporates information on the methods and procedures the utility employs to ensure the safe construction, maintenance and operation of its electrical infrastructure in order to reduce the risk that the infrastructure could cause a catastrophic wildfire. The WMP

specifically discusses Riverside Public Utility's (RPU's) preventative strategies and operational actions that minimize risk of wildfires caused by RPU's electrical infrastructure.

Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan

The City of Riverside is a participating jurisdiction within the Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). The Riverside County LHMP provides the basis for the Governor's Office of Emergency Services to provide technical assistance and prioritize project funding and is a requirement of the Disaster Mitigation Act of 2000. The Act requires that local communities enact hazard reduction measures to minimize losses from disasters. The Riverside LHMP includes a risk assessment for wildfires, floods, earthquakes, nuclear incidents, civil unrest, and many other types of hazards (County of Riverside, 2018).

5.20.3 ENVIRONMENTAL SETTING

5.20.3.1 Fire Agencies

The City of Riverside Fire Department provides fire protection services within the Project area. The Fire Prevention Division is located at 3900 Main Street, on the third floor of City Hall. The Fire Marshal oversees the Fire Prevention Division.

5.20.3.2 Topography and Vegetation

The Project site is generally flat and located at an approximate elevation of 890 - 901 feet above mean sea level. The site is currently entirely developed and disturbed and contains sparse ornamental landscaping. The Project site is surrounded by industrial land uses to the north, south, and west, and by community services/shelter and manufacturing uses to the east.

5.20.3.3 Wildland Fire Hazards

The Project site is not located within an FHSZ. According to the most recent CAL FIRE FHSZ Viewer (CAL FIRE, 2025), as shown in Figure 5.20-1, *Fire Hazard Severity Zones*, the nearest FHSZ areas are designated as Moderate within Local Responsibility Areas. These zones are located approximately 1mile east of the Project site, near the Box Spring Mountains, and approximately 1.5 miles west of the Project site, near Lake Evans. The nearest Very High FHSZ is located approximately 1.5 miles east of the Project site. This area is designated as a Local Responsibility Area and is associated with the Box Spring Mountains. Beyond this, a Very High FHSZ within a State Responsibility Area is also present in the same general vicinity.

5.20.3.4 Prevailing Winds

The predominant wind direction at the Project site area is from the west and north (NOAA, 2025).

5.20.3.5 Large Fire History

According to CAL FIRE, larger wildfires have occurred within the region surrounding the Project site over the past three years:

- In July 2024, the Columbia Fire burned approximately 58 acres in the hills approximately 1.6 miles east of the Project site in the City of Highgrove. Involved agencies included the CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2024).

- In July 2024, the Top Fire burned approximately 49 acres in the hills approximately 3.5 miles southeast of the Project site in the City of Riverside. Involved agencies included CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2024).
- In June 2024, the Lotus Fire burned approximately 30 acres in the hills approximately 5.3 miles northwest of the Project site in the City of Jurupa Valley. Involved agencies included the CAL FIRE Riverside Unit. No damages were reported. One firefighter injury was reported (CAL FIRE, 2024).
- In July 2023, the Reche Fire burned approximately 436 acres in the hills approximately 7.5 miles east of the Project site in the City of Moreno Valley. Involved agencies included the CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2023b).
- In July 2023, the Oak Fire burned approximately 137 acres in Jurupa Valley approximately 5.5 miles northwest of the Project site. Involved agencies included the CAL FIRE Riverside Unit. No damages or injuries were reported (CAL FIRE, 2023b).

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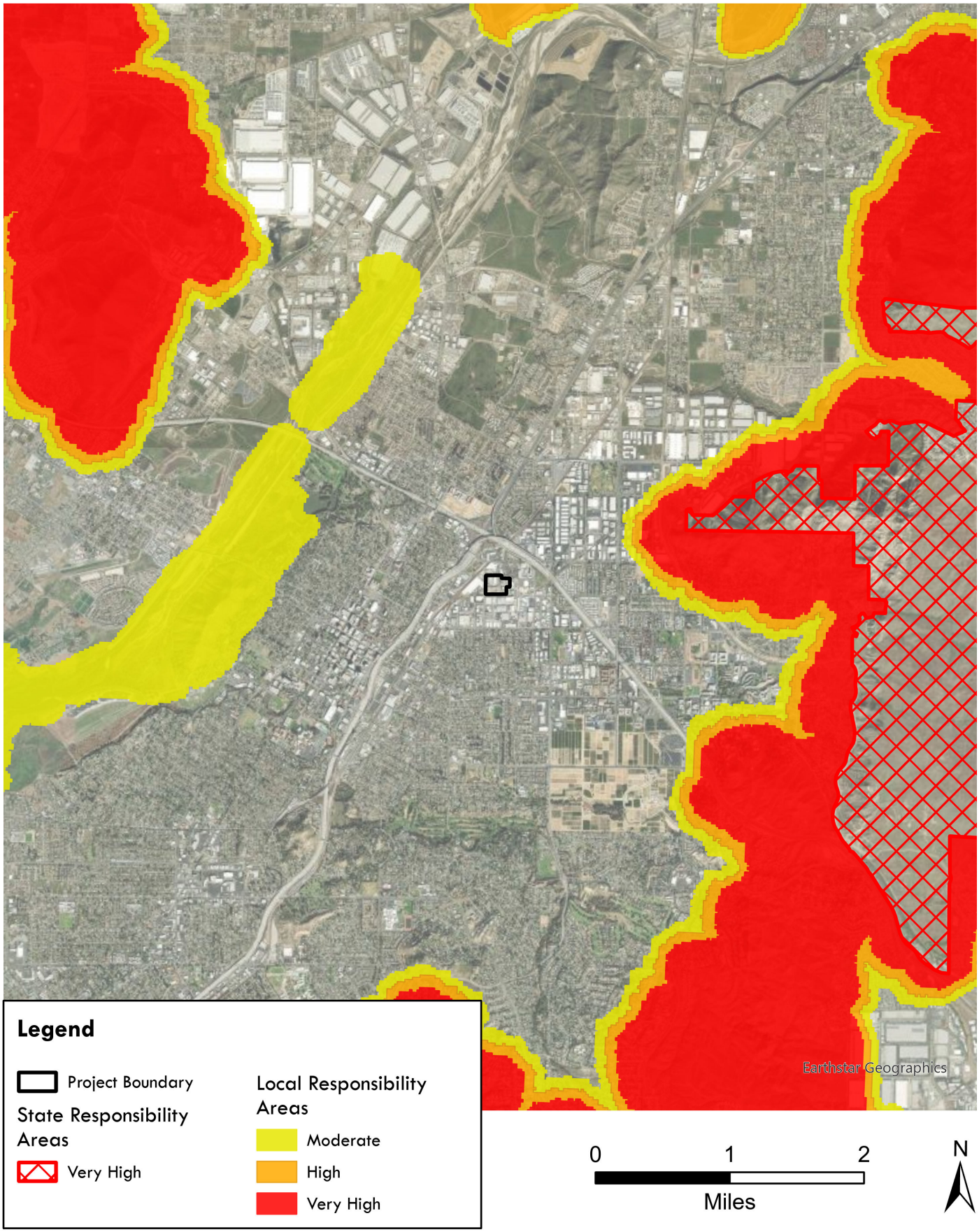
Fire Hazard Severity Zones



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5.20.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to, if located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones:

Threshold A Substantially impair an adopted emergency response plan or emergency evacuation plan.

Threshold 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.

Threshold 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.

Threshold 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.

5.20.5 METHODOLOGY

Impact analysis contained within this section is based on review of CAL FIRE wildfire hazard mapping and recent wildfire history within and adjacent to the City of Riverside. In addition, State and local fire hazard regulations were evaluated to identify applicable design requirements for the proposed Project in order to minimize wildfire risk. Local fire agencies were contacted to discuss their resources and responsibilities related to wildfires in proximity to the Project site.

5.20.6 ENVIRONMENTAL IMPACTS

THRESHOLD A: WOULD THE PROJECT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?

The Project site is not located within a State Responsibility Area or area classified as a very high FHSZ. The nearest FHSZ is Box Springs Mountains, located approximately 2.4 miles east of the Project site (CAL FIRE, 2023a).

The County of Riverside has implemented a Multi-Jurisdictional LHMP, which the City of Riverside participates in, that identifies risks by natural and human-made disasters and ways to minimize the damage from those disasters (County of Riverside, 2018). In addition, Chapter 9.20 of the City of Riverside Code of Ordinances provides for the preparation and carrying out of plans for the protection of persons and property within this City in the event of extraordinary emergencies or disasters.

The Project would construct and operate two Class A light industrial buildings. Additional improvements would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. The proposed Project would be permitted and approved in compliance with existing safety regulations, such as the California Building Code and CFC to ensure that it would not conflict with implementation of the Multi-Jurisdictional LHMP or the City of Riverside Municipal Code.

Construction

According to the City's Safety Element there are no specific designated evacuation routes within the City. Programs and Action Items address identification and planning of evacuation routes in coordination with CAL FIRE and other local and regional jurisdictions (City of Riverside, 2021).

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. During construction of driveways and connections to existing infrastructure, the roadways would remain open to ensure adequate emergency access to the Project area and vicinity. Construction activities within the Project site that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the safe passage of persons and vehicles during required temporary road restrictions. In accordance with Section 503 of the CFC (Title 24, California Code of Regulations, Part 9), prior to any activity that would encroach into a right-of-way, the area of encroachment must be safeguarded through the installation of safety devices to ensure that construction activities would not physically interfere with emergency access or evacuation. Compliance with Section 503 of the CFC would be verified by the City's Building and Safety Division during the construction permitting process in connection with plan check and the issuance of grading and building permits. Therefore, the Project would not block any evacuation routes along any of the roadways or conflict with an emergency response plan, and impacts related to interference with an adopted emergency response of evacuation plan during construction activities would be **less than significant**.

Operation

The Project would include vehicular access to the Project site from Roberta Street, Kansas Avenue, and Massachusetts Avenue. Building 1 would be accessed by three proposed driveways: the northwestern driveway on Roberta Street would be 26 feet wide; the northeastern driveway on Roberta Street would be 37.5 feet wide; and the driveway on Kansas Avenue would be a shared 50-foot-wide driveway. Building 2 would also be accessed via three proposed driveways: the northernmost driveway on Kansas Avenue would be a shared 50-foot-wide driveway; the southernmost driveway on Kansas Avenue would be 26 feet wide; and the driveway on Massachusetts Avenue would be 35 feet wide. Internal access for both buildings would be provided via 26-foot-wide to 35-foot-wide drive aisles which would double as fire lanes. Therefore, the Project would provide adequate and safe circulation to, from, and through the Project site and would provide a variety of routes for emergency responders to access the site. The development would comply with Municipal Code standards, which require design and construction specifications to allow adequate emergency access to the site and ensure that roadway improvements would meet public safety requirements. Therefore, operation of the Project would not impair implementation or interfere with adopted emergency response or evacuation plans. Impacts would be **less than significant.**

THRESHOLD B: WOULD THE PROJECT, 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?

The Project site is not located within a State Responsibility Area, Local Responsibility Area, or an area designated as a Very High FHSZ. The nearest FHSZ are the areas designated as Moderate within Local Responsibility Areas near the Box Springs Mountains, approximately 1 mile east of the Project site, and near Lake Evans, approximately 1.5 miles west of the Project site, as shown in Figure 5.20-1, *Fire Hazard Severity Zones*. The nearest Very High FHSZ is located approximately 1.5 miles east of the Project site. This area is designated as a Local Responsibility Area and is associated with the Box Spring Mountains. Beyond this, a Very High FHSZ within a State Responsibility Area is also present in the same general vicinity (CAL FIRE, 2025).

The Project site and surrounding area are relatively flat, with no significant slopes that could promote or intensify wildfire spread; on-site elevations on the site range from 904 feet above mean sea level (AMSL) at the southeast portion of the site to 889 feet AMSL at the northwest portion of the site. Further, the predominant wind direction at the Project site area is typically from the west and north (NOAA, 2023). This

suggests that a fire burning in the Very High FHSZ associated with the Box Spring Mountains east of the Project site has a low probability of being blown toward the site during typical prevailing wind conditions.

