

City of Riverside

HOUSING AND PUBLIC SAFETY ELEMENT UPDATES AND ENVIRONMENTAL JUSTICE POLICIES

DRAFT ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2021040089

July 2021

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Policy Title	Summary
	<ul style="list-style-type: none"> ○ Policy PS-10.1: Ensure that Police and Fire service facilities are strategically located to meet the needs of all areas of the City. ○ Policy PS-10.2: Consider means to develop joint police and general community facilities within the City. ○ Policy PS-10.3: Ensure that public safety infrastructure and staff resources keep pace with new development planned or proposed in Riverside and the Sphere of Influence. ○ Policy PS-10.4: Continue to ensure that each development or neighborhood in the City has adequate emergency ingress and egress, and review neighborhood access needs to solve problems, if possible.
Land Use and Urban Design Element	<ul style="list-style-type: none"> ● Objective LU-26: Ensure that a network of modern, effective and adequate community facilities are equitably distributed across the entire City. ○ Policy LU-26.1: Develop and enforce standards for community facilities (such as fire and police stations, libraries and parks) based upon population densities and proximity of existing facilities.
Education Element	<ul style="list-style-type: none"> ● Objective ED-5: Ensure that the library system remains a premier information and independent learning resource for the Riverside residents and a complement to formal education. ○ Policy ED-5.1: Provide ample and convenient library facilities. ○ Policy ED-5.2: Outreach to the community to assess, select, organize and maintain collections of materials and information sources of value desired by the community. ○ Policy ED-5.3: Partner with the school districts, universities, colleges and community and child care centers to operate joint-use learning and information resource centers.
Housing Element	<ul style="list-style-type: none"> ● Objective H-1: To provide livable neighborhoods evidenced by well-maintained housing, ample public services, and open space that provide a high quality living environment and instill community pride. ○ Policy H-1.5: Public Facilities and Infrastructure. Provide quality community facilities, physical infrastructure, traffic management, public safety, and other public services to promote and improve the livability, safety, and vitality or residential neighborhoods.
Specific Plans	
Canyon Springs Business Park Specific Plan	There are no applicable policies relevant to the Project regarding public services.
Downtown Specific Plan	Contains an assessment and vision for cultural and art resources and facilities.
Hunter Business Park Specific Plan	There are no applicable policies relevant to the Project regarding public services.
La Sierra University Specific Plan	<p>Goal LSU-1: To provide a high quality, attractive mixed-use development which includes educational, residential, commercial, industrial and recreational uses, all integrated with and enhancing the existing campus environment.</p> <p>Policy LSU-1.7: A public elementary school site is to be provided in Subarea 6, at the corner of Raley Drive and Pierce Street, eventually to total ten acres. The school site is subject to the approval by the State of California.</p>

Policy Title	Summary
Magnolia Avenue Specific Plan	Objective 1: Restore the Magnolia/Market Corridor to its historical role as a scenic, “showcase roadway” that spans the City of Riverside while updating its function as a key transit corridor to support future growth. Policy 1.11: Collaborate on strong joint use arrangements to create partnerships with the City, Riverside Unified School District, Alvord Unified School District, Sherman Indian School and California Baptist University to remove barriers to joint use of facilities.
Riverside Market Place	There are no applicable policies relevant to the Project regarding public services.
University Avenue Specific Plan	There are no applicable policies relevant to the Project regarding public services.

Sources: City of Riverside 1991, 2002, 2005, 2007a, 2007b, 2009, 2017b, 2017c, 2018a, 2018b, 2019.

Policy Consistency

CEQA regulations require a discussion of inconsistencies or conflicts between a project and federal, state, regional, or local plans and laws. Several federal and state laws and regional policies pertain to public services. As discussed in Chapter 2, *Project Description*, one of the objectives of the Project, through the Housing Element Update, is to provide livable neighborhoods that facilitate and encourage new sustainable neighborhoods by designing safe and healthy complete neighborhoods that take into consideration schools and other needs. Additionally, another Project objective is to address the public safety and public health needs and concerns of its residents, businesses, institutions, and visitors, and set forth a proactive and coordinated program of protection for all foreseeable natural and human-caused hazards. Therefore, implementation of the Project would be consistent with all relevant plans and laws.

3.10.4 Methodology and Thresholds of Significance

The methods for analysis are based on an assessment of existing public services such as fire and police resources, standards and capacities, existing public school resources and enrollment data, and recreational resources and standards. In order to conduct an analysis for the Project, desktop research was conducted to determine service capabilities, service ratios, response times, and performance objectives. This impact analysis considers the potential public services impacts associated with the implementation of the Housing Element Update, Zoning Code and Specific Plan amendments, Public Safety Element Update, and Environmental Justice Policies.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or 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 following public services:
 - Fire protection
 - Police protection

- Schools
- Other facilities, including libraries

3.10.5 Impacts and Mitigation Measures

This section describes potential impacts related to public services that could result from implementation of the Project and recommends mitigation measures as needed to reduce significant impacts.

Impact PS-1: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, or other public facilities. This impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Future development facilitated by the Project would increase demand for public services over time. Potential impacts would include greater demands for fire protection, police protection, schools, and library facilities potentially resulting in the need to provide for new or expanded public facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Additionally, future development facilitated by the Project would increase the use of existing public facilities, which could cause physical deterioration of the facilities.

Fire Protection

Demand for fire protection services would increase as a result of future development facilitated by the Project. Potential impacts would include placing greater demands on fire protection services, potentially resulting in the need to provide new or expanded fire protection facilities in order to maintain an acceptable level of service. Additionally, future residential and mixed-use development facilitated by the Project would increase the use of existing fire protection services, which could cause physical deterioration of existing facilities. As discussed in Chapter 2, *Project Description*, implementation of the Project could result in the future development of an additional 31,564 dwelling units. This increase in dwelling units would increase population and could result in a permanent increase in demand for fire protection services in areas served by RFD.

RFD provides fire protection for the City and has 14 fire stations that serve the City (see Table 3.10-1). In addition, RCFD provides service to the unincorporated territory within the City's Sphere of Influence through a mutual aid agreement. According to the RFD Strategic Plan, RFD responded to 32,000 calls for service in 2015. GP 2025 Public Safety Element, Policy PS-6.2 endeavors to meet/maintain a response time of 5 minutes for the City's urbanized areas (City of Riverside 2018a). RFD's average response time is 7 minutes and 59 seconds (McDowell pers. comm. 2021), which is below RFD's established performance goal of 8 minutes of dispatch over 90 percent of the time. Ensuring that a high level of service can be provided over the long-term is a community goal. RFD implemented service improvements through application of Riverside Measure Z funding and

achieved an ISO Rating of ISO Class 1—the highest awarded level—in December 2019 (City of Riverside Fire Department 2019). Measure Z also continues to provide funding for RFD staff positions, training, and vehicle replacement and maintenance (City of Riverside 2020).

State, county, and City jurisdictions have policies related to providing adequate fire services to the area. All development would be constructed in accordance with current building and fire/life/safety ordinances and codes, including all applicable County of Riverside and City jurisdiction code requirements related to construction, access, water mains, fire flows, and hydrants. Fire services are based on community needs because local departments conduct ongoing evaluations and annual budgeting processes to determine infrastructure, equipment, and staffing needs for the upcoming year. If ongoing evaluations indicate increased response time, then the acquisition of equipment, personnel, and new stations is considered. GP 2025 Public Safety Element, Policy PS-6.1 ensures that sufficient fire stations, personnel, and equipment are provided to meet the needs of the community as it grows in size and population.

RCFD's *Strategic Plan 2009–2029* (RCFD 2009) also guides the development of fire station facilities. Future development within Riverside County would be required to comply with fire safety regulations. As previously stated, RFD has a mutual aid agreement with RCFD that stipulates that the closest station would respond to emergencies regardless of jurisdiction. This would ensure that adequate fire service is available to respond to calls for service within the City.

Compliance with the above-mentioned state and local regulations would ensure that there would be sufficient fire protection service and facilities to accommodate additional population resulting from residential and mixed-use development and associated population growth facilitated by the Project. As such, impacts related to fire protection services would be less than significant.

Police Protection

Future development would increase demand for police protection over time. Implementation of the Project could result in the future development of an additional 31,564 dwelling units and mixed-use development. This increase in dwelling units would increase population and could result in a permanent increase in demand for police protection services in areas served by the RPD.

In the City, RPD provides police protection services. There are four RPD stations that serve the City (see Table 3.10-2). The Field Operations Division provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services for the City. The Field Operations Division is managed by a Captain who oversees patrol officers, sergeants, lieutenant Watch Commanders, an Executive Lieutenant, and civilian support staff. The Field Operations Division includes over 130 sworn officers, 24 Sergeants, six Lieutenant Watch Commanders, one Executive Lieutenant, one Traffic Lieutenant, and a civilian support staff position (City of Riverside 2021b).

The GP 2025 Public Safety Element, Policy PS-7.5 provides for response time of within 7 minutes to Priority 1 calls (life-threatening) and within 12 minutes for Priority 2 calls (non-life-threatening) (City of Riverside 2018a).

Implementation of the Housing Element Update would increase demands of police services over time. However, RPD would evaluate its budget annually to provide adequate police services, including police staffing increases, to accommodate additional growth associated with development facilitated by the Project. The City would continue to meet the recommended police response times

(7 minutes to Priority 1 calls and 12 minutes for Priority 2 calls); therefore, the Project would not cause any adverse effects. Therefore, impacts on police services would be less than significant.

Compliance with the above-mentioned state and local regulations would ensure that there would be sufficient police protection service and facilities to accommodate additional population resulting from development and associated population growth facilitated by the Project. As such, impacts related to police protection services would be less than significant.

Public Schools

Future development and population growth facilitated by the Project would increase the demand for RUSD and AUSD school facilities and services over time. Implementation of the Project could result in the future development of an additional 31,564 dwelling units. This increase in dwelling units would increase population and could result in a permanent increase in demand for public school services in areas served by RUSD and AUSD. Some of the new residents may attend private schools or charter schools, or they may be home schooled. Future residential development would comply with RMC Chapter 16.56, *School Development Fee*, which establishes coordination between the City and the applicable school district to develop a school development fee for mitigating the impact of residential development on local school districts. In addition, legislation allows school districts to collect impact fees from developers of new residential and commercial uses. Pursuant to Government Code Section 65996, school fees imposed through the Education Code are deemed to be full mitigation for new development projects; the City cannot impose additional mitigation measures.

RUSD, MVUSD, and AUSD school impact fees would be imposed on future development within their districts' boundaries. RUSD and MVUSD collect Level I fees for residential additions and commercial/industrial construction based on the square footage of new developments. Similarly, RUSD collects Level II fees for new residential construction based on the square footage of new developments (RUSD 2019; MVUSD 2021). AUSD collects school fees levied on new development projects, if findings can be made that such projects will lead to higher student enrollment and increased facility costs. School fees finance school facilities necessitated by students generated from new development. School development fees were recently updated in 2020 and vary for new residential construction, residential addition, commercial/industrial construction, senior housing, and self-storage (AUSD 2020).

Fees paid by the developer would be used to offset the impact of the number of new students generated by the development facilitated by the Project and would ensure that the development contributes to a fair-share amount to help maintain adequate school facilities and levels of service. Therefore, the provision of schools is the responsibility of the school district. Senate Bill 50 provides that the statutory fees found in the Government and Education Codes are the exclusive means of considering and mitigating for school impacts. Imposition of the statutory fees constitutes full and complete mitigation (Government Code Section 65995(b)).

Future development must also comply with GP 2025 Education Element Policies ED-1.1 and ED-3.1. Policy ED-1.1 requires an adequate level of infrastructure and services to be provided to accommodate campus growth at all educational levels (City of Riverside 2007a). Policy ED-3.1 requires educational institutions to accommodate the needs of City residents.

Compliance with the above-mentioned state and local regulation would ensure that there would be sufficient facilities and service to accommodate additional students resulting from development and

associated population growth facilitated by the Project. As such, impacts related to schools would be less than significant.

Other Public Facilities

Future development would increase demand for other public services—such as libraries, community centers, and museums—over time. Potential impacts would include placing greater demands on public service facilities, potentially resulting in the need to provide new or expanded facilities in order to maintain an acceptable level of service. Additionally, use of existing public services facilities would increase, which could cause physical deterioration of the facility.

The City has nine existing libraries (see Table 3.10-5). Service expansion would be evaluated regularly. Library service needs and standards are determined by the following methods: volumes by population, community need/service gaps (including services provided/not provided by other area departments and agencies), customer requests, and innovation/success of pilot projects. Impacts would be less than significant.

While there are no development impact fees that would fund the RPL system, the Project would comply with GP 2025 Education Element Objective ED-5, which states that a project should help to ensure that the library system remains a premier information and independent learning resource for the Riverside residents and a complement to formal education, and Policy ED-5.1, which states that the City is required help to provide ample and convenient library facilities. Compliance with GP 2025 would ensure that the Project would not affect the City's ability to provide adequate libraries. Therefore, the Project would result in less-than-significant impacts on library service and no mitigation is required.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; and climate change and resiliency. These policies and implementing actions aim to reduce the risk to the community and to ensure protection from foreseeable natural and human-caused hazards.

Proposed new residential and mixed-use development would be predominantly located in more urbanized areas of the City. Public Safety Element Update policies and implementing actions could affect the design and construction of planned developments, including addition of design elements related to emergency access and pedestrian safety. The Public Safety Element Update policies and implementing actions would also involve evaluation of public services, with respect to responding to risks of natural hazards, transportation hazards, etc. Public Safety Element policies do not include specific development proposals that would result in the need for public services.

The Public Safety Element Update policies and implementing actions would also involve additional Environmental Justice Policies to address public safety issues within environmental justice communities. Many Public Safety Element Update policies could result in community benefits. No specific infrastructure improvements or projects are identified in the Public Safety Element Update. As this is a policy document, this update would not have any significant environmental effects related to public services. Impacts would be less than significant.

