CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT **PLANNING DIVISION**

DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 6

1. **Case Number:** **PR-2021-001114 (General Plan Amendment, Rezone, and Design Review)**

2. **Project Title:** Mikasa Luxury Villas Residential Development Project

3. **Hearing Date:** December 18, 2025

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

5. **Contact Person:** Yenifer Cid, Associate Planner | (951) 826-5652

6. **Project Location:** The applicant proposes to consolidate three parcels and develop 117 multifamily units ("Project"). The Project is located at 4618 Jones Avenue, 4705 Hedrick Avenue, and 4663 Hedrick Avenue (APN# 143-040-010, 143-040-011, and 143-040-012; "Project Site") in the City of Riverside. The Project Site is approximately 4.54 acres and is in the western portion of the City. The Project Site is located east of Hedrick Avenue, west of Jones Avenue, north of Hole Avenue, and south of Wells Avenue (**Figure 1, Project Location**).

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

Century Heritage Buildings, Inc.
4095 East La Palma Avenue, Suite D
Anaheim, CA 92807

8. **General Plan Designation:** The City of Riverside General Plan Land Use Map shows that parcels 143-040-010 and 143-040-011 are designated as Medium Density Residential (MDR) while 143-040-012 is designated High Density Residential (HDR). Parcels directly west, north, and east of the Project Site are designated as MDR, and parcels south of the Project Site are designated HDR.

9. **Zoning:** The City of Riverside Zoning Map shows that parcels 143-040-010 and 143-040-011 are zoned as Single-Family Residential (R-1-7000) while 143-040-012 is zoned as Multiple-Family Residential (R-3-1500).

10. **Description of Project:**

Required Entitlements
General Plan Amendment (GPA), Rezone (RZ), and Design Review (DR)

Project Background
The Project Site is currently predominantly undeveloped but contains three single-family residences, two mobile homes, and four storage sheds (**Figure 2, Project Site**). The Project Site is surrounded by two-story multifamily residences located south of the Project Site and one-story, single-family residences to the west, north, and east. Parcels 143-040-010 and 143-040-011 are zoned Single-Family Residential (R-1-7000) while

143-040-012 is zoned Multiple-Family Residential (R-3-1500). As a matter of information, Parcel 143-040-012 was rezoned to R-3-1500 as part of the City's Housing Element Update (Fifth Cycle) to meet the housing needs for the City.

Proposed Project

The Project includes the demolition of all of the existing structures on site: 4618 Jones Avenue, 4663 Hedrick Avenue, and 4705 Hedrick Avenue. According to documentation from the County Assessor, the square footage of the existing buildings is 1,462 square feet, 2,157 square feet, and 668 square feet, respectively (a total of 4,287 square feet of buildings to be demolished). The Project includes the construction of approximately 193,421 square feet of new development **Figure 3, Proposed Site Plans,** and **Table 1, Project Features**. In addition, the Project would include approximately 80,803 square feet of open space (common, private, and public). The Project would include 15 multifamily buildings, containing 117 dwelling units, a community hall, gym, pool, spa, and tot lot/play area. The dwelling units would range from studios to two bedrooms.

Table 1
Project Features

Project Features	Type	Stories	Maximum Height[1]	Number of Units	Building Area Square Footage (sq. ft.)
Building A	1	2	20' 6"	3	4,415
Building B	1R	2	20' 6"	3	4,415
Building C	1	2	20' 6"	3	4,415
Building D	1R	2	20' 6"	3	4,415
Building E	2	2	20' 6"	3	4,415
Building F	2	2	20' 6"	3	4,415
Building G	2	2	20' 6"	3	4,415
Building H	3	2	20' 6"	6	8,492
Building I	4	2	20' 6"	7	9,851
Building J	5	3	40'	14	24,310
Building K	6	3	40'	14	23,517
Building L	6R	3	40'	14	23,517
Building M	5R	3	40'	14	24,310
Building N	5R	3	40'	14	24,310
Building O	7	2	28' 8"	10	17,149
Building P (Manager Units and Leasing Office)	8	2	23' 2"	3	3,664
Building Q (Community Hall and Gym)	9	2	25' 6"	-	3,396
			Total	**117 units**	**193,421 sq. ft.**

Source: G&G Engineering, Inc., Sheet C-1.1, September 15, 2021.
[1] Height from finished grade to the top of the roof

Courtyards are located between buildings J and K, M, and N. The tot lot is located between buildings L and M. The pool, spa, gym, and clubhouse are located between buildings K and L. The Project would include a total of 215 parking spaces (203 standard and 12 handicap).

Landscaping and Trees

The Project Site contains 9 trees that will be removed. None of the trees is protected. The Project Site also contains some bushes that will be removed. The Project would include landscaping comprised of shrub planting, natural turf, and trees.

SOURCE: Esri, 2023

FIGURE **1**

IMPACT SCIENCES

Project Location

1558.001•08/2023

SOURCE: Esri, 2023

FIGURE 2

IMPACT SCIENCES

Project Site

1558.001•08/2023

SOURCE: G&G Engineering, 2025

FIGURE 3

IMPACT SCIENCES

Project Site Plan

1558.001•11/2025

Site Drainage

The Project would install a new drainage and stormwater collection system on-site to collect stormwater runoff from the proposed development. The Project would install underground storm pipes that would drain runoff to two underground stormwater collection chambers located in the northeastern corner and the western portion of the Project Site. These collection chambers would capture on-site runoff, filter it, and outflow to the drainage sump pumps and module wetland systems (MWS) attached to each collection chamber for treatment. Stormwater would also be collected through an above-ground concrete v-ditch along the southern perimeter of the Project Site, where water would be conveyed to a drainage inlet and then outflowed into the City's storm drainage system. Furthermore, the Project would implement source control Best Management Practices (BMPs), including street sweeping practices, drainage facility inspections, and ensuring that all landscaped areas on-site are irrigated.

Walls/Fences

The Project will include a 6-foot iron fence along the perimeter of the Project Site, and the driveways will be accessible to residents through an electronic gate. The Project would also retain the existing concrete wall along the upper eastern perimeter of the Project Site and include a new 6-foot-tall concrete masonry wall along the northwestern and western perimeters of the Project Site. As shown in **Table 1** above, the Project would provide 10 buildings with a maximum height of 29 feet, and 5 buildings with a maximum height of 40 feet. Architectural features would include balconies/patios, smooth finish stucco, accent stone laminate, wood siding, metal guardrails, and flat roofs.

Access/Parking

Regional access to the Project Site is provided by State Route 91 (SR-91, Riverside Freeway), located approximately 1.3 miles to the south. The Project Site will provide a total of 215 parking spaces (203 standard and 12 handicap). Of the 215 parking spaces, 40 will be uncovered open parking, and the remaining 175 parking spaces will be incorporated into the first floor of each building as described below in **Table 2**, Parking Spaces. The 175 covered parking spaces will have an EV connection. One driveway entrance will be provided by Hedrick Avenue, and one driveway entrance will be provided by Jones Avenue.

Table 2
Parking Spaces

Project Features	Building Type	Number of Units	Spaces
Building A	1	3	3
Building B	1R	3	3
Building C	1	3	3
Building D	1R	3	3
Building E	2	3	3
Building F	2	3	3
Building G	2	3	3
Building H	3	6	6
Building I	4	7	7
Building J	5	14	25
Building K	6	14	23
Building L	6R	14	23
Building M	5R	14	25
Building N	5R	14	25
Building O	7	10	17
Building P	8	3	3
		Uncovered Open Parking	**40**
		Total	**215**

Source: G&G Engineering, Inc., September 15, 2021.

Land Use
The City of Riverside General Plan Land Use Map shows that parcels 143-040-010 and 143-040-011 are designated as Medium Density Residential (MDR) while 143-040-012 is designated High Density Residential (HDR). Parcels directly west, north, and east of the Project Site are designated as MDR, and parcels south of the Project Site are designated HDR.

Utilities
The Project would obtain Water and Wastewater verification letters from Western Municipal Water District (WMWD).

Project Construction Sequencing
For the purpose of analyzing impacts associated with construction activities, this analysis assumes a construction schedule of approximately 18 months with demolition beginning in mid-2024. This analysis assumes the Project will be fully operational in 2025.[1] This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition and removal of existing residences and debris, (2) grading/foundation preparation, and (3) building construction.

Demolition and removal of existing debris would occur for approximately one month. This phase would include the demolition of the three existing buildings (approximately 4,287 square feet of demolition). Per the California Emissions Estimator Model (CalEEMod) User Guide Appendix C, one square foot of demolished structure is 0.046 short tons of waste material. Given this information, the Project would result in approximately 197.2 tons of waste material.

Grading and foundation preparation would occur for approximately 3.5 months, and this analysis assumes cut/fill operations would balance soil on site and no soil import or export would be required.

Building construction would occur for approximately 13.5 months and would include the construction of the proposed structures, connection of utilities, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. Paving and architectural coatings would take place concurrently during the final month of building construction.

Conventional construction equipment would be used, such as excavators, backhoes, and both light- and heavy-duty trucks. Truck trips are expected to reach the Project Site via SR-91 and La Sierra Avenue. Truck trips are expected to travel along these same routes and arterials to dispose of construction and demolition debris.

Consistent with the assumptions included within CalEEMod, the following maximum daily equipment by phase will be assumed. The following equipment assumptions are daily estimates based on the Project Site size (between 3 and 5 acres).

- Demolition: 1 concrete/industrial saw, 1 excavator, 1 rubber-tired dozers
- Grading: 1 excavator, 1 grader, 1 rubber-tired dozer, 2 tractors/loaders/backhoes
- Building Construction: 1 crane, 2 forklifts, 1 generator set, 1 tractor/loader/backhoe, 1 welder
- Paving: 2 cement and mortar mixers, 2 paving equipment, 1 roller compactor, 1 tractor/loader/backhoe
- Architectural Coating: 1 air compressor

[1] It is acknowledged that construction activities for the Project would begin at a later date than analyzed. However, because air quality emission factors improve (i.e., emissions decrease) each year into the future, the emissions estimated herein present a worst-case analysis.

11. Surrounding land uses and setting: Briefly describe the project's surroundings:

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Single-Family Residential uses	Medium Density Residential (MDR) and High Density Residential (HDR)	R-1-7000 – Single Family Residential and R-3-1500 - Multiple-Family Residential
North	Single-Family Residential uses	MDR	R-1-7000 – Single Family Residential
East	Single-Family Residential uses	MDR	R-1-7000 – Single Family Residential
South	Multifamily Residential uses	HDR	R-3-1500 - Multiple-Family Residential
West	Single-Family Residential uses	MDR	R-1-7000 – Single Family Residential

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

a. None

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

Per Assembly Bill (AB) 52, the City of Riverside sent out consultation notices to the 19 tribal contacts who may have an interest in the Project Area. As of October 18, 2023, three of the 19 tribal contacts have responded to date: the Pechanga Band of Indians, the Augustine Band of Cahuilla Indians, and the Agua Caliente. The Pechanga Band of Indians requested government-to-government consultation, which took place in May 2024, and an archaeological and tribal monitor during construction. The Augustine Band of Cahuilla Indians requested to be contacted only in the case of unanticipated discoveries. Agua Caliente had no comments or requests.

Following the successful government-to-government consultation meeting with the Pechanga Band of Indians mitigation measures were added to this CEQA document to prevent any significant impacts to tribal cultural resources from occurring.

Other Environmental Reviews Incorporated by Reference in this Review:

a. General Plan 2025
b. General Plan 2025 Final Program Environmental Impact Report

14. Acronyms

AQMP - Air Quality Management Plan
CEQA - California Environmental Quality Act
CMP - Congestion Management Plan
EIR - Environmental Impact Report
EMWD - Eastern Municipal Water District
EOP - Emergency Operations Plan
FEMA - Federal Emergency Management Agency
FPEIR - General Plan 2025 Final Programmatic Environmental Impact Report

GIS -	Geographic Information System
GHG -	Greenhouse Gas
GP 2025 -	General Plan 2025
IS -	Initial Study
LHMP -	Local Hazard Mitigation Plan
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MSHCP -	Multiple-Species Habitat Conservation Plan
MVUSD -	Moreno Valley Unified School District
NCCP -	Natural Communities Conservation Plan
OEM -	Office of Emergency Services
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report
PW -	Public Works, Riverside
RCALUC -	Riverside County Airport Land Use Commission
RCALUCP -	Riverside County Airport Land Use Compatibility Plan
RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RPD -	Riverside Police Department
RPU -	Riverside Public Utilities
RTIP -	Regional Transportation Improvement Plan
RTP/SCS -	Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCH -	State Clearinghouse
SWPPP -	Storm Water Pollution Prevention Plan
USGS -	United States Geological Survey
WMWD -	Western Municipal Water District
WQMP -	Water Quality Management Plan

Appendix List

Appendix A	Air Quality and Greenhouse Gas Technical Report
Appendix B	Biological Resources Assessment
Appendix C	Cultural Resources Report
Appendix D	Project WQMP
Appendix E	Noise and Vibration Technical Report
Appendix F	Traffic Analysis
Appendix G	Tribal Consultation

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature _____ Date _____

Printed Name & Title _____ For _____

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

8) The explanation of each issue should identify:

   a. the significance criteria or threshold, if any, used to evaluate each question; and
   b. the mitigation measure identified, if any, to reduce the impact to less than significance.

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

1a. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways)***

Less Than Significant Impact. A scenic vista is generally defined as a view of undisturbed natural characteristics exhibiting a unique feature that comprises an important or dominant portion of the viewshed. Although scenic vistas are identified at the discretion of its jurisdiction, common examples of scenic vistas include open hillsides, mountain ranges, rivers/streambeds, and large bodies of water.

According to the Program Environmental Impact Report of the City of Riverside General Plan 2025 (GP 2025 FPEIR), hills and ridgelines that surround the City of Riverside provide scenic vistas to the City's residents. Specifically, the GP 2025 FPEIR identified the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. The peaks of Box Springs Mountain, Mountain Rubidoux, Arlington Mountain, and Alessandro Heights are identified as local scenic vistas. The GP 2025 FPEIR also identified several City roadways and parkways as local scenic and special boulevards (see Figure 5.1-1, Scenic and Special Boulevards and Parkways, of the GP 2025 FPEIR). The closest scenic boulevard/parkway to the Project Site is La Sierra Avenue, located approximately 0.69 miles south of the Project Site. Due to its distance and intervening objects (i.e., trees and structures), the Project Site is not visible from La Sierra Avenue. The La Sierra/Norco Hills are partially visible for motorists, pedestrians, and bicyclists travelling along Jones Avenue from the eastern portion of the Project Site (4618 Jones Avenue property). These views are partially obstructed by existing trees and structures.