Despite the proposed Project's close proximity to Moderate HFSZ to the west and Moderate to Very High HFSZ to the east, the Project will comply with existing regulations that will reduce wildfire-related risk. The Project would be required to comply with all applicable provisions of the California Fire Code (CFC), which mandates comprehensive fire prevention measures including vegetation management, defensive space requirements, the use of fire-resistant construction materials and methods, installation of automatic sprinkler systems, and adequate water supply for fire protection (fire flow). Compliance with these requirements would be verified by the City prior to issuance of building permits for the Project. In addition, the predominant use of non-flammable materials, such as concrete, in the Project's structural design further minimizes fire risk. Overall, the Project would not exacerbate wildfire risks and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire and impacts would be **less than significant.**

THRESHOLD C: WOULD THE PROJECT 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?

The Project site is not located within a State Responsibility Area or area classified as a very high FHSZ. The proposed Project would include two concrete tilt-up warehouses and a paved parking lot. Concrete is generally nonflammable and would not exacerbate the fire risk to the environment. The proposed Project would connect to existing power lines on Kansas Avenue and Massachusetts Avenue. While the Project does propose construction of a cul-de-sac driveway on Roberta Street, the Project does not include installation or maintenance of infrastructure related to fuel breaks, emergency water sources, or power lines that could exacerbate wildfire risk. Further, the Project would be required to comply with the CFC, which provides requirements to reduce the potential of fires that include vegetation management, construction materials and methods, installation of automatic sprinkler systems, and fire flows (the quantity of water available for fire-protection purposes). Compliance with these requirements would be verified by the City prior to issuance of building permits for the Project. Overall, the Project would not exacerbate wildfire risks, and impacts would be **less than significant**.

THRESHOLD D: WOULD THE PROJECT 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?

The Project site is not located within a State Responsibility Area or area classified as a very high FHSZ. Post-fire slope instability occurs when a wildfire affects a vegetated slope which removes the vegetation and decreases the infiltration of the slope and causes the soil to become loose after rainfall. No significant slopes occur on-site or in the immediate vicinity. Elevations on the site range from 889 feet AMSL to 904 feet AMSL. The nearest slopes are located approximately 2.4 miles east of the Project site, on Box Springs Mountains. The nearest body of water is the Santa Ana River located approximately 1.6 miles west of the Project site. The Project would maintain the existing topography at the Project site and would not result in the creation of new slopes on- or off-site. The site is relatively flat although it does have a slight slope of 55 feet from the northwest portion of the site to the southeast portion of the site. Therefore, the potential for landslides as a result of post-fire slope instability are limited. As further discussed in Section 5.10, *Hydrology and Water Quality*, the hydrologic features of the proposed Project have been designed to slow, filter, and infiltrate stormwater with landscaping and the proposed underground infiltration systems, which would also reduce the potential for flooding on-site from runoff from wildfire-affected areas. As such, should a wildfire occur

within the vicinity of the Project site, the drainage facilities on-site would capture and slow post-fire runoff, minimizing the potential for flooding downstream. Therefore, the Project would not expose people or structures to significant risks associated with wildfire, and impacts would be **less than significant**.

5.20.7 CUMULATIVE IMPACTS

This cumulative impact analysis for wildfire considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site as well as the projects identified in Section 5.0, *Environmental Impact Analysis*, Table 5-1*, Cumulative Projects List*. As defined in Section 15355 of the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. None of the projects identified in Table 5-1 are proposed adjacent to the Project site. However, there are multiple projects within the City of Riverside, in the general vicinity of the Project which may be affected by wildfires spreading across the site. As with the proposed Project, any cumulative project would be required to adhere to the requirements set forth in the CFC and Riverside Municipal Code. Cumulative projects as well as the proposed Project would be required to include fire sprinklers and fire alarms as required by existing regulation, which would be verified through the City's permitting process. Compliance with State and local standards would minimize wildfire risk at each project location. With compliance with these regulations, cumulative impacts related to wildfire would be **less than significant**. Although the Project site is not located within a high FHSZ, the Project improvements would consist of non-flammable materials as mentioned under Threshold B, and would comply with all City and applicable State and federal fire regulations.

Potential impacts of the proposed Project with regard to wildfire, when combined with the impacts of past, present, and reasonably foreseeable projects in the City, are not expected to result in a cumulatively significant impact. All future development applications received by the City would be required to undergo environmental review pursuant to CEQA. If there was any potential for significant impacts with regard to wildfire and related risks, an investigation would be required to determine the nature and extent of the resources and identify the appropriate mitigation measures. Impacts would therefore be **less than cumulatively considerable**.

5.20.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Building Code (CBC)
- California Fire Code (CFC)

5.20.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project would result in less-than-significant impacts as discussed under Thresholds A through D.

5.20.10 MITIGATION MEASURES

No mitigation measures are required.

5.20.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable wildfire impacts would occur.

5.20.12 REFERENCES

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6. Other CEQA Considerations

6.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As described in detail in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result not result in significant and unavoidable impacts; all impacts would be less than significant or less than significant with mitigation

6.2 GROWTH INDUCEMENT

State CEQA Guidelines Section 15126.2(e), Growth Inducing Impact of the Proposed Project, requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

1. Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;
2. Remove obstacles to population growth;
3. Require the construction of new or expanded facilities that could cause significant environmental effects; or
4. Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

1. Does the Project directly or indirectly foster economic or population growth or the construction of additional housing?

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as SCAG. The Project would contribute to the economic growth and could contribute to population growth in the City of Riverside and the surrounding areas through the generation of jobs. As described in Section 5.14, *Population and Housing*, of this Draft EIR, the proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. The Project would require the need for approximately 194 employees, based on employment generation rates listed in Table 3.G of the *Riverside County General Plan EIR*, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF (County of Riverside, 2015).

According to SCAG's 2024 RTP/SCS population and household growth forecast for City of Riverside, between 2019 and 2050, SCAG anticipates an employment increase of 45,900 additional jobs (from 158,600 to 204,500), yielding a 28.9 percent growth rate (Southern California Association of Governments, 2024). SCAG regional growth forecasts are based upon, among other things, land uses designated in land use plans. As such, a project that is consistent with the land use designated in a General or Specific Plan would be consistent with SCAG's growth projections. The proposed Project is consistent with the site's existing land use designation therefore the projected increases in employment resulting from the Project are within

SCAG's 2024 RTP/SCS projected increases. Thus, Project-related growth would not be unexpected or constitute substantial unplanned growth.

The proposed Project may cause an indirect economic growth as it would generate revenue to the City through taxes generated by the development. Additionally, employees (short-term construction and long-term operational employees) from the Project site would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers. The Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, available in areas near the Project site.

In addition, the proposed Project would create jobs, a majority of which would likely be filled by residents of the City of Riverside and the surrounding Riverside County areas. The employees that would fill these roles are anticipated to come from within the City or the region, as the number of individuals employed in manufacturing, transportation, and warehousing is 27,377 in the City of Riverside, 169,172 in Riverside County, 196,819 in the City of San Bernardino, 27,266 in Fontana, and 20,567 in Ontario (U.S. Census Bureau, U.S. Department of Commerce, 2023a,b,c,d,e). Due to these numbers of skilled industrial laborers in the region, it is anticipated that new employees at the Project site would already reside within commuting distance and would not generate substantial needs for any housing. Employees would live in housing either already built or planned for development in the City and the surrounding Riverside County areas.

Because it is anticipated that most of the future employees from implementation of the Project would already be living in the region, the Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing. Thus, the Project would not result in the influx of new labor to serve the increased economic activities that would result from implementation of the Project.

2. Does the Project remove obstacles to population growth?

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

As described in Section 3.0, *Project Description*, the Project proposes installation of new potable water lines, and sewer lines on the site that would connect to surrounding, existing infrastructure in order to accommodate the demands of the Project. However, the proposed infrastructure improvements have been designed to serve only the demands of the Project. Therefore, the Project would not expand water or sewer services into unplanned areas and would not result in significant growth inducing impacts.

The Project does not propose roadway extensions into new undeveloped areas that would allow for additional growth and development.

3. Does the proposed Project require the construction of new or expanded facilities that could cause significant environmental effects?

Growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services that requires the construction of new public service facilities, or if it can be demonstrated that the potential growth significantly affects the environment in some other way. The proposed Project would slightly increase the demand for fire protection and emergency response and police protection. However, as described in Section 5.19, *Utilities*, of this Draft EIR, the Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service for public services. Based on service ratios and build out projections, the Project would not create a

demand for services beyond the capacity of existing facilities. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

4. Does the Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Surrounding Project areas are already developed with commercial and industrial uses. Therefore, the Project would not spur increased development in surrounding areas. Additionally, the proposed infrastructure is only sized to serve the Project and would not have capacity to serve additional development projects in the area. The Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The proposed Project would comply with all applicable City plans, policies, and ordinances. In addition, Project features and mitigation measures have been identified within this Draft EIR to ensure that the Project minimizes environmental impacts. The proposed Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

6.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely…. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." (CEQA Guidelines Section 15126.2(d)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to warehousing and industrial uses once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:
    - Increased traffic on area roadways (see Section 5.17, *Transportation*).
    - Emissions of air pollutants and greenhouse gas emissions associated with Project construction and operation (see Section 5.3, *Air Quality*, and Section 5.8, *Greenhouse Gas Emissions*).
    - Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, trucks, lighting, heating, and cooling systems, appliances, etc. (see Section 5.6, *Energy*).

  - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.13, *Noise*).

- Construction of the proposed Project as described in Section 3, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the Project, as demonstrated in the analysis contained in Section 5.6, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-conserving Project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. In addition, as listed in Section 5.8, *Greenhouse Gas Emissions*, the proposed Project would include sustainability features in line with Title 24 requirements that result in additional energy-efficiency. Project specific information related to energy consumption is provided in Section 5.6, *Energy*, of this EIR.

6.4 REFERENCES

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7. Alternatives

7.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is to identify alternatives to the project."

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed project or to the project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, CEQA Guidelines Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which require the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (CEQA Guidelines Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and
- The requirement of the *CEQA* Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (CEQA Guidelines Section 15126.6(e)).

Neither the CEQA statute, the CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines 15126(f)).

7.2 SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the Project being evaluated. This analysis evaluates both the potential to avoid or reduce a significant and unavoidable impact, and to avoid the need for mitigation to obtain less-than-significant levels.

The analysis in Section 5 of this Draft EIR determined that no significant and unavoidable Project-specific impacts would occur, and that potentially significant impacts of the Project related to biological resources, cultural resources, paleontological resources, hazards and hazardous materials, and tribal cultural resources can be mitigated to a less-than-significant level.

7.2.1 Significant and Unavoidable Impact

There are no significant and unavoidable impacts.

7.2.2 Impacts Mitigated to Less than Significant

Biological Resources Threshold D: Impacts to wildlife movement or native wildlife nursery sites.

As discussed in Section 5.4, *Biological Resources*, the Project site has the potential to support songbird and raptor nests due to the presence of shrubs, ground cover, and trees. Project development activities could disturb or destroy active migratory bird nests including eggs and young. Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Game Code Section 3503. As such, direct impacts to breeding birds (e.g., through nest removal) or indirect impacts (e.g., by noise causing abandonment of the nest) is considered a potentially significant impact. Therefore, Mitigation Measure BIO-1 is included to require a nesting bird survey if vegetation is removed during nesting season (February 1st through August 31st), which would reduce potential impacts to a less-than-significant level. Impacts would be less than significant with Mitigation Measure BIO-1 incorporated.

Cultural Resources Threshold B: Impacts to an archaeological resource pursuant to § 15064.5.

As discussed in Section 5.5, *Cultural Resources*, due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource. However, if the discovery of archaeological resources occurs during ground disturbing activities, Mitigation Measure CUL-1 would be implemented to require work to be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. With the implementation of Mitigation Measure CUL-1, the Project's impacts related to archaeological resources would be reduced to a less-than-significant level.