3.11 Recreation

3.11.1 Introduction

This section describes the environmental and regulatory setting for parks and recreation for the Project, and provides an analysis of potential parks and recreation impacts that could occur with the implementation of the Project. The analysis examines the degree to which the Project may result in changes to parks and recreational resources in the City of Riverside (City) and includes analysis of potential impacts related to recreational resources. The analysis methods, data sources, significance thresholds, and terminology used in this section are described in the appropriate subsections below.

Details on the location of the Project and a description of Project activities are included in Chapter 2, *Project Description*, of this EIR.

3.11.2 Environmental Setting

The Parks and Recreation Element of the *Riverside General Plan 2025* (GP 2025) describes *parks* as:

Intended as public green space where city dwellers can escape from the rush of urban life. Passive parks may include such amenities as large open green spaces, meadows, meandering pathways, ponds and gardens. Active parks, on the other hand, include a variety of facilities for recreation. Baseball and softball diamonds, basketball courts, horseshoe rings, football fields, playgrounds and swimming pools are examples of facilities often found in active parks.

The City has 68 parks and additional open space areas with approximately 2,940.61 acres of City-owned parkland (City of Riverside 2020). The acreage for each park type is shown in detail in Table 3.11-1 and locations of parks that would serve the Project are shown on Figure 3.11-1. According to the *City of Riverside Comprehensive Park, Recreation & Community Services Master Plan* (Parks Master Plan), adopted on February 4, 2020, the City has identified nine undeveloped City-owned park sites in underserved areas of the City that can be developed into parks contingent upon availability of funds. These sites include City Citrus State Park, Golden Star Park, Hole Lake, Mission Ranch Park, Mount Vernon Park, Savi Ranch Park, Seven Mile Trail, Tequesquite Open Space, and Victoria Cross Park (City of Riverside 2020).

Table 3.11-1. Acreage for Existing Parks and Recreation Facilities in the City of Riverside

Park Category	City of Riverside Acreage
Developed Parks	
Pocket Parks	3.5
Neighborhood Parks	225.57
Community Parks	370.18
Regional Parks	279.45
Joint-Use Facilities	—
Special-Use Facilities	97.54

Park Category	City of Riverside Acreage
Natural Parks	
Regional Reserve	1,615.33
Miscellaneous Facilities	
Undeveloped City-owned property	349.05
Total City-Owned Acres	2,940.61
Total City-Owned Acres excluding Undeveloped City-Owned Property	2,595.07

Source: City of Riverside 2020.

The Parks Master Plan defines parks as areas that are “intended as public green space where city dwellers can escape for the rush of urban life.” The City categorizes its parks into three categories: Developed Parks, Natural Parks, and Miscellaneous Facilities (City of Riverside 2020).

Developed Parks

Pocket parks are small parks that the general public has access to. They are often designed and built in a single lot or smaller parcel. These parks may be created as a component of public space requirements of larger developments and can occur in all manner of settings.

Neighborhood parks may provide green space, recreation centers, sports facilities, or playgrounds. They are often landscaped and serve a multitude of functions from passive recreation to a planned center for sports activities. They are typically less than 30 acres in total size and will often present themselves as a community or neighborhood focal point.

Community parks are typically larger parks meant to serve a larger geographic area than the immediate neighborhood. These parks are formed with the intent to engage the community and visitors for longer periods of time and offer more diverse activities and amenities.

Regional parks are areas preserved to protect or bring attention to natural features, historic significance, or recreational use or other reasons. These parks are administered by a local jurisdiction, usually a city or a county.

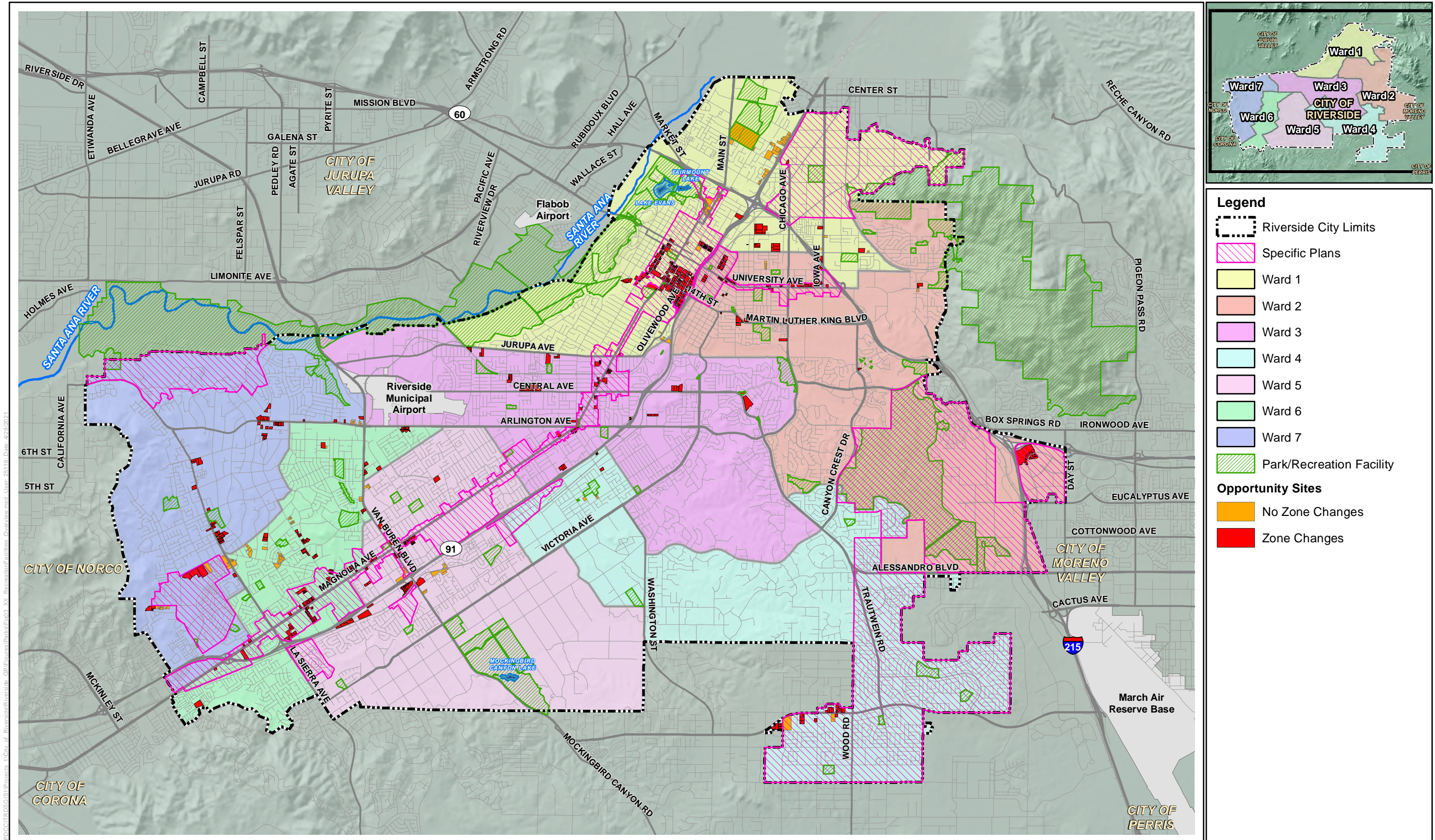
Joint-use facilities can also be referred to as shared-use or community-use sites. These sites are managed by jurisdictions or quasi-government entities and allow access for community use.

Special-use facilities cover a broad range of specialized park and recreation facilities, often with a single major use. Golf courses, historical sites, community center sites, theme parks, and water parks are other special-use facilities that fall into this use type.

County and state parks exist within the City of Riverside and the City’s Sphere of Influence. Although not directly owned or controlled by the City, these parks also provide recreation opportunities to the community.

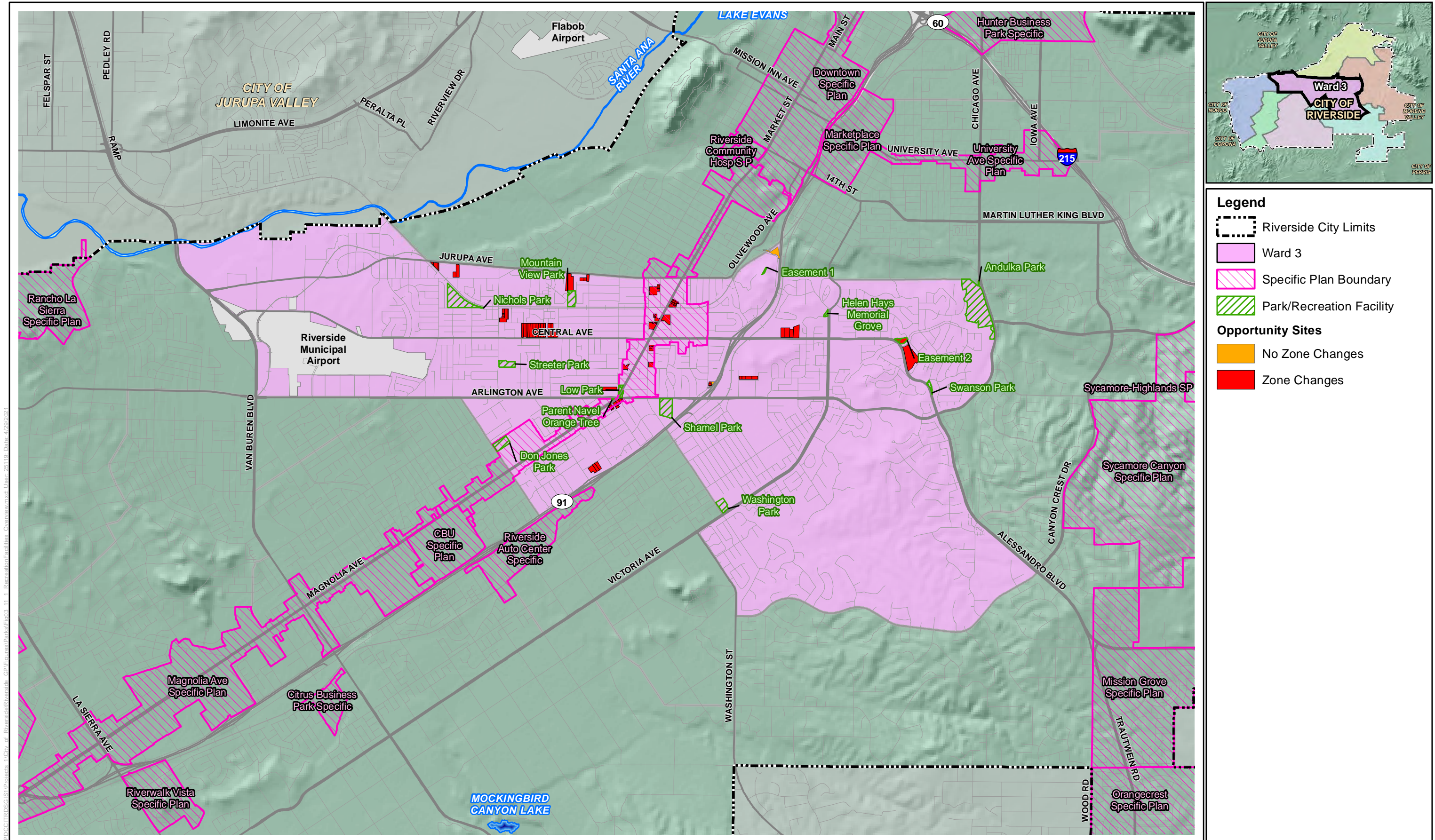
Natural Parks

Regional reserves areas set aside for the protection of wildlife, habitat, and other ecological considerations. There is usually minimal infrastructure within the park beyond trails and signs. These areas may be accessible for low-impact use.



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Figure 3.11-1
Recreational Resources for City of Riverside - Overview
Riverside General Plan Update



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Figure 3.11-1 - Sheet 3
Ward 3 - Opportunity Sites & Recreational Resources for City of Riverside
Riverside General Plan Update