The Project does not constitute a hillside development (on slopes greater than 10 percent) where special considerations of the City's natural terrain must be considered for impacts to scenic vistas, as required by Title 17, Grading, and Chapter 19.100 (Residential Zones), of the City's Municipal Code. Additionally, the Project Site is not located on a scenic vista point or contains clear distant views of scenic vistas, as the site is in an urbanized area surrounded by existing residential uses. As such, the Project would not have a substantial adverse effect on a scenic vista and would be less than significant.

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

1b. Response: ***(California Department of Transportation, California State Scenic Highway System Map)***

No Impact. There are no designated or eligible State scenic highways located near the Project Site or within its immediate vicinity. The nearest designated, or eligible for designation, State scenic highways are State Route 91 (SR-91) eastbound, Interstate 15 (I-15) southbound, and the intersecting junction of the two highways. These highway segments are located approximately 4.55 miles southwest of the Project Site. Due to this distance, as well as the topography and intervening structures (i.e., buildings, trees), SR-91 and I-15 are not visible from the Project Site, nor is the Project Site visible from either highway. Therefore, no impact would occur.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1c. Response: ***(Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)*** **Less Than Significant Impact.** The Project Site is located in an urbanized area of the City that has been highly disturbed. Thus, for the purpose of this threshold, the Project's potential to conflict with applicable zoning and other regulations governing scenic quality is evaluated. The Project Site is located in a suburban area and is surrounded by single-family and multifamily residential uses. Although the construction activities associated with the Project would result in changes to the visual quality of the Project Area, these activities would be temporary and would cease upon completion of the Project. The Project would be constructed in accordance with the City's design regulations for multifamily residential uses, as outlined in Chapter 19 (Residential Zones) of the Municipal Code and the Citywide Design Guidelines. Per Chapter 19.710 (Design Review) of the City's Municipal Code, application materials for the Project (i.e., Project Site Plan) would be subject to a Design Review. Upon approval, the Project would be consistent with applicable zoning and other regulations governing scenic quality. As such, impacts would be less than significant.				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
1d. Response: ***(Source: General Plan 2025, General Plan FPEIR, Figure 5.1-2, Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines, Title 7, Noise Control)*** **Less Than Significant Impact**. Light emanating from building interiors that pass through windows and light from exterior sources (i.e., street lighting, parking lot lighting, field lighting, building illumination, security lighting, and landscape lighting) serve as primary sources of light. As shown in Figure 5.1-2, Mt. Palomar Nighttime Lighting Policy Area, of the City's GP 2025 FPEIR, the Project Site is located outside of the 45-mile radius of the Mount Palomar Observatory. Therefore, the Project would not be subject to City Ordinance No. 655, which outlines the unique nighttime lighting standards for areas within proximity to the Observatory. Any proposed outdoor lighting would be subject to Chapter 19.556 (Outdoor Lighting) of the City's Municipal Code. The Project Site is located in a developed area of the City and is surrounded by single and multifamily residential uses. Existing on-site light sources are limited to multiple lighting fixtures that are mounted to both existing buildings on-site. Existing off-site light sources include streetlights, light emitted from adjacent properties, and vehicle headlights traveling along Hedrick Avenue and Jones Avenue. The Project includes the demolition of 4,287 square feet of three single-family residences, two mobile homes, and four storage sheds to construct 185,090 square feet of new development. As such, the Project introduce new exterior lighting for streetlights, vehicle lights, and residential security lighting Construction activities associated with the Project would adhere to Title 7 (Noise Control) of the City's Municipal Code which limits the hours of construction for a development between the hours of 7:00 PM and 7:00 AM. on weekdays, between the hours of 5:00 PM and 8:00 AM on Saturdays, or at any time on Sunday or a federal holiday. Additionally, the Project would be required to adhere to Chapter 19.556 (Outdoor Lighting) of the City's Municipal Code, establishes design and development standards for outdoor lighting that include height, shielding, and location requirements that ensure new lighting does not impact existing uses in the Project Site. Compliance with City regulations will be determined during the City's review of the Project Plans. As such, impacts related to increased sources of light would be less than significant.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
2a. Response: ***(Source: California Department of Conservation. California Important Farmland Finder)*** **No Impact.** According to the California Department of Conservation's California Important Farmland Finder, the Project Site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Further, the Project Site is designated Medium Density Residential (MDR) and High Density Residential (HDR) and zoned Single-Family Residential (R-1-7000) and Multiple-Family Residential (R-3-1500), which does not allow agricultural uses. Thus, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
2b. Response: ***(Source: General Plan 2025, Figure OS-3, Williamson Act Preserves, General Plan)*** **No Impact.** As stated above, the Project Site is not zoned for agricultural use. The existing zoning does not include any agricultural-related zoning designations, nor is the site part of a Williamson Act contract. Additionally, the land uses surrounding the Project Site are not zoned for agricultural uses or in a Williamson Act contract. A review of Figure 5.2-2, Williamson Act Preserves, of the General Plan 2025 FPEIR, demonstrates that the Project Site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. No impact would occur.				
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
2c. Response: **No Impact.** The Project Site is not zoned or used for forest land or timberland purposes and is not zoned for timberland production. Further, Project implementation would not result in the rezoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
2d. Response: **No Impact.** As stated above, the Project Site is not occupied by or used for forest land. Therefore, no impact would occur.				
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
2e. Response: **No Impact**. As the Project would occur within a highly developed and urban area, Project implementation would not result in the conversion of farmland or forest land to non-agricultural/non-forest land use. No impact would occur.				
3. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
3a. Response: ***Source: SCAQMD CEQA Regional Significance Thresholds, SCAQMD Localized Significance Thresholds, South Coast Air Quality Management District's 20022 Air Quality Management Plan, CalEEMod, and the Air Quality and Greenhouse Gas Technical Report Analysis prepared by Impact Sciences, Inc. (See Appendix A).*** **Less Than Significant Impact.** As part of its enforcement responsibilities, the U.S. Environmental Protection Agency (U.S. EPA) requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date. Drafted by the SCAQMD, the 2022 Air Quality Management Plan (AQMP) was developed in coordination with the California Air Resources Board (CARB), SCAG, and the U.S. EPA to establish a program of rules and regulations to reduce air pollutant emissions to achieve California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The AQMP's pollutant control strategies are based on SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's 1993 CEQA Air Quality Handbook, and include the following: • **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of an existing air quality violation, 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. 2**: The Project will not exceed the assumptions in the AQMP, or increments based on the years of the Project build-out phase.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
With respect to the first criterion, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may contribute to the attainment of applicable air quality standards within the SCAB. Construction-related emissions would be temporary in nature, lasting only for the duration of the construction period, and would not have a long-term impact on the region's ability to meet state and federal air quality standards. Furthermore, the development projects resulting from implementation of the Project will be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the Project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. By meeting SCAQMD rules and regulations, future construction activities will be consistent with the goals and objectives of the AQMP to improve air quality in the SCAB. Also discussed herein, the Project would not result in construction or operational air quality emissions that exceed the SCAQMD thresholds of significance. Thus, the Project will not result in an increase in the frequency or severity of an existing air quality violation, 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. And, as discussed in more detail herein, projects, land uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. Thus, the Project would be consistent with the first criterion. With respect to the second criterion, the AQMP was prepared to achieve national and state air pollution standards within the region. A project that is considered to be consistent with the AQMP would not interfere with the attainment of AQMP goals because the growth from the Project is included in the regional projections used to formulate the AQMP. The Project proposes to consolidate three parcels and develop 117 multifamily units. Based on the City's average household size of 3.06 persons per household, the Project would introduce up to 358 residents. Conservatively assuming that all 358 Project-generated residents relocate from outside of the City, potential population growth associated with the Project would represent less than one percent of the City's 316,690 persons. Population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. The Southern California Association of Governments (SCAG) growth forecasts estimate the City's population to reach 387,300 persons by 2050, representing a total increase of 70,610 persons. The Project's potential maximum increase of 358 persons would represent less than one percent of the City's projected population increase between 2024 and 2050. Thus, the potential increase in population resulting from the Project would be nominal. Further, two of the three parcels within the Project Site currently have a land use designation of Medium Density Residential (MDR), which allows a maximum population density of 18.6 persons per acre. Under the Project, a General Plan Amendment and a rezone is requested to re-designate two parcels of the Project Site to High Density Residential (HDR) and rezoned to R-3-1500, which has an allowed maximum population density of 87 persons per acre. As discussed, the Project would introduce up to 358 new residents, which would result in a population density of 80 people per acre. It is acknowledged that the Project would increase the Project Site's overall population density compared to the planned population density for the Project Site under the General Plan. However, given that one of the three existing parcels is currently designated as HDR and would allow for an on-site density of 77 persons per acre, this increase would not induce substantial unplanned population growth. Additionally, the Project is supportive of the City's Regional Housing Needs Assessment (RHNA) growth need for 7,394 above moderate-income units. Thus, the Project is also consistent with the second criterion. As the Project is consistent with Criterion Nos. 1 and 2, it would not conflict with or obstruct implementation of any applicable air quality plan, and this impact is less than significant.				
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

3b. Response: ***Source: SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 20022 Air Quality Management Plan, CalEEMod, and the Air Quality and Greenhouse Gas Technical Report Analysis prepared by Impact Sciences, Inc. (See Appendix A).***

Less Than Significant Impact. For purposes of this analysis, it is estimated that the Project would be constructed in approximately 18 months, with construction beginning in mid-2024 and project operations commencing in 2025.[2] While construction may begin at a later date and/or take place over a longer period, these assumptions represent the earliest and fastest build-out potential, resulting in a worst-case daily impact scenario for purposes of this analysis. This analysis assumes construction would be undertaken with the following primary construction phases: (1) Demolition, (2) Grading and Foundations, and (3) Structural Building and Finishing.

Demolition and removal of existing debris would occur for approximately one month. This phase would include the demolition of the three existing buildings (approximately 4,287 square feet of demolition). Grading and foundation preparation would occur for approximately 3.5 months, and this analysis assumes cut/fill operations would balance soil on site and no soil import or export would be required. Building construction would occur for approximately 13.5 months and would include the construction of the proposed structures, connection of utilities, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. Paving and architectural coatings would take place concurrently during the final month of building construction.

The analysis of regional daily construction emissions has been prepared utilizing the CalEEMod computer model recommended by the SCAQMD. Predicted maximum daily construction-generated emissions for the Project are summarized in **Table 3, Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day.** These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as specified by SCAQMD Rule 403 (Fugitive Dust). Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes; applying soil binders to uncovered areas; reestablishing ground cover as quickly as possible; utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site; and maintaining effective cover over exposed areas. In addition, these calculations assume construction activities would be consistent with SCAQMD Rule 1113 (Architectural Coatings), which regulates the amount of VOC per liter of coating. As shown in **Table 3**, the peak daily emissions generated during the construction of the Project would not exceed any of the regional emission thresholds recommended by the SCAQMD. Therefore, Project construction would not result in a cumulatively considerable net increase of any criteria air pollutant for which the Project region is in nonattainment under an applicable federal or state ambient air quality standard.

Table 3
Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day

Construction Year	ROG	NOx	CO	SO_2	PM10	PM2.5
2024	1.84	17.1	18.0	0.02	3.71	2.10
2025	57.2	13.9	22.7	0.03	2.15	0.87
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

Source: Impact Sciences August 2023. See Appendix A to this Initial Study. Emissions shown are the highest daily from either the summer or winter season.

Note:

1. Project emissions account for the reductions from SCAQMD Rule 403 (Fugitive Dust).

2. It is acknowledged that construction would begin at a later date than analyzed. However, because air quality emission factors improve (i.e., emissions decrease) each year into the future, the emissions estimated herein present a worst-case analysis.

Regional Operational Significance Analysis

Project-generated emissions would be associated with motor vehicle use, energy use, and area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, consumer cleaning products, and architectural coatings associated with the operation of the Project. The operational emissions from the Project were

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

calculated with CalEEMod, and the operational emissions were compared against SCAQMD regional thresholds to determine Project significance. Long-term operational emissions attributable to the Project are summarized in **Table 4, Long-Term Operational Emissions – Maximum Pounds per Day**. As shown, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD.

Table 4
Long-Term Operational Emissions – Maximum Pounds per Day

Source	ROG	NOx	CO	SO_2	PM10	PM 2.5
Mobile Source	2.57	2.26	18.9	0.04	3.77	0.95
Area Source	5.07	0.06	6.62	<0.01	<0.01	0.98
Energy Use	0.02	0.38	0.16	<0.01	0.03	0.03
Total	*7.66*	*2.70*	*25.68*	*0.06*	*3.81*	*1.96*
Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

*Source: Impact Sciences, August 2023. See **Appendix A** to this Initial Study.*
Note: It is acknowledged that construction would begin at a later date than analyzed. However, because air quality emission factors improve (i.e., emissions decrease) each year into the future, the emissions estimated herein present a worst-case analysis.

As shown in **Table 3** and **Table 4**, the Project's construction and operational emissions would not exceed the SCAQMD's thresholds for any criteria air pollutants. Thus, the Project would also not result in a cumulatively considerable net increase of any criteria air pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard. These impacts are less than significant.

Air Quality Health Impacts

On December 24, 2018, the California Supreme Court published its opinion in *Sierra Club et al. v. County of Fresno et al.* (Case No. S219783), which determined that an environmental review must adequately analyze a project's potential impacts and inform the public how its bare numbers translate to potential adverse health impacts or explain how existing scientific constraints cannot translate the emissions numbers to the potential health impacts.

Criteria air pollutants are defined as those pollutants for which the federal and state governments have established air quality standards for outdoor or ambient concentrations to protect public health. The national and state ambient air quality standards have been set at levels to protect human health with a determined margin of safety.[3] As discussed previously, the Basin is in state non-attainment for PM2.5, PM10, and Ozone (O_3) and federal non-attainment for PM2.5 and O_3. Therefore, an increase in emissions of particulate matter or ozone precursors (ROG and NOx) has the potential to push the region further from reaching attainment status, and, as a result, these pollutants are the greatest concern in the region. As noted in **Table 3** and **Table 4** above, the Project will emit criteria air pollutants during construction and operation**.** However, the Project will not exceed SCAQMD thresholds for ozone precursors (ROG and NOx), PM2.5, PM10, or any other criteria air pollutants, and will not result in a cumulatively significant impact for which the region is in non-attainment. Thus, with respect to the Project's increase in criteria pollutant emissions, the Project would not have the potential to cause significant air quality health impacts.

[2] It is acknowledged that construction activities for the Project would begin at a later date than analyzed. However, because air quality emission factors improve (i.e., emissions decrease) each year into the future, the emissions estimated herein present a worst-case analysis.