Geology and Soils Threshold F: Impacts to a unique paleontological resource or site or unique geologic feature.

As discussed in Section 5.7, *Geology and Soils*, earthmoving activities, including grading and trenching activities, have the potential to disturb previously unknown paleontological resources. The Project site has been heavily disturbed due to past grading and development. Therefore, there is a reduced chance that sensitive paleontological resources or unique geological features underly the site. However, according to *Riverside County Land Information Service Map My County* (Riverside County, n.d.), the Project site is in an area with high paleontological sensitivity. If an unanticipated on-site fossil is encountered during construction, Mitigation Measure GEO-1 would be implemented and would require all construction plans and

specifications to state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist has evaluated the find. Implementation of Mitigation Measure GEO-1 would reduce potential impacts related to paleontological resources to a less-than-significant level.

Hazards and Hazardous Materials Threshold A: Impacts related to significant hazards through the routine transport, use, or disposal of hazardous materials.

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the Project site contains VOCs at levels that exceed current regulatory screening thresholds. Specifically, at 2626 Kansas Avenue, elevated concentrations of TCEs have been found in shallow soil vapor on the northwest portion of the parcel, PCE and TCE have been detected in southcentral and southeast exterior areas of the parcel, and 1,1-DCE has also been detected in groundwater monitoring wells on the northwest portion of the parcel. Soil vapor and groundwater PCE and TCE have also been detected underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue.

Due to the potential for minor shallow VOC-impacted soils to exist at the 2626 Kansas Avenue property, a qualified consultant would be required to prepare and implement a Soil Management Plan (SMP) and Health and Safety Plan (HSP), per South Coast Air Quality Management District (SCAQMD) Rule 1166 and SARWQCB requirements, to be implemented during earthwork and grading to identify soils that are hazardous and require off-site disposal (included as Mitigation Measure HAZ-1).

With implementation of Mitigation Measures HAZ-1 and compliance with SCAQMD Rule 403, SCAQMD Rule 1166 (included PPP HAZ-1), SCAQMD Rule 1466, OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), and CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), that would be verified by the City during Project permitting and inspections, impacts related to transport, use, or disposal of contaminated materials during construction would be less than significant.

Hazards and Hazardous Materials Threshold B: Impacts related to creation of a significant hazard through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment.

As discussed in Section 5.9, *Hazards and Hazardous Materials*,

due to the potential for minor shallow VOC-impacted soils to exist at the Project site, preparation and implementation of a SMP (through Mitigation Measure HAZ-1) for excavation, grading, and redevelopment activities pursuant to standard regulatory requirements would be required.

In addition, a Health and Safety Plan (HSP) per OSHA requirements is required to implement health and safety requirements to minimize worker and public exposure, and provide response to release and exposure, to hazardous materials during construction, including contaminated soils and vapors that could emanate from contaminated soils (included as Mitigation Measure HAZ-1).

Furthermore, the proposed Project is located in the located within Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area. The May 5, 2025, ALUC Determination Letter found the proposed Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to conditions that include requirement that outdoor lighting shall be installed in a downward facing position to prevent spillage, prohibit uses/activities that are incompatible with airport operations, requirement to provide a notice of airport in vicinity to prospective purchasers or tenants, and

notification to March Air Reserve of any land use involving electromagnetic radiation (included as Mitigation Measures HAZ-2 through HAZ-5).

Therefore, with implementation of Mitigation Measures HAZ-1 through HAZ-5 and compliance with SCAQMD Rule 1166 (included as PPP HAZ-1), that would be verified through the City's development permitting process, potential impacts related to significant hazard to the public or environment through the reasonably foreseeable release of contaminated soils or potential vapors from contaminated soils would be less than significant.

Hazards and Hazardous Materials Threshold E: Impacts related to safety hazards or excessive noise for projects located within an airport land use plan.

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the Project site located within Zone E of the March Air Reserve Base/Inland Port Airport Influence Area. Zone E prohibits uses that are hazards to flights, such as physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Zone E does not restrict residential density or non-residential intensity. The May 5, 2025 ALUC Determination Letter found the proposed Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to conditions that include requirement that outdoor lighting shall be installed in a downward facing position to prevent spillage, prohibit uses/activities that are incompatible with airport operations, requirement to provide a notice of airport in vicinity to prospective purchasers or tenants, and notification to March Air Reserve of any land use involving electromagnetic radiation. These conditions are included as Mitigation Measures HAZ-2 through HAZ-5. Through implementation of Mitigation Measures HAZ-1 through HAZ-5, the proposed Project would be consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Therefore, impacts would be less than significant with mitigation.

Tribal Cultural Resources Threshold B: Impacts related to substantial adverse changes to Tribal Cultural Resources.

As discussed in Section 5.18, *Tribal Cultural Resources*, as part of the City's AB 52 consultation process, the City reached out to Native American tribes who may have knowledge of tribal cultural resources within the Project area. No known tribal cultural resources or sensitive sites were identified within the Project site during the AB 52 consultation process. Construction of the proposed Project would include earthmoving activities, such as grading, which have the potential to disturb previously unknown tribal cultural resource on the Project site. Although AB 52 consultation did not yield substantial evidence that listed or eligible tribal cultural resources—pursuant to criteria in Pub. Resources Code Section 5024.1(c)— within the Project site, Mitigation Measures TCR-1, TCR-2, TCR-3, and TCR-4, would be implemented to ensure that potential impacts related to the inadvertent discovery of tribal cultural resources are less than significant.

7.3 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to redevelop an underutilized property with an industrial use to provide an employment-generating use to help grow the economy in the City of Riverside. The Project would achieve this goal through the following objectives:

1. To make efficient use of the property in the City of Riverside by adding to its potential for employment generating uses.
2. To attract new business and employment to the City of Riverside and thereby promote economic growth.
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.

4. To redevelop a partially underutilized property with two industrial warehouse buildings near I-215, SR-60, and SR-91, to help meet demand for logistics business in the City and surrounding region.
5. To develop two warehouse facilities with updated infrastructure that are up-to-date with efficient building standards.
6. To build an industrial warehouse project in the City of Riverside that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Riverside.

7.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to State CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the Draft EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects.

Alternate Site Alternative. An alternate site for the Project was eliminated from further consideration. Based on a review of available sites for sale and the City of Riverside land use map, there are no other available, suitable sites within the control of the Project Applicant. However, in the event that land could be purchased of suitable size, the Project could have the same potential impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources. Moreover, other possible sites may not be located in close proximity to I-215, SR-91, Interstate 605 (I-605), established truck routes, and with access to available infrastructure, including roads and utilities thereby possibly resulting in further potential impacts. Therefore, analysis of an alternative site for the proposed Project is neither meaningful nor necessary, because the impacts and need for mitigation resulting from the proposed Project would not be avoided or substantially lessened by its implementation. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternate Site Alternative was rejected from further consideration.

7.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Three alternatives to the Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the Project Objectives, may avoid or substantially lessen the Project's significant impact, avoid the need for mitigation, or are feasible from a development perspective. The following alternatives have been developed based on the criteria identified in Section 7.1:

Alternative 1: No Project/No Development Alternative. Consistent with the requirements of CEQA Guidelines Section 15126.6(e), this alternative consists of the Project not being approved, and the Project site remaining in the condition that existed at the time the Notice of Preparation (NOP) was published (December 12, 2024). Under this alternative, operation of the existing uses on the Project site would continue. Existing uses include: two commercial/industrial buildings at 2626 Kansas Avenue, a lot used for bus parking and storage at 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings at 1989 Massachusetts Avenue.

Alternative 2: Reduced Project Alternative. This Reduced Project Alternative consists of the development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage and

operational intensity. Specifically, the Reduced Project Alternative would result in the construction of one 99,900 SF Class A warehouse building with 17 dock doors at 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

This alternative would include construction of an on-site drainage system comprised of two underground detention/infiltration systems, like the proposed Project. The Reduced Project Alternative would allow for development of only one warehouse building and would therefore reduce the total Project square footage by approximately 50 percent, or by 99,950 SF.

Consistent with the proposed Project, the Reduced Project Alternative would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Like the proposed Project, the Reduced Project Alternative does not require off-site improvements.

Alternative 3: No Project/Buildout of Employment Emphasis Subdistrict. This alternative consists of developing the Project site in a manner that is consistent with the existing General Plan land use designation of I – General Industrial. In addition, this alternative would be consistent with the existing Innovation District Overlay (ID) Overlay Zone and Employment Emphasis (EE) subdistrict. However, this alternative would require an amendment to the City's zoning code and zoning map due to the current split of subdistrict designations, as all three parcels are presently divided between EE and Housing Emphasis (HE) subdistricts. Therefore, this alternative would include an amendment to the City's zoning code and zoning map to designate the entire three parcels Innovation District (ID) Overlay Zoning subdistrict from EE and HE to exclusively EE.

This alternative would also include a proposed modification of the development standards in the EE overlay zone. Proposed modifications would include, but are not limited to: specifying a minimum floor area ratio (FAR) allowance for sites under 5 acres and sites over 5 acres; modifying the allowed building setbacks; and reducing the parking requirement. These modifications would allow for a minimum FAR of 1 and a maximum FAR of 6 at the site.

Furthermore, this alternative would require a General Plan Amendment to change the existing General Plan land use designation of Industrial (I) to Mixed Use-Urban (MU-U), which allows for development of primarily high-density residential development with commercial, office, institutional and business uses emphasizing retail, entertainment and student-oriented activities.

The EE subdistrict promotes a high-intensity vertical mix of office, clean and green industrial, educational, and hospitality uses to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. Per the City of Riverside Code of Ordinances Title 19, Zoning, Article VI, Overlay Zones, up to 40 percent of the primary and/or accessory buildings in the EE Subdistrict shall be residential with units allowed to average more than 400 SF. Office uses, including administrative and professional facilities, are also permitted in the EE Subdistrict.

This No Project/Buildout of Employment Emphasis Subdistrict Alternative would consist of construction of two new two-story buildings designed to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. The alternative would consist in the development of 2 two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue).

Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Building 1 would be on a 5.15-acre lot, resulting in a FAR of 1. Building 2 would be on a 5.06-acre lot, resulting in a FAR of 1.

This alternative would include construction of an on-site drainage system comprised of two underground detention/infiltration systems, like the proposed Project. Consistent with the proposed Project, the No Project/ Buildout of Employment Emphasis Subdistrict Alternative would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Areas plan for grading and physical impact would be consistent with the proposed Project. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts.

7.6 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft EIR is required to "discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services [...] In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

The No Project/No Development Alternative allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the property were to be left in its existing conditions for the foreseeable future. Under the existing conditions, the Project site continues operations as commercial/industrial buildings, parking and storage lot, and bus parking and storage yard. See Section 4.0, *Environmental Setting*, for additional details regarding the existing conditions at the Project site.

7.6.1 Environmental Impacts

Aesthetics

Under the NDA, no new development would occur within the Project site, and the visual character and quality of the site would be maintained in its existing condition, which includes developed with a commercial/industrial business and a bus storage yard. No additional lighting or sources of glare would be installed. No views across the Project site would change. Thus, implementation of the No Project/No Development Alternative would not result in contrast or aesthetic incompatibilities with the existing environment. However, the visual improvements that would be introduced throughout the Project site if the proposed Project is approved include new and improved landscaping, providing a building of contemporary design, and improvements to the public realm by streetscaping would not be implemented by the NDA. Overall, there would be no aesthetic impacts from this alternative; thus, impacts would be less than significant and would be reduced in comparison to the Project.

Agricultural and Forestry Resources

The Project site is located in a fully developed area of the City of Riverside and does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, per the Department of Conservation Important Farmland Finder. Furthermore, there is no forest land on the site or in the immediate vicinity of the Project site. Under this alternative no new development would occur, and no new agricultural uses would be introduced to the Project site. This alternative would not convert Prime Farmland to nonagricultural use, similar to the proposed Project. Therefore, this alternative would result in no impact, consistent with the proposed Project, and impacts would be the same as compared to the proposed Project.