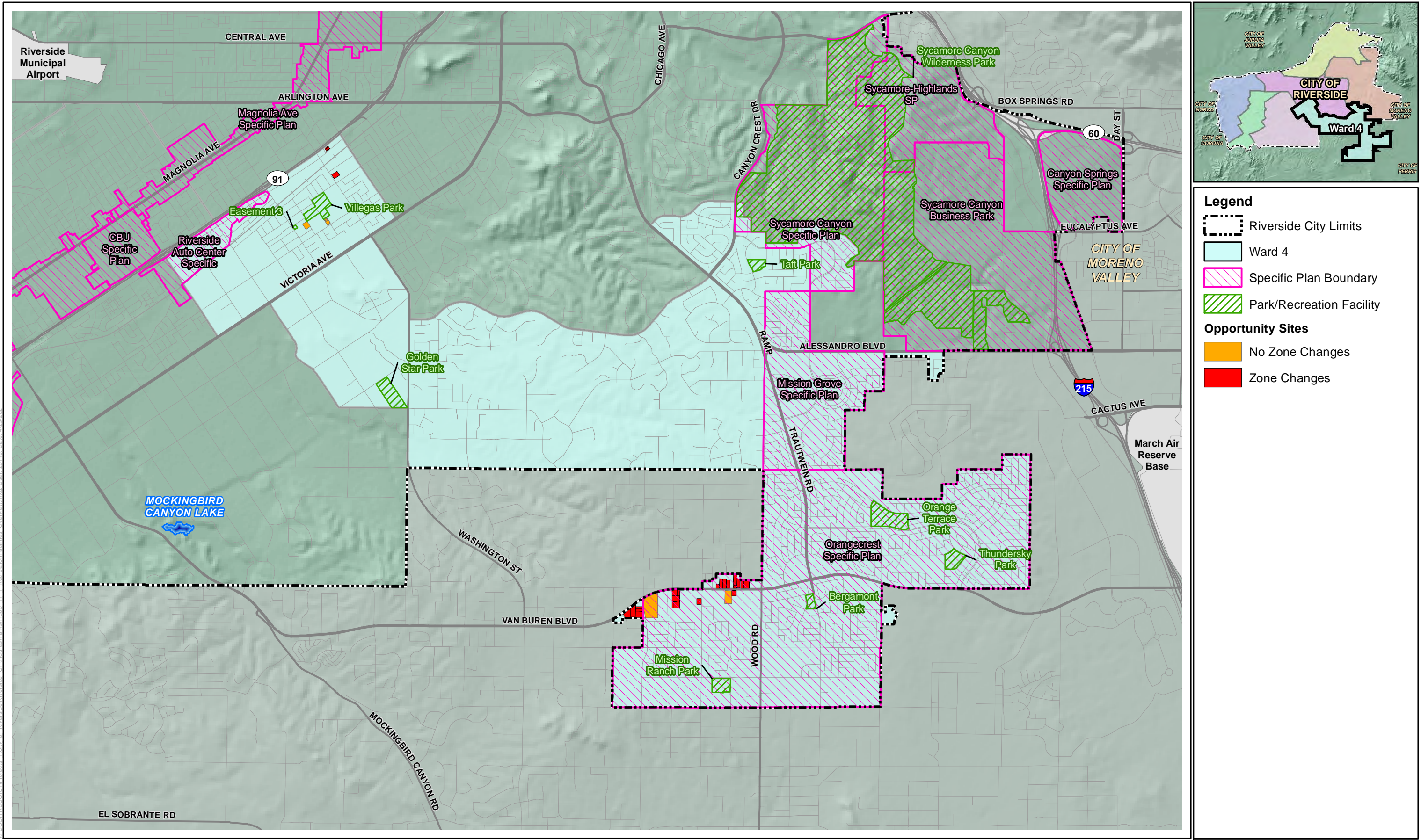
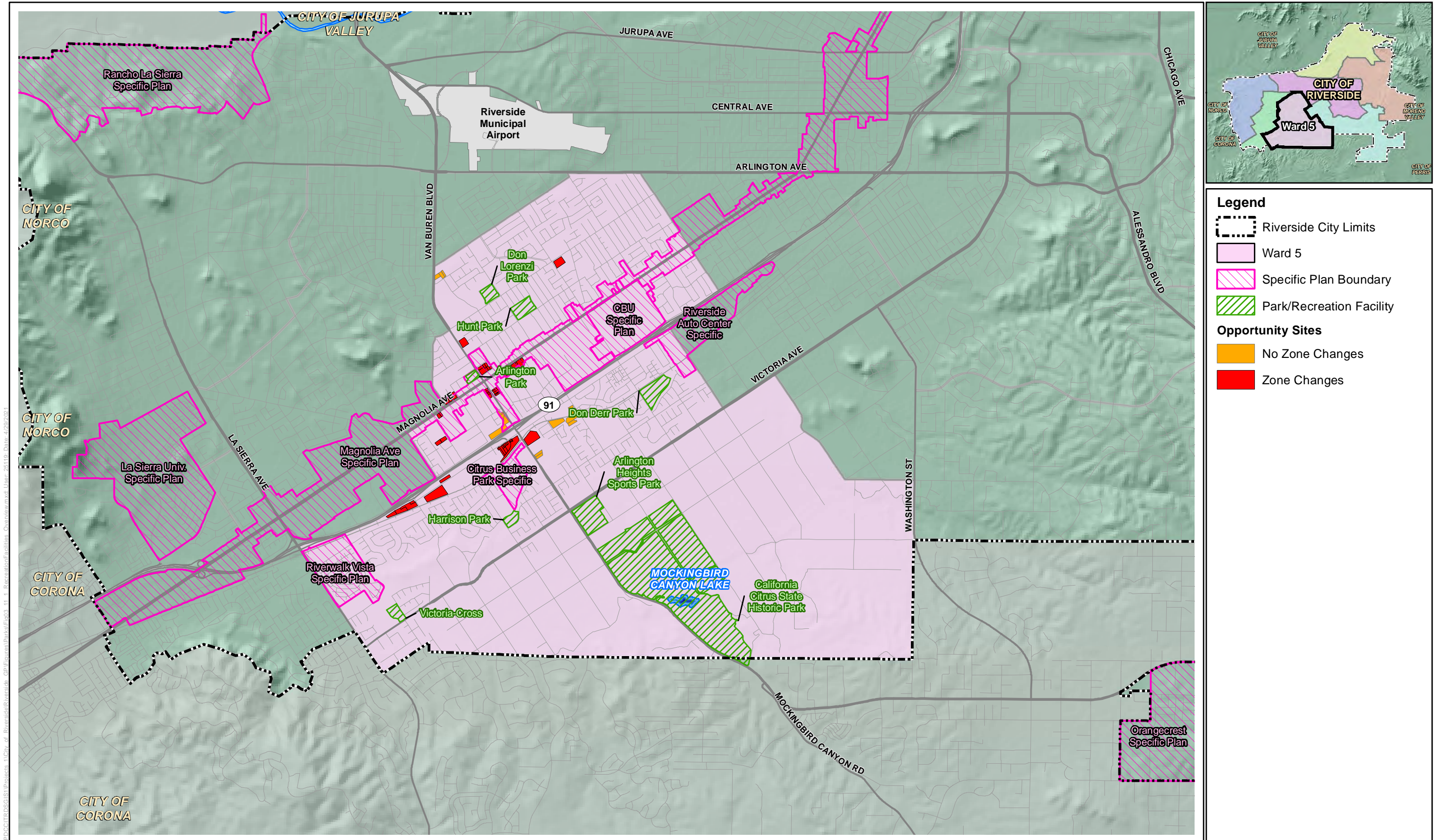
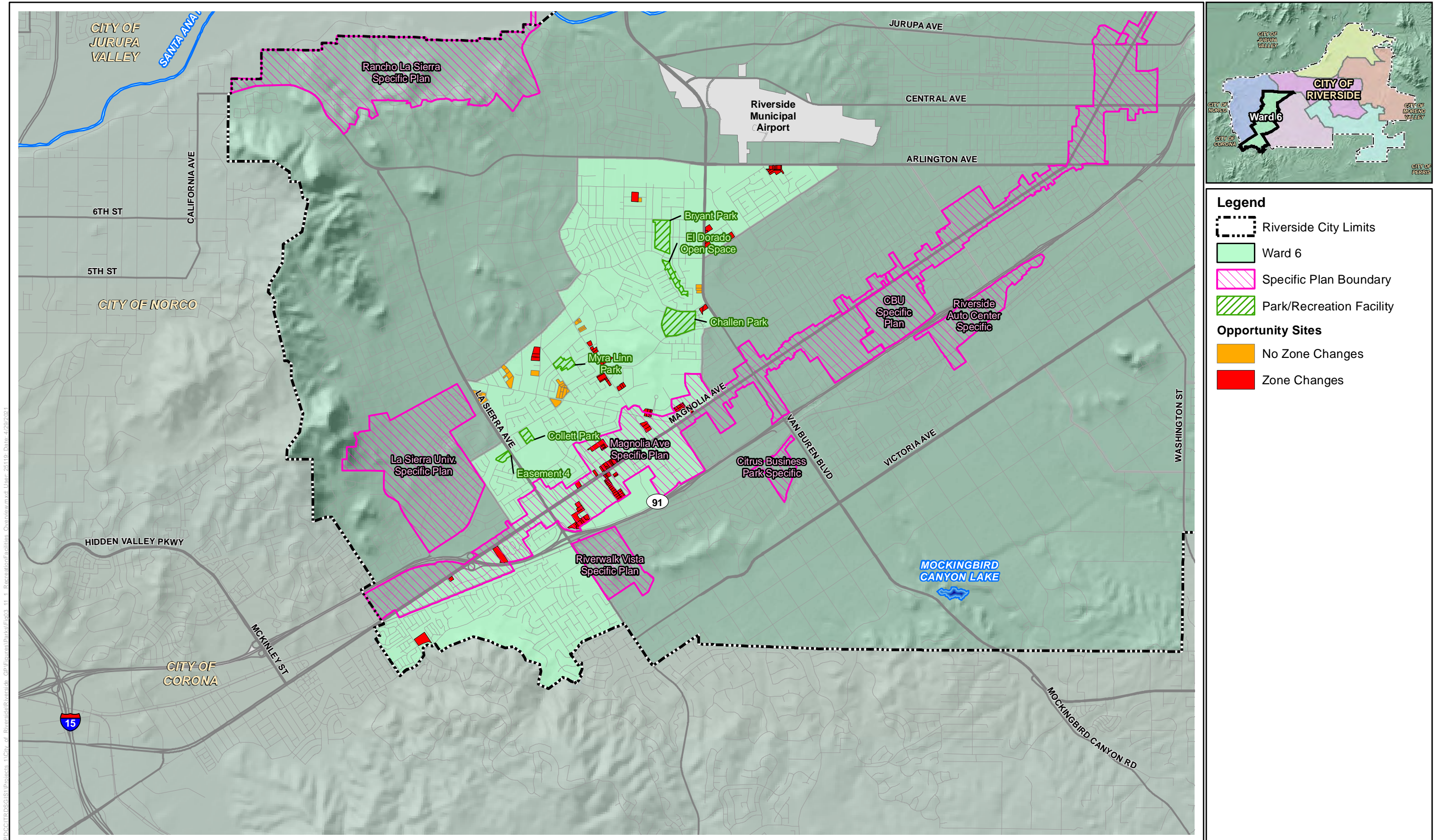


Figure 3.11-1 - Sheet 4
Ward 4 - Opportunity Sites & Recreational Resources for City of Riverside
Riverside General Plan Update



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Figure 3.11-1 - Sheet 5
Ward 5 - Opportunity Sites & Recreational Resources for City of Riverside
Riverside General Plan Update



Legend

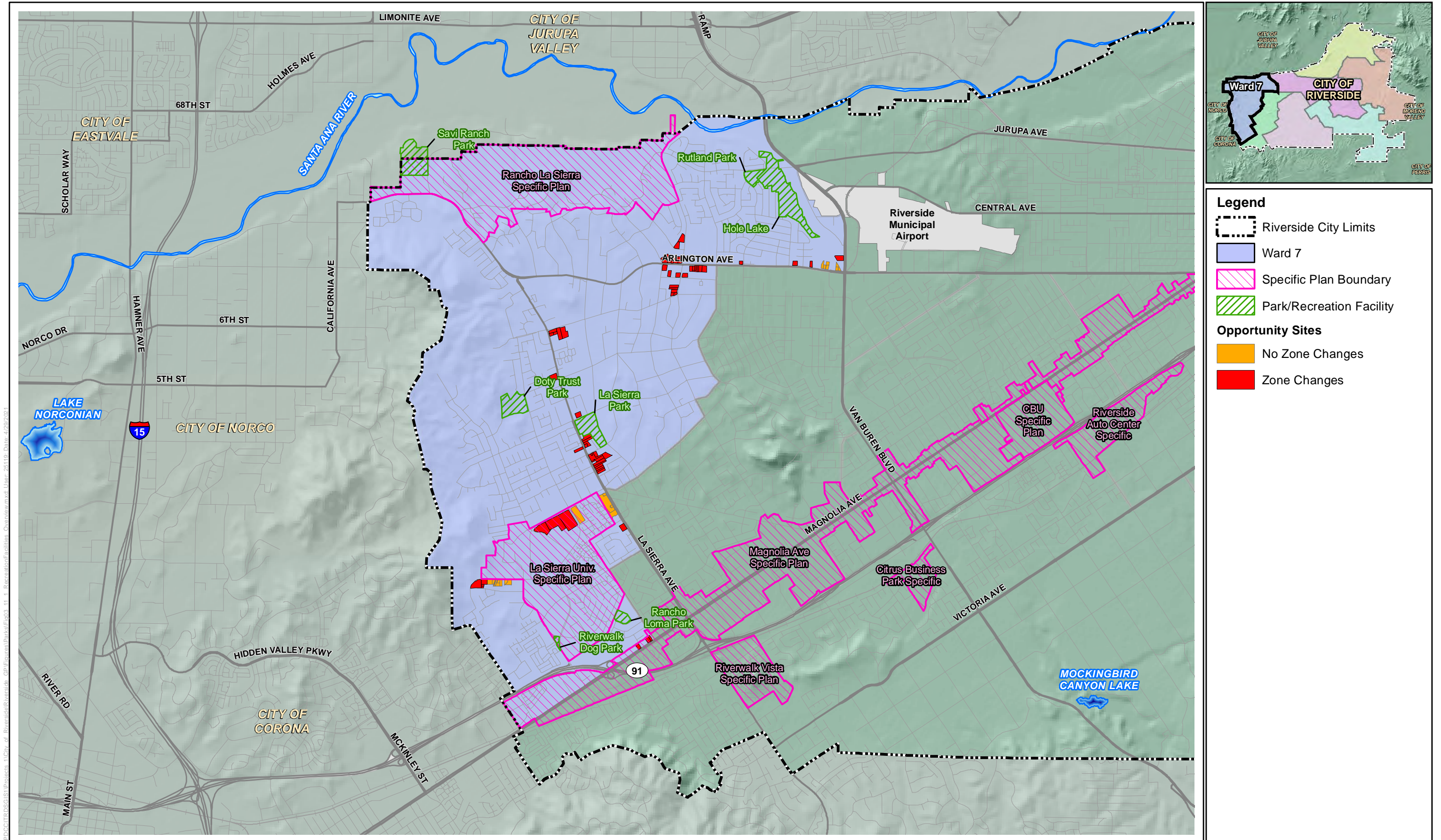
- Riverside City Limits
- Ward 6
- Specific Plan Boundary
- Park/Recreation Facility

Opportunity Sites

- No Zone Changes
- Zone Changes

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Figure 3.11-1 - Sheet 6
Ward 6 - Opportunity Sites & Recreational Resources for City of Riverside
Riverside General Plan Update



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Figure 3.11-1 - Sheet 7
Ward 7 - Opportunity Sites & Recreational Resources for City of Riverside
Riverside General Plan Update

Miscellaneous Facilities

Private use parks are areas that have restricted access and are generally only available for use by the local community, such as a homeowners' association or a private club.