[3] SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

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

3c. Response: ***Source: SCAQMD Localized Significance Thresholds, South Coast Air Quality Management District's 20022 Air Quality Management Plan, CalEEMod, and the Air Quality and Greenhouse Gas Technical Report Analysis prepared by Impact Sciences, Inc. (See Appendix A).***

Less Than Significant Impact.

Localized Construction Significance Analysis

As detailed in the methodology section of **Appendix A** of this Initial Study, the SCAQMD has developed localized significance thresholds (LST) for construction areas that are one, two, and five acres in size to simplify the evaluation of localized emissions. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the applicable federal or State ambient air quality standard. LSTs are provided for each source receptor area (SRA) and various distances from the source of emissions. The closest air quality sensitive receptors are single-family residences located adjacent to the Project Site.

In the case of this analysis, the Project Site is located within SRA 23 – Metropolitan Riverside County with sensitive receptors (residences) adjacent to the Project Site. As the Project Site is approximately 4.54 acres, LSTs for a 4.54-acre site in SRA 23 with sensitive receptors located within 25 meters were calculated per SCAQMD Linear Regression Methodology and utilized to address the potential localized NOx, CO, PM10, and PM2.5 impacts. As shown in **Table 5, Localized Significance of Construction Emissions – Maximum Pounds per Day**, the Project would not exceed any of the identified localized thresholds of significance during construction. Therefore, the Project's construction would not expose sensitive receptors to substantial air pollutant concentrations and these impacts would be less than significant.

Table 5
Localized Significance of Construction Emissions – Maximum Pounds per Day

Construction Phase	NOx	CO	PM10	PM2.5
Demolition	**12.80**	**11.30**	**0.73**	**0.53**
SCAQMD Localized Thresholds	*255.17*	*1,471.92*	*12.11*	*8.57*
Grading/Foundation Preparation	**17.00**	**16.90**	**3.55**	**2.06**
SCAQMD Localized Thresholds	*255.17*	*1,471.92*	*12.11*	*8.57*
Building Construction	**13.47**	**15.89**	**0.56**	**0.52**
SCAQMD Localized Thresholds	*255.17*	*1,471.92*	*12.11*	*8.57*
Exceed?	***No***	***No***	***No***	***No***

Source: Impact Sciences, July 2023. See ***Appendix A*** *to this Initial Study.*

Notes: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. SCAQMD's Linear Regression method was applied to the LSTs for a 4.54-acre site with a receptor distance of 25 meters in SRA 23. The building construction emission total includes architectural coating and paving emissions.

Localized Operational Significance Analysis

Because the LST methodology is applicable to projects where emission sources occupy a fixed location, the LST methodology would typically not apply to the operational phase of a primarily residential project because emissions for these projects are primarily generated by mobile sources traveling on local roadways over generally large distances or areas. LSTs would apply to the operational phase of a project if the project includes stationary sources

or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology applies to operational projects such as warehouse/transfer facilities.[4] As the Project would not include warehouse or transfer facilities, an operational analysis against the LST methodology is not directly applicable to the Project. Nevertheless, **Table 6, Localized Significance of On-Site Operational Emissions – Maximum Pounds per Day**, has been included to illustrate the potential on-site emissions during Project operation. As shown in **Table 6**, the Project would not exceed any of the identified localized thresholds of significance. Therefore, the Project's operation would not expose sensitive receptors to substantial air pollutant concentrations, and these impacts would be less than significant.

Table 6
Localized Significance of On-Site Operational Emissions – Maximum Pounds per Day

Emissions Source	NOx	CO	PM10	PM2.5
Area Sources	0.06	6.62	<0.01	<0.01
Energy Demand	0.36	0.16	0.03	0.03
Total On-Site Emissions	**0.42**	**6.78**	**0.04**	**0.04**
SCAQMD Localized Thresholds	*255.17*	*1471.92*	*3.70*	*1.84*
Exceed?	***No***	***No***	***Yes***	***No***

Source: Impact Sciences, August 2023. See **Appendix A** *to this Initial Study.*

The Project would not result in potentially significant CO "hot spots" and a Project-specific CO hotspots analysis is not required to reach this conclusion. It has long been recognized that CO exceedances ("hot spots") are caused by vehicular emissions, primarily when idling at intersections. Vehicle emissions standards have become increasingly more stringent in the last twenty years. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations for the Project vicinity have historically met state and federal attainment status for the air quality standards. Based on the measured concentrations, CO concentrations in SRA 23 are substantially below the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively. Impacts with respect to localized CO concentrations would be less than significant.

Diesel Particulate Matter

Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required for demolition, grading and excavation, building construction, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

In March 2015, the Office of Environmental Health Hazard Assessment (OEHHA) adopted revised guidelines that update previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The intent of the OEHHA 2015 guidance is to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of existing, new, or modified stationary sources. As the Project is not part of the Air Toxics Hot Spots Program and is considered an urban infill residential development consisting primarily of mobile and area sources (i.e., non-stationary sources), the OEHHA 2015 guidance is not directly applicable.

[4] SCAQMD, *Sample Construction Scenarios for Projects Less than Five Acres in Size*, February 2005, page 1-3.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodology for conducting health risk assessments is associated with long-term exposure periods (9, 30, and 70 years). Therefore, short-term construction activities would not be expected to generate a significant health risk. Furthermore, the Project Site is approximately 4.54 acres. Generally, construction for projects contained in a site of such size represents less than significant health risks due to limitations of the off-road diesel equipment able to operate. When compared to larger sites, smaller sites such as the Project would generally result in reduced DPM emissions, reduced dust-generating ground-disturbance, and reduced duration of construction activities. Furthermore, construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five (5) minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities would not be expected to expose sensitive receptors to substantial amounts of air toxics, and these impacts would be less than significant.				
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐
3d. Response: ***Source: Air Quality and Greenhouse Gas Technical Report Analysis prepared by Impact Sciences, Inc.*** **Less Than Significant Impact.** The SCAQMD CEQA Air Quality Handbook (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The Project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts on existing adjacent land uses would be short-term and not substantial. As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.				
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
4a. Response: ***Source: Biological Resources Assessment-Mikasa Multifamily Development City of Riverside, Riverside County, California, Bargas, September 2023 prepared by Bargas Environmental Consulting (****see* ***Appendix B, Biological Resources Assessment)*** **Less than Significant Impact.** The Project Site is fairly disturbed with three single-family residences, two mobile homes, and four storage sheds. The Project Site is also located in a suburban area of the City of Riverside with ornamental vegetation. According to the *Biological Resource Assessment* (BRA) prepared for the Project (see **Appendix B**), there are seven special-status plant species and seven special-status wildlife species that have the potential to occur in the Project's Regional Study Area (which consists of the Project Site and a three-mile buffer). Of the 14 identified special-status species, the Southwestern Willow Flycatcher (*Empidonax traillii extimus*) was determined to have a low potential to occur within the Project Site. The remaining 13 species were determined to				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
have no potential to occur on-site. However, the BRA concluded that the Project would not provide suitable habitat for any special-status plant or wildlife species. As such, the Project would result in less than significant impacts.				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
4b. Response: ***(Source: Biological Resources Assessment-Mikasa Multifamily Development City of Riverside, Riverside County, California, Bargas, September 2023, prepared by Bargas Environmental Consulting [****see Appendix B, Biological Resources Assessment])*** **Less than Significant Impact.** The Project Site is fairly disturbed with three single-family residences, two mobile homes, and four storage sheds. The Project Site is also located in a suburban area of the City of Riverside with ornamental vegetation. According to the *Biological Resource Assessment* (BRA) prepared for the Project (see **Appendix B** to this Initial Study), there are seven special-status plant species and seven special-status wildlife species that have the potential to occur in the Project's Regional Study Area (which consists of the Project Site and a three-mile buffer). Of the 14 identified special-status species, the Southwestern Willow Flycatcher (*Empidonax traillii extimus*) was determined to have a low potential to occur within the Project Site. The remaining 13 species were determined to have no potential to occur on-site. However, the BRA concluded that the Project would not provide suitable habitat for any special-status plant or wildlife species. As such, the Project would result in less than significant impacts.				
c. Have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
4c. Response: ***(Source: United States Fish and Wildlife, Wetlands Mapper)*** **No Impact:** According to the U.S. Fish and Wildlife, there are no federally protected wetlands identified on site. As such, no impacts would occur				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
4d. Response: ***(Source: MSHCP, General Plan 2025, Figure OS-7, MSHCP Cores and Linkage; Biological Resources Assessment, Mikasa Multifamily Development City of Riverside, Riverside County, California, Bargas, September 2023, prepared by Bargas Environmental Consulting [see Appendix B, Biological Resources Assessment])*** **Less than Significant Impact.** According to the BRA, the Project Site is not located within an identified wildlife corridor or movement corridor. The closest wildlife movement corridor to the Project Site is the Santa Ana River mainstream, located approximately two miles north. Due to this distance and the intervening urban environment between both areas, the Project Site would not impact the wildlife movement in this corridor. As discussed in **Section 2.0**, **Project Description**, the Project would remove nine existing trees on-site. According to the BRA, there is a moderate chance that some migratory birds may nest in the vegetation in the area. As such, the Project Applicant would need to comply with all applicable requirements of the Migratory Bird Treaty Act (MBTA). The Project would also implement all applicable BMPs outlined in the MSHCP. The Project Applicant would be required to follow California Department of Fish and Wildlife (CDFW) guidelines, and if construction is proposed during breeding/nesting season for migratory birds (typically February 15 through August 31), the Project Applicant shall retain a qualified biologist to conduct a pre-construction survey for any nests prior to construction. In the event that a nest is discovered, the Project Applicant would follow CDFW and MSHCP protocol, minimizing				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
impacts to the nests. Compliance with these regulations would ensure that the Project does not interfere with the movement of any migratory birds that may be present, and impacts would be less than significant.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
4e. Response: ***(Source: General Plan-Open Space and Conservation Element)*** **Less than Significant Impact.** Vegetation removal associated with the Project would involve the removal of nine on-site trees. However, these trees are not located within the City's right-of-way (ROW) and are located within private property. Furthermore, the City does not have an adopted tree ordinance, and the Project would be consistent with the City's General Plan policies pertaining to native wildlife protection. Therefore, implementation of the Project would not conflict with any local policies or ordinances protecting biological resources, and the Project would have a less than significant impact on local policies or ordinances protecting biological resources.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐
4f. Response: ***(Source: General Plan 2025, Figure OS-6, Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans [HCP]; Western Riverside County Multiple Species Habitat Conservation Plan [MSHCP])*** **Less than Significant Impact.** As discussed above, the Project Site is located within a predominantly developed and suburban area within the City. According to the City's General Plan, the Project Site is not located within the Stephens' Kangaroo Rat (SKR) Core Reserves and Other Habitat Conservation Plans (HCP). The Project is located within the planning boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). However, as a residential development located within an already developed area of the City, the Project would not conflict with the MSHCP, and the Project Applicant would follow all applicable protocols identified therein. As such, impacts would be less than significant.				
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☐	☐	☒
5a. Response: ***(Source: Cultural Resources Technical Report prepared by ASM Affiliates (October 2023)(****see Appendix C, Cultural Resources Technical Report)*** **No Impact. "**Historical Resources: are defined by CEQA as a resource that meets one or more of the following criteria: (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR); (2) is listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) is determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and State CEQA Guidelines Section 15064.5[a]). A "substantial adverse change" to a historical resource, according to PRC Section 5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired." A ***Cultural Resources Technical Report*** **(see Appendix C** to this Initial Study**)** was prepared for the Project Site. **Appendix C** provides the City of Riverside with the necessary information and analysis to determine, as mandated by CEQA, whether the Project would cause substantial adverse changes to any historical resources that may exist in or around the Project Site.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
A cultural resources records search, historical background research, and field survey were conducted for the Project. Each method of research included a review of the archaeological/historical background of each existing residency on-site. Results of the records search indicate that no archaeological or historic resources were identified within the Project Site. Further, the existing residencies are not listed, nor have they been determined individually eligible for listing, in the National Register of Historic Properties (NRHP). The Project Site's ineligibility for listing in the NHRP would also result in the site's ineligibility for listing in the CRHR. Furthermore, **Appendix C** determined that the existing on-site residencies are not eligible as a historical "Structure of Merit" pursuant to Title 20 (Cultural Resources Ordinance) of the City's Municipal Code. Nevertheless, the Project would not result in substantially adverse changes in the significance of a historical resource pursuant to Section 15064.5 and no impacts would occur.				
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☒	☐	☐

5b. Response: ***(Cultural Resources Technical Report prepared by ASM Affiliates [October 2023], AB52 and SB 18 Consultation, January 2024 through May 2024)***

Less Than Significant With Mitigation Incorporated. Appendix C determined that there are no previously documented archaeological resources that are present on-site. However, the Project Site could have unknown subsurface resources, and project-related construction could uncover previously undiscovered archaeological resources during earth-moving activities. Per the requirements AB 52 and SB 18, the City sent out initial letters of inquiry on January 12, 2024, to four tribal contacts who may have an interest in the Project Area (see **Appendix G, AB 52 and SB 18 Consultation, January 2024 through May 2024***)*. Tribal organizations subsequently provided various responses to the letter, with one organization (the Pechanga Band of Indians) requesting the provision of an archaeological and tribal monitor during Project construction (see **Section 18, Tribal Cultural Resources**, for additional detail).

Appendix C recommends that, if cultural or archaeological resources are encountered during ground-disturbing activities, work in the immediate area must halt, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology must be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work, such as data recovery excavation, may be warranted. Mitigation Measures **CUL-1 through CUL-4** would implement these recommendations. The City sent final memorandums to each organization on May 7, 2024, to confirm concurrence with implementing **Mitigation Measures MM CUL-1** through **MM CUL-4** to minimize impacts to tribal cultural resources, including archaeological resources. Additionally, as a Standard Condition of Approval, the Project would comply with State Law and adhere to the required procedures outlined in the State of California Health and Safety Code Section 7050.5 and Section 5097.98 of the California Public Resources Code in the event that human remains are encountered. As of May 2024, all tribal organizations have concurred that **Mitigation Measures MM CUL-1** through **MM CUL-4**, as well as the Standard Condition of Approval, would minimize potential impacts. Thus, impacts would be less than significant with mitigation incorporated.

MM CUL-1 Tribal Consultation

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 interested 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 CUL-2 Archaeological Monitoring

At least 30 days prior to the application for a grading permit, and before any grading, excavation and/or ground-disturbing activities take place, the Developer/Applicant shall retain a Secretary of Interior Standards qualified

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

archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project Archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the Project Site. Details in the plan shall include:
   a. Project grading and development scheduling;
   b. The development of a rotating or simultaneous schedule in coordination with the Developer/Applicant and the Project Archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project Archaeologists;
   c. The protocols and stipulations that the Applicant, tribes, and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;
   d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the Project Site; and
   e. The scheduling and timing of the Cultural Sensitivity training noted in mitigation measure **MM CUL-4**.