Air Quality

Under this alternative no new development would occur in the Project site. This alternative would not generate any construction activities. Also, no new stationary sources of air pollution would be introduced. However, existing emissions from ongoing operations would continue to occur. Like the proposed Project, this alternative would not require implementation of new mitigation measures.

As shown in Table 7-1 below, when compared to the existing uses, reactive organic gases (ROG) emissions under the proposed Project would increase by 9.3 pounds per day (lbs/day) (or 494.7 percent increase), nitrogen oxide (NOx) emissions would increase by 20.8 lbs/day (or 65.8 percent increase), and carbon monoxide (CO) emissions would increase by 171.8 lbs/day (or 281 percent increase). Sulfur dioxide (SO_2) emissions under the proposed Project would decrease by less than 0.1 lbs/day (or 25 percent decrease), PM_{10} emissions would decrease by 6.0 lbs/day (or 25 percent decrease), and $PM_{2.5}$ would decrease by 1.3 lbs/day (or 19 percent decrease). Overall, the No Project/No Development Alternative would have lower emissions than the proposed Project; and thus, impacts from this alternative would be less than those that would occur from the proposed Project.

In addition, like the proposed Project, this alternative would be consistent with the 2022 AQMP and would have similar less-than-significant impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and related to other emissions that adversely affect a substantial number of people. Therefore, the No Project/No Development alternative would have less-than-significant impacts to air quality, and impacts would be less than those of the proposed Project.

Table 7-1: Existing and Proposed Regional Project Operational Emissions

	Maximum Daily Regional Emissions (pounds/day)					
	ROG	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Existing Use Operational Emissions (No Project/No Development Alternative)	1.9	31.6	61.0	0.4	23.1	6.3
Total Proposed Project Operational Emissions	11.3	52.4	232.7	0.3	17.2	5.1
Net New Emissions	**9.3**	**20.8**	**171.8**	**<0.1**	**-6.0**	**-1.3**
Percent Change	**+ 494.7%**	**+ 65.8%**	**+ 281%**	**- 25%**	**- 25%**	**- 19%**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: Appendix B

Biological Resources

The Project site is not located within a Multiple Species Habitat Conservation Plan (MSHCP) Area and is not located within a Criteria Cell or Cell Group. The Project site is not located within any plan-defined areas requiring surveys for amphibian species, burrowing owl, criteria area species, mammalian species, narrow endemic plant species, criteria species, or invertebrate species.

The Project site contains non-native trees and shrubs that can support nesting birds and raptors protected under the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code during the nesting season. Under this alternative, vegetation removal would not occur. As such, this alternative would not result in potential impacts to nesting birds from tree or shrub removal during the nesting bird season (February 1 through August 31). Although Mitigation Measure BIO-1 included in the proposed Project would reduce biological resource impacts to less-than-significant levels, this alternative would generate less impacts to biological resources as compared to the Project and would not require mitigation. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Cultural Resources

No Project/No Development Alternative The Project site is heavily disturbed and partially developed, containing two existing industrial buildings. The site's soils have been extensively altered due to past development. Given the disturbed condition and the absence of previously identified archaeological resources, it is unlikely that the project would impact unknown archaeological resources. However, Mitigation Measure CUL-1 is included to address any unanticipated discoveries during construction. Under the NDA, no construction or ground-disturbing activities would occur, resulting in no impacts to cultural resources. Therefore, the NDA's impact level would be less than the proposed project's "less than significant with mitigation" impact, and no mitigation would be required.

Energy

Under the NDA, the existing commercia/industrial uses and bus parking and storage uses would continue to operate at the site. Under the NDA, there would be no new development on the site, and there would be no demand for electricity for construction or increased demand from the Project site for operations. As such, the No Project/No Development Alternative would result in less-than-significant impacts and would not require mitigation measures, similar to the proposed Project. However, as shown in Table 7-2, the proposed Project is expected to require more electricity, natural gas, gasoline, and diesel fuel than the existing on-site use. Overall, impacts to energy resources from the No Project/No Development Alternative would be less than significant and less than those of the proposed Project.

Table 7-2: Existing and Proposed Annual Operational Energy Consumption

Electricity (kWh)		
Proposed Project	2,493,702	
Existing Use	955,472	
Natural Gas (kBTU)		
Proposed Project	7,924,546[1]	
Existing Use	4,288,590	
Petroleum (Gasoline) Consumption		
	Annual VMT	Gallons of Gasoline Fuel
Proposed Project	4,042,423	130,759

Existing Use	2,952,844	95,515
Petroleum (Diesel) Consumption		
	Annual VMT	Gallons of Diesel Fuel
Proposed Project	3,568,847	453,441[2]
Existing Use	281,430	35,145
Net Total Energy Use		
Net Electricity (Kilowatt-Hours)		**1,538,230**
Net Natural Gas (Thousands British thermal Units)		**3,635,956**
Net Gasoline Consumption (Gallons)		**35,244**
Net Diesel Consumption (Gallons)		**418,296**

Notes: kWh= kilowatt-hours, kBTU = thousand British Thermal Unit, VMT = vehicle miles traveled
[1] Inclusive of the 20 on-site CNG forklifts presumed for the operation of the Project.
[2] Inclusive of the two diesel emergency generators and two diesel fire pumps presumed for the operation of the Project.
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Geology and Soils

Under this alternative, no new development activities would occur at the Project site. As such, no new grading or excavation related construction activities would occur under this alternative and there would be no impact. Therefore, the No Project/No Development Alternative would not require Mitigation Measure GEO-1, which is included in the proposed Project to avoid potential impacts to paleontological resources. Therefore, impacts from the No Project/No Development Alternative would be less than those of the proposed Project.

Greenhouse Gas Emissions

Under the NDA, the existing commercial/industrial uses and bus parking and storage uses would continue to operate at the site. No new development activities would occur at the Project site or operation of new structures that would increase GHGs under this alternative.

As shown in Table 7-3 below, the existing uses at the site result in 1,785 $MTCO_2e$ GHG annually. The proposed Project would result in 7,242 $MTCO_2e$ GHG annually, which is an increase of 5,457 $MTCO_2e$ GHG annually (or 205.7 percent increase). Neither the existing use nor the proposed Project would exceed SCAQMD significance threshold of 10,000 $MTCO_2e$ GHG annually. Therefore, the No Project/No Development Alternative would result in less impacts related to greenhouse gas emissions as compared to the proposed Project and impacts would continue to be less than significant.

Table 7-3: Existing and Proposed Greenhouse Gas Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Total Project Emissions	**7,242**
Existing Emissions	1,785
Net New Emissions (Gross - Existing)	**5,457**
Percent Change	+205.7%
Significance Threshold	10,000
Threshold Exceeded?	**No**

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Hazards and Hazardous Materials

Existing site conditions, including two commercial/industrial buildings on 2626 Kansas Avenue, and bus parking and storage on 2069 Massachusetts Avenue and 1989 Massachusetts Avenue, would remain "as is" under the NDA. No new development activities would occur at the Project site or operational uses that could generate, use, and result in transport of, hazardous materials. The No Project/No Development Alternative would not include major construction activities that would use typical construction-related hazardous materials. However, the existing contaminated soils would remain on the site. Therefore, the No Project/No Development Alternative would avoid the need to implement the construction related mitigation measures that implement regulations for cleanup and disposal of contaminated soils, and the benefits of the Project, which include removal and disposal of contaminated soils would not occur. Overall, the No Project/No Development Alternative would result in a less-than-significant impact, and no mitigation measures would be required.

Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain "as is" under this alternative as no new development would occur. This alternative would not introduce new sources of water pollutants from either the construction or operation phases of development to the Project site, because no new development would occur. Both the No Project/No Development Alternative and the proposed Project would comply with existing regulations related to water quality. Therefore, both the proposed Project and the No Project/No Development Alternative would result in less-than-significant hydrology and water quality impacts.

Land Use

The Project site has a General Plan Land Use designation of Industrial. The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. Under the NDA, existing uses that consist of two commercial/industrial buildings on 2626 Kansas Avenue, a lot used for bus parking and storage on 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings on 1989 Massachusetts Avenue would continue on the site.

This alternative would not result in new development, and as such, there would be no potential for land uses to be introduced that would indirectly result in environmental impacts due to a conflict with an existing land use plan. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, this alternative would result in less-than-significant impacts to land use and planning, and would be consistent with the Project's less-than-significant impacts.

Mineral Resources

The No Project/No Development Alternative would result in maintaining the existing site conditions comprised of existing two commercial/industrial buildings on 2626 Kansas Avenue, a lot used for bus parking and storage on 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings on 1989 Massachusetts Avenue would continue on the site. As discussed in Section 5.12, *Mineral Resources*, the Project site is not currently used for mining or mineral extraction operations. According to the City of Riverside General Plan EIR, the Project site is in an area designated as MRZ-4. As such, the Project site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, the No Project/No Development Alternative would result in no impacts to mineral resources, and impacts would be the same as compared to the proposed Project.

Noise

Under this alternative, no development would occur on-site, and no new sources of noise would be introduced to the Project site or surrounding areas. Since no new development would occur and no new traffic trips would be generated, this alternative would not contribute to an incremental increase in area-wide traffic noise levels. In addition, this alternative would not result in construction on-site and no construction noise or vibration would occur. This alternative would avoid the Project's less-than-significant impact related to noise. However, existing noise from the existing commercial/industrial and bus parking and storage uses would continue to occur.

Population and Housing

This alternative would not result in new development, and as such, would not result in induced growth or displacement affecting population and housing. As such, the No Project/No Development Alternative would result in no impact to population and housing. Therefore, while the Project's impacts would be less than significant, this alternative would result in less impacts as compared to the Project. However, this alternative would also not result in the benefit of adding new employment opportunities, which would help result in a more balanced jobs-housing ratio.

Public Services

This alternative would not result in new development, and as such, would not result in increased demand for public services such as fire and sheriff services, school services, library services, or health services that requires the new construction of public facilities. As such, the No Project/No Development Alternative would result in no impact to public services. Therefore, while the Project's impacts would be less than significant through compliance with regulatory programs, this alternative would result in less impacts than the Project. However, this alternative would also not result in the payment of the City's development impact fees.

Recreation

This alternative would not result in new development, and as such, would not result in increased use of existing parks and recreation facilities nor would it result in the need for construction or expansion of parks and recreation facilities. As such, the No Project/No Development Alternative would result in no impact to public services. Therefore, while the Project's impacts would be less than significant through compliance with existing regulations, this alternative would result in less impacts than the Project.

Transportation

This alternative would not result in new development, and as such, would not result in any new trips, traffic, or changes to VMT related to operation of the Project site. This alternative would not impact existing transit service and alternative transportation facilities within the Project site. As discussed in Section 5.17, *Transportation*, the Project site is located within a low VMT-generating area (WRCOG TAZ 2101). Under this Alternative, the site would continue to be within a low VMT-generating area. However, as the Project site would not be developed and trips would not be generated, the No Project/No Development Alternative avoids the Project's less-than-significant impacts related to VMT. Overall, there would be no transportation impacts under the NDA, and impacts would be less than those from the proposed Project.

Tribal Cultural Resources

Under this alternative, existing conditions would remain, and no new development would occur. No grading or excavation would occur that could impact tribal cultural resources that may be buried below ground.

Although the Project would result in less-than-significant impacts to tribal cultural resources with implementation of mitigation measures, this alternative would eliminate the need for mitigation for tribal cultural resources. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Utilities and Service Systems

Under this alternative, existing conditions would remain, and no new development would occur. No additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, or telecommunication facilities would be needed under this alternative, and there would be no change in the demand for domestic water or wastewater treatment services. This alternative would also not result in increased demand for solid waste collection and disposal. While the proposed Project would result in less-than-significant impacts, selection of this alternative would result in no impact to utilities and service system providers and would thus be less than the proposed Project.