Undeveloped City-owned property is land owned by the City. It can potentially be leased for use. It also may be projected as a potential park site in the future but is not included in calculations of acres or parkland per thousand people until improved as a Developed Park.

Wards

Parks, open space, and recreational facilities are in all seven wards throughout the City. Table 3.11-2 describes the parks, open space, and recreational facilities that are within 0.5 mile (an approximately 15-minute walk) from the Opportunity Sites identified in the Project.

Table 3.11-2. Existing Parks and Open Space by Ward and Distance from Opportunity Site

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Ward 1				
Ab Brown Sports Complex	Size: Approximately 55.5 acres Features: 39 acres of playing fields, 15 acres of gravel parking lot, concession stand, restrooms, maintenance facility	3700 Placentia Ln	Special Use Facility	1,702 feet
Box Springs Mountain Reserve	Size: Approximately 3,400 acres Features: Hiking trails, protected habitat	9699 Box Springs Mountain Rd	Regional Reserve	1,789 feet
Carlson Bark Park	Size: 1.77 acres Features: Off-leash dog park, picnic area, historic site	4700 Buena Vista Ave	Special Use Facility	3,486 feet
Evans Sports Complex	Size: 11.89 acres Features: gymnasium, aquatics complex, athletic fields	4759 Magnolia Ave	Special Use Facility	Adjacent
Fairmount Park	Size: 209.58 acres Features: Band shell, cultural heritage, fishing, golf course, tennis courts, public barbecues, boat rentals, sailing, walking trails	2601 Fairmount Blvd	Regional Park	100 feet
Hunter Hobby Park	Size: 32 acres Features: Softball fields, picnic tables, barbecues, 10,000 feet of miniature train track and steam locomotives	1401 Iowa Ave	Neighborhood Park	1,496 feet
Loring Park	Size: 2.45 acres Features: Open space	3787 Mt. Rubidoux Dr	Special Use Facility	2,212 feet
Martha McLean Anza Narrows Park	Size: 40 acres Hiking and equestrian trails, picnic areas, fishing, horseshoe pits	5759 Jurupa St	Community Park	88 feet
Mount Rubidoux Park	Size: 225 acres Features: Open space, rock formations, running paths, over 3 miles of trails, historic site.	Mt. Rubidoux Dr at 9th St	Regional Reserve	1,072 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Newman Park	Size: 0.41 acres Features: De Anza Statue, Sport Hall of Fame – Historic Site	3780 14th St	Pocket Park	Adjacent
Rancho Jurupa Regional Park	Size: 548 acres Features: Playground, picnic shelters, concession facilities, restrooms, sports fields, walking paths	Crestmore Rd off Mission Blvd	Regional Park	2,391 feet
Reid Park	Size: 42.24 acres Features: indoor and outdoor recreational areas, playgrounds, ball and athletic fields	701 N Orange St	Community Park	Adjacent
Riverside Sports Complex	Size: 17.7 acres Features: Baseball stadium, lighted sports field, restrooms, onsite parking, and bike trail connections	1000 Blaine St	Joint Use Facility	128 feet
Ryan Bonaminio Park	Size: 42.9 acres Features: Baseball field, restrooms, picnic tables, walking paths, community center, fitness stations, gymnasium, parking, playground, softball field, outdoor volleyball, trails, connection to community garden	5000 Tequesquite Ave	Community Facility	623 feet
Santa Ana River Wildlife Area	Size: 2290 acres Features: Undeveloped	2 miles southeast of Limonite on Riverview Dr	Regional Reserve	2,081 feet
White Park	Size: 6 acres Features: Senior center gazebo, botanical garden, maintenance facility, picnic area, walking trails, restrooms	3936 Chestnut St	Special Use Facility	Adjacent
Ward 2				
Bobby Bonds Park	Size: 15 acres Features: Lighted softball field, lighted basketball/tennis courts, sports field, soccer field, social service center, Olympic pool, picnic tables, and childcare	2060 University Ave	Community Park	443 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Bordwell Park	Size: 23 acres Features: Lighted softball field, lighted basketball court, community center, senior activity area, childcare center, playground, picnic tables, and barbecues	2008 Martin Luther King Blvd	Community park	390 feet
Castleview Park	Size: 31.5 acres Features: Playground, picnic tables, undeveloped open space, walking trails	1410 Via Vista Dr	Neighborhood Park	5,771 feet
Dario Vasquez Park	Size: 1.8 acres Features: Lighted basketball court, playground, covered picnic tables, barbecues, and onsite parking	2400 14 th St	Neighborhood Park	304 feet
Highland Park	Size: 7.1 acres Features: Basketball court, two playgrounds, picnic facilities, covered picnic area, and onsite parking	780 Glenhill St	Neighborhood Park	1,101 feet
Islander Park	Size: 23 acres Features: Community pool, bathhouse/lockers/showers, onsite parking, picnic facility, and open space	3794 Mount Vernon Ave	Special Use Facility	441 feet
Kensington Pocket Park	Size: 0.7 acre Features: Open space	5050 Kensington Ave	Pocket Park	436
Lincoln Park	Size: 3.7 acres Features: Lighted basketball court, T-ball field, horseshoe courts, community center, fitness stations, horseshoes, playground, and picnic facilities	4261 Park Ave	Neighborhood Park	698 feet
Mount Vernon Park	Size: 8 acres Features: Undeveloped	Blaine St and Valencia Hill Blvd	Undeveloped City-Owned Property	2,283 feet
North Park	Size: 1.4 acres Features: Historic site with arbor structure, parking	3172 Mission Inn Ave	Special Use Facilities	436 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Patterson Park	Size: 4.25 acres Features: Lighted softball and sports fields, playground, picnic shelters, snack bar, restrooms and onsite parking	1846 Linden St	Neighborhood Park	367 feet
Quail Run Open Space	Size: 27 acres Features: Natural open space	Quail Run Rd	Regional Reserve	3,111 feet
Sycamore Highlands Park	Size: 10.48 acres Features: Playground, picnic tables, barbecues, covered picnic area, ballfield, butterfly garden, and water spray feature	Fair Isle Dr	Neighborhood Park	5,336 feet
Ward 3				
Andulka Park	Size: 36.64 acres Features: Tennis courts, basketball courts, baseball and soccer field	5201 Chicago Ave	Community Park	123 feet
Don Jones Park	Size: 5.77 acres Features: Lighted softball and soccer field, picnic tables, restrooms, snack bar	3995 Jefferson St	Neighborhood Park	3,554 feet
Pachappa Hill	Size: 0.39 acre Features: Open space	Pachappa Hill	Regional Reserve	643 feet
Helen Hays Memorial Grove	Size: 0.72 acre Features: Historic site	2720 Rumsey Dr	Citrus Grove	1,140 feet
Low Park	Size: 1.25 acres Features: Picnic facilities	7101 Magnolia Ave	Pocket Park	70 feet
Mountain View Park	Size: 5.51 acres Features: Basketball half courts, playground, picnic tables, barbecues, and exercise course	6241 Wiehe Ave	Neighborhood Park	Adjacent
Nichols Park	Size: 14.72 acres Features: Two lighted softball fields, basketball and volleyball courts, sports field, community center with gym, playground, picnic tables, and barbecues	5505 Dewey Ave	Community Park	335 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Parent Navel Orange Tree	Size: 0.09 acre Features: Historic resource; one of two original Parent Washington Navel Orange Trees is preserved at this site with fence surrounding it	7101 Magnolia Ave	Neighborhood Park	220 feet
Shamel Park	Size: 9.84 acres Features: Lighted ball fields, lighted tennis courts, covered picnic area, horseshoe courts, pool, picnic tables and barbecues, restroom, and onsite parking	3650 Arlington Ave	Neighborhood Park	1,204 feet
Streeter Park	Size: 4.42 acres Features: Senior and handicapped citizens' center, patio area includes covered picnic area, basketball half court, arbors, horseshoe courts	5257 Sierra Ave	Special Use Facility	1,114 feet
Swanson Park	Size: 0.80 acre Features: Picnic tables	5725 Glenhaven Ave	Pocket Park	929 feet
Washington Park	Size: 3.90 acres Features: Playground, restrooms, picnic tables, barbecues, onsite parking	2769 Mary St	Neighborhood Park	2,623 feet
Ward 4				
Bergamont Park	Size: 5.32 acres Features: Basketball half courts, playground, picnic tables, and exercise course	9229 Bergamont Dr	Neighborhood Park	2,531 feet
Golden Star Park	Size: 19.31 acres Features: Undeveloped	Bradley St and Washington Ave	Undeveloped City-Owned Property	7,247 feet
Mission Ranch Park	Size: 12 acres Features: Undeveloped park	Lurin Ave & Obsidian Dr	Neighborhood Park	3,333 feet
Orange Terrace Park	Size: 29.81 acres Features: Lighted softball fields, restrooms, snack bar, playground, and picnic shelters	20010 Orange Terrace Pkwy	Community Park	5,932 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Sycamore Canyon Wilderness Park	Size: 1,590.06 acres Features: Wilderness reserve, Stephens' kangaroo rat habitat, onsite parking, bike and hiking trails	400 Central Ave	Regional Reserve	2,805 feet
Taft Park	Size: 7.18 acres Features: Basketball half courts, tennis courts, playground, picnic tables, and barbecues	6826 New Ridge Dr	Neighborhood Park	11,056 feet
Thundersky Park	Size: 12.65 acres Features: Playground, covered picnic areas, ballfield, picnic tables, walking trails, barbecues	20440 Thundersky Cir	Neighborhood Park	8,738 feet
Villegas Park	Size: 17.46 acres Features: Lighted ballfields, lighted soccer fields, basketball court, handball court, covered picnic area, community center, playground, pool, picnic tables, barbecues, restrooms, onsite parking	7260 Marguerita Ave	Community Park	Adjacent
Ward 5				
Arlington Heights Sports Park	Size: 34.39 acres Features: Water features, walking trails, lighted softball field and basketball courts, multi-use field, playground, pool, picnic table, covered picnic table, barbecue, restrooms	Van Buren Ave & Cleveland Ave	Community Park	2,761 feet
Arlington Park	Size: 4.77 acres Features: Basketball, tennis, and roller hockey courts, picnic areas, swimming pool, restroom, community center, and playground	3860 Van Buren Ave	Community Park	122 feet
California Citrus State Historic Park	Size: 377 acres Features: Visitor center, exhibits, hiking trails, picnic tables, barbecues, Sunkist Center, and small amphitheater	9400 Dufferin Ave	State Park	1,139 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Don Derr Park	Size: 21.44 acres Features: Lighted ball fields, basketball courts, football, softball field, playground, snack bar, picnic tables, barbecues, restrooms, and onsite parking	3003 Monroe Ave	Neighborhood Park	2,856 feet
Don Lorenzi Park	Size: 9.08 acres Features: Lighted sports fields, baseball field, picnic tables, barbecues, restrooms, and onsite parking	4230 Jackson St	Community Park	2,104 feet
Harrison Park	Size: 6.49 acres Features: Beach volleyball, playground, horseshoe pit, picnic tables, and covered picnic areas.	2851 Harrison St	Neighborhood Park	2,236 feet
Hunt Park	Size: 13.93 acres Features: Lighted softball field and basketball court, sports field, volleyball court, community center, playground, pool, picnic tables, barbecues, and skate park	4015 Jackson St	Community Park	1,681 feet
Victoria-Cross	Size: 7.83 acres Features: Undeveloped park	Victoria Ave and Cross St	Undeveloped City-Owned Property	3,810 feet
Ward 6				
Bryant Park	Size: 19.65 acres Features: Lighted softball fields, basketball and tennis courts, community center, playground, picnic tables, barbecues, covered picnic areas, snack bar, childcare, and social services center	5950 Philbin Ave	Community Park	962 feet
Challen Park	Size: 33.01 acres Features: Parking and trails	4602 Challen Ave	Regional Reserve	184 feet
Collett Park	Size: 5.60 acres Features: Beach volleyball, playground, horseshoe pits, picnic tables, and covered picnic areas	10950 Collet Ave	Neighborhood Park	1,497 feet
El Dorado Open Space	Size: 8.75 acres Features: Natural open space	Warren Rd	Neighborhood Park	359 feet

Name of Resource	Description of Resource	Location	Park Type	Distance from nearest Opportunity Site
Myra Linn Park	Size: 7.89 acres Features: Lighted tennis courts, playground, picnic tables, barbecues, and exercise course	4540 Meredith St	Neighborhood Park	541 feet
Ward 7				
Doty Trust Park	Size: 21.31 acres Features: Water feature, walking trails, playground, lighted basketball court, picnic tables, barbecues	Golden Ave and Campbell Ave	Neighborhood Park	1,312 feet
Hole Lake	Size: 61.0 acres Features: Undeveloped park	Bradford St and Jurupa Ave	Undeveloped City-Owned Property	1,038 feet
La Sierra Park	Size: 23.15 acres Features: Lighted ball fields, community center, covered picnic area, playground, picnic tables, snack bar, barbecues, restrooms, onsite parking	5205 La Sierra Ave	Community Park	Adjacent
Rancho Loma Park	Size: 6.48 acres Features: Tether ball courts, beach volleyball, volleyball courts, playground, picnic tables, barbecues, and covered picnic area	11343 Rancho Loma Dr	Neighborhood Park	1,005 feet
Riverwalk Dog Park	Size: 5.83 acres Features: Off-leash dog park, picnic table	Corner of Pierce St and Riverwalk Pkwy	Special Use Facility	2,018 feet
Rutland Park	Size: 8.63 acres Features: Basketball half courts, beach volleyball, horseshoe pits, playground, picnic tables, barbecues, and covered picnic areas	7000 Rutland Ave	Neighborhood Park	3,319 feet
Savi Ranch Park	Size: 37.62 acres Features: Undeveloped park	N of Arlington Ave, NW corner of the City	Undeveloped City-Owned Property	8,723 feet

Source: City of Riverside 2021

3.11.3 Regulatory Setting

Federal

There are no federal regulations directly applicable to parks and recreation with respect to this Project.