MM CUL-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 the 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. 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 to be thoroughly inventoried with tribal monitor oversight of the process; 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. 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 cataloging and basic recordation have been completed;
   b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
   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 Riverside Metropolitan Museum 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

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

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 interested tribes.

MM CUL-4 Worker's Environmental Awareness Program (WEAP) 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 conduct mandatory Worker's Environmental Awareness Program (WEAP) training to all construction grading personnel. The training will include a brief review of the cultural sensitivity of the Project and the surrounding area, summarize and show examples of the types of resources that could be identified during earthmoving activities and provide notification protocols to be followed in the event suspected cultural resources are identified. Safety protocols would also be discussed to ensure the safety of the monitors and construction crew. 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.

Standard Condition of Approval

A standard condition of approval will include the following – consistent with State Law:

Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. No photography of any human remains shall be taken, unless directed by the Riverside County Coroner. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

Incorporation of the above mitigation measures and the Standard Condition of Approval would reduce impacts to less than significant levels.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

5c. Response: ***(Cultural Resources Technical Report prepared by ASM Affiliates (October 2023))***

Less Than Significant Impact. No dedicated cemetery exists on or within the vicinity of the Project Site. As the Project Site has been subject to past subsurface disturbance associated with grading and foundations, it is not anticipated that intact human remains would be encountered during construction activities. However, in the event that human remains are encountered, those remains would require proper treatment, in accordance with the State of California Health and Safety Code Section 7050.5. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would also be implemented. With adherence to existing State laws and the Standard Condition of Approval outlined above, impacts related to the disturbance of any previously unknown human remains would be less than significant.

6. ENERGY

Would the project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

6a. Response: City's Municipal Code, Title 24, California Green Building Standards Code

Less Than Significant Impact. Neither federal nor State law nor the State CEQA Guidelines establishes thresholds that define when energy consumption is considered wasteful, inefficient, and unnecessary. Compliance with Title 24 Energy Efficiency Standards would result in energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. For example, energy would be required to transport people and goods to and from the project site. Energy use is discussed based on the anticipated use type below.

Construction

Construction activities would include the consumption in the form of gasoline and diesel fuel in order to power construction worker vehicle trips, hauling and materials delivery truck trips, and operation of construction equipment. Energy in the form of electricity may also be consumed by some pieces of construction equipment, such as power tools, lighting, etc.; however, the amount of consumed electricity would be relatively minimal. Indirect energy use would include the energy required to make the materials and components used in construction.

Construction equipment would be maintained to applicable standards, and construction activities and associated fuel consumption and energy use would be temporary and typical of construction sites. The Project Applicant would use fuel-efficient equipment consistent with State and federal regulations, such as the fuel efficiency regulations outlined in Title 24, Assembly Bill 32 (AB 32), which regulates energy resources and fuel consumption and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. It is also reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, construction activities associated with the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational

The Project includes the development of luxury villas that would include 15 multifamily buildings, containing 117 dwelling units, a community hall, gym, pool, spa, and tot lot/play area. The Project would comply with the mandatory requirements set forth in the California Green Building Standards Code (CBSC) related to energy efficiency, water efficiency and conservation, and material conservation and resource efficiency for new non-residential buildings. Additionally, Riverside Public Utilities is required to comply with the State's Renewables Portfolio Standard, mandating that investor-owned utilities, electric service providers, and community choice aggregators must meet a 33 percent total procurement of eligible renewable energy resources by 2020 and 60 percent total procurement by

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2030. This ensures that a portion of the electricity consumed during project operations would be generated from renewable resources. Energy would also be consumed as a result of vehicle trips. Thus, Project operations would result in an increase in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The majority of the Project's vehicle fleet would consist of light-duty automobiles and light-duty trucks, which are subject to state fuel efficiency standards, such as the Low Carbon Fuel Standard (LCFS) and Low-Emission Vehicle Program Standards. The Low Carbon Fuel Standard, in part, aims to reduce fuel consumption and providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets the LCFS carbon intensity standards for each annual compliance period.				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
6b. Response: City of Riverside Restorative Growthprint, California Green Building Standards Code, Title 24, Part 6 of the California Code of Regulations; California Building Code and Energy Code The Project would be designed to comply with the California Green Building Standards Code; Title 24, Part 6 of the California Code of Regulations; California Building Code and Energy Code standards, as applicable to the type of use being developed on site. The Project would also comply with measures that are presented in the Riverside Restorative Growthprint by implementing different design elements that increase energy efficiency. The measures and how the Project will comply are presented below: • **Measure E-2: Shade Trees.** The applicant of the Project has prepared a Landscape Plan for the site, which includes multiple trees and palms that would provide shade throughout the site. • **Measure SR-3: Utility Programs.** The Project would be designed to support the City's utility programs to promote energy efficiency and the use of renewable energy. • **Measure T-6: Density.** The Project is proposing to amend the current general plan designation for parcels 143-040-10 and 143-040-11 from MDR to HDR; the Project also includes a request to rezone these parcels from R-1-7000 to R-3-1500. The rezone and general plan amendment will increase the density on the site and promote density goals of the City. **Measure T-14: Neighborhood Electric Vehicle Programs.** The Project includes EV charging infrastructure within the first floor of the apartment buildings. • **Measure W-1: Water Conservation and Efficiency.** The Project would comply with the California Green Building Standards Code through implementation of fixture flow rates, standards for plumbing fixtures and fittings, and automatic irrigation systems utilizing weather and/or soil moisture-based irrigation controllers. Based on the Project design features, the Project would not conflict with or obstruct a State or local plan related to renewable energy or energy efficiency. Direct, indirect, or cumulative Project impacts would be less than significant.				
7. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
7.a.i. Response: (*Source: General Plan 2025 FPEIR, Figure 5.6-2, Faults and Fault Zones)* **Less Than Significant Impact.** Seismic activity is to be expected in Southern California. In the City of Riverside, there are no Alquist-Priolo zones. The Project Site does not contain any known fault lines, and the				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
potential for fault rupture or seismic shaking is low. Compliance with the California Building Code regulations will ensure that impacts related to strong seismic ground will be reduced to less than significant levels.				
ii. Strong seismic ground shaking?	☐	☐	☒	☐
7.a.ii. Response: ***(Source: General Plan 2025 FPEIR, Figure 5.6-2, Faults and Fault Zones)*** **Less Than Significant Impact.** The San Jacinto Fault Zone (approximately 14 miles northeast of the Project Site), located in the northeastern portion of the City, or the Elsinore Fault Zone (approximately 5 miles south of the Project Site), located in the southern portion of the City's Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause intense ground shaking. Compliance with California Building Code regulations will ensure that impacts associated with strong seismic ground shaking will be reduced to less than significant impact levels.				
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
7.a.iii. Response: ***(Source: General Plan 2025, PS-2, Liquefaction Zones; General Plan 2025 FPEIR, Figure PS-3, Soils with High Shrink-Swell Potential)*** **Less Than Significant Impact.** The Project Site is located in an area with "high" potential for liquefaction per Figure 5.6-3, General Liquefaction Zones, of the GP 2025 FPEIR. Compliance with the California Building Code regulations will ensure that impacts related to seismic-related ground failure, including liquefaction, are reduced to less than significant impact levels directly, indirectly, or cumulatively.				
iv. Landslides?	☐	☐	☐	☒
7.a.iv. Response: ***(Source: General Plan 2025 FPEIR, Figure 5.6-1, Areas Underlain by Steep Slope)*** **No Impact.** The Project Site and its surroundings have generally flat topography and are not located in an area prone to landslides, per Figure 5.6-1 of the General Plan 2025 FPEIR. Therefore, there will be no impact related to landslides directly, indirectly, or cumulatively.				
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
7b. Response: ***(Source: General Plan 2025 FPEIR, Figure 5.6-1, Areas Underlain by Steep Slope, Figure 5.6-4, Soils, Table 5.6-B, Soil Types; Title 18, Subdivision Code; Title 17, Grading Code; and SWPPP)*** **Less Than Significant Impact.** Erosion and loss of topsoil could occur as a result of the Project. State and Federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The Project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. Implementation of the required erosion control standards (Title 18) and Grading Code (Title 17) would minimize soil erosion. Furthermore, the Project would install an on-site storm drain system with modular wetland systems and stormwater collection chambers. The proposed on-site drainage system, as well as compliance with State and Federal requirements, as well as with Titles 18 and 17 will ensure that soil erosion or loss of topsoil will have a less than significant impact.				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
7c. Response: ***(Source: General Plan 2025 FPEIR, Figure 5.6-4, Soils, Table 5.6-B, Soil Types)*** **No Impact.** The Project is not located on a geologic unit or soil that is unstable and will not cause soil to become unstable, as the Project does not involve development, grading activities, or structures. As such, the Project will have no impact resulting in a geologic unit or soil becoming unstable, resulting in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
7d. Response: ***(Source: General Plan 2025 FPEIR, Figure 5.6-4, Soils, Table 5.6-B, Soil Types, Figure 5.6-5, Soils with High Shrink-Swell Potential)*** **No Impact.** The Project is located on a site that does not have expansive soils, and therefore, there will be no impact.				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
7e. Response: ***(Source: General Plan 2025 FPEIR, Figure 5.6-4, Soils, Table 5.6-B, Soil Types)*** **No Impact.** The Project will be served by sewer infrastructure and will not include the use of septic tanks or alternative waste water disposal systems. Therefore, the Project will have no impact**.**				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
7f. Response: (*Source: General Plan 2025, Policy HP-1.3, Cultural Resources Report)* **Less than Significant Impact.** Activities, including construction-related and earth-disturbing actions, could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in *State CEQA Guidelines* Section 15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact. A cultural resources survey prepared by ASM has determined that the Project has no historical resources as defined by CEQA(neither archaeological nor built environment) within the Area of Potential Impacts (API) and.is consistent with General Plan Policy HP-1.3 including compliance with the Federal Native American Graves Protection and Repatriation Act, and as such the Project will have a less than significant impact to a unique paleontological resource or site or unique geologic feature.				
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
8a. Response: (*Source: the Air Quality and Greenhouse Gas Technical Report Analysis prepared by Impact Sciences, Inc. [see Appendix A, Air Quality and Greenhouse Gas Technical Report]).* **Less than Significant.** Section 15064.4(a) of the *State CEQA Guidelines* states, in part, that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas (GHG) emissions resulting from a project. The Project would generate GHG emissions during temporary, short-term construction activities such as demolition, grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the site, asphalt paving, and construction worker motor vehicle trips. With the use of CalEEMod, GHG emissions associated with Project construction were calculated from off-road equipment usage, hauling vehicles, delivery, and worker trips to and from the site. According to CalEEMod calculations, the total GHG construction emissions would be approximately 200 MT CO_2e for 2024 and 377 MT				

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

CO_2e for 2025, totaling approximately 577 MT CO_2e.[5] However, these emissions would be temporary in nature and would represent a small portion of a Project's lifetime GHG emissions. As GHG emissions from construction activities would occur over a relatively short time span, they would contribute a relatively small portion of the lifetime GHG emission impact of the Project. The total construction GHG emissions were divided by 30 years to determine an annual construction emission rate to be amortized over the Project's first 30 years of operations, consistent with SCAQMD recommendations. Amortized over a 30-year period, the Project is anticipated to emit approximately 19 metric tons of carbon dioxide per year (MT CO_2e/year).

The operations of the Project would generate GHG emissions from mobile sources (vehicles traveling to and from the Project Site), the usage of energy, water, and the generation of solid waste and wastewater. Emissions of operational GHGs are shown in **Table 7, Project Greenhouse Gas Emissions**. As shown, the GHG emissions generated by the Project would be approximately 1,106 CO_2e MTY.

As discussed previously, the SCAMQD Draft Threshold (Tier 3) identified a screening threshold of 3,000 $MTCO_2e$/year for non-industrial projects. As the Project would generate approximately 1,106 $MTCO_2e$/year, the Project would be below the SCAQMD's draft threshold. This quantified illustration of the Project's scope of GHG emissions is provided for informational purposes, and significance under CEQA is based on the Project's consistency with statewide and regional policies and plans to meet the state reduction goals set in AB 32, SB 32, and AB 1279 as outlined in CARB's 2022 Scoping Plan, SCAG's Connect SoCal 2024 RTP/SCS, and the City's Climate Action Plan (also known as the RRG).

Table 7
Project Greenhouse Gas Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)
Construction Emissions	19.00
Mobile Sources	687.00
Area Sources	2.02
Energy Sources	349.00
Water Sources	22.10
Waste Sources	27.00
Refrigerants	0.23
Total GHG Emissions	**1,106.35**

*Source: Impact Sciences, Inc. August 2023. See **Appendix A** to this Initial Study for CalEEMod data.*
Note: It is acknowledged that construction will begin at a later date than analyzed. However, because air quality and GHG emission factors improve (i.e., emissions decrease) each year into the future, the emissions estimated herein present a worst-case analysis.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

8b. Response: ***(Source: Impact Sciences, Inc.)***

Less Than Significant Impact. Pursuant to Appendix A of the *State CEQA Guidelines*, a significant GHG impact is identified if a Project could conflict with applicable GHG reduction plans, policies, or regulations. The relevant adopted regulatory plans and regulations include AB 32, SB 32, AB 1279 (through consistency with CARB's 2022 Scoping Plan), SCAG's Connect SoCal 2024 Plan, and the City's RRG (CAP). As shown in **Appendix A** of this

[5] It is acknowledged that construction activities for the Project would begin at a later date than analyzed. However, because air quality and GHG emission factors improve (i.e., emissions decrease) each year into the future, the emissions estimated herein present a worst-case analysis.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Initial Study, the Project is consistent with the RRG, AB 32, SB 32, AB 1279, the 2022 Scoping Plan, and the SCAG RTP/SCS, and impacts would be less than significant.				
9. HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

9a. Response: ***(Source: Impact Sciences, Inc.)***

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials could potentially occur through improper handling or use of hazardous materials or hazardous wastes during routine use, disposal, and/or transport of hazardous materials. The severity of these potential effects varies with the activity conducted, the concentration and type of hazardous materials or wastes present, and the proximity of sensitive receptors.

Operating as a multifamily residency, the Project would not involve the handling, use, or transport of hazardous materials or hazardous wastes. However, limited amounts of some hazardous materials could be used in the short-term construction phase of the Project, including standard construction materials (e.g., paints and solvents), vehicle fuel, and other hazardous materials, and could expose construction workers and the general public. In the event of a release of hazardous material, the Project would be required to notify the following State agencies under the following State statutes, respectively:

- Department of the California Highway Patrol: California Vehicle Code Section 23112.5;
- Office of Emergency Services and the California Public Utilities Commission: Public Utilities Code Section 7673, (PUC General Orders #22-B, 161);
- State Fire Marshal: Government Code Sections 51018
- Office Emergency Services: Water Codes Sections 13271, 13272; and
- Division of Occupational Safety and Health (Cal/OSHA): California Labor Code Section 6409.1 (b)10.