Wildfire

Under this alternative, existing conditions would remain, and no new development would occur. No additional demand for fire fighter services or installation of new infrastructure that may exacerbate fire would occur. Since no construction, grading, or land disturbance would take place, there would be no increased exposure of people or structures to wildfire hazards. Additionally, this alternative would not introduce new ignition sources, such as electrical infrastructure or construction equipment, that could increase wildfire risk. Emergency response times and evacuation routes would remain unchanged from existing conditions. Therefore, while the Project would result in less-than-significant impacts related to wildfire, the No Project/No Development Alternative would result in no impact related to wildfire hazards and impacts would be less than the proposed Project.

7.6.2 Conclusion

Ability to Reduce Impacts

The No Project/No Development Alternative would result in maintaining the existing site conditions which is currently developed with two commercial/industrial buildings on 2626 Kansas Avenue, a lot used for bus parking and storage at 2069 Massachusetts Avenue, and a bus parking and storage yard with two buildings at 1989 Massachusetts Avenue. The proposed redevelopment of the site would not occur under the NDA. As a result, this alternative would avoid the need for mitigation measures that are identified in Section 5 of this Draft EIR, which include measures related to biological resources, cultural resources, geology and soils, hazards and hazardous, and tribal cultural resources. This alternative would result in no significant and unavoidable impacts, consistent with the proposed Project. This alternative would result in lessened impacts to 16 of the 20 environmental topics analyzed in this Draft EIR (see Table 7-6).

However, the environmental benefits of the proposed Project would also not be realized, including, but not limited to removal and disposal of the existing contaminated soils and the generation of approximately 194 jobs within the City of Riverside at full buildout.

Ability to Achieve Project Objectives

As shown in Table 7-5, below, the No Project/No Development Alternative would not meet any of the Project objectives. This alternative would not make efficient use of the site for employment uses, would not, would not attract new businesses and employment, would not reduce the need for residents to commute outside the Project vicinity to work, would not help meet demand for logistic businesses in the city and surrounding region,

would not redevelop the site with up-to-date efficient building standards, and would not build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction. Thus, the Project objectives would not be achieved from implementation of the NDA.

7.7 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative consists of the development of the Project site in a manner similar to the Project, but would only construct one building, resulting in a 50 percent reduction in square footage. This alternative would result in construction of one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

This alternative would include construction of an on-site drainage system comprised of two underground detention/infiltration systems, like the proposed Project. The Reduced Project Alternative would allow for development of only one warehouse building and would therefore reduce the total Project square footage by approximately 50 percent, or by 99,950 SF.

Consistent with the proposed Project, the Reduced Project Alternative would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue, and the Reduced Project Alternative does not require off-site improvements. Areas planned for physical impact would be the same as the proposed Project.

7.7.1 Environmental Impacts

Aesthetics

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped to allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. The visual improvements that would be introduced throughout the Project site include new and improved landscaping on both 2626 Kansas Avenue and 2069 Massachusetts Avenue, providing a building of contemporary design, and improvements to the public realm by streetscaping would be implemented similar to the proposed Project.

This alternative would construct only one of the two buildings proposed by the Project. The building proposed by the Reduced Project Alternative would have the same height and the same architectural character as the Project. Also like the proposed Project, the Reduced Project Alternative does not require off-site improvements. As a result, the developed portion of the site would maintain a similar visual character and quality to the Project, though with a reduced impact due to the absence of one building. Overall, implementation of the Reduced Project Alternative would result in less-than-significant impacts, and impacts would be less than those of the proposed Project.

Agricultural and Forestry Resources

As discussed previously, the Project site is located in a fully developed area of the City of Riverside and does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, per the Department of Conservation Important Farmland Finder. Furthermore, there is no forest land on the site or in the immediate vicinity of the Project site. Under this alternative no new agricultural uses would be introduced to the Project site. This alternative would not convert Prime Farmland to nonagricultural use, similar to the proposed Project. Therefore, this alternative would result in no impact, consistent with the proposed Project, and impacts would be the same as compared to the proposed Project.

Air Quality

Under this alternative, approximately 50 percent less built area, or 99,950 fewer SF, would be developed, which would result in fewer vehicle and truck trips and a reduction of paint needed for architectural coating. As shown in Table 7-1 above, the proposed Project would not exceed SCAQMD air quality significance thresholds. Therefore, because the Reduced Project Alternative would result in fewer vehicle trips and fewer building square footage than the proposed Project, it is expected the Reduced Project Alternative would result in less emissions as compared to the proposed Project and would also not exceed SCAQMD air quality significance thresholds. In addition, like the proposed Project, this alternative would be consistent with the 2022 AQMP and would have similar less-than-significant impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and related to other emissions that adversely affect a substantial number of people. Like the proposed Project, this alternative would not require implementation of new mitigation measures. Therefore, consistent with the proposed Project, impacts would be less than significant under the Reduced Project Alternative. In addition, this alternative results in less impacts as compared to the proposed Project.

Biological Resources

Although only one of the two buildings would be developed, this alternative would still require removal of existing vegetation, including shrubs, which provide nesting habitat for migratory bird species, on both 2626 Kansas Avenue and 2069 Massachusetts Avenue. Areas planned for physical impact on- and off-site would be identical to those required for development of the proposed Project. As such, the impacts to biological resources at the Project site would be similar to the Project and require Mitigation Measures BIO-1 to reduce potential project impacts to nesting birds. Mitigation Measure BIO-1 would reduce potential impacts from this alternative to a less-than-significant level. Thus, this alternative would result in less-than-significant impacts to biological resources with implementation of mitigation, which is consistent with the impacts and required mitigation for the proposed Project.

Cultural Resources

Areas planned for physical impact under this alternative would be identical to the proposed Project. The Project site is heavily disturbed and partially developed with two existing industrial buildings. Soils at the site have been extensively disturbed by past development. Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource. However, the proposed Project includes Mitigation Measure CUL-1 for the unanticipated discovery of archaeological resources during construction. Under the Reduced Project Alternative, areas planned for physical impact would be the same as the proposed Project. Thus, the Reduced Project Alternative would also result in less-than-significant impacts with implementation of Mitigation Measure CUL-1, and impacts would be the same as the proposed Project.

Energy

Under the Reduced Project Alternative, approximately 50 percent less building area, or 99,950 fewer SF, would be developed on the Project site. This would result in an approximately 50 percent decrease in the demand for operational energy in comparison to the proposed Project, which was determined to be less than significant. Like the Project, this alternative would be required include typical Title 24 measures such as insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The alternative would also require the use of diesel fuel for trucking operations; however, operations would be reduced by 50 percent capacity as a result of reduction in facility size. Therefore, impacts to energy from the Reduced Project Alternative would be less than those associated with the proposed Project, but would also be less than significant. Therefore, while Project impacts to energy would be reduced compared to the proposed Project; impacts would continue to be less than significant, consistent with the proposed Project.

Geology and Soils

As discussed in Section *5.7*, *Geology and Soils*, the Project site is in an area with high paleontological sensitivity. As such, like the proposed Project, this alternative would require implementation of Mitigation Measure PAL-1 to require that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist has evaluated the find.

Under this alternative, approximately 50 percent less building area would be developed within the Project site. Areas planned for physical impact on-site would be identical to those required for development of the proposed Project. However, unlike the proposed Project, no building would be constructed on 2069 Massachusetts Avenue. Under the Reduced Project Alternative, 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. Because no structures would be constructed on 2069 Massachusetts Avenue, the depth of excavation on this parcel would be shallower than that of the proposed Project. Paleontological resources are typically buried underground. Thus, in the case that paleontological resources exist on this parcel, such resources would be less likely to be disturbed under the Reduced Project Alternative than under the proposed project. Therefore, impacts to paleontological resources from the Reduced Project Alternative would be less than those associated with the proposed Project, but would also be less than significant with mitigation.

Greenhouse Gas Emissions

Under the Reduced Project Alternative, approximately 50 percent less building area would be developed within the Project site. Therefore, a reduced volume of construction activities and related production of GHG emissions would occur during construction of the buildings. In addition, the reduced amount of development by this alternative would result in less stationary source emissions from on-site equipment, and less traffic-associated GHG emissions than the proposed Project. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project. As shown in Table 7-3, the proposed Project would generate 7,242 $MTCO_2e$ per year. When taking existing emissions into account, the net new emissions (proposed Project minus existing) would be *5,457* $MTCO_2e$ per year. Both the total Project emissions and net new emissions would not exceed the City's screening threshold of 10,000 $MTCO_2e$ per year. It is expected that operational GHG emissions from this alternative would be approximately 50 percent less than the Project and would therefore also not exceed the screening threshold. Therefore, GHG impacts under this alternative would remain less than significant and be less than the proposed Project.

Hazards and Hazardous Materials

This alternative would involve demolishing the existing building at 2626 Kansas Avenue and redeveloping the parcel with a 99,900-square-foot speculative warehouse, similar to the proposed project. The site at 2069 Massachusetts Avenue would be repaved and restriped, allowing existing storage and bus parking operations to continue. As with the proposed Project, this alternative would not include redevelopment or construction at 1989 Massachusetts Avenue, and the Reduced Project Alternative does not require off-site improvements. The areas subject to physical impact would be identical to those affected by the proposed project. As discussed in Section 5.9, *Hazards and Hazardous Materials*, the site contains VOCs at levels that exceed current regulatory screening thresholds. Specifically, at 2626 Kansas Avenue, elevated concentrations of TCEs have been found in shallow soil vapor on the northwest portion of the parcel, PCE and TCE have been detected in southcentral and southeast exterior areas of the parcel, and 1,1-DCE has also been detected in groundwater monitoring wells on the northwest portion of the parcel. Soil vapor and groundwater PCE and TCE have also been detected underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue. As such, like the proposed Project, the Reduced Project Alternative would be required to implement Mitigation Measures HAZ-1. which requires implementation of a soil management plan and a health and safety plan.

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the Project site located within Zone E of the March Air Reserve Base/Inland Port Airport Influence Area. The Airport Land Use Commission (ALUC) Determination Letter found the proposed Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to conditions that include requirement that outdoor lighting shall be installed in a downward facing position to prevent spillage, prohibit uses/activities that are incompatible with airport operations, requirement to provide a notice of airport in vicinity to prospective purchasers or tenants, and notification to March Air Reserve of any land use involving electromagnetic radiation. These conditions are included in the proposed Project as Mitigation Measures HAZ-2 through HAZ-5. Because the Reduced Project Alternative would construct one building within the Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area, implementation of the Reduced Project Alternative would also require Mitigation Measures HAZ-2 through HAZ-5 to achieve consistency with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

In addition, this alternative would likely require the same utilization of hazardous materials during operation, including small quantities of household cleaners, lubricants, batteries, etc. as the proposed Project (albeit to a lesser degree). Overall, this alternative would result in similar impacts as compared to the proposed Project and impacts related to hazards and hazardous materials would be less than significant after implementation of mitigation.

Hydrology and Water Quality

Under this alternative, the Reduced Project Alternative would result in the construction of one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue. Unlike the proposed Project, this alternative would not construct a new building on 2069 Massachusetts Avenue. 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Areas planned for physical impact on-site would be identical to those required for development of the proposed Project, and the net new impervious area would be the same as that of the proposed Project. Construction of the alternative would construct underground detention/infiltration systems, consistent with the proposed Project. In addition, preparation of a SWPPP and a WQMP would be required for development of this alternative. Overall, consistent with the proposed Project, this alternative would result in less-than-significant impacts related to hydrology and water quality, and impacts would be the same.

Land Use

The Project site has a General Plan Land Use designation of Industrial. The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction at 1989 Massachusetts Avenue.

Like the proposed Project, the Reduced Project Alternative would be consistent with the General Plan land use designation of Industrial. Therefore, potential impacts due to land use compatibility under both the Project and this alternative would be less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the Reduced Project Alternative would be less than significant; and therefore, would be consistent with the Project's impacts.

Mineral Resources

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. As discussed in Section 5.12, *Mineral Resources*, the Project site is not currently used for mining or mineral extraction operations. According to the City of Riverside General Plan EIR, the Project site is in an area designated as MRZ-4. As such, the Project site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, the RPD would result in no impacts to mineral resources, consistent with the proposed Project.