State

The Quimby Act (Government Code Section 66477)

The Quimby Act, enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, and allows developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

Proposition 40 Park Bond Act

Proposition 40 allows for the maintenance and preservation of parks for the state's growing population. This is conducted by borrowing money through general obligation bonds. This money is then used for the development, restoration, and acquisition of state and local parks, recreation areas, and historical resources, and for land, air, and water conservation programs.

California Public Park Preservation Act (California Public Resources Code, § 5400–5409)

The California Public Park Preservation Act is the primary instrument for protecting and preserving parkland. Under the Public Resources Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land or both is provided to replace the parkland acquired. It provides that a public agency that acquires public parkland for non-park use must either pay compensation that is sufficient to acquire substantially equivalent substitute parkland or provide substitute parkland of comparable characteristics. This act ensures no net loss of parkland and facilities. However, the Project would not acquire parkland for non-park use, and this act would not apply.

Local

Riverside General Plan 2025

Enhancing Riverside's existing park and recreation facilities, as well as creating new recreational opportunities, will be carried out through the objectives and policies of the Parks and Recreation Element. The City will continue to maintain its existing recreation programs and facilities, as well as making those resources accessible to all Riverside citizens. Access to park facilities and connections between open space resources through pedestrian, bicycle, and equestrian trails are important to enhancing Riverside's recreational experiences.

Protecting Riverside’s open space areas, scenic resources, and hillsides will be carried out through the objectives and policies of the Open Space and Conservation Element. The City is committed to preserving its natural resources and open spaces of the highest quality and in a cost-effective manner to enhance the living environment of all residents. The City believes that individual interests must be balanced against the general public interest and particularly the conservation of natural resources.

City of Riverside Comprehensive Park, Recreation & Community Services Master Plan (Parks Master Plan)

On February 4, 2020, the City adopted the Parks Master Plan (City of Riverside 2020), which serves as a guide and implementation tool for the management and development of parks and recreational facilities and programs in the City.

The policies that have been developed in the Parks Master Plan are intended to provide a framework of support and guidance. They are for the benefit of City staff, as well as the community, as a tool for decision-making about all parks and recreation programs and resources that affect the City. Policies and implementation strategies for the Parks Master Plan include the following:

- Secure adequate funding mechanisms to support facility and program development.
- As recreation needs develop with generational shifts, facilities should be re-evaluated for potential improvements, preserving as much open naturalized areas as possible.
- Secure adequate funding mechanisms to support parks maintenance programs to preserve and extend the life of the Riverside Park System.
- Develop and implement a public outreach mechanism to continuously coordinate park updates and re-assess community needs at periodic intervals.
- For locations of Opportunity Sites for parks, each recommendation should be considered against the overall distribution of existing parkland.

Table 3.11-3 summarizes GP 2025 and Specific Plan policies relevant to recreation.

Table 3.11-3. Relevant General Plan and Specific Plan Policies

Policy Title	Summary
Riverside General Plan 2025	
Parks and Recreation Element	<ul style="list-style-type: none"> • Objective PR-1: Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents. <ul style="list-style-type: none"> ○ Policy PR-1.1: Implement the policies of the City of Riverside Comprehensive Park, and Recreation Master Plan. Revise the neighborhood/community park ratio standard to two acres of community park and one acre of neighborhood park, and five acres overall per one thousand residents. ○ Policy PR-1.2: Distribute recreational facilities equally throughout Riverside’s neighborhoods, for all residents regardless of age, gender, ethnicity, economic status, or physical capability. ○ Policy PR-1.3: Encourage private development and/or operation of new and existing recreational facilities to complement, and supplement, and economize the public recreational system. ○ Policy PR-1.6: Develop sustainable standards to design park facilities and landscaping that enhance and preserve natural site characteristics as

Policy Title	Summary
	<p>appropriate, to minimize maintenance demands, encourage the planting of native landscapes, and to incorporate xeriscape (low-water demand) principles where feasible. •</p> <ul style="list-style-type: none"> ○ Policy PR-1.7: Evaluate opportunities to “naturalize” many existing facilities, especially those built near and around creeks and other drainages. This could include the elimination of turf in areas of little public use and expansion of riparian and natural areas. ○ Policy PR-1.8: Pursue potential funding sources and partnerships for a multi-use sports park, community and special-use facilities that do not rely on future private development. ○ Policy PR-1.9: Seek funding opportunities, including feasibility of voter-approved measure to support development identified within the Comprehensive Park, Recreation and Community Services Master Plan. ○ Policy PR-1.10: Adopt as part of the Comprehensive Park, Recreation and Community Services Master Plan including the update to the Financial Strategy relating to development impact fees. Development fees should be updated annually with a recovery of a minimum of 80% of the impact. ○ Policy PR-1.11: Review and comment on local and regional planning documents for consistency with the Comprehensive Park, Recreation and Community Services Master Plan. ○ Policy PR-1.12: Decision makers and staff from both the city and local school districts should meet and discuss changes required to initiate and/or modify existing agreements to meet the changing recreational needs and demands of the community. <ul style="list-style-type: none"> ● Objective PR-2: Increase access to existing and future parks and expand pedestrian linkages between park and recreational facilities throughout Riverside. <ul style="list-style-type: none"> ○ Policy PR-2.1: Integrate public transportation routes, including Class I Bike Routes, when locating regional reserve parks, community parks and community centers. ○ Policy PR-2.2: Implement recommend trail expansions, improvements and linkages between parks throughout the City’s trails system as identified in the adopted Park Master Plan and Trails System Master Plan. ○ Policy PR-2.5: Encourage the development of community sponsored recreational opportunities for the trail and pedestrian system in Riverside. Opportunities could include walk-a-thons, 5K-and-over runs, triathlons, and bike races. ○ Policy PR-2.7: Pursue partnerships with the County, other local government agencies, and non-profits in securing funding from Federal Transportation Funds, the State Bicycle Commuter Program, State Park Bonds, and other funding sources. ○ Policy PR-2.8: Evaluate/update at a minimum every 5 years, the trails component of the Comprehensive Park, Recreation and Community Services Master Plan, to reevaluate routes/alignments and trail design/construction standards and trail related City policies/codes.
<p>Open Space and Conservation Element</p>	<ul style="list-style-type: none"> ● Objective OS-1: In conjunction with the County, RCRC, Riverside Land Conservancy, and other appropriate agencies, preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.

Policy Title	Summary
	<ul style="list-style-type: none"> ○ Policy OS-1.1: Protect, restore, and preserve environmentally sensitive areas with unique resources, including plant communities, wildlife habitats and corridors, special geology or physical features, and wetlands, riparian areas, and floodplains along creeks where possible. ○ Policy OS-1.2: Establish an open space acquisition priority program that identifies acquisition area priorities based on, establishment of a maintenance endowment, capital costs, operation, and maintenance costs, accessibility, needs, resource preservation, ability to complete or enhance the existing open space linkage system and unique environmental features. ○ Policy OS-1.5: Require the provision of open space linkages between development projects, consistent with the provisions of the Comprehensive Park, Recreation and Community Services Master Plan, Trails Master Plan, Open Space Plan, and other environmental considerations, including the Multi-Species Habitat Conservation Plan (MSHCP). ○ Policy OS-1.15: Recognize the value of major institutional passive open spaces as important components of the total open space systems and protect their visual character. ● Objective OS-3: Preserve designated agricultural lands in recognition of their economic, historic, and open space benefits and their importance to the character of the City of Riverside. <ul style="list-style-type: none"> ○ Policy OS-3.3: Identify park locations or portions of existing parks that could be utilized to promote and encourage agricultural activities including community gardens or for leased agricultural activities. Recreation use should be the priority use of parkland. Agricultural activities should be temporary unless it is integrated into the overall theme of the park, like the CA Citrus State Park. ● Objective OS-5: Protect biotic communities and critical habitats for endangered species throughout the General Plan Area. ● Objective OS-6: Preserve and maintain wildlife movement corridors. <ul style="list-style-type: none"> ○ Policy OS-6.3: Preserve the integrity of Riverside’s arroyos and riparian habitat areas through the preservation of native plants through the removal of non-natives and reintroduction of native species. ● Objective OS-7: Turn the Santa Ana River Task Force “Vision” into reality. <ul style="list-style-type: none"> ○ Policy OS-7.2: Give priority to the Fairmount Park Camp Evans wetlands enhancement project and the completion of the Santa Ana River Trail. ○ Policy OS-7.3: Preserve and expand open space along the Santa Ana River to protect water quality, riparian habit, and appropriate recreational uses. ○ Policy OS-7.4: Interconnect the Santa Ana River Trail with other parks, cultural and community centers throughout the City through trails and linkages to encourage more pedestrian and bicycle usage. ● Objective OS-10: Preserve the quantity and quality of all water resources throughout Riverside. <ul style="list-style-type: none"> ○ Policy OS-10.4: Develop a required native plant policy that requires 80% minimum level for native plants at open space and park developments or improvements. Include this list in the recommended landscape standards for private development. ○ Policy OS-10.5: Establish standards for the use of reclaimed water for landscaping including medians and street trees.
<p>Land Use and Urban Design Element</p>	<ul style="list-style-type: none"> ● Objective LU-1: Increase the prominence of the Santa Ana River by providing better connections, increased recreational opportunities, and development of Class I Bike Path and Recreational Trail along the length of the river within the City of Riverside including an adjacent decomposed granite walkway.

Policy Title	Summary
	<ul style="list-style-type: none"> ● Objective LU-7: Preserve and protect significant areas of native wildlife and plant habitat, including endangered species. <ul style="list-style-type: none"> ○ Policy LU-7.1: Continue to maintain Sycamore Canyon Wilderness Park as primarily a functioning open space area featuring native flora and fauna. ○ Policy LU-7.2: Design new development adjacent and in close proximity to native wildlife flora and fauna in a manner which protects and preserves habitat. ● Objective LU-11: Create a network of parkways to establish stronger linkages between Riverside’s neighborhoods, major elements of its natural environment, and neighborhood parks and schools. <ul style="list-style-type: none"> ○ Policy LU-11.2: Recognize Victoria Avenue, Magnolia Avenue/Market Street, University Avenue, Van Buren Boulevard, Riverwalk Parkway, La Sierra Avenue, Arlington Avenue, Canyon Crest Drive, and Overlook Parkway as the fundamental elements of the City’s parkway landscape network, and open space components linking Riverside’s Park system. ○ Policy LU-11.3: Recognize and maintain Victoria Avenue as a historic scenic boulevard/ parkway and the Rosanna Scott Memorial Bicycle Trail (RSMBT), providing a vital pedestrian, bicycle and vehicular connection to the Arlington Neighborhood and linking neighborhoods to schools, parks and other vital resources in the Greenbelt. ○ Policy LU-11.5: Recognize that University Avenue serves as a parkway linking neighborhoods with such major components of open space components linking Riverside’s Park System. ○ Policy LU-11.6: Recognize Van Buren Boulevard as a significant parkway, linking neighborhoods along its path to the Santa Ana River, the Arlington Heights Greenbelt, Victoria Avenue, and the California Citrus State Historic Park. ○ Policy LU-11.7: Recognize Riverwalk Parkway as a vital link between neighborhoods and open space features in the western end of the City. ○ Policy LU-11.8: Identify the completed Overlook Parkway as an important parkway connection between the Arlington Heights Greenbelt and Sycamore Canyon Park. ○ Policy LU-11.9: Recognize Canyon Crest Drive as a vital parkway connection for the eastern portion of the City. ○ Policy LU-11.10: Designate La Sierra Avenue as a City parkway, providing links to major northern and southern open space areas. ○ Policy LU-11.11: Recognize and enhance Arlington Avenue as a cross-city roadway that connects east to west. ● Objective LU-26: Ensure that a network of modern, effective, and adequate community facilities are equitably distributed across the entire City. <ul style="list-style-type: none"> ○ Policy LU-26.1: Monitor local land-use changes for opportunities to facilitate and/or implement City strategies, policies, and priorities including procuring trail acquisitions or easements and park and open space acquisition or easements through new development, donations, partnerships, and grants consistent with the Comprehensive Park, Recreation and Community Services Master Plan. ○ Policy LU-26.2: Develop and enforce standards for community facilities (such as fire and police stations, libraries and parks) based upon population densities and proximity of existing facilities.