With compliance to these regulations, impacts related to the routine transport, use or disposal of hazardous materials would be less than significant.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

9b. Response: ***(Source: State Water Resources Control Board. Geotracker, Department of Toxic Substances Control, Envirostor, Historic Aerials. 4618 Jones Avenue, 4705 Hedrick Avenue, and 4663 Hedrick Avenue Aerials-1950, City of Riverside Community & Economic Development Department Building & Safety Division.)***

Less Than Significant Impact. The Project includes the demolition of three single-family homes, two mobile homes, and four storage sheds. Project operations would not contribute to conditions that could cause a reasonably foreseeable release of hazardous materials. Construction equipment utilized during construction activities associated with the Project could result in accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. However, the level of risk associated with this type of accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction.

According to the State Water Resources Control Board (SWRCB) and the Department of Toxic Substances Control (DTSC), there are no reported cases of soil, soil vapor, or groundwater contamination on-site. However, the existing buildings on-site were constructed prior to the year 1960. Given their approximate age, there is potential for asbestos-containing materials (ACMs) and lead-based paint (LBP), as well as other potential hazardous materials, to be present in association with the building materials of this structure. As such, demolition of these structures could potentially expose construction personnel to ACMs or LBPs. Demolition activities that could potentially result in the release of

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ACMs or LBPs would be required to be conducted in accordance with the U.S. EPA's National Emission Standards for Hazardous Air Pollutants. These standards mandate that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition. The Project would also follow California Code of Regulations Title 8, Section 1532 requirements in disposing of and handling all LBP discovered during demolition. Furthermore, the Project Applicant would be required to follow City requirements and survey the Project Site for ACMs or LBPs prior to obtaining a demolition permit. Prior to being issued a demolition permit, the Project Applicant would be required to submit a Demolition Disclosure form to the City that affirms Project compliance with SCAQMD regulatory requirements. Accordingly, compliance with applicable federal, state, and local regulations regarding the abatement and disposal of hazardous materials would ensure impacts would be less than significant.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
9c. Response: ***(Source: Impact Sciences, Inc.)*** **Less Than Significant Impact.** The nearest existing school to the Project Site is Myra Linn Elementary School, located approximately 0.21 miles east of the Project Site at 10435 Branigan Way. Given the number of residential uses within the surrounding area, it is unlikely that a new school would be sited within the immediate vicinity of the Project Site. As discussed above, handling and disposal of hazardous materials is anticipated to be minimal and would be conducted in compliance with existing federal and state regulations. The demolition of the existing buildings on-site may result in the accidental release of ACMs and LBPs. However, due to the distance and number of intervening structures between the school and the Project Site, accidental exposure to the school is not anticipated. Project compliance with federal and state regulations would ensure these impacts would be less than significant.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
9d. Response: ***(Source: California Environmental Protection Agency. Cortese List Data Resources. https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/Riverside%20Municipal.pdf)*** **No Impact.** Government Code §65962.5 requires the Department of Toxic Substances Control (DTSC), State Department of Health Services, SWRCB, and California Integrated Waste Management Board to compile and annually update lists of hazardous waste sites and land designated as hazardous waste property throughout the state. The Project Site is not listed on any of the lists pursuant to Government Code §65962.5. As such, no impact would occur.				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
9e. Response: ***(Source: General Plan 2025, Figure PS-6, Airport Safety Zones and Influence Areas; RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan [1999])*** **No Impact.** The nearest airport to the Project Site is the Riverside Municipal Airport, located approximately 2.5 miles southwest of the Project Site. The Project Site is not located within the Riverside Municipal Airport influence area, nor is the Project located within a compatibility zone. Furthermore, under the proposed zone change, the Project would meet the City's design standards for the maximum building height of a High-Density Residential zone (see **Section 11, Land Use and Planning**) and would not cause a hazard to flights. As such, the Project would not result in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risk area, and no impact**s** would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

9f. Response: ***(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM's Strategic Plan)***

Less Than Significant Impact. The City of Riverside's Office of Emergency Management (OEM) administers a comprehensive all-hazards community-based emergency management program. The Project would provide single-family residential uses that would be permitted and approved in compliance with existing safety regulations, such as the California Building Code and Fire Code, to ensure that it would not conflict with implementation of an emergency evacuation.

As a residential use that is compatible in use with the site's immediate surroundings, Project operations are not anticipated to result in a physical interference with an emergency response evacuation. Construction activities associated with the Project would occur over a span of several months. Construction activities, including equipment and supply staging and storage, would largely occur within the Project Site and would not restrict access of emergency vehicles to the Project Site or adjacent areas. The Project would construct two new driveways along Jones Avenue and Frederick Avenue, resulting in temporary lane closures in each roadway. Since both roadways are collector streets and provide only one lane for vehicles to travel in each direction, emergency access to the Project Site and surrounding uses would be limited on each roadway. However, as a standard condition of project approval, the Project Applicant would be required to prepare and submit a Traffic Management Plan (TMP) to address the proposed traffic circulation for vehicles on roadways adjacent to the Project Site. Upon approval of the Project TMP, impacts would be less than significant.

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

9g. Response: ***(Source: General Plan 2025, Figure PS-7, Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002, Riverside Operational Area, Multi-Jurisdictional LHMP, 2004 Part 1/Part 2)***

No Impact. The Project Site is located within a developed area and is not adjacent to wildlands or located within an identified wildland fire hazard area. The Project would be implemented in compliance with the City Fire Code requirements, as included in Chapter 16.32 (Fire Prevention) of the City's Municipal Code. As such, the Project would not expose people or structures to a significant risk of loss, injury, or death from wildfires, and no impact would occur.

10. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

10a. Response: ***(Source: Clean Water Act, Section 402, SWRCB Order No. 2012-0006-DWQ, NPDES No. CAS000002, Project Specific Preliminary Water Quality Management Plan, (September 2023) (see Appendix D, Project WQMP)***

Less Than Significant Impact. Section 402 of the Clean Water Act (CWA) includes regulations established by the U.S. EPA under the National Pollutant Discharge Elimination System (NPDES) program to control direct stormwater discharges. In the State of California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The State Water Resources Control Board (SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality.

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

The City of Riverside is located in the Santa Ana Regional Water Quality Control Board (SARWQCB). Under the NPDES program, construction activities that disturb more than one acre of land would be required to obtain a Construction General Permit.

The majority of the Project Site is undeveloped and unpaved. Construction activities associated with the Project would include the demolition of existing structures on-site, and the excavation and grading of the paved and unpaved portions of the Project Site. As a result, waste discharge would occur and may consist of oil and grease, trash, heavy metals, and pathogens, as well as other pollutants. Further, construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Given that the Project Site is greater than one acre in size, the Project Applicant would be required to obtain coverage under the NPDES Construction General Permit. The Construction General Permit requires the project Applicant to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP is required for plan check and approval by the City of Riverside Public Works Department and would specify best management practices (BMPs) to be implemented during construction of the project to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality. Adherence to existing federal and regional requirements, as well as implementation of the appropriate Best Management Practices (BMPs) would ensure that the potential water quality degradation associated with the Project's construction activities would be minimized, and impacts would be less than significant.

The Project would construct 185,090 square feet of new multifamily apartment buildings within a Project Site that consists of 4,287 square feet of development. As such, the Project would generate an increase in runoff and stormwater pollution compared to existing conditions.

In accordance with the SWRCB Order No. 2012-0006-DWQ, NPDES No. CAS000002, the Project Applicant would also be required to incorporate the appropriate post-construction (or permanent) Low Impact Development (LID) site design, source control, and treatment control BMPs into the Project. The LID site design would minimize the polluting effects of new impervious surfaces and provide infiltration of runoff into landscaped areas. In compliance with Chapter 14.12.316 (Reduction of pollutants in stormwater), the Project Applicant has prepared the *Project Specific Preliminary Water Quality Management Plan* (see **Appendix D** to this Initial Study), which outlines the proposed on-site drainage system for the Project and outlines the project-specific BMPs that could potentially be used to off-set and treat stormwater runoff. According to **Appendix D,** the potential source control BMPs for the Project include, but are not limited to, drainage facility and maintenance operations, minimizing driveway widths, and irrigated landscaped areas. The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts and provide treatment control BMPs that would treat stormwater runoff. The Project's LID includes a new storm drainage system to help mitigate this increase in stormwater runoff on-site. The new stormwater drainage system would include two underground stormwater collection chambers that would capture on-site stormwater and runoff and would convey water to the modular wetland system (MWS) units for stormwater treatment. Upon filtration, water would then flow to two adjacent drainage sump pumps. From there, underground storm drainpipes would outflow the water into the City of Riverside's storm drain system.

In conclusion, the proposed on-site storm drainage system, adherence to state and local regulations, and implementing the appropriate BMPs would reduce the Project impacts on the existing water quality conditions and ensure that the Project would not violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters. As such, the impact would be less than significant.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

10b. Response: ***(Riverside Public Utilities. 2020 Urban Water Management Plan, Western Municipal Water District)***

Less than Significant Impact. The Project Site is located in the Arlington Groundwater Basin (Arlington Basin) and would be served by the Riverside Public Utilities (RPU) for domestic water supply. The RPU's water supply from 2016 to 2020 does not include groundwater from the Arlington basin. The Project Sist is specifically located within the Riverside-Arlington sub-basin (Riverside-Arlington Basin). Because the Riverside-Arlington Basin is not

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
adjudicated, a Groundwater Management Plan (GWMP) was developed, and currently, a Groundwater Sustainability Plan (GSP) is being prepared pursuant to the Sustainable Groundwater Management Act of 2014. The Riverside-Arlington Basin is not an adjudicated Basin and is not utilized by RPU. Rather, the Riverside-Arlington Basin is utilized by the Western Municipal Water District (WMWD). The WMWD has adopted the Arlington Basin Groundwater Management Plan to protect and improve the groundwater quality of the basin. As such, the Arlington GWMP is incorporated into the WMWD Urban Water Management Plan (UWMP). According to the WMWD UWMP, the Riverside-Arlington Basin has historically been degraded by elevated concentrations of TDS, nitrate, and other contaminants from industrial sources. As multifamily residences, the Project would not emit substantial concentrations of chemicals typically emitted from industrial sources. Furthermore, the Project would not include any land uses or facilities that would require groundwater extraction or have the capacity to substantially decrease groundwater supplies or recharge. Given the existing pervious surfaces of the Project Site, the Project would increase impervious surfaces. However, as discussed above, the Project Applicant would be required to comply with the SWRB Order No. 2012-0006-DWQ, NPDES No. CAS000002 and incorporate the appropriate LID site design, source control, and treatment control BMPs intended to provide for stormwater retention and infiltration. Furthermore, Project Operations would be consistent with the regional water quality standards as outlined above. Thus, it is not anticipated that the increase of impervious surface that would result from Project implementation would impede percolation of runoff into the groundwater basin underneath the Project area. The Project would not have the capacity to substantially interfere with groundwater recharge, such that there would be a decrease in aquifer volume or of the groundwater table level during long-term operations. As such, the Project's groundwater impact would be less than significant.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on or off-site?	☐	☐	☒	☐
10.c.i Response: ***(Clean Water Act – Section 402, Project Specific Preliminary Water Quality Management Plan prepared by G&G Engineering Inc [September2023])*** **Less than Significant.** Soil disturbance would temporarily occur during Project construction due to excavation and grading activities. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via storm water runoff from the Project Site. The Project would construct a new on-site storm drainage system to collect and drain on-site stormwater. According to **Appendix D**, the Project would implement the storm-drainage system would divide the Project Site into three drainage management areas (DMAs) and six sub-DMAs. Three sub-DMAs would be self-treating areas that would be self-retaining landscaped areas. Another three sub-DMAs would use bio-retention/bio-treatment BMPs to treat runoff. The Project would be subject to compliance with the requirements set forth in the NPDES Construction General Permit for construction activities. Compliance with the NPDES, including the preparation of an SWPPP, would reduce the volume of sediment-laden runoff discharging from the site. The implementation of BMPs would reduce the potential for sediment and storm water runoff containing pollutants from entering receiving waters. Furthermore, the Project Applicant would be required to implement a grading and erosion control plan. The grading and erosion control plan is required for plan check and approval by the City's Public Works Department, prior to provision of permits for the Project, and would include construction BMPs to reduce erosion or siltation. Therefore, Project implementation would not substantially alter the existing drainage pattern of the site during the construction process, such that substantial erosion or siltation would occur. The long-term operation of the proposed multifamily residential uses would not have the potential to result in substantial erosion or siltation on- or off-site. Furthermore, the Project would be required to comply with the SWRCB Order No. 2012-0006-DWQ, NPDES No. CAS000002 and incorporate the appropriate LID BMPs.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Furthermore, in compliance with Chapter 14.12.316 (Reduction of pollutants in stormwater) of the City's Municipal Code, the Project Applicant has prepared a WQMP. As such, long-term operational impacts would be less than significant.				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	☐	☐	☒	☐
10.c.ii Response: ***(Source: Federal Emergency Management Agency, Flood Rate Insurance Map # 06037C1700F, Project Specific Preliminary Water Quality Management Plan prepared by G&G Engineering Inc. (September2023) (see Appendix D, Project WQMP)*** **Less Than Significant Impact.** According to the Federal Emergency Management Agency's Flood Map Service Center, the Project Site is not located within a 100-year flood hazard area. The Project Applicant would collect stormwater on-site in accordance with SWRCB Order No. 2012-0006-DWQ, NPDES No. CAS000002, and incorporate the appropriate BMPs to minimize runoff. As stated, the Project Applicant would implement a grading and erosion control plan and prepare an SWPPP. The grading and erosion control plan and SWPPP are required for plan check and approval by the City's Public Works Department, prior to provision of permits for the Project, and would include construction BMPs to reduce erosion or siltation. In compliance with Section 14.12.316 of the City's Municipal Code, the Project Applicant has prepared a WQMP that outlines the collection and treatment of on-site stormwater runoff in accordance with the landscape and irrigation requirements outlined in Section 19.570.100 (Stormwater management and rainwater retention) of the City's Municipal Code. As such, impacts would be less than significant.				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
10.c.iii Response: ***(Source: Project Specific Preliminary Water Quality Management Plan, prepared by G&G Engineering, Inc [September2023])*** **Less Than Significant Impact.** Although the Project would result in an increase in impervious areas, the proposed stormwater system would collect on-site stormwater at the Project Site resulting in less runoff leaving the Project Site than the existing condition. Therefore, implementation of the Project is not expected to exceed the capacity of the City's existing/planned stormwater drainage systems. **Appendix D** of this document addresses the Project's potential water quality impacts. As such, impacts would be less than significant.				
iv. Impede or redirect flood flows?	☐	☐	☐	☒
10.c.iv No Impact. As stated, the Project Site is located outside of a 100-year flood hazard area and is located within an area identified as having little chance of flooding. Therefore, **no impacts** would occur.				
d. In floor hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
10d. Response: ***(Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality, California Department of Conservation)*** **No Impact.** As stated above, the Project Site is not located within a 100-year flood hazard area. The Project Site is located approximately 37.54 miles east of the Pacific Ocean, and, according to the California Department of Conservation, is located at a sufficient distance so as not to be subject to potential tsunami hazards. The Project Site is located approximately 4.9 and 7.2 miles from Lake Mathews and Lake Evans, respectively, and would not result in any risks to either lake. Furthermore, the Project Site is not located within any located in an area with potential for seiche and is relatively flat, which is not conducive for mudflows. As such, the Project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **No impact** would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

10e. Response:

Less than Significant Impact. The Basin Plan is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained. Accordingly, the Project's water quality impacts would be reduced through compliance with state, regional, and local regulations (See Response 10 [a]). Adherence to these regulations would reduce the Project's impacts to the water quality within the area, thereby minimizing its potential impacts to the Santa Ana River Basin. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

11. LAND USE AND PLANNING: Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

11a. Response:

No Impact. The Project would demolish three single-family residences, two mobile homes, and four storage sheds to develop 15 multifamily residential buildings. These buildings would be compatible in use with the surrounding properties. The Project would not introduce any new factors that could physically divide an established community, such as constructing major highways/roadways, storm channel, bridge, or utility transmissions. Therefore, no impacts would occur.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

11b. Response: ***(Source: General Plan, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code)***

Less Than Significant Impact.