Noise

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Development under the Reduced Project Alternative would reduce the number of buildings to one (from two buildings), the total Project square footage by approximately 50 percent (99,950 SF), and the number of dock doors would by 22 (from a total of 39 dock doors to 17 dock doors). The operation of this alternative would result in approximately 50 percent fewer daily trips in comparison to the proposed Project because of the reduction in square footage, thereby reducing traffic-related noise. In addition, the decrease in dock doors would also reduce the number of truck loading and unloading activity at the site, further reducing noise impacts. However, under both conditions impacts would be less than significant. Short-term noise and vibration impacts would occur during construction similar to the Project. Like the Project, long-term operational noise would not expose nearby sensitive receivers to noise levels over the city's daytime noise standards. Overall, this alternative would result in less operational noise than those from the Project, but consistent with the Project, impacts would be less than significant.

Population and Housing

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow

for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

Based on employment generation rates listed in Table 3.G of the *Riverside County General Plan EIR*, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF, this alternative has the potential to result in the need for approximately 97 new jobs in comparison to the Project's 194 estimated employees, which is a reduction of 97 employees (50 percent). Consistent with the proposed Project, the resulting employment increase from this alternative would also be within the SCAG growth projections. Thus, this alternative would also not result in unplanned growth inducing impacts or displacement of population and housing. Therefore, consistent with the proposed Project, the Reduced Project Alternative would result in less-than-significant impacts related to population and housing. However, the employment benefit of the Project would be less than that that would be provided by the proposed Project.

Public Services

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Construction of this alternative would result in a slightly decreased demand for public services based on the decreased amount of employment generated. The same fire and sheriff's stations would serve the alternative, and the decrease in square footage developed would likely decrease the amount of service calls received by these public services compared to the proposed Project. In addition, this alternative would also require the payment of development impact fees imposed by the City of Riverside, although the amount of fees would likely be reduced. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less-than-significant impacts as the proposed Project.

Recreation

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

As described in Section 5.14, *Population and Housing*, employees needed to operate the proposed Project are anticipated to come from the existing labor force in the region. Thus, consistent with the proposed Project, there would be no increase in residents that would cause an increase in demand for existing parks or other recreational facilities. The Reduced Project Alternative would construct and operate one warehouse building on a site that is currently developed with industrial uses, and would not construct any residential facilities, nor create an additional need for housing. Therefore, the Reduced Project Alternative would result in similar less-than-significant impacts as the proposed Project.

Transportation

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

Consistent with the proposed Project, this alternative would not impact existing transit service and alternative transportation facilities within the Project site. The operation of this alternative would result in fewer daily employee trips in comparison to the proposed Project because of the reduction in square footage. As

discussed in Section 5.17, *Transportation*, the Project site is located within a low VMT-generating area (WRCOG TAZ 2101) and meets the Low VMT Area screening criteria. Therefore, per the City's VMT screening criteria, the proposed Project would have less-than-significant impact on VMT and requires no further VMT analysis. Under this Alternative, the site would continue to be within a low VMT-generating area. As such, consistent with the proposed Project the Reduced Project Alternative would result less-than-significant transportation impacts, and impacts would be the same.

Tribal Cultural Resources

The Reduced Project Alternative would redevelop 2626 Kansas Avenue with one 99,900 SF Class A warehouse building with 17 dock doors; 2069 Massachusetts Avenue would be repaved and restriped allow for existing storage and bus parking operations to continue. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Areas planned for physical impact on-site would be identical to those required for development of the proposed Project; however, the depth of excavation at 2069 Massachusetts Avenue would be reduced. Thus, in the case that tribal cultural resources exist on this parcel, such resources would be less likely to be disturbed under the Reduced Project Alternative than under the proposed project. Therefore, impacts to tribal cultural resources from the Reduced Project Alternative would be less than those associated with the proposed Project, but would also be less than significant with mitigation.

Utilities and Service Systems

The level of development on-site would be decreased under this alternative as compared to the proposed Project. Both the Project and this alternative would require extension of existing electrical, gas, and communication utilities to the site from existing facilities along Kansas Avenue and Massachusetts Avenue. Additionally, both the Project and this alternative would connect to the existing 10-inch water line in Massachusetts Avenue and the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street. Impacts associated with the provision of such facilities would be similar to those of the proposed Project and would be less than significant upon compliance with existing regulatory requirements. Although impacts would be decreased under this alternative due to the decrease in building size/capacity and associated demand for water resources, impacts to water supply would continue to be less than significant. Similarly, Water Quality Control Plant (RWQCP) would have adequate capacity to treat wastewater generated under both the Project and this alternative; however, this alternative would require less water and would generate less wastewater than the proposed Project. This alternative would also generate less solid waste than the proposed Project and would require less landfill capacity. Overall, this alternative would result in less-than-significant impacts related to utilities and service systems, which although less in volume, would result in similar less-than-significant impacts as the proposed Project.

Wildfire

Under the Reduced Project Alternative, approximately 50 percent less building area would be developed on the Project site. The reduced development footprint would lower operational fire hazards by decreasing the amount of electrical infrastructure and potential ignition sources introduced to the site. Like the proposed Project, this alternative would comply with applicable fire safety regulations, including the California Fire Code, and would incorporate fire protection measures such as fire-resistant building materials, automatic sprinkler systems, and adequate emergency access. As discussed in Section 5.20, *Wildfire*, the Project site is located outside of a Fire Hazard Severity Zone. Consistent with the proposed Project, the Reduced Project Alternative would not significantly alter emergency response times or evacuation routes. Overall, while this alternative would reduce potential wildfire risks compared to the proposed Project, impacts would remain less than significant, consistent with the proposed Project.

7.7.2 Conclusion

Ability to Reduce Impacts

The Reduced Project Alternative would consist of construction of one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. As with the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Development under the Reduced Project Alternative would reduce the Project's number of buildings (from two buildings to one building), resulting in a reduction in square footage of approximately 50 percent. Areas planned for physical impact on- and off-site would be identical to those required for development of the proposed Project.

The Reduced Project Alternative would result in lessening of impacts to nine of the 20 environmental topics analyzed in this Draft EIR due to the 50 percent reduction in building space. However, this alternative would not change the overall impact conclusions (impact level) of any of the 20 environmental topics analyzed in this Draft EIR. All mitigation measures included in the Project for biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources would still be applicable to this alternative.

Ability to Achieve Project Objectives

As shown in Table 7-6, below, the Reduced Project Alternative would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. This alternative would attract new businesses and employment, reduce the need for residents to commute outside the Project vicinity to work, help meet demand for logistic businesses in the city and surrounding region, redevelop the site with up-to-date efficient building standards, and build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction. However, this alternative would not meet the main Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but to a greater degree. This alternative would result in a reduction of 97 employees (50 percent) in comparison to the proposed Project.

7.8 ALTERNATIVE 3: NO PROJECT/BUILDOUT OF EMPLOYMENT EMPHASIS SUBDISTRICT

As previously described, the No Project/Buildout of Employment Emphasis Subdistrict would develop the Project site in a manner that is consistent with the existing zoning designation of I – General Industrial. In addition, this alternative would be consistent with the existing Innovation District Overlay (ID) Overlay Zone and Employment Emphasis (EE) subdistrict. However, this alternative would require an amendment to the City's zoning code and zoning map due to the current split of subdistrict designations, as all three parcels are presently divided between EE and Housing Emphasis (HE) subdistricts. Therefore, this alternative would include an amendment to the City's zoning code and zoning map to designated the entire three parcels Innovation District (ID) Overlay Zoning subdistrict from EE and HE to exclusively EE.

Furthermore, this alternative would require a General Plan Amendment to change the exiting General Plan land use designation of Industrial (I) to Mixed Use-Urban (MU-U), which allows for development of primarily high-density residential development with commercial, office, institutional and business uses emphasizing retail, entertainment and student-oriented activities.

This No Project/Buildout of Employment Emphasis Subdistrict Alternative would consist of construction of two new two-story buildings designed to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. The alternative would consist in the development of 2 two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue).

Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Building 1 would be on a 5.15-acre lot, resulting in a FAR of 1.0. Building 2 would be on a 5.06-acre lot, resulting in a FAR of 1.0.

This alternative would include construction of an on-site drainage system comprised of two underground detention/infiltration systems, like the proposed Project. Consistent with the proposed Project, the No Project/ Buildout of Employment Emphasis Subdistrict Alternative would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Areas plan for grading and physical impact would be consistent with the proposed Project. Like the proposed Project, this alternative would not involve redevelopment or construction at 1989 Massachusetts.

7.8.1 Environmental Impacts

Aesthetics

Under the No Project/ Buildout of Employment Emphasis Subdistrict Alternative, a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) would be developed with 2 two-story buildings designed to be an employment center with a limited mix of residential uses to compliment the employment focus. Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts.

The buildings under this alternative would be larger than those proposed in the Project (which are 99,900 SF and 99,950 SF) and would feature two stories instead of the single-story design in the proposed Project, but would be of the same architectural character as the Project. Areas planned for physical impact on- and off-site would be identical to those required for development of the proposed Project. The visual improvements that would be introduced throughout the Project site that include new and improved landscaping, providing a building of contemporary design, and improvements to the public realm by streetscaping would be implemented similar to the proposed Project. Overall, implementation of the No Project/ Buildout of Employment Emphasis Subdistrict Alternative would result in impacts that are greater than the proposed Project due to increase in square footage and building height; however, impacts to aesthetics would remain less than significant.

Agricultural and Forestry Resources

As discussed previously, the Project site is located in a fully developed area of the City of Riverside and does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, per the Department of Conservation Important Farmland Finder. Furthermore, there is no forest land on the site or in the immediate vicinity of the Project site. Under this alternative, no new agricultural uses would be introduced to the Project site. This alternative would not convert Prime Farmland to nonagricultural use, similar to the proposed Project. Therefore, the No Project/ Buildout of Employment Emphasis Subdistrict Alternative would result in no impact, consistent with the proposed Project, and impacts would be the same as compared to the proposed Project.

Air Quality

Under this alternative, the Project site would be developed with two new two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue). Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts Avenue.

Development of the No Project/Buildout Employment Emphasis Subdistrict Alternative would result in approximately 4,454 net new daily trips, with 455 during the AM peak hour (324 inbound and 131 outbound) and 475 during the PM peak hour (152 inbound and 323 outbound), as shown in Table 7-4. The proposed Project would generate 487 net new trips, with 74 during the AM peak hour (65 inbound and 9 outbound) and 66 during the PM peak hour (10 inbound and 56 outbound), as discussed in Section 5.17, *Transportation*. Therefore, this alternative would result in 3,967 (814 percent) more daily trips, 381 more AM trips and 391 more PM trips compared to the proposed Project. Therefore, air quality impacts would be much greater than those under the proposed Project due to increased emissions resulting from the increase in number of trips/mobile emissions. Therefore, the No Project/Buildout of Employment Emphasis Subdistrict Alternative has potential to result in emissions above SCAQMD thresholds and may require mitigation. Therefore, this alternative would result in greater overall air quality impacts compared to the Project, and impacts would be potentially significant.

Biological Resources

This alternative would develop a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) with two two-story mixed use (office and residential) buildings. Each building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF per building.

The footprint area of Building 1 would be 12,290 SF larger (or 10.9 percent larger) than that of the proposed Project.[1] The footprint area of Building 2 would be 14,490 SF larger (or 14.8 percent larger) than that of the proposed Project.[2] However, areas planned for physical impact would be the same as the proposed Project. This alternative would also require removal of existing vegetation, including shrubs, which provide nesting habitat for Migratory Bird species, on both 2626 Kansas Avenue and 2069 Massachusetts Avenue. As such, the impacts to biological resources at the Project site would be similar to the Project and require Mitigation Measures BIO-1 to reduce potential project impacts to nesting birds. Mitigation Measure

[1] The footprint area of Building 1 under the proposed Project is 99,900 SF
[2] The footprint area of Building 2 under the proposed Project is 97,700 SF

BIO-1 would reduce potential impacts from this alternative to a less-than-significant level. Thus, this alternative would result in less-than-significant impacts to biological resources with implementation of mitigation, which is consistent with the impacts and required mitigation for the proposed Project.