Policy Title	Summary
	<ul style="list-style-type: none"> ○ Policy LU-26.3: Encourage new community facilities to be jointly developed and utilized by one or more City department, City/regional agency, and/or appropriate non-profits. ● Objective LU-71: Establish the Northside Community as a balanced community in which it is pleasant to live, work and play. ● Objective LU-79: Preserve and enhance the natural character and qualities of Sycamore Canyon Wilderness Park. <ul style="list-style-type: none"> ○ Policy LU-79.3: Seek to balance the Park’s potentially conflicting roles as both habitat for native flora and fauna and a community recreational and open space resource. ● Objective LU-85: Preserve and enhance the largely residential character of the Victoria Neighborhood. <ul style="list-style-type: none"> ○ Policy LU-85.4: Maintain current designation of Victoria Avenue as a historic, scenic parkway, and the Rosanna Scott Memorial Bicycle Trail.
Public Facilities and Infrastructure Element	<ul style="list-style-type: none"> ● Objective PF-2: Find new and expanded uses for recycled wastewater. <ul style="list-style-type: none"> ○ Policy PF-2.1: Expand the use of reclaimed water for irrigation and other applications as permitted under state law ● Objective PF-4: Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows. <ul style="list-style-type: none"> ○ Policy PF-4.4: Comply with Federally mandated requirements of the National Pollutant Discharge Elimination System (NPDES) for treatment of urban storm-water runoff in new facility design. ○ Policy PF-4.5: Within available resources, utilize the low-impact development plans to design all parking lots, walkways, and other paved surfaces with bioswales or other similar on-site facilities to help environmentally process water runoff. ● Objective PF-10: Meet the varied recreational and service needs of Riverside’s diverse population. <ul style="list-style-type: none"> ○ Policy PF-10.1: Provide every neighborhood with easy access to recreation and service programs by decentralizing community centers and programs. Promote the development of shared facilities and satellite offices in each Riverside neighborhood either by the City or in cooperation with another public agency, private business, or non-profit organization. ○ Policy PF-10.3: Explore innovative funding and development concepts with private businesses or non-profit organizations. ○ Policy PF-10.4: Ensure that youth activities and programs are provided or are accessible by all neighborhoods, either in City facilities or through joint-use or cooperative agreements with other public, private, or non-profit service providers.
Specific Plans	
Canyon Springs Business Park Specific Plan	There are no applicable policies relevant to the Project regarding parks and recreation.
Downtown Specific Plan	There are no applicable policies relevant to the Project regarding parks and recreation.
Hunter Business Park Specific Plan	Goal: To enhance on Hunter Business Park’s unique features, including Hunter Park, Box Springs Mountain Regional Park and city vistas

Policy Title	Summary
La Sierra University Specific Plan	<ul style="list-style-type: none"> • Policy LSU-5.4 The tops of natural hill forms shall be developed as landscaped open spaces.
Magnolia Avenue Specific Plan	<ul style="list-style-type: none"> • Objective 1: Maintain the established residential character of the Magnolia Heritage District while allowing for higher intensity transit oriented residential and mixed-use development on opportunity sites, particularly along Magnolia and California Avenues. <ul style="list-style-type: none"> ○ Policy 1.2 Preserve historic landscaping and increase green space along the Magnolia Corridor. ○ Policy 1.5 Enhance and celebrate the Parent Navel Orange Tree as a historic and cultural landmark.
Riverside Marketplace Specific Plan	There are no applicable policies relevant to the Project regarding parks and recreation.
University Avenue Specific Plan	There are no applicable policies relevant to the Project regarding parks and recreation.

Sources: City of Riverside 1991, 2002, 2005, 2007, 2009, 2012a, 2012b, 2012c, 2017a, 2017b, 2019.

City of Riverside Municipal Code

The City has enacted a development fee ordinance in accordance with the Quimby Act.

Chapter 16.44 – Regional Parks and Reserve Parks Development Fee

16.44.010 - Purpose. The purpose of this chapter is to provide for the payment of a development fee to be utilized for the acquisition and development of regional parks and reserve parks, and if necessary, to be utilized for interfund borrowing for local parks.

Chapter 16.60 - Local Park Development Fees

16.60.010 - Purpose. The purpose of the Local Park Development Fee is to enable the acquisition and/or development and/or improvement of neighborhood and community parks to provide both passive and active recreational opportunities to the residents of the City of Riverside in order to improve the quality of life and for the public health, welfare and benefit. New development within the City generates a need for added facilities and an increased demand upon existing facilities, and the imposition of a Local Park Development Fee upon such new development is necessary to provide funding for such new or improved facilities meeting established standards for such new development.

Policy Consistency

CEQA regulations require a discussion of inconsistencies or conflicts between a proposed project and federal, state, regional, or local plans and laws. Several state laws and regional policies pertain to parks, recreation, and open space resources. The Project would be consistent with GP 2025, the Parks Master Plan, and applicable Specific Plan goals and policies. As discussed in Chapter 2, *Project Description*, one of the objectives of the Project is to locate new housing in areas readily accessible to services, parks and other amenities, transit, jobs, and activity centers. Policy HE-4, Thriving Neighborhoods, in the Housing Element Update is to facilitate and encourage new housing development that results in livable and sustainable neighborhoods. This in part would be accomplished through implementation of Action-HE-4.1 by preparing design regulations that create links between private development and public space to create safe, healthy, complete

neighborhoods that promote proximity of quality housing to schools, transit, parks, and other needs. The implementation of the Project would be consistent with all relevant plans and laws.

3.11.4 Methodology and Thresholds of Significance

The methods for analysis are based on review of GP 2025, the Riverside Municipal Code (RMC), and the Parks Master Plan. This impact analysis considers the potential recreation impacts associated with implementation of the Project. Because the existing population would change under build-out of the Project, this analysis is based on a comparison of existing City park and recreation land with the amount of park and recreation land necessary to serve the population adequately under the Project as a means of estimating the extent to which existing parks would be affected by the Project. The analysis considers whether the Project would result in deterioration of existing parks and recreational facilities as a result of the projected population increase. Additionally, this analysis considers the prospective impacts of future recreational facilities and the expansion of existing facilities that would be allowed under the Project to meet the adopted area standards related to parks and recreation and provide sufficient park and recreation resources for the increased population.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would:

- 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
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment

3.11.5 Impacts and Mitigation Measures

Impact REC-1: The Project could potentially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

The City has a current population of 328,155 people. With the implementation of the Project, with maximum build-out the population could increase to 431,685 people. Maximum build-out of the Opportunity Sites identified in the Housing Element Update would result in a 31.4-percent increase in population. The potential increase from the implementation of the Project could result in increased use of park and recreational facilities listed in Table 3.11-1 and on Figure 3.11-1.

Within all wards, the amount of land designated as neighborhood parks provided per resident is already inadequate based on the ratios that the City has outlined. The implementation of the Project could result in an increased use of nearby existing neighborhood parks, regional parks, and community parks. Potential impacts would include greater demands on parkland and recreational

facilities, potentially increasing the use of existing parks and other recreational facilities, which could cause physical deterioration of the facility. However, the impacts associated with park development and operation would be less than significant.

New residential and mixed-use development within the City is required to adhere to minimum open space standards of the Zoning Code (Title 19 of the RMC), which could include pocket parks, tot lots, court facilities, barbecue facilities, jogging or walking trails, community gardens, accessible green roof space, and traditional neighborhood parks. The development of these parks would offset the Project's increased demand and thereby minimize physical deterioration of existing parks and open space facilities. The potential environmental impacts associated with the development and operation of these new park facilities are not known at this time. Subsequent project-specific CEQA analysis will be required to evaluate future projects on a case-by-case basis. If potential impacts (e.g., noise, dust) would result from development and operation of new park facilities, specific mitigation measures can be applied at that time.

The City currently has 2,940.61 acres of existing parkland. Also, spaces categorized as undeveloped City-owned property are not included in the parkland-to-resident-ratio analysis as determined by the Parks Master Plan (City of Riverside 2020). Approximately 345.54 acres of parkland in the City is categorized as undeveloped City-owned property. Therefore, for the purposes of the parkland-to-resident-ratio analysis, the City currently has 2,595.07 acres of existing parkland. The GP 2025 Parks and Recreation Element currently has an adopted standard of 3 acres per 1,000 residents (City of Riverside 2012). This is further broken down to 2 acres of neighborhood parkland provided per 1,000 persons, and 1 acre of community parkland per 1,000 residents. There are 129.5 acres of neighborhood park, which leaves a deficit of neighborhood parks within walking distance before development of Opportunity Sites has occurred (Table 3.11-4). New development of parks and Opportunity Sites would require new parks and open space facilities to minimize new demand on existing facilities. Furthermore, the new facilities would be subject to subsequent project-specific CEQA analysis on a case-by-case basis.

City parkland ratio goals versus parkland ratios with implementation of the Housing Element Update would decrease the overall parkland-to-resident ratio. The existing parkland-to-resident ratio is 7.91 acres per 1,000 residents citywide, and implementation of the Housing Element Update would result in 6.07 acres per 1,000 residents citywide. Although the parkland-to-resident ratio would potentially be reduced with implementation of the Project, the projected parkland-to-resident ratio would remain compliant with both the current standard of 3 acres per 1,000 residents and the suggested standard of 5 acres per 1,000 residents. New development under the Project would be required to provide facilities to serve its own needs.

Adoption and implementation of the Project with the resulting potential population growth would exacerbate the already-existing neighborhood parkland deficiency but, for the reasons explained above, would not lead to a further substantial physical deterioration of recreational facilities (Table 3.11-4). The City has signed joint-use agreements with the Alvord Unified School District to use aquatic facilities and with Riverside Unified School District and Ramona High School to use the stadium at the school campus. As stated in the Parks Master Plan, the City will continue to look for opportunities to implement joint-use agreements with the local school districts.

Table 3.11-4. City of Riverside Parkland Ratio Goals versus Parkland Ratios with Implementation of the Housing Element Update

Current Population (2018) ¹	Current Parkland Acreage	Parkland-to-Resident Ratio (Current Standard)	Existing Parkland-to-Resident Ratio	Population with Implementation of Project (max) ²	Projected Parkland-to-Resident Ratio
328,155	2,595.07	3 acres per 1,000 residents	7.91 acres per 1,000 residents	431,685	6.01

¹ Existing City population is assumed to be 328,155 (Department of Finance 2020)

² The full implementation of the Housing Element Update would add 103,530 persons to the City. With the addition of this population to the existing 328,155 (Department of Finance 2020), the total City population with implementation of the Housing Element Update was assumed to be 431,685 residents at maximum build-out.

There is a scarcity of neighborhood parks in Wards 1, 4, and 5 within a walkable distance of Opportunity Sites. However, in Ward 1, there are several recreational resources within a walkable distance from the proposed Opportunity Sites including county and City community parks, citywide special-use areas, and regional reserve within 0.5 mile of the proposed Opportunity Sites. The Santa Ana River Wildlife Area, Rancho Jurupa Regional Park, and Box Springs Mountain Reserve extend partially into Ward 1. Ryan Bonaminio Park, Martha McLean Anza Narrows Park, Carlson Bark Park, White Park, Loring Park, Mount Rubidoux Park, Newman Park, Reid Park, Fairmount Park, and Hunter Hobby Park, as well as the Riverside Sports Complex, Evans Sports Complex and Ab Brown Sports Complex, are all within 0.5 mile of the Opportunity Sites and provide upward of 7,188 acres of park and open space (Table 3.11-2).

Similarly, in Ward 4, there are several recreational opportunities within a walkable distance of proposed Opportunity Sites including the Bergamont Park, Orange Terrace Park, Thundersky Park, Taft Park, and Villegas Park, and access to the 1,590-acre reserve Sycamore Canyon Wilderness Park (Table 3.11-2). In addition, the Mission Ranch Park and Golden Star Park are undeveloped sites that in the future could add acreage to the City’s parks inventory. The Parks Master Plan (City of Riverside 2020) includes a recommendation that future development in Ward 4 should consider a new multiuse sports complex and new dog parks in response to community feedback received.

Ward 5 is similar to Wards 1 and 4, with a large recreational resource situated within it (the 377-acre California Citrus State Historic Park). Also within a walkable distance of Opportunity Sites in Ward 5 are Don Lorenzi Park, Hunt Park, Arlington Park, Harrison Park, Don Derr Park, and Arlington Heights Sports Park (Table 3.11-2). The Arlington Heights Sports Park at the corner of Cleveland and Van Buren Avenue provides additional recreation opportunities for the residents of Ward 5. Also, Victoria Cross is an undeveloped site that in the future could add acreage to the City’s Parks inventory.

The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as part of the subdivision process, which ensures that recreational resources are included in new plans. To provide more local recreational resources for City residents, developers will adhere to RMC 16.60, Local Park Development Fees, from build-out of the Opportunity Sites and are encouraged to incorporate living roofs and/or rooftop greenspace on mixed-use and high-density residential and, wherever possible, to design pocket parks into development plans to provide more local recreational resources. Chapter 6 of the Parks Master Plan (City of Riverside 2020) outlines additional funding sources for the creation of new parks, including state funding through the June 2018 Park Bond and through the California Department of Housing and Community Development’s Housing-Related Parks Program.

Implementation of the Project could result in a substantial increase in demand for neighborhood parks and create the need for more parks in underserved areas of the City. The implementation of proposed Housing Element Policy HE-4, Thriving Neighborhoods (Appendix B), would facilitate and encourage new housing that provides access to fresh food within a quarter mile, livable neighborhoods that link private development with public space including parks, and new housing development, including both single- and multi-family housing, that results in livable and sustainable neighborhoods. Related implementation actions including the preparation of design regulations to create safe and healthy complete neighborhoods that promote proximity of quality housing development to commercial uses, schools, transit, parks, and other needs would have a positive effect in providing additional park resources for the City. The inclusion of public parks and green space would help offset the impacts on recreational resources in the City. New development of parks and Opportunity Sites would require subsequent project-specific CEQA analysis on a case-by-case basis.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; and climate change and resiliency. These policies and implementing actions aim to reduce the risk to the community and ensure protection from foreseeable natural and human-caused hazards. Proposed new residential and mixed-use development would be predominantly located in more urbanized areas of the City. Public Safety Element Update policies and implementing actions could affect the design and construction of planned developments, including e.g., addition of design elements related to emergency access and pedestrian safety.

The Public Safety Element Update policies and implementing actions would also involve additional Environmental Justice Policies to address public safety issues within environmental justice communities. Many Public Safety Element Update policies could result in community benefits. No specific infrastructure improvements or projects are identified in the Public Safety Element Update. As this is a policy document, this update would not have any significant environmental effects related to park and recreation facilities. All proposed policies and implementing actions are included in Appendix B.

Impact REC-2: The Project could include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. This impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Implementation of the Housing Element Update would result in additional housing beyond what is currently allowed under the existing GP 2025. As stated previously, this could result in an additional 31,564 dwelling units and an increase of 103,530 in City population or up to 31,175 dwelling units over existing conditions and is anticipated at build-out under the City's 2014–2021 Housing Element. City parkland standards, RMC Chapter 16, and GP 2025 Policy PR-1.2 require a minimum of 3 acres of developed parkland per 1,000 residents and other requirements applicable to new residential development to accommodate demand for recreational facilities. The City requires that private developers proposing residential projects in the City include open space within their project

as well as adhere to RMC 16.60 and pay park development impact fees as described in Section 3.11.3 above. These dedications and fees are collected by the City as part of the development review process and are used for the purpose of supporting the City's recreational budget for past and present facilities to serve the community.