City of Riverside General Plan

The Project proposes an amendment to the City's General Plan that would re-designate two parcels on-site from Medium Density (MDR) to a High Density Residential (HDR) land use designation. According to the City's General Plan, the HDR land use permits the development of row houses, senior housing, condominiums, and apartments. Development of multifamily clusters is also allowed under this land use designation. The maximum development density under this land use designation is 29 dwelling (du) per acre (ac). The Project would introduce up to 117 du on a 4.54 ac site, and thus, would have an approximate density of 25.78 du/ac. Therefore, the Project would not exceed the City's maximum density for HDR land uses.

According to the City's General Plan, the Project Site is located within the La Sierra Neighborhood Plan Area (La Sierra NPA). The La Sierra Community is a neighborhood that consists of a diverse set of land uses, such as industrial uses, residential uses, and public facilities. In addition to being home to so many different land uses, La Sierra plays an important role as the City's major western gateway. Like any gateway, La Sierra needs to act as both an entry point to Riverside and as an edge to distinguish it from adjacent communities.

Table 8, **Project Consistency with Applicable General Plan Land Use Element Policies**, analyzes the Project's consistency with applicable goals and policies in the General Plan Land Use Elements. As shown, the Project would be consistent with all applicable General Plan policies.

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

Table 8
Project Consistency with Applicable General Plan Land Use Element Policies

Relevant Policy	Project Consistency Analysis
ObjectiveLU-7: Preserve and protect significant areas of native wildlife and plant habitat, including endangered species.	
Policy LU-7.2: Design new development adjacent to and in close proximity to native wildlife in a manner that protects and preserves habitat.	**Consistent.** As discussed in **Section 4**, **Biological Resources**, the Project would not result in significant impacts to the existing critical habitats of special status species, nor would the Project impact any wildlife corridors within the Project Area.
Objective LU-9: Provide for continuing growth within the General Plan Area, with land uses and intensities appropriately designated to meet the needs of anticipated growth and to achieve the community's objectives	
Policy LU-9.2: Evaluate proposed amendments to the Land Use Policy Map (Figure LU-10) to consider the effect such amendments will have on the City's ability to achieve its objectives.	**Consistent**. The Project would require a General Plan Amendment to the Land Use Policy Map to ensure that all three parcels within the Project Site are re-designated as HDR.
Policy LU-9.7: Protect residentially designated areas from encroachment by incompatible uses and from the effects of incompatible uses in adjacent areas. Uses adjacent to planned residential areas should be compatible with the planned residential uses and should employ appropriate site design, landscaping, and building design to buffer the non-residential uses.	**Consistent.** The Project would introduce 117 new multifamily units in a neighborhood comprised of single-family and multifamily residential uses.
Objective LU-58: Enhance the role of La Sierra as a major employment center in the City, with complementary residential and mixed-use development.	
Policy LU-58.6: Allow for increased residential and commercial densities to bring more people to the neighborhood, support transit, and complement the scale of the Kaiser facility.	**Consistent.** Project implementation would increase the number of residents on-site and density on site to 25.78 du/ac.

Source: City of Riverside General Plan, Land Use Element. Amended August 2019.

City of Riverside Municipal Code

The Project includes a zone change to convert the Project Site's current R-1-7000- Single-Family Residential to R-3-1500- Multiple-Family Residential zone. Under Section 19.100.030 (Permitted land uses) of the City's Municipal Code, multifamily residential buildings are an acceptable use for an R-3-1500- Multiple-Family Residential zone. According to the City's General Plan, the R-3-1500- Multiple-Family Residential zones are compatible with the General Plan's HDR land use designation. As discussed above, the Project would be consistent with allowed uses and requirements for developments designated as HDR. Furthermore, the Project would be consistent with Section 19.100.040 (Residential development standards), which outlines the development standards for R-3-1500- Multiple-Family Residential zones (see Table 19.100.040B [Residential Development Standards: Multiple-Family Residential Zones]) and Section 19.100.070 (Additional regulations for the R-3 and R-4 Zones the additional regulations for R-3 zones) of the City's Municipal Code. Thus, the Project would be consistent with the City's Municipal Code, and impacts would be less than significant.

In conclusion, the Project would be consistent with the relevant policies and standards under the City's General Plan and Municipal Code for development in R-3-1500- Multiple-Family Residential zones. Therefore, the Project would not conflict with any local land use plan, policy, or regulation, and impacts would be less than significant.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐

12a. Response: ***(Source: General Plan 2025, Figure OS-1, Mineral Resources)***

Less Than Significant Impact. State-classified MRZ-2 and MRZ-4 Mineral Resource Zones are shown in Figure 5.10-1, Mineral Resources of the GP 2025 FPEIR. The Project is located in MRZ-4.

According to GP 2025 FPEIR, mining operations have not been active within the City of Riverside for decades. There are scattered areas within the City and surrounding areas that have deposits of feldspar, silica, limestone, and other rock products. However, all that remains are past remnants of mining activities, and the maximum potential for mineral extraction that had occurred. There is no active mining under a valid permit occurring on site, the Project is not adjacent to areas supporting feldspar, silica, limestone and/or other rock products, and the Project does not meet the necessary criteria for marketability and threshold values to support mineral resources as specified by the Department of Conservation. Therefore, the impacts on known mineral resources are less than significant directly, indirectly, or cumulatively.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

12b. Response: ***(Source: General Plan 2025, Figure OS-1, Mineral Resources)***

No Impact. The GP 2025 FPEIR determined that there are no specific areas within the City or surrounding areas that have locally important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The Project is consistent with the General Plan 2025. Therefore, there is no impact.

13. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

13a. Response: ***(Source: Noise and Vibration Technical Report prepared by Impact Sciences [see Appendix E, Noise and Vibration Technical Report])***

Less Than Significant Impact.

Construction Impacts

Construction of the Project would require the use of heavy equipment for demolition, grading/site preparation, installation of utilities, building fabrication, and finishing. Construction activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of construction, several types of equipment could potentially be operating concurrently, and noise levels would vary based on the amount of equipment in operation and the location of the activity. The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities.

With the use of the RCNM, the construction noise levels forecasted for the sensitive receptors are presented in **Table 9, Estimated Exterior Construction Noise at Sensitive Receptors.** Noise levels would diminish notably with distance from the construction site at a rate of 6 dB(A) per doubling of distance (noise from stationary or point sources is reduced by about 6 dB(A) for every doubling of distance at acoustically hard locations). For example, a

noise level of 86 dB(A) Leq measured at 50 feet from the noise source to the receptor would decline to 80 dB(A) Leq at 100 feet from the source to the receptor and fall by another 6 dB(A) Leq to 74 dB(A) Leq at 200 feet from the source to the receptor. These noise attenuation rates assume a flat and unobstructed distance between the noise generator and the receptor. Intervening structures and vegetation would further attenuate (reduce) the noise. Furthermore, it should be noted that increases in noise levels at sensitive receptors during construction would be intermittent and temporary and would not generate continuously high noise levels. In addition, the construction noise experienced at sensitive receptors during the initial periods of construction (i.e., demolition, site preparation/grading/foundations) typically would be reduced in the later construction periods (i.e., interior building construction).

Table 9
Estimated Exterior Construction Noise at Sensitive Receptors

Sensitive Land Uses [a]	Distance to Project Site (feet)	Estimated Construction Noise Levels [dB(A) Leq]	Exceed FTA 90 dB(A) 1-Hour Leq Criteria?
1. Adjacent residences to the north	Adjacent[b]	75.4	No
2. Adjacent residences to the south	Adjacent[b]	74.2	No
3. Residences to the west on Hedrick Avenue	40	69.5	No
4. Residences to the East on Jones Avenue	54	69.4	No

[a] *See Appendix E of this Initial Study, Figure 3, for locations of sensitive receptors.*
[b] *While the project would include construction activities up to the adjacent property lines, consistent with Federal Transit Administration (FTA) methodology, these calculations are based on distances from the center of the site to the receptors.*
See Appendix E of this Initial Study

Temporary construction, maintenance, repair, and demolition activities are exempt from the City Code regulations regarding noise so long as the temporary construction does not take place between the hours of 7:00 PM and 7:00 AM on weekdays, between the hours of 5:00 PM and 8:00 AM on Saturdays, or at any time on Sunday or a federal holiday. As the Project would comply with the daytime construction hours established in Title 7, Noise Control, of the City's Municipal Code, this analysis also uses the FTA's general construction noise criteria of 90 dB(A) Leq (1-hour) to provide additional context for the Project's potential to generate daytime construction noise impacts. While construction activity would increase noise levels in the vicinity of the Project Site (see **Table 9)**, the Project's construction activities would not exceed the FTA's general construction noise criteria of 90 dB(A) Leq (1-hour) at any sensitive receptors. Furthermore, Project construction would not occur during restricted periods, and thus, the Project would be consistent with the criteria set forth in the City Code. As such, construction noise impacts would be **less than significant,** and no mitigation is required.

In addition to adherence to Title 7, Noise Control, of the City's Municipal Code, which limits the construction hours, the best management practices (BMPs) discussed within **Appendix E** are recommended that would further reduce noise levels associated with the construction of the Project.

Operational Impacts

Permanent Operational Traffic Noise

A traffic analysis for the Project was prepared by CR Associates (see **Appendix F** to this Initial Study). Based on the traffic analysis contained therein, the Project is anticipated to generate approximately 789 average daily traffic trips (ADT). The closest roadway to the Project Site with a recorded average daily traffic volume is Tyler Street, located approximately 2,800 feet northeast of the Project Site. According to City data, this roadway segment carries approximately 17,203 average daily trips at Wells Avenue. Based on this data, it is clear the Project's maximum of 789 daily trips would not have the potential double traffic volumes on existing roadways in the vicinity of the Project

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

Site. Since it would take a doubling (i.e., a 100% increase) of roadway traffic volume to increase noise levels by 3 dB(A), the addition of traffic volume from operation of the Project would not increase traffic to levels capable of producing a 3 dB(A) ambient noise increase. Additionally, the Project is consistent with the surrounding land uses, which currently generate mobile noise sources typical of a residential neighborhood. As such, any noise increase would be imperceptible, and impacts would be less than significant.

Stationary Noise Sources

As part of the Project, new mechanical equipment, HVAC units, and exhaust fans could be installed on or near the proposed new structures. Although the operation of this equipment would generate noise, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations of Title 7, Noise Control, of the City's Municipal Code. Specifically, Section 7.25.010 (Exterior Sound Level Limits) states that for stationary noise sources such as an air-conditioning unit or refrigeration system, the exterior noise level when measured at the property line shall not exceed 60 dB(A) for units installed before 1-1-80 and 55 dB(A) for units installed after 1-1-80. As such, compliance with Section 7.25.010 (Exterior Sound Level Limits) and other applicable regulations would ensure noise from stationary sources would be less than significant.

b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

13b. Response: (*Source: Noise and Vibration Technical Report prepared by Impact Sciences (see Appendix E, Noise and Vibration Technical Report)*)

Less Than Significant Impact. The FTA provides ground-borne vibration impact criteria with respect to building damage during construction activities. Peak Particle Velocity (PPV), expressed in inches per second, is used to measure building vibration damage. Construction vibration damage criteria are assessed based on structural category (e.g., reinforced-concrete, steel, or timber). FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines. Although the nearby structures appear to be constructed of reinforced concrete, steel, or timber, this analysis conservatively applies the 0.2 inch/sec PPV threshold typically applied to non-engineered timber and masonry buildings. The vibration levels at nearby structures are shown below in **Table 10, Vibration Levels at Off-Site Structures from Project Construction**.

Table 10
Vibration Levels at Off-Site Structures from Project Construction

Sensitive Uses Off-Site [a]	Distance to Project Site (ft.)	Vibration Threshold (PPV)	Estimated PPV (in/sec)
1. Adjacent residences to the north	Adjacent [b]	0.2 in/sec	0.191
2. Adjacent residences to the north	Adjacent [b]	0.2 in/sec	0.191
3. Residences to the west on Hedrick Avenue	40	0.2 in/sec	0.044
4. Residences to the east on Jones Avenue	54	0.2 in/sec	0.028

[a] *See Appendix E of this Initial Study, Figure 3, for locations of off-site structures.*
[b] *These calculations are based on distance from the site boundary to the structures. See Appendix B*

The vibration velocities predicted to occur at the nearest off-site structures would be 0.191 in/sec PPV. As shown in **Table 10**, Project construction vibration levels would not have the potential to exceed the standard 0.2 in/sec threshold established by the FTA. This impact would be less than significant.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

13c. Response: ***(Source: Noise and Vibration Technical Report prepared by Impact Sciences) (see Appendix E, Noise and Vibration Technical Report)***

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan and is not located within 2 miles of a public airport or public-use airport. The closest airport, the Riverside Municipal Airport, is located approximately 3.5 miles northeast of the Project Site. Therefore, no impacts with respect to airstrip or airport-related noise would occur, and no further analysis is required.

14. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

14a. Response: ***(Source: California Department of Finance Demographic Research Unit. E-5 Population and Housing Estimates for Cities, Southern California Association of Governments. Connect SoCal 2024 Southern California Demographic Workshop, General Plan)***

Less Than Significant Impact. A Project could induce population growth in an area either directly, through the development of new businesses, or indirectly, through the extension of roads or other infrastructure. The Project would demolish several existing structures on-site, including three single-family residences and two mobile homes, to construct a new 185,090-square-foot mixed-use development that would contain 15 separate multifamily buildings and 117 housing units. Therefore, the Project would result in direct population growth.

Based on the City's average household size of 3.06 persons per household, the Project would introduce up to 358 new residents. Therefore, the Project would induce population growth in the City. Conservatively assuming that all 358 Project-generated residents relocate from outside of the City, potential population growth associated with the Project would represent less than one percent of the City's 316,690 persons. Therefore, the Project would not induce substantial unplanned population growth.

Population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. The Southern California Association of Governments (SCAG) growth forecasts estimate the City's population to reach 387,300 persons by 2050, representing a total increase of 70,610 persons. The Project's potential maximum increase of 358 persons would represent less than one percent of the City's projected population increase between 2024 and 2050. Thus, the potential increase in population resulting from the Project would be nominal.

Further, two of the three parcels within the Project Site currently have a land use designation of Medium Density Residential (MDR), which allows a maximum population density of 18.6 persons per acre. The Project includes a General Plan Amendment to redesignate the Project Site parcels to High Density Residential (HDR), which has an allowed maximum population density of 87 persons per acre. As discussed above, the Project would introduce approximately 358 new residents, which would result in a population density of 77 people per acre. It is acknowledged that the Project would increase the Site's overall population density compared to the planned population density for the Project Site under the General Plan. However, given that one of the three existing parcels is currently designated as HDR and would allow for an on-site density of 80 persons per acre, this increase would not induce substantial unplanned population growth.

Overall, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. As such, the Project would result in a less than significant impact.

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

14b. Response: ***(Source: California Department of Finance Demographic Research Unit. E-5 Population and Housing Estimates for Cities)***

Less Than Significant Impact. The Project would demolish three occupied existing single-family homes and two mobile homes on-site. However, the Project would construct up to 15 new multifamily residential buildings with 117 new residential units on-site and would provide more available housing units within the Project Site that is greater than the existing number of housing units and structures. The Project Site is located within a suburban area of the City, and the land uses immediately surrounding the Project Site include single-family and multifamily housing. Additionally, as of 2022, the City has a vacancy rate of 4.1 percent with approximately 4,146 unoccupied housing units. As such, there is an adequate number of vacant housing units within the City to house any current residents of the Project that may need to relocate. Therefore, the Project would not substantially displace the owners of the existing homes that would be demolished. Therefore, the Project would not displace substantial numbers of existing housing or people, and less than significant impacts would occur.

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

15a. Response: ***(Source: FPEIR Table 5.13-B, Fire Station Locations, Table 5.13-C, Riverside Fire Department Statistics and Ordinance 5948 § 1)***

Less Than Significant Impact. The Project is located in a suburban area and includes 117 new residences on three consolidated existing parcels. Adequate fire facilities and services are provided by Station #8 La Sierra Riverside Station located at 11076 Hole Avenue, 0.8 miles from the Project Site. As discussed in **Section 14, Population and Housing,** above, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. In addition, compliance with existing codes and standards, and through Fire Department practices, there will be a less than significant impact on the demand for additional fire facilities or services either directly, indirectly, or cumulatively.

b. Police protection?	☐	☐	☒	☐

15b. Response: ***Source: General Plan 2025, Figure 5.13-1, Policing Centers)***

Less Than Significant Impact. The Project would demolish three occupied existing single-family homes and two mobile homes on-site. However, the Project would construct up to 15 new multifamily residential buildings with 117 new residential units on-site and would provide more available housing units within the Project Site that is greater than the existing number of housing units and structures. As discussed in **Section 14, Population and Housing,** above, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. Therefore, adequate police facilities and services are provided by the Magnolia Neighborhood Policing Center located at 10540 Magnolia Avenue (1.4 miles from the Project Site). In addition, CPTED (Crime Prevention Through Environmental Design) principles will be applied to the Project to ensure greater security and crime prevention through design, and be consistent with General Plan policies, such as Policy PS-8.1. This policy requires future development to maximize natural surveillance through physical design features that promote visibility in all new development. With implementation of CPTED principles, compliance with existing

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
codes and standards, and through Police Department practices, there will be less than significant impacts on the demand for additional police facilities or services either directly, indirectly, or cumulatively.				
c. Schools?	☐	☐	☒	☐
15c. Response: ***(Source: Riverside County of Education School District Locator)*** **Less Than Significant Impact.** The Project would demolish three occupied existing single-family homes and two mobile homes on-site. However, the Project would construct up to 15 new multifamily residential buildings with 117 new residential units on-site and would provide more available housing units within the Project Site that is greater than the existing number of housing units and structures. The Beaumont Unified School District serves the Project Site. As discussed in **Section 14, Population and Housing,** above, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. Therefore, adequate school facilities and services will be provided by the Beaumont Unified School District to serve this project. Due to the limited increase in population, there will be less than significant impacts on the demand for school facilities or services, either directly, indirectly, or cumulatively.				
d. Parks?	☐	☐	☒	☐
15d. Response: ***(Source: General Plan 2025, Figure PR-1, Parks, Open Spaces and Trails; Table PR-4, Park and Recreation Facilities; GP 2025 FPEIR, Table 5.14-A, Park and Recreation Facility Types)*** **Less Than Significant Impact.** The Project would demolish three occupied existing single-family homes and two mobile homes on-site. However, the Project would construct up to 15 new multifamily residential buildings with 117 new residential units on-site and would provide more available housing units within the Project Site that is greater than the existing number of housing units and structures. As discussed in **Section 14, Population and Housing,** above, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. Therefore, adequate park facilities and services are provided by La Sierra Park (1.3 miles from the Project Site) and Collett Park (0.9 miles from the Project Site). In addition, with implementation of General Plan 2025 policies and objectives such as PR-1 "Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents", compliance with existing codes and standards, and through Park, Recreation and Community Services practices, there will be less than significant impacts on the demand for additional park facilities or services either directly, indirectly or cumulatively.				
e. Other public facilities?	☐	☐	☒	☐
15e. Response: ***(Source: General Plan 2025, Figure LU-8, Community Facilities; FPEIR Figure 5.13-5, Library Facilities, Figure 5.13-6, Community Centers, Table 5.3-F, Riverside Community Centers, Table 5.13-H, Riverside Public Library Service Standards)*** **Less Than Significant Impact.** The Project would demolish three occupied existing single-family homes and two mobile homes on-site. However, the Project would construct up to 15 new multifamily residential buildings with 117 new residential units on-site and would provide more available housing units within the Project Site that is greater than the existing number of housing units and structures. As discussed in **Section 14, Population and Housing,** above, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. Adequate public facilities and services, such as libraries and community centers, are provided by La Sierra Library (0.8 miles from the Project Site). Therefore, implementation of the Project will not result in a substantial increase in demand for additional public facilities or services, and impacts will be less than significant.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

16a. Response:

Less than Significant Impact. As discussed in **Section 14, Population and Housing,** above, the Project would not induce substantial unplanned population growth exceeding existing local conditions or projected population increases. Therefore, the Project will not result in a substantial increase in 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. Therefore, there will be a less than significant impact on the demand for additional recreational facilities either directly, indirectly, or cumulatively.

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

16b. Response:

No Impact. The Project will not include new recreational facilities or require the construction or expansion of recreational facilities; therefore, there will be no direct, indirect, or cumulative impact.

17. TRANSPORTATION Would the project result in:				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

17a. Response: ***(Source: Metrolink. Regional System Map- Free/ Special Rate/ Pay Transfer, General Plan-Circulation Element)***

Less than Significant Impact.

Roadway Network

Hedrick Avenue is a two-lane roadway with one lane travelling in each direction. The roadway travels in a north-south direction with a posted speed limit of 25 miles per hour (mph). The City's General Plan does not have a roadway classification for Hedrick Avenue.

Jones Avenue is a two-lane roadway with one lane travelling in each direction. The roadway travels in a north-south direction with a posted speed limit of 25 miles per hour (mph). The roadway is classified as a Collector Street under the City's General Plan. According to the General Plan, Collector Streets may handle some localized through traffic from one local street to another; however, their primary purpose is not to provide for through traffic but to connect the local street system to the arterial network.

Bicycle and Pedestrian Facilities

Existing pedestrian facilities are limited to the existing paved sidewalks located across the street from the Project Site along both Hedricks Avenue and Jones Avenue. There are no identified bicycle facilities within close proximity to the Project Site.

Transit Systems

Transit services in the City are provided by Metrolink and Riverside Transit Agency (RTA). The Metrolink rails that service the City include the Metrolink Perris Valley line and the Metrolink Inland Empire line that passes through the Riverside Metrolink station, located approximately 1.42 miles southeast of the Project Site at 3825 Downing

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

Avenue. The RTA Routes 1, 10, 12, 13, 14, 15, 16, 20, 21, 22, 27, 29, 49, 51, 56, 200, and 204 serve the City, with two Route 12 bus stops located approximately 0.15 miles south at the intersection of Jones Avenue and Hole Avenue.

Analysis

The Project Site is within walking distance of the existing bus stops located along Jones Avenue and Hole Avenue. Construction activities associated with the Project would not affect access or safety at these existing bus stops. In addition, construction and operation of the Project would not result in impacts to the existing Riverside Metrolink station, due to the distance between the Project Site and the transit stations. Additionally, given its distance from existing pedestrian and bicycle facilities, the Project would not impact either facility. Rather, the Project would introduce new walkways on-site to serve as pedestrian facilities for residents and visitors. As such, the Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and less than significant impacts would occur.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

17b. Response: ***(Source: SB 743, Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, Mikasa Residential – Vehicle Miles Traveled Screening Memorandum prepared by CR Associates (*****See Appendix F*****, *Traffic Analysis)***

Senate Bill 743 (SB 743), effective September 2013, established new criteria for determining the significance of transportation impacts that "promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses." Specifically, SB 743 directed the Governor's Office of Planning and Research (OPR) to update the *State CEQA Guideline*s to replace automobile delay—as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion—with vehicle miles traveled (VMT) as the recommended metric for determining the significance of transportation impacts. OPR has approved the *State CEQA Guidelines* implementing SB 743.

The State of California Governor's Office of Planning and Research (OPR), in implementing SB 743, issued proposed updates to the *State CEQA Guidelines* in November 2017 that amends the Appendix F question for transportation impacts to delete reference to vehicle delay and level of service (LOS) and instead refer to Section 15064.3, subdivision (b)(1), describes factors that might indicate whether a development project's VMT may be significant or not. OPR also developed the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) (December 2018), which provides non-binding recommendations on the implementation of VMT methodology, which has significantly informed how VMT analyses are conducted in the State.

In anticipation of the mandated change to VMT, the City of Riverside Public Works Department incorporated local VMT assessment guidelines as part of the City's *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (TIA Guidelines) (dated July 2020) to assist with answering important implementation questions about the methodology, thresholds, and mitigation measures for VMT impact analysis in land use projects.

According to the TIA Guidelines, the City has adopted five screening criteria that could be applied to screen projects out of a detailed VMT analysis. Based on the City's TIA Guidelines, the following screening criteria are relevant to the Project's proposed land use:

- Projects located within a Transit Priority Area (TPA);
- Projects located in a low-VMT generating area identified on the most recent TREDLite VMT Screening tool;
- Affordable housing projects; and
- Projects generating less than 110 daily vehicle trips

To assess the Project's applicability with the criteria listed above, the TREDLite VMT screening tool was used as part of the *Mikasa Residential – Vehicle Miles Traveled Screening Memorandum* (VMT Memorandum) (see **Appendix F** to this Initial Study). Based on the VMT Memorandum. The Project is located in a low-VMT generating area with the most recent TREDLite VMT screening tool. Accordingly, the Project is deemed to be screened out from conducting a VMT analysis based on the City's TIA Guidelines. Thus, the Project would have less than significant environmental impacts related to VMT without additional study. The Project would not conflict with, or

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
be inconsistent with, *State CEQA Guidelines* Sections 15064.3, subdivision (b); and impacts would be less than significant.				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
17c. Response: (Source: Riverside County Airport Land Use Commission. Riverside County Airport Land Use Compatibility Plan Policy Document) **No Impact.** The nearest airport to the Project Site is the Riverside Municipal Airport, located approximately 2.50 miles southwest of the Project Site. The Project Site is not located within the Riverside Municipal Airport influence area, nor is the Project located within a compatibility zone. Furthermore, under the proposed zone change, the Project would meet the City's design standards for the maximum building height of a High Density Residential zone (see **Section 11, Land Use and Planning**) and would not cause a hazard to flights. As such, the Project would not result in changes to air traffic patterns, including either an increase in traffic levels or a change in location that results in a substantial safety risk area, and no impacts would occur.				
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
17d. Response: ***(California Fire Code)*** **Less Than Significant Impact.** The Project Site is currently surrounded by residential uses, with one-story single-family residences located north, east, and west, and multifamily residential buildings located immediately south. Additionally, the Project Site is immediately surrounded by uses currently zoned residential. Thus, as a new development with 15 new multifamily residential buildings, the Project would not introduce any incompatible uses to the Project Area. The Project would implement a new vehicular circulation on-site. As shown in **Figure 3, Proposed Site Plans**, the Project would construct one new driveway along Hedrick Avenue and one new driveway along Jones Avenue. The new driveways along Jones Avenue and Hedrick Avenue would serve as a separate ingress and egress for vehicles to enter and exit the Project Site. As illustrated in **Figure 3**, the Project would include on-site circulation through an internal roadway network that would provide access to the proposed multifamily buildings and uncovered open parking spaces. The Project would be subject to site plan and development review by the City, in which the Project Applicant would be required to show compliance with applicable requirements under the California Fire Code (CFC) for construction and access to the site. Project access would not include new travel lanes outside of the Project Site and has been designed in conformance with the City's engineering and fire department standards. As a result, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, and impacts would be less than significant.				
e. Result in inadequate emergency access?	☐	☐	☒	☐
17e. Response: ***(2022 California Building Code)*** **Less Than Significant.** The Project would introduce two new driveways as on-site access points to provide vehicular access from Hedrick Avenue and Jones Avenue. The Project would incorporate all applicable design and safety standards and regulations outlined in Chapter 33 of the 2022 California Building Code, and Chapter 11 (Construction Requirements for Existing Buildings) of the California Fire Code. Further, the Project would submit all Project Plans to the City of Riverside's City Engineer and the Riverside Fire Department to confirm that the Project would provide adequate on-site access to emergency services. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
18a. Response: (*Source: AB 52 Consultation)* **No Impact.** As detailed in **Response 4a**, no historic resources listed or eligible for listing in a State or local register of historic resources are located on-site. Therefore, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur**.**				
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

18b. Response: ***(Source: AB 52 and SB 18 Consultation, January 2024 through May 2024, (see Appendix G, Tribal Consultation)***

Less than Significant with Mitigation Incorporated. The Native American Historic Resource Protection Act (AB 52) took effect on July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCR) into the CEQA process. AB 52 requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt an ND or MND are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact, requiring feasible mitigation measures.