Cultural Resources

As described previously, the Project site is heavily disturbed and partially developed with two existing industrial buildings. Soils at the site have been extensively disturbed by past development. Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource. However, the proposed Project includes Mitigation Measure CUL-1 for the unanticipated discovery of archaeological resources during construction. Under the No Project/ Buildout of Employment Emphasis Subdistrict Alternative, areas planned for physical impact would be the same as the proposed Project. Thus, this alternative would also result in less-than-significant impacts with implementation of Mitigation Measure CUL-1, and impacts would be the same as the proposed Project.

Energy

Under this alternative, the Project site would be developed with 2 two-story mix-use (office and residential) buildings. Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. The total area of Building 1 would be 124,480 SF larger (or 124.6 percent larger) as compared to the proposed Project, and the total area of Building 2 would be 124,430 SF larger (or 124.5 percent larger) as compared to the proposed Project. This would result in an increase in energy demand associated with the approximately 55.5 percent increase in building square footage.

Like the proposed Project, this alternative would be required to meet the 2022 California Energy Code and California Green Building Standards Code (CALGreen). Thus, with implementation of existing regulations and policies, this alternative would not obstruct use of renewable energy or energy efficiency.

This alternative would have an increase in fuel usage as compared to the proposed Project resulting from the 814 percent additional trips. Although more energy would be used by this alternative, it would not be used in a wasteful, inefficient, or unnecessary manner because it would comply with Title 24 Building Energy Efficiency Standards and implement typical Title 24 measures, consistent with the proposed Project. Therefore, impacts to energy from the No Project/Buildout of Employment Emphasis Subdistrict would be less than significant, but greater than impacts under the proposed Project.

Geology and Soils

The No Project/Buildout Employment Emphasis Subdistrict would consist of construction of two new two-story mix-use (office and residential) buildings. Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. As discussed under Biological Resources, the building footprint area under this alternative would be approximately 10.9 percent larger as compared to the proposed Project. However, areas planned for physical impact would be identical to the proposed Project.

Like the proposed Project, this alternative would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project.

Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation measure regarding paleontological resources would be required for this alternative. This alternative would result in less-than-significant impacts with implementation of mitigation measures, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under this alternative, the Project site would be developed with two new two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue). Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts Avenue.

As discussed in Section 5.8, *Greenhouse Gas Emissions*, the majority of the Projects GHG emissions are from mobile sources such as emission from vehicles and trucks, and the proposed Project would generate 7,242 $MTCO_2e$ per year. When taking existing emissions into account, the net new emissions (proposed Project minus existing) would be 5,457 $MTCO_2e$ per year.

Development of the No Project/Buildout of Employment Emphasis Subdistrict Alternative would result in approximately 3,967 (814 percent) more daily trips, 381 more AM trips and 391 more PM trips compared to the proposed Project (see Table 7-4). The additional trips are a result of the office and residential uses associated with this alternative and the approximately 55 percent increase in building square footage as compared to the proposed Project.

As the number of trips would increase by 814 percent, the overall volume of GHG emissions would be much greater in comparison to the proposed Project. The proposed Project's GHG emissions (5,457 $MTCO_2e$ per year) are below the threshold of 10,000 $MTCO_2e$/yr. Due to the substantial increase in number of trips, this alternative is potentially significant.

Furthermore, the threshold of 10,000 $MTCO_2e$/yr used for the proposed Project is the threshold for industrial projects within the City. However, this alternative would develop a mixed use (office and residential) site. Based on the City's CEQA significance thresholds, which rely on compliance with the local air district threshold, the appropriate threshold for mix-used developments is 3,000 $MTCO_2e$/yr. Therefore, this alternative would result in GHG impacts that would exceed the mix-used development threshold and would require mitigation.

Therefore, this alternative would result in impacts that are greater than impacts under the proposed Project. GHG impacts under this alternative would be potentially significant and mitigation would be required.

Hazards and Hazardous Materials

This alternative would demolish the existing building at 2626 Kansas Avenue and redevelop the site with a mix-use (office and residential) development at 2626 Kansas Avenue and 2069 Massachusetts Avenue. This alternative would include construction of two new two-story buildings that would be approximately 224,380 SF with a total footprint of approximately 112,190 SF.

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the site contains VOCs at levels that exceed current regulatory screening thresholds. Specifically, at 2626 Kansas Avenue, elevated concentrations of TCEs have been found in shallow soil vapor on the northwest portion of the parcel, PCE and TCE have been

detected in southcentral and southeast exterior areas of the parcel, and 1,1-DCE has also been detected in groundwater monitoring wells on the northwest portion of the parcel. Soil vapor and groundwater PCE and TCE have also been detected underlying 2069 Massachusetts Avenue and 1989 Massachusetts Avenue. As such, like the proposed Project, this alternative would be required to implement Mitigation Measure HAZ-1 . which requires implementation of a soil management plan and a health and safety plan.

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the Project site located within Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area. Like the proposed Project, this alternative would include review by the Airport Land Use Commission (ALUC) for consistency with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Like the proposed Project, this alternative would be subject to ALUC conditions that include requirement that outdoor lighting shall be installed in a downward facing position to prevent spillage, prohibit uses/activities that are incompatible with airport operations, requirement to provide a notice of airport in vicinity to prospective purchasers or tenants, and notification to March Air Reserve of any land use involving electromagnetic radiation. These conditions are included in the proposed Project as Mitigation Measures HAZ-2 through HAZ-5. Because the No Project/Buildout of Employment Emphasis Subdistrict Alternative would construct two buildings within the Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area, implementation of this alternative would also require Mitigation Measures HAZ-2 through HAZ-5 to achieve consistency with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

In addition, this alternative would likely require the same utilization of hazardous materials during operation, including small quantities of household cleaners, lubricants, batteries, etc., as the proposed Project (albeit to a lesser degree). Overall, this alternative would result in similar impacts as compared to the proposed Project and impacts related to hazards and hazardous materials would be less than significant after implementation of mitigation.

Hydrology and Water Quality

This alternative would include construction of two new two-story buildings designed to support office and residential uses at 2626 Kansas Avenue and 2069 Massachusetts Avenue. Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Like in the proposed Project, this alternative would not involve redevelopment/construction at 1989 Massachusetts Avenue. Areas planned for physical impact on-site would be identical to those required for development of the proposed Project, and the net new impervious area would be the same as that of the proposed Project. Construction of the alternative would construct underground detention/infiltration systems, consistent with the proposed Project. However, the proposed detention/infiltration system would be deeper in order to support the needs or the larger buildings and proposed uses. In addition, preparation of a SWPPP and a WQMP would be required for development of this alternative. Overall, consistent with the proposed Project, this alternative would result in less-than-significant impacts related to hydrology and water quality, and impacts would be the same.

Land Use

The Project site has a General Plan Land Use designation of Industrial. The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The No Project/Buildout of Employment Emphasis Subdistrict Alternative would redevelop a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) with two new 224,380 SF two-story buildings that would consist of 60 percent (or 134,628 SF per building) of office space (admin and professional) and 40 percent (or 89,752 SF per building) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150

dwelling units per building. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. As such, this alternative would require a General Plan Amendment to change the existing General Plan land use designation of Industrial (I) to Mixed Use-Urban (MU-U), which allows for development of primarily high-density residential development with commercial, office, institutional and business uses.

With a General Plan Amendment, the No Project/Buildout of Employment Emphasis Subdistrict Alternative would be consistent with the General Plan land use designation Mixed Use-Urban (MU-U). Therefore, potential impacts due to land use compatibility under both the Project and this alternative would be less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from this alternative would be less than significant; and therefore, would be consistent with the Project's impacts.

Mineral Resources

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would redevelop a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) with two new 224,380 SF two-story buildings that would consist of 60 percent office and 40 percent residential uses. Similar to the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. As discussed in Section 5.12, *Mineral Resources*, the Project site is not currently used for mining or mineral extraction operations. According to the City of Riverside General Plan EIR, the Project site is in an area designated as MRZ-4. As such, the Project site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, this alternative would result in no impacts to mineral resources, consistent with the proposed Project.

Noise

Under this alternative, the Project site would be developed with two new two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue). Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts Avenue.

As shown in Table 7-4, the operation of this alternative would result in approximately 3,967 (814 percent) more daily trips, 381 more AM trips and 391 more PM trips in comparison to the proposed Project. Therefore, this alternative would result in a substantial increase in roadway noise when compared to the proposed Project and would increase noise-related impacts. As detailed in Section 5.13, *Noise*, in Table 5.11-9, *Existing and Opening Year Traffic Noise Levels Without and With Proposed Project*, the proposed Project-related traffic noise increase would be 1.5 dBA at Massachusetts Avenue East of Kansas Street. A substantial increase of 814 percent in traffic at this location compared to the proposed Project would likely result in this alternative being close to or exceeding the 3.0 dBA traffic noise level increase threshold. Therefore, traffic noise impacts from the No Project/Buildout of Employment Emphasis Subdistrict Alternative has the potential to be significant, and mitigation measures would likely be required.

Short-term noise and vibration that would occur during construction of the No Project/Buildout of Employment Emphasis Subdistrict Alternative would be similar to the Project. Like the Project, long-term on-site operational noise would not expose nearby sensitive receivers to noise levels over the City's daytime noise standards.

The proposed Project has less than significant noise impacts without mitigation. Overall, this alternative would result in greater operational noise-related impacts than those associated with the Project and impacts may be potentially significant and may require mitigation.

Population and Housing

This alternative would include construction of two new two-story buildings designed to support office and residential uses on 2626 Kansas Avenue and 2069 Massachusetts Avenue. Each two-story building would be approximately 224,380 SF and would consist of 60 percent (or 134,628 SF per building) of office space (admin and professional) and 40 percent (or 89,752 SF per building) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

Based on employment generation rates listed in Table 3.G of the *Riverside County General Plan EIR*, which lists an employment generation factor for office commercial uses of 1 employee per 300 SF, this alternative has the potential to result in the need for approximately 897 new employees, which is 703 additional employees (or 362.8 percent increase) when compared to the Project's 194 estimated employees. As discussed in Section 5.14, *Population and Housing*, the City of Riverside is expected to increase by 45,900 jobs between 2019 and 2050. Based on these growth projections, full buildout of the Project would represent approximately 3.2 percent of projected employment growth within the City of Riverside. Thus, consistent with the proposed Project, the resulting employment increase from this alternative would also be within the SCAG growth projections.

However, the employees required for admin and professional offices could need specialized skills that may not currently exist in large numbers within the region. As a result, the facility would have the potential to attract workers from outside the immediate area and create additional unplanned housing demand. As such, this alternative has potential to result in unplanned growth inducing impacts. Therefore, the No Project/Buildout of Existing Land Use Alternative would result in potentially significant impacts and may require mitigation.

Public Services

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would construct two new two-story buildings designed to support 60 percent office (admin and professional) and 40 percent residential uses on 2626 Kansas Avenue and 2069 Massachusetts Avenue. Each two-story building would be approximately 224,380 SF and consist of 60 percent (or 134,628 SF) office space and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

Construction of this alternative would result in an increase in demand for public services based on the increased amount of employment generated (362.8 percent increase from the proposed Project) and in the increase in population from the new residential uses. The same fire and sheriff's stations would serve the alternative, but the increase in employees and residents has potential to increase the amount of service calls received by these public services compared to the proposed Project. However, this alternative would also require the payment of development impact fees imposed by the City of Riverside, which would be increased to account for the additional need for public resources. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in less-than-significant impacts, but impacts would be greater than the proposed Project.

Recreation

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would construct two new two-story buildings designed to 60 percent office (admin and professional) and 40 percent residential uses on 2626 Kansas Avenue and 2069 Massachusetts Avenue. Each two-story building would be approximately 224,380 SF and consist of 60 percent (or 134,628 SF) office space and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue.

As described under "Population and Housing," employees required for administrative and professional offices could need specialized skills that may not currently exist in large numbers within the region. As a result, the facility would have potential to attract workers from outside the immediate area and create additional unplanned housing demand. Furthermore, the development would consist of 40 percent residential (or a total of 300 dwelling units for the site). The increase in housing supply would increase the use of existing recreational facilities and potentially require mitigation to create new recreational facilities near the site. Therefore, the No Project/Buildout of Employment Emphasis Subdistrict Alternative would result in potentially significant impacts and may require mitigation.