Typical environmental impacts associated with expansion of existing parks or construction of new parks include construction noise and temporary disruption of access. When in use, neighborhood parks may result in noise, lighting (e.g., lighted ball courts), and minor traffic impacts on their surrounding neighborhoods. Construction of new parks on undeveloped sites would have similar impacts to those of other construction projects on undeveloped land. They may result in impacts related to site-specific conditions, such as biological or cultural resources, depending on their location. Construction of park facilities would be subject to policies, standards, and mitigation measures from GP 2025 and the GP 2025 EIR, or the mitigation identified in Project-specific analyses. Such impacts can generally be mitigated to a less-than-significant level. Mitigation measures for impacts of implementation of the Project on other resource topics such as air quality are presented in the relevant resource sections of this EIR. No new or substantially more severe impacts would be associated with implementation of the Project. The impacts of park construction to be facilitated by the Project would be less than significant.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and associated Environmental Justice Policies address natural hazards, transportation hazards, emergency services, pandemic preparedness and response, homelessness, and climate change and resiliency. These policies aim to reduce the risk to the community and to ensure protection from foreseeable natural and human-caused hazards.

There are no infrastructure projects proposed or new policies related to environmental justice under the proposed Public Safety Element Update that would impede future development or the construction of new housing, public safety infrastructure, and mixed-use development. Rather, these policies and implementing actions describe treatment of hazardous materials associated with contaminated sites within environmental justice communities; ensure access to affordable housing, health care, and emergency services; consider the needs of environmental justice communities in planning for emergency response and recovery; consider health implications for land use decisions that could involve hazardous uses; and minimize the potential for vehicular and pedestrian accidents in underserved areas. Implementation of these policies and implementing actions would not affect recreational facilities.

The Public Safety Element Update would not have any environmental effects related to park and recreation facilities because there are no specific infrastructure projects identified in the update. As this is a policy document, the implementation of the Public Safety Element update of the Project would have a less-than-significant impact.

3.12 Transportation

3.12.1 Introduction

This section describes the environmental and regulatory setting for transportation for the Project and provides information regarding changes in vehicle miles traveled (VMT) for the City of Riverside (City). An analysis of potential VMT impacts that could occur with implementation of the Project is presented. Data presented were obtained from the U.S. Census Bureau, Western Riverside Council of Governments (WRCOG), Riverside County, the City, and Southern California Association of Governments (SCAG). The analysis methods, data sources, significance thresholds, and terminology used are described. Details on the location of the Project and a description of Project activities are included in Chapter 2, *Project Description*, of this EIR.

3.12.2 Environmental Setting

An existing conditions report for transportation was prepared in January 2021. The subsections below contain abridged information from this report.

Travel Characteristics

Mode Share

Residents and employees in the City use many different forms of transportation. The proportion of travelers taking different transportation modes (e.g., driving alone, riding transit, walking) is referred to as “mode share.” The California Household Travel Survey data collected in 2012–2013 provide the most recent comparison data between commute mode share patterns and overall mode share patterns. The commute and overall mode shares for the City and Riverside County residents are shown in Table 3.12-1.

Table 3.12-1. Mode Share for Commute Trips and General Trips

	City of Riverside	Riverside County
Population	325,860	2,415,000
Mode	Commute Trips	All Trips
Drove alone	75%	77%
Carpooled	14%	13%
Public transit	3%	1%
Walked	3%	2%
Worked at home	4%	5%
Other	1%	2%

Sources: U.S. Census Bureau 2018; NREL 2013.

Residents of the City primarily rely on driving both for commuting and other trips. Driving alone or carpooling accounts for 89 percent of commute trips, which is comparable to countywide averages. Transit use is slightly higher than countywide averages, likely related to availability of transit in the City.

Commute Patterns

Of the approximately 144,000 employed residents from the City, only 25 percent live and work in the City. The rest typically commute to Los Angeles, Corona, Ontario, San Bernardino, Orange County, and beyond.

Commute times for residents in the City are lower than commute times to jobs in the rest of the county. The commute averages 31 minutes per direction compared to the county average commute of 34 minutes. The difference is particularly pronounced for transit commutes, which take 56 minutes compared to 31 minutes for commuters who drove alone. This means that the typical inbound transit commuter spends more than 2 hours of the day traveling to and from work in the City.

Vehicle Miles Traveled

VMT measures the total amount of vehicular travel for a specific area. It is typically normalized on a per-household, per-resident, per-employee, or per-service-population (residents plus employees) basis such that it is a metric of travel efficiency (e.g., fewer vehicle trips per person or shorter distances traveled in an automobile per person means that travel is more efficient). Ultimately, VMT is a powerful performance indicator of a city's land use plan and multi-modal transportation network.

VMT generation is influenced by several factors that may or may not be affected by city goals, policies, and plans. These factors include, but are not limited to:

- The location of the city within the Inland Empire region
- The diversity, density, and location of land uses internal and external to the city
- Access to destinations (accessibility) and speed of travel/congestion (mobility) along automobile, bicycle, pedestrian, and transit networks
- Convenience of travel (e.g., service frequency, Wi-Fi availability on transit, lockers/showers at the end of a bicycle trip)
- Costs of travel (e.g., gas prices, transit fares, auto/bike maintenance costs)

The VMT-per-service-population data from the Riverside County Traffic Analysis Model (RIVTAM)¹ travel demand model yield the following conclusions on the existing state of VMT generation in the City as shown in Table 3.12-2:

- Riverside VMT per service population is 6 percent lower than the average of western Riverside County and total for Riverside County.
- The total VMT per household (e.g., the total VMT in the City divided by the total number of households) is higher than the region.

The total VMT on a per-household basis in the City is higher than the VMT on a per-household basis in surrounding jurisdictions, which is likely an indication that the City draws people from the surrounding region to access employment, goods, and services, attracting visitors and employees at

¹ At the time that analysis was performed, RIVTAM was the most recently updated regional model, which was validated and calibrated with local data for use in Riverside County. It is the most appropriate tool for estimating VMT in Riverside County.

a higher rate than that of other cities. This could be due to the City's robust Downtown, multiple university and college campuses, employment areas, and commercial uses that attract regional trips.

Table 3.12-2. Riverside VMT Summary

	City of Riverside	Riverside County	Western Riverside County	SCAG Region
VMT per Service Population	27.6	29.3	29.8	24.3
VMT per Household	130.1	120.9	126.4	106.4

Source: Fehr & Peers 2021.

Roadway System

Interstates

Interstate 215

Interstate (I-) 215 is an interstate highway that runs in the north-south direction from Murrieta at the southern terminus to San Bernardino at the northern terminus. I-215 is at the eastern end of the City and is a six-lane facility (three lanes in each direction) with an additional high-occupancy vehicle (HOV) lane in each direction.

State Routes

California State Route 91

State Route (SR-) 91 is a major east-west freeway within Southern California and runs from Vermont Avenue in Gardena to Riverside at the junction of SR-60 and I-215. SR-91 bisects the City from the southwestern end to the northeastern boundary. SR-91 is a six-lane facility (three lanes in each direction) with an additional HOV lane in each direction.

California State Route 60

SR-60, also known as the Moreno Valley Freeway, runs in the east-west direction from Beaumont and terminates in Los Angeles. It provides direct access through the northeastern region of the City and, near the City, generally has four general purpose lanes plus an HOV lane in each direction south and east of SR-91 and has three general purpose lanes plus an HOV lane in each direction north and west of SR-91.

Local Circulation

In the City, the local street system is organized into a hierarchy of three roadway types according to *Riverside General Plan 2025 (GP 2025)*. These three types are arterial, collector, and local. GP 2025 classifies all streets within the City according to their functional classification. Functional classifications of roadway networks categorize streets by purpose, location, and typical land uses to which they provide access.

The list below presents a description of some key roadways within the City. Note that this is not an exhaustive list that describes every roadway in the City; rather, it is a sampling of roadways in the City to provide context for the local setting.

Arterial Roadways

Alessandro Boulevard: Alessandro Boulevard is classified as a 120-foot arterial and varies between two and three travel lanes in each direction. This roadway runs in the east-west orientation. The speed limit varies between 45 and 55 miles per hour.

Arlington Avenue: Arlington Avenue is classified as a 120-foot arterial and varies between two and three lanes in each direction. This roadway runs in the east-west orientation. Field observations reveal that Arlington Avenue is a four-lane arterial. The posted speed limit is 45 miles per hour.

California Avenue: California Avenue is classified as an 88-foot four-lane arterial. This roadway runs in the east-west orientation. The speed limit is 40 miles per hour.

Chicago Avenue: Chicago Avenue is classified as a 110-foot, four-lane arterial in GP 2025 and runs in the north-south direction. The posted speed limit varies between 40 and 45 miles per hour.

Indiana Avenue: Indiana Avenue is classified as an 88-foot, four-lane arterial in GP 2025 and runs in the east-west direction. Field observation reveals that currently Indiana Avenue is a two-lane collector east of Harrison Street. The speed limit is 40 miles per hour.

Jackson Street: Jackson Street is classified as an 88-foot, four-lane arterial north of Victoria Avenue and as an 80-foot, two-lane collector south of Victoria Avenue in GP 2025. This roadway runs in the north-south direction. Field observation reveals that currently Jackson Street is a two-lane collector south of Victoria Avenue and a four-lane arterial north of Lincoln Avenue. The posted speed limit varies between 40 and 45 miles per hour.

La Sierra Avenue: La Sierra Avenue is classified as a 110-foot, four-lane arterial in GP 2025 and runs in the north-south direction. Field observation reveals that currently La Sierra Avenue is a six-lane arterial. The posted speed limit varies between 40 and 45 miles per hour.

Lincoln Avenue: Lincoln Avenue is classified as an 88-foot, four-lane arterial west of Madison Street and as a 66-foot, two-lane collector east of Madison Street in GP 2025. Lincoln Avenue runs in the east-west direction. The posted speed limit varies between 40 and 45 miles per hour.

Magnolia Avenue: Magnolia Avenue is classified as a 110-foot, four-lane arterial west of Polk Street and a 110-foot, four-lane arterial between Jurupa Avenue and Ramona Drive in GP 2025. This roadway is classified as a 120-foot, six-lane arterial between Polk Street and Jurupa Avenue. Magnolia Avenue runs in the east-west direction. Field observation reveals that currently Magnolia Avenue is a four-lane arterial east of Harrison Street. The posted speed limit varies between 35 and 45 miles per hour.

Martin Luther King Boulevard: Martin Luther King Boulevard is classified as a 110-foot, four-lane arterial in GP 2025 and runs in the east-west direction. Field observation reveals that currently Martin Luther King Boulevard is a six-lane arterial. The posted speed limit varies between 35 and 50 miles per hour.

Pierce Street: Pierce Street is classified as a 110-foot, four-lane arterial east of Golden Avenue and as a 66-foot, two-lane collector west of Golden Avenue in GP 2025. This roadway runs in the east-west direction. The posted speed limit varies between 30 and 40 miles per hour.

Riverwalk Parkway: Riverwalk Parkway is classified as a 110-foot, four-lane arterial in GP 2025 and runs in the north-south direction. The posted speed limit is 40 miles per hour.

Trautwein Road: Trautwein Road is classified as a 110-foot, four-lane arterial north of Orange Terrace Parkway and as an 88-foot, four-lane arterial south of Orange Terrace Parkway in GP 2025. Trautwein Road runs in the north-south direction. The posted speed limit is 50 miles per hour.

Tyler Street: Tyler Street is classified as a 110-foot, four-lane arterial north of Magnolia Avenue and a 120-foot, six-lane arterial between Magnolia Avenue and Indiana Avenue in GP 2025. This roadway is classified as an 88-foot, four-lane arterial between each extension of Indiana Avenue and then as an 80-foot, two-lane collector between Indiana Avenue and Dufferin Avenue. South of Dufferin Avenue, this roadway is classified as a 66-foot, two-lane collector. Tyler Street runs in the north-south direction. Field observation reveals that currently Tyler Street is a six-lane arterial north of Magnolia Avenue and an eight-lane arterial north of SR-91. The posted speed limit is 35 to 40 miles per hour.

Van Buren Boulevard: Van Buren Boulevard is classified as a 120-foot, six-lane arterial in GP 2025. This roadway is classified as a 144-foot, eight-lane arterial north of Jurupa Avenue. This roadway runs in the north-south direction. Field observation reveals that Van Buren Boulevard north of Jurupa Avenue currently is a four-lane arterial. Between Colorado Avenue and Hayes Street, as well as between Rudicill Street and Wood Road, Van Buren Boulevard currently contains four lanes. The posted speed limit varies between 40 and 55 miles per hour.

Victoria Avenue: Victoria Avenue is classified as a local street and scenic boulevard in GP 2025 south of Arlington Avenue and runs in the northeast-southwest direction. Victoria Avenue consists of one lane in each direction south of Arlington Avenue, with a special landscaped median and rural character in this area. This roadway is classified as a 110-foot, four-lane arterial between Arlington Avenue and Ivy Street and a 66-foot, two-lane collector north of Ivy Street. The posted speed limit on the arterial section is 35 and 45 miles per hour.

Transit

Public Transit Services

Public transportation is a vital part of the circulation system within the City. Transit expands mobility options to citizens that may not be able to afford or physically operate other means of travel, while some choose not to drive. Intercity buses, local buses, and demand-responsive service are provided, all of which help people move. It is important that the City continue to invest in and improve local transit service because the most frequent users include some of the most vulnerable, such as older adults, persons with disabilities, and students.