On January 12, 2024, per AB 52 requirements, letters of inquiry were sent out to tribal contacts who may have an interest in the Project Site (see **Appendix G** of this Initial Study). As of May 2024, three tribal contacts responded: the Pechanga Band of Indians, the Rincon Band of Luiseño Indians, and the Soboba Band of Luiseño Indians. The Pechanga Band of Indians requested tribal consultation on February 15, 2024, and met with the City on March 14, 2024. The Pechanga Band of Indians requested an archaeological and tribal monitor during Project construction. The Rincon Band of Luiseno Indians requested a Cultural Resource Assessment on February 19, 2024, and conditioned the project on March 19, 2024, with the protocols for inadvertent discoveries of cultural material and human remains. The Soboba Band of Luiseno Indians also requested consultation on February 12, 2024, and met with City staff on February 28, 2024.

SB 18 (Government Code Sections 65352.3 and 65352.4) requires that prior to the adoption or amendment of a general plan proposed on or after March 1, 2005, a City or County must consult with Native American tribes with respect to the possible preservation of, or the mitigation of impacts to, specified Native American places, features, and objects located within that jurisdiction.

On January 12, 2024, per SB 18 requirements, letters of inquiry were sent out to tribal contacts who may have an interest in the Project Site (see **Appendix G** of this Initial Study). As of May 2024, three tribal contacts have responded to date: Morongo Band of Mission Indians, Pechanga Band of Indians, Soboba Band of Luiseno Indians, and the Cahuilla Band of Indians. The Morongo Band of Mission Indians requested tribal consultation on January

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
30, 2024, and met with the City on April 10, 2024. The Morongo Band of Mission Indians also requested tribal monitors to be present during all ground-disturbing activities of the Project. The Pechanga Band of Indians requested tribal consultation on February 15, 2024, and met with the City on March 14, 2024. The Soboba Band of Luiseno Indians requested tribal consultation on February 15, 2024, and met with the City on February 28, 2024. The Cahuilla Band of Indians requested tribal consultation on January 12, 2024, and met with the City on May 2, 2024. After meeting with each tribal organization described above, the City sent final memorandums to each organization on May 7, 2024, to confirm concurrence with implementing Mitigation Measures **MM CUL-1** through **MM CUL-4** as well as a Standard Condition of Approval regarding steps to address the discovery of human remains to minimize impacts to tribal cultural resources (See **Section 5**, **Cultural Resources**). Each tribe has concurred with the listed **MM CUL-1** through **MM CUL-4,** and the Standard Condition of Approval would reduce impacts related to tribal cultural resources to less than significant levels.				
19. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

19a. Response: ***(Source: Riverside Public Utilities UWMP, NPDES.)***

Less than Significant Impact.

Water

Potable water services would be provided by the Riverside Public Utilities (RPU) via connection to existing underground pipelines. RPU's primary source of supply is local groundwater. RPU also distributes recycled water for non-potable uses. These two locally controlled supplies have been highly reliable. RPU also has an agreement with Western Municipal Water District (WMWD) to access imported water when needed. This agreement can provide RPU with up to 21,700 acre-feet per year (AFY) of imported water.

The Project would introduce up to 117 residential units to the Project Site. The Project Applicant would install new water lines that would connect each residential building on-site to the existing main lines owned by the City, located along Jones Avenue and Hedrick Avenue**.** The Project Applicant would also comply with the applicable provisions outlined in Chapter 14.20 (Water Connections) of the City's Municipal Code. Furthermore, the Project would demonstrate compliance with all of the requirements outlined in the RPU's "Will Serve" Letter. Compliance with the City's regulations and requirements would ensure that the Project would result in less than significant impacts to the City's existing water infrastructure and facilities.

Wastewater

Wastewater generated by the Project would be collected and processed by the City's RPU. Wastewater and sewage collected by the City would be processed in the Riverside Water Quality Control Plant (RWQCP). Currently, the RWQCP consists of two separate treatment plants and one common tertiary filtration plant. These provide preliminary, primary, secondary and tertiary treatment for the plant. Currently, the RWQCP has a capacity of 40 million gallons per day (mgd) for wastewater treatment.

The Project would install new sewer lines that would connect each residential building on-site to the existing main lines owned by the City, located along Jones Avenue and Hedrick Avenue. Per Chapter 14.04 (Sewer Service Charges) and Chapter 14.08 (Sewer Connection and Permits) of the City's Municipal Code, the Project would be subject to payment of service fee and connections fees to RPU. Utility connections, including sewer system connections, may be included in the Project Applicant's site plan submittal to the City for review and approval. This approval as well as adherence with existing local regulations, would ensure that the Project would result in less than significant impacts to the City's existing wastewater infrastructure and facilities.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Storm Drainage As discussed in Section 10, Hydrology and Water Quality, the Project would increase impervious surfaces compared to existing conditions. However, the Project would adhere to NPDES requirements and incorporate the appropriate LID site design, source control, and treatment control BMPs intended to provide for stormwater retention and infiltration. Implementation of these BMPs would ensure that the City's existing stormwater drainage system would have adequate capacity for the Project stormwater. Thus, new off-site stormwater facilities would not be required, nor are other off-site existing facilities anticipated to be expanded. Impacts would be less than significant. **Dry Utilities** Dry utilities include electricity, natural gas, and telecommunications facilities. The Project would utilize the existing electricity, natural gas, and telecommunication lines and services for the Project Site. While the Project would result in an increase in dry utilities usage compared to existing conditions, the Project would be subject to payment of connection fees to the existing electric, natural gas, and telecommunication providers that service the Project Site. Payment of these connection fees would ensure that the Project would not significantly impact the services and facilities of these utility providers. As such, less than significant impacts would occur.				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
19b. Response: ***(Source: Riverside Public Utilities UWMP)*** **Less Than Significant.** The RPU procures its water supplies through imported water from the Western Municipal Water District (WMWD), recycled water, and groundwater. According to the RPU UWMP, the reliability of RPU's recycled water and groundwater supply is expected to be adequate to meet normal year, single dry year, and multiple dry year demand conditions between 2025 and 2045. The RPU would have an average surplus of 23,673 potable water in acre-feet per year (AFY) under a Normal Year Supply, Single Dry Year Supply, and under a Multiple Dry Year scenario. According to **Appendix A** of this IS/MND, the Project is estimated to consume approximately 6,060,378 gallons per year, or approximately 18.6 AFY. The Project would represent less than one percent of the average surplus under each scenario. Thus, water demand from the proposed development is within the UWMP's water demand projection for RPU, and the RPU would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.				
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
19c. Response: ***(Source: Riverside Public Utilities UWMP)*** **Less than Significant Impact.** As discussed above, the RWQCP currently has a capacity of treating 40 mgd of wastewater. The development of the Project would generate additional wastewater beyond existing conditions. However, the proposed uses under the Project are consistent with the HDR land use designation, which is what the Project Site is partially designated under the City's General Plan. As such, there would be substantial remaining capacity to treat project-generated wastewater at the two RWQCP wastewater treatment plants. As such, less than significant impacts would occur.				
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
19d. Response: ***(Source: CalRecycle. Jurisdiction Disposal and Alternative Daily Cover, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility)***				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Less than Significant Impact. Approximately 75 percent of solid waste generated within the City is disposed of at the Badlands Sanitary Landfill. The Badlands Sanitary Landfill permits a maximum daily throughput of 5,000 tons of solid waste per day and currently has a remaining capacity of 7,800,000 tons of solid waste. Construction activities associated with the Project would generate solid waste that would be temporary and would cease upon completion of the Project. According to the Project's Air Quality and Greenhouse Gas modeling, Project operational activities are expected to generate approximately 0.05 tons per year of solid waste (see **Appendix A** to this Initial Study). The solid waste generated from Project operations would represent less than one percent of the maximum daily throughput of both landfills. As such, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Less than significant impacts would occur**.**				
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
19e. Response: ***(Source: Impact Sciences, Inc.)*** **Less than Significant Impact.** As concluded above, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Furthermore, the Project would demonstrate compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." AB 939 requires that at least 50 percent of waste produced be recycled, reduced, or composted. The Project would also comply with the 2022 California Green Building Standards (CALGreen) Code, which includes design and construction measures that help reduce construction-related waste through material conservation and other construction-related efficiency measures. Thus, less than significant impacts would occur.				
20. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
20a. Response: ***(Source: City of Riverside - 2021-2029 Public Safety Element Technical Background Report, CalFire. Riverside County- State Responsibility Area Fire Hazard Severity Zones*)** **No Impact.** The Project Site is not located within a locally identified wildfire hazard zone, nor is the Project Site located within a State Responsibility Area. The Project Site is located within a developed, residential area of the City, and does not present a wildfire hazard. Additionally, the Project Site is not adjacent to any evacuation routes identified by the City. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no impacts would occur.				
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
20b. Response: ***(Source: N/A)*** **No Impact.** As stated above, the Project Site is not located in or near state responsibility areas or lands classified as a local fire hazard zone. The Project would be located in a developed and urban environment that would not exacerbate wildfire risks or expose the public to uncontrolled spread. Thus, no impacts would occur.				
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?	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20c. Response: ***(Source: N/A)*** **No Impact.** The Project will not require the installation or maintenance of infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities. Therefore, the Project would not exacerbate fire risk, and there would be no impact.				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
20d. Response: ***(Source: N/A)*** **No Impact**. As stated above, the Project would not be located in or near state responsibility areas or lands classified as a local fire hazard zone. Additionally, the Project Site is located on relatively flat terrain and would not be subject to landslides. Thus, wildfire impacts involving downslope, downstream flooding, or landslides would not occur, and there would be no impact.				
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
21a. Response: ***(Source: Cultural Resources Technical Report prepared by ASM Affiliates [October 2023]; Biological Resources Assessment, Mikasa Multifamily Development City of Riverside, Riverside County, California, Bargas, September 2023; United States Fish and Wildlife, Wetlands Mapper, MSHCP; General Plan 2025, Figure OS-7, MSHCP Cores and Linkage; General Plan 2025, Figure OS-6, Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans [HCP])*** **Less Than Significant With Mitigation Incorporated.** As discussed in **Section 4**, **Biological Resources**, there are no potential significant impacts related to special-status plant and wildlife species associated with the Project. The Project is not located within a wetland environment or wildlife corridor, and compliance with all applicable regulatory requirements would ensure impacts remain less than significant. As discussed in **Section 5, Cultural Resources**, the Project would not have substantial impacts on any known historic resources. No dedicated cemetery exists on or within the vicinity of the Project Site. However, construction activities associated with the Project could uncover previously undiscovered archaeological resources during earth-moving activities. As such, the Project could potentially reduce the number of historical artifacts of California history or prehistory. However, mitigation measures **MM CUL-1, MM CUL-2, MM CUL-3,** and **MM CUL-4** would reduce impacts to less than significant levels.				
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
21b. Response: **Less than Significant with Mitigation Incorporated.** A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As discussed throughout this Initial Study, the Project would not result				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
in any unmitigated significant adverse impacts and/or cumulatively considerable impacts with implementation of existing regulatory requirements and mitigation measures **MM CUL-1, MM CUL-2, MM CUL-3,** and **MM CUL-4**. Implementation of all regulatory requirements and these mitigation measures at the project-level would reduce the potential for the incremental effects of the Project to be considerable when viewed in connection with the effects of projects from the past, present, and probable future. Impacts would be less than significant.				
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
21c. Response: **Less than Significant with Mitigation Incorporated.** As indicated in the above analysis, with implementation of all applicable regulatory requirements and Project mitigation measures in this Initial Study, the Project would not result in any unmitigated significant adverse impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings. Impacts would be less than significant.				

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal.App.3d 1337 (1990).

Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[6]	Monitoring/Reporting Method
Cultural Resources/Tribal Cultural Resources	**MM CUL-1 Tribal Consultation** 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 interested 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 the consulting tribe to provide tribal monitoring for ground-disturbing activities.	Prior to the issuance of grading permits	Community and Economic Development Department – Planning Division; Public Works Department	Notification of the City by the Applicant
	MM CUL-2 Archaeological Monitoring At least 30 days prior to the application for a grading permit, and before any grading, excavation, and/or ground-disturbing activities take place, the Developer/Applicant shall retain a Secretary of the Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. The Project Archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the Project Site. Details in the plan shall include: a. Project grading and development scheduling;	At least 30 days prior to the application for a grading permit, before grading, excavation, and/or ground disturbing activities	Community and Economic Development Department – Planning Division; Public Works Department	Submission of an Archaeological Monitoring Plan

[6] Agencies are City of Riverside Departments/Divisions unless otherwise noted.

	b. The development of a rotating or simultaneous schedule in coordination with the Developer/Applicant and the Project Archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project Archaeologists; c. The protocols and stipulations that the Applicant, tribes, and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation; d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the Project Site; and e. The scheduling and timing of the Cultural Sensitivity training noted in mitigation measure **MM CUL-4**.			
	MM CUL-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 the 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. 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 to be thoroughly inventoried with tribal monitor oversight of the process; 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-	During construction	Community and Economic Development Department – Planning Division	Submission of a Phase IV Monitoring Report

	human remains as part of the required mitigation for impacts to cultural resources. 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 cataloging and basic recordation have been completed. b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; 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 Riverside Metropolitan Museum 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 interested tribes.			
	MM CUL-4 Worker's Environmental Awareness Program (WEAP) Training The Secretary of the Interior Standards County certified Archaeologist and Native American monitors shall attend the pre-grading meeting with the Developer/permit holder's contractors to conduct mandatory Worker's Environmental Awareness Program (WEAP) training to all construction grading personnel. The training will include a brief review of the cultural sensitivity of the Project and the surrounding area, summarize and show examples of the types of resources that could be identified during earthmoving activities, and provide notification protocols to be followed in the event suspected cultural resources are identified. Safety protocols would also be discussed to ensure the safety of the monitors and construction crew. 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.	Prior to the issuance of a grading permit	Community and Economic Development Department – Planning Division; Building and Safety Division; Public Works Department	Submission of a Phase IV Monitoring Report