Transportation

Under this alternative, the Project site would be developed with two new two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue). Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like the proposed Project, this alternative would not involve redevelopment or construction on 1989 Massachusetts Avenue.

Development of the No Project/Buildout Employment Emphasis Subdistrict Alternative would result in approximately 4,454 net new daily trips, with 455 during the AM peak hour (324 inbound and 131 outbound) and 475 during the PM peak hour (152 inbound and 323 outbound), as shown in Table 7-4. The proposed Project would generate 487 net new trips, with 74 during the AM peak hour (65 inbound and 9 outbound) and 66 during the PM peak hour (10 inbound and 56 outbound), as discussed in Section 5.17, *Transportation*. Therefore, this alternative would result in 3,967 (814 percent) more daily trips, 381 more AM trips and 409 more PM trips compared to the proposed Project.

With respect to VMT, the proposed Project was determined to meet the requirements of Screening Criteria 2 for projects located in a low VMT area, and therefore, would have a less-than-significant VMT impact. The No Project/Buildout Employment Emphasis Subdistrict Alternative would not meet the low VMT area screening criteria because it is inconsistent with the existing General Plan land use designation of Industrial (I), and requires a general plan amendment. Furthermore, this alternative would likely not meet any of the screening criteria due to its potential to generate approximately 4,454 net new daily trips. As a result, this alternative would require a VMT analysis, VMT impacts are expected to greater as compared to the Project, and potentially significant and may require mitigation.

Table 7-4: No Project/Buildout Employment Emphasis Subdistrict Alternative Trip Generation

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Total Existing Trip Generation	487	62	9	71	10	54	64
Alternative 3 General Office Trip Generation	2,919	360	49	409	66	322	388
Alternative 3 Multifamily Housing Trip Generation	2,022	29	91	120	96	57	153
Alternative 3 Total New Trip Generation	4,941	389	140	529	162	379	541
Net New Trip Generation (Existing – Alternative 3)	**4,454**	**324**	**131**	**455**	**152**	**323**	**475**

Tribal Cultural Resources

The No Project/Buildout of Employment Emphasis Subdistrict would redevelop 2626 Kansas Avenue and 2069 Massachusetts Avenue two new two-story buildings designed to be an employment center of regional importance with a limited mix of residential uses. Similar to the proposed Project, this alternative would not involve redevelopment/construction at 1989 Massachusetts Avenue. Areas planned for physical impact on-site would be identical to those required for development of the proposed Project. Therefore, potential tribal cultural resource impacts would be the same as the Project and would require the same mitigation measures. Therefore, impacts to tribal cultural resources from this alternative would be the same as the Project.

Utilities and Service Systems

Under this alternative, the Project site would be developed with 2 two-story mix-use (office and residential) buildings. Each two-story building would be approximately 224,380 SF, which is an increase of 124.5 percent in square footage as compared to the proposed Project.

Both the Project and this alternative would require to extend existing electric, gas, and communications utilities to the site from existing facilities along Kansas Avenue and Massachusetts Avenue. Additionally, both the Project and this alternative would install new water service laterals that would connect to the existing 10-inch water line in Massachusetts Avenue. Lastly, both the proposed Project and this alternative would install new private sewer lines to connect to the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street.

Impacts associated with the provision of such facilities would be similar and would be less than significant upon compliance with existing regulatory requirements. However, it is expected this alternative would result in higher demand for utilities and an increase in wastewater and solid waste generation due to the increase in building size and additional number of workers and residents associated with the proposed office and residential uses. Although impacts would be increased under this alternative due to the increase in building demand and associated demand for water resources, impacts to water supply would still be less than significant with implementation of existing regulations. Overall, this alternative would also result in less-than-significant impacts related to utilities and service systems but would result in an increase in impacts in comparison to the proposed Project.

Wildfire

Under this alternative, approximately 124.5 percent more building area would be developed on the Project site. The increased in building size would increase operational fire hazards by increasing the amount of

electrical infrastructure and potential ignition sources introduced to the site. Like the proposed Project, this alternative would comply with applicable fire safety regulations, including the California Fire Code, and would incorporate fire protection measures such as fire-resistant building materials, automatic sprinkler systems, and adequate emergency access. As discussed in Section 5.20, *Wildfire*, the Project site is located outside of a Fire Hazard Severity Zone. Consistent with the proposed Project, the No Project/Buildout of Employment Emphasis Subdistrict Alternative would not significantly alter emergency response times or evacuation routes. Overall, impacts would remain less than significant, but be greater than the proposed Project.

7.8.2 Conclusion

Ability to Reduce Impacts

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would consist of the development of 2 two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue). Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF. Each building would consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Areas planned for physical impact on and off-site would be identical to those required for development of the proposed Project.

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would not result in a reduction of impacts to any of the 20 environmental topics analyzed in this Draft EIR. This alternative would result in an increase of impacts to 11 of the 20 environmental topics analyzed in this Draft EIR. In addition, this alternative would not reduce the impact level of any of the 20 environmental topics analyzed in this Draft EIR, and would have potential to increase the impact level to six of the 20 environmental topics analyzed in this Draft EIR.

All mitigation measures included in the Project for biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources would still be applicable to this alternative. Furthermore, this alternative may result in the need for additional mitigation measures for air quality, greenhouse gas emissions, noise, population and housing, recreation, and transportation, which is not required under the proposed Project.

Ability to Achieve Project Objectives

As shown in Table 7-5 below, the No Project/Buildout of Employment Emphasis Subdistrict Alternative would meet two, partially meet one, and would not meet three of the six Project objectives. This alternative would make efficient use of the site for employment and attract new businesses and employment to the City of Riverside. This alternative would partially reduce the need for members of the local workforce to commute outside of the Project vicinity to work; however, the employees required for admin and professional offices could need specialized skills that may not currently exist in large numbers within the region. As a result, the facility would have potential to attract workers from outside the immediate area. This alternative would not redevelop the site with industrial warehouse buildings that are similar to and compatible with other industrial buildings that were recently built or recently approved in the vicinity.

7.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" when significant environmental impacts result from a proposed Project…

Additionally, State CEQA Guidelines Section 15126.6(3)(1) states:

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.*

Therefore, pursuant to CEQA, because the No Project/No Development Alternative has been identified as the Environmentally Superior Alternative, the next best Environmentally Superior Alternative would be Alternative 2: Reduced Project Alternative, which would involve developing the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage and operational intensity. Specifically, the Reduced Project Alternative would result in the construction of one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue.

The Reduced Project Alternative would result in lessened impacts to 9 of the 20 environmental topics analyzed in this EIR, but would not reduce the impact level to any environmental topics. This alternative would be required to implement the same applicable mitigation measures as the proposed Project. Like the proposed Project, the Reduced Project Alternative would not result in any significant and unavoidable impacts. The Reduced Project Alternative would not meet the Project objectives to the same extent as the proposed Project and would have reduction of 97 employees (50 percent) in comparison to the proposed Project.

CEQA does not require the Lead Agency (the City of Riverside) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Table 7-5 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 7-6 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

Table 7-5: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Project	Alternative 3 No Project/Buildout of Employment Emphasis Subdistrict
Aesthetics	Less than significant	Less than significant – Less than proposed Project	Less than significant – Less than proposed Project	Less than significant – Greater than proposed Project
Agricultural and Forestry Resources	No Impact	No Impact – Same as proposed Project	No Impact – Same as proposed Project	No Impact – Same as proposed Project

	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Project	Alternative 3 No Project/Buildout of Employment Emphasis Subdistrict
Air Quality	Less than significant	Less than significant – Less than proposed Project	Less than significant – Less than proposed Project	Potentially Significant (Potential to Require Mitigation) –Greater than proposed Project
Biological Resources	Less than significant with mitigation	Less than significant – Less than proposed Project	Less than significant with mitigation –Same as proposed Project	Less than significant with mitigation –Same as proposed Project
Cultural Resources	Less than significant with mitigation	Less than significant – Less than proposed Project	Less than significant with mitigation –Same as proposed Project	Less than significant with mitigation –Same as proposed Project
Energy	Less than significant	Less than significant – Less than proposed Project	Less than significant – Less than proposed Project	Less than significant – Greater than proposed Project
Geology and Soils	Less than significant with mitigation	No Impact – Less than proposed Project	Less than significant with mitigation –Less than proposed Project	Less than significant with mitigation –Same as proposed Project
Greenhouse Gases	Less than significant	Less than significant – Less than proposed Project	Less than significant – Less than proposed Project	Potentially Significant (Potential to Require Mitigation) –Greater than Proposed Project
Hazards and Hazardous Materials	Less than significant with mitigation	Less than significant – Less than proposed Project	Less than significant with mitigation –Same as proposed Project	Less than significant with mitigation –Same as proposed Project
Hydrology and Water Quality	Less than significant	Less than significant – Same as proposed Project	Less than significant –Same as proposed Project	Less than significant –Same as proposed Project
Land Use and Planning	Less than significant	Less than significant – Same as proposed Project	Less than significant –Same as proposed Project	Less than significant –Same as proposed Project
Mineral Resources	No Impact	No Impact – Same as proposed Project	No Impact –Same as proposed Project	No Impact –Same as proposed Project
Noise	Less than significant	Less than significant – Less than proposed Project	Less than significant –Less than proposed Project	Potentially Significant (Potential to Require Mitigation) –Greater than Proposed Project
Population and Housing	Less than significant	No Impact – Less than proposed Project	Less than significant –Same as proposed Project	Potentially Significant (Potential to Require Mitigation)

	Proposed Project	Alternative 1 No Project/ No Development	Alternative 2 Reduced Project	Alternative 3 No Project/Buildout of Employment Emphasis Subdistrict
				–Greater than Proposed Project
Public Services	Less than significant	No Impact – Less than proposed Project	Less than significant –Same as proposed Project	Less than significant – Greater than prosed Project
Recreation	Less than significant	No Impact – Less than proposed Project	Less than significant –Same as proposed Project	Potentially Significant (Potential to Require Mitigation) –Greater than Proposed Project
Transportation	Less than significant	No Impact – Less than proposed Project	Less than significant –Same as proposed Project	Potentially Significant (Potential to Require Mitigation) –Greater than Proposed Project
Tribal Cultural Resources	Less than significant with mitigation	No Impact – Less than proposed Project	Less than significant with mitigation –Less than proposed Project	Less than significant with mitigation –Same as the proposed Project
Utilities and Service Systems	Less than significant	No Impact – Less than proposed Project	Less than significant –Less than proposed Project	Less than significant –More than proposed Project
Wildfire	Less than significant	No Impact – Less than proposed Project	Less than significant –Less than proposed Project	Less than significant –More than the proposed Project
Reduce Impacts of the Project?		Yes, to 16 of 20 environmental topics	Yes, to 9 of 20 environmental topics	No
Areas of Reduced Impact Level Compared to the Project		11	0	0

Table 7-6: Comparison of the Proposed Project and Alternatives' Ability to Meet Objectives

	Project	Alternative 1 No Project/No Development	Alternative 2 Reduced Project	Alternative 3 No Project/Buildout of Employment Emphasis Subdistrict
1. To make efficient use of the property in the City of Riverside by adding to its potential for employment generating uses.	Yes	No	No	Yes
2. To attract new business and employment to the City of Riverside and thereby promote economic growth.	Yes	No	Yes, but to a lesser extent	Yes

3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
4. To redevelop a partially underutilized property with two industrial warehouse buildings near I-215, SR-60, and SR-91, to help meet demand for logistics business in the City and surrounding region.	Yes	No	Yes, but to a lesser extent	No
5. To develop two warehouse facilities with updated infrastructure that are up-to-date with efficient building standards.	Yes	No	Yes, but to a lesser extent	No
6. To build an industrial warehouse project in the City of Riverside that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Riverside.	Yes	No	Yes, but to a lesser extent	No

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