Riverside Transit Agency

The majority of the available public transportation is provided by the Riverside Transit Agency (RTA) via fixed-route bus services. RTA provides four bus routes within the City that connect to the Downtown Riverside Metrolink Station, La Sierra Metrolink Station, University of California, Riverside (UCR), and surrounding cities. Major City bus routes include routes 1, 10, 12, 13, 14, 15, 16, 20, 21, 22, 27, 29, 49, and 50. In addition, RTA has two commuter link express bus routes. Route 200 connects Downtown Riverside and the La Sierra Metrolink Station with the cities of Orange and Anaheim. Route 204 connects UCR and Downtown Riverside with Montclair Transit Center and Ontario Mills. Route 208 connects the cities of Riverside, Temecula, Murrieta, Perris, and Moreno Valley, while commuter link express bus routes provide peak-hour services for commuters in the morning and evening on weekdays. The RapidLink express bus service offers frequent bus service

between UCR and Corona, serving 14 stops via University Avenue, Market Street, and Magnolia Avenue.

RTA's "Bring Your Bike or Scooter" program features bike racks on all fixed-route buses including commuter link routes. A partnership with schools allows anyone age 18 and under to ride RTA buses for free until July 2021. The general base fare for a ride is \$1.75, a day pass is \$5, a 7-day pass is \$20, and a 30-day pass is \$60, with reduced fares for youths, seniors, people with disabilities, and veterans. RTA also accepts Orange County Transportation Authority passes on Route 200 and valid Metrolink passes for the full fare on routes. RTA's Dial-a-Ride service offers complimentary service to people with disabilities throughout the RTA service area that are within 0.75 mile of local fixed-route bus service and during the hours of bus service operation.

Sunline Transit Agency

A commuter link bus route (220) connects the cities of Riverside, Moreno Valley, Beaumont, Cabazon, Thousand Palms, and Palm Desert and provides peak-hour services on weekday mornings and evenings. This route connects to the Riverside Metrolink Station.

Omnitrans

A commuter link bus route (215) connects the cities of Riverside, Grand Terrace, Colton, and San Bernardino and provides service every 30 minutes during peak hours on weekdays and every 60 minutes during off-peak hours on weekdays and weekends. The route connects to Downtown Riverside and the Riverside Metrolink Station.

Metrolink

Metrolink is a commuter rail program operated by the Southern California Regional Rail Authority providing service from outlying suburban communities to employment centers such as Burbank, Irvine, and Downtown Los Angeles. For the City, the Riverside Line connects Downtown Riverside with Jurupa Valley, Ontario, Pomona, Diamond Bar, Industry, Commerce, and Downtown Los Angeles. The Inland Empire-Orange County Line connects Downtown Riverside with San Bernardino to the north and Corona, Anaheim, Orange, Tustin, Irvine, and San Diego to the south. The 91/Perris Valley Line connects all stations in Riverside with Downtown Los Angeles to the west and Perris to the east. Four Metrolink rail transit stations serve the City, with the La Sierra, Downtown, and Hunter Park stations within City limits and the Moreno Valley/March Field station adjacent to the City's southern boundary in unincorporated Riverside County. The 24-mile extension of the Perris Valley Line was the first major enhancement to the route network in 14 years. The establishment of the Perris Valley Line was a joint effort of the Riverside County Transportation Commission (RCTC) and Federal Transit Administration.

Amtrak

Amtrak, the National Railroad Passenger Corporation, provides service to the Downtown Riverside station, connecting it with the rest of the country.

Biking and Walking

With relatively flat terrain throughout a majority of the City and a rectilinear street grid, the City is an inherently bikeable and walkable community. Improving bicycling and pedestrian facilities and diversifying land use patterns can increase the likelihood and desirability of active transportation

modes for short-distance trips, school trips, and recreational activities. By shifting mode share to include higher rates of active travel, the City can reduce greenhouse gas emissions and promote a healthy lifestyle, consistent with Assembly Bill 32 and other state laws.

PACT

The City of Riverside Active Transportation Plan is currently being developed to integrate walking, bicycling, and other transportation modes into a single plan that includes policies, infrastructure recommendations, and supporting programs, as well as identifying context-specific funding sources, prioritized infrastructure projects, and implementation strategies. This plan is one component of the Pedestrian Target Safeguarding Plan, Active Transportation Plan, Complete Streets Ordinance, and Trails Master Plan (PACT) for the City. The PACT will provide a framework for a multi-modal network for the City's future bicycle and pedestrian improvement projects.

Active Transportation Plan

The draft Active Transportation Plan outlines the need for comfortable bicycle and pedestrian facilities for achieving the following goals:

- Economic prosperity: connecting residents to employment and commercial centers
- Improved safety
- Socially responsible and equitable investment throughout the City
- Reduction of VMT by establishing a culture of biking and walking
- Access to community destinations

Complete Streets Ordinance

As part of PACT, the City is undertaking the update of the Complete Streets Ordinance to provide guidance on street character, connectivity, access for all users, development of continuous pedestrian paths and urban trails/recreation opportunities, and inclusion of public gathering spaces equitably placed throughout the City. The proposed street cross-sections include recommended modifications to the roadway of the four primary arterial types that are prevalent within the City.

Bicycle Network

Bicycle facilities in Riverside consist of bike lanes, routes, trails, and paths. On-street bicycle facilities are classified into four categories depending on their design and function as described below; numbers in parentheses indicate the lengths of bicycle facilities.

Class I (14 miles): Provides a completely separated right-of-way for the exclusive use of cyclists and pedestrians with crossflow minimized. Typically, the most desirable for all ages and abilities.

Example: Santa Ana River Trail

Class II (122 miles and 7 miles of buffered Class II): Provides a striped lane for one-way travel on a street, which may include a buffer zone consisting of a striped portion of roadway between the bicycle lane and the nearest vehicle travel lane. Typically, suitable for some bicyclists comfortable sharing some space with cars.

Example: Market Street

Class III (2 miles): Provides for shared use with motor vehicle traffic to help guide bicyclists between major destinations. Typically, not suitable for most bicyclists except on local residential streets.

Example: Mission Inn Avenue

Class IV (1 mile): Provides a right-of-way designated exclusively for bicycle travel, which is protected from vehicular traffic. Types of separation include, but are not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking. Typically, suitable for most bicyclists.

Example: Canyon Crest Drive between Martin Luther King Boulevard and El Cerrito Drive

Pedestrian Network

Pedestrian facilities in the City consist of sidewalks and paths, trails, crossing facilities, curb treatments, beacons and signals, and pedestrian-support facilities. Pedestrian-oriented land uses, street widths, lighting, and landscaping also contribute to the quality of the pedestrian environment. Pedestrian activity in the City tends to be highest around Downtown, the Downtown Riverside Station, the UCR campus, schools, and retail destinations along major corridors.

Safe Routes to School

Safe Routes to School (SRTS) promotes walking and bicycling to school in a safe and supportive environment through education and encouragement activities. The Riverside County Department of Public Health Injury Prevention Services received SRTS Cycle 1 funds to provide pedestrian and bicycle education and encouragement activities at schools in the City. SRTS recommendations include:

- Expanding the number of SRTS site assessments
- Partnering with local agencies and school districts to deliver education and encouragement programs
- Reducing speed limits to 15 miles per hour, when warranted, in school zones
- Continuing to implement pedestrian recommendations

Near-Term Planned Improvements

The City's Capital Improvement Program includes updates to the vehicle, bicycle, and pedestrian networks. The Capital Improvement Program includes funding for pre-construction activities such as feasibility studies and design, as well as construction funding. The proposed network improvements in the City with construction funding through 2020–2021 include the following.

General:

- Traffic Management Center Program
- BNSF Railway (BNSF) Quiet Zone: Mission Inn, 3rd, Spruce (1 of 2, Funded Portion)
- Mission Boulevard Bridge Replacement at Santa Ana River

Vehicle Traffic:

- Miscellaneous Traffic Projects Program
- Arterial Interconnect Project Program

Bike and Pedestrian:

- SR-91 Pedestrian Bridge-Metrolink to Downtown (1 of 2, Funded Portion)
- High-friction surface & high-intensity activated crosswalk signals
- Pedestrian Ramps Program
- Mission Boulevard Bridge Replacement at Santa Ana River
- Santa Ana Walking Trail-McLean Park to Fairmount Park (1 of 2, Funded Portion)
- Sidewalk/Trail Construction at Various Locations Program
- Sidewalk Repair Program

Major Planned Improvements

According to the SCAG 2020–2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) approved project list, the following strategic roadway improvements are planned.

Grade-Separation Projects

Construction of quiet zones or rail grade-separation projects are planned on Harrison Street, Gibson Street, Jefferson Street, Palm Avenue, Washington Street, Brockton Avenue, Panorama Road, Cridge Street, Palmyrita Avenue, Center Street, Main Street, 3rd Street, Jackson Street, Mary Street, and Mission Inn Avenue. RCTC is the lead agency for implementing these projects.

Bicycle and Sidewalk Improvements

The City continually evaluates bicycle and pedestrian improvements throughout the City. Most recently, this has included a variety of improvements including buffered bike lanes, green paint, and other improvements on a variety of streets within the City. Future major improvements include those outlined in the Eastside Mode Shift and Eastside Climate Collaborative projects.

The City's Capital Improvement Program also identifies the installation of 1.28 miles of Americans with Disabilities Act-compliant sidewalk on Carmine Street, Richmond Street, Norwood Avenue, from College Avenue to Sierra Vista Avenue, on Doverwood Drive from Butler Drive to La Sierra Avenue, on a portion of Butler Drive, and on College Avenue from Doverwood Drive Norwood Avenue in the La Sierra neighborhood

Roadway Improvements

- Reconfiguration of SR-91 at Adams Street interchange ramps, including reconstruction of the Adams Street overpass, on Adams Street from Auto Center Drive to Briarwood Drive and Indiana Avenue from Vance Street to Detroit Drive
- Completion of the remaining work from the SR-91 HOV associated with the Union Pacific Railroad line along Pachappa underpass; paving of the full structure section of westbound SR-91

auxiliary lane and shoulder; and construction of the full structure section for the second lane of Mission Inn westbound exit ramp

Transit Improvements

- Vine Street mobility hub, which includes construction of an intermodal station on the west side of Vine Street that will allow for bus access from the Metrolink Station. This project is currently finalizing design.

Rail and Goods Movement

Rail Movement

The Union Pacific Railroad and BNSF provide freight service in Riverside County, connecting the county with major markets within California and other destinations north and east. The City has 25 at-grade railroad crossings and actively pursues grade-separation projects (such as its current design to grade separate the 3rd Street crossing) to enhance vehicular and pedestrian safety and reduce delays, which will also have the beneficial side effect of improving local air quality by minimizing the number of idling vehicles waiting for trains to pass.

Truck Traffic

Goods movement plays an important role in both the circulation network and the economy of the City and the region. Often, it can be difficult to accommodate trucks and other vehicles without impeding other modes or the well-being of residents. Due to the City's important location between two highways and the role of logistics in the local economy, effectively accommodating goods movement along its roadways is critical for local transportation planning.

Truck traffic on City streets is restricted as outlined in City ordinances 10.56.010 and 10.56.020, which prohibit trucks over 3 tons and 5 tons, respectively, from certain routes throughout the City.

Airport Facilities

Riverside Municipal Airport

The Riverside Municipal Airport, within the City, is owned and operated by the City, with airport operations overseen by the City of Riverside Airport Commission. The *Airport Master Plan for Riverside Airport*, updated in 2009, is used by the City to guide development of the airport to ensure the airport's long-term viability and reduce the risk of potential aircraft-related hazards.

March Air Reserve Base

The March Air Reserve Base, to the east of the City boundary, has transitioned from a military base to a joint-use facility housing the National Air Force and a commercial cargo port.

3.12.3 Regulatory Setting

Federal

Federal rules and regulations govern many facets of the City's traffic and circulation system including transportation planning and programming; funding; design, construction, and operation of facilities; and others. The City complies with all applicable rules and regulations of the Federal Highway Administration, Urban Mass Transit Administration, Federal Railroad Administration, Federal Aviation Administration, and other federal agencies. In addition, the City coordinates with federal resource agencies where appropriate in the environmental clearance process for transportation facilities.

State

Assembly Bill 1358

Assembly Bill 1358, also known as the California Complete Streets Act of 2008, requires cities and counties to include "Complete Street" policies in their general plans. These policies address the safe accommodation of all users, including bicyclists, pedestrians, motorists, public transit vehicles and riders, children, the elderly, and the disabled. These policies can apply to new streets as well as the redesign of corridors.

As discussed in Section 3.12.2, the City is currently preparing the PACT. This effort will further expand implementation of the City's complete streets policies and direction.

Senate Bill 375

Senate Bill (SB) 375 provides guidance regarding curbing emissions from cars and light trucks. There are four major components to SB 375. First, SB 375 requires regional greenhouse gas emission targets. These targets must be updated every 8 years in conjunction with the revision schedule of the housing and transportation elements of local general plans. Second, Metropolitan Planning Organizations are required to create an SCS that provides a plan for meeting regional targets. Third, SB 375 requires housing elements and transportation plans to be synchronized on 8-year schedules. Finally, Metropolitan Planning Organizations must use transportation and air emissions modeling techniques that are consistent with the guidelines prepared by the California Transportation Commission.

Senate Bill 743

SB 743 changes the focus of transportation impact analysis in CEQA from measuring impacts on drivers, to measuring the impact of driving. The change replaces level of service (LOS) with VMT and provides streamlined review of land use and transportation projects that will help reduce future VMT growth. This shift in transportation impact focus is expected to better align transportation impact analysis and mitigation outcomes with the state's goals to reduce greenhouse gas emissions, encourage infill development, and improve public health through more active transportation.

WRCOG released the WRCOG SB 743 Implementation Pathway in March 2019, a guiding document for VMT analysis methodology, thresholds, and mitigation strategies for transportation impact evaluation for WRCOG agencies such as the City. The City adopted thresholds of significance and identified a VMT analysis methodology in its updated traffic impact study guidelines in July 2020.

California Department of Transportation

The California Department of Transportation's *VMT-Focused Transportation Impact Study Guide* provides a starting point and a consistent basis with which the department evaluates traffic impacts on state highway facilities. The guide provides information on when a traffic impact study is needed based on VMT, the scope of a traffic impact study (i.e., the boundaries of the traffic study and the analysis scenarios), the required data for a traffic impact study, analysis methodologies for various types of state facilities, and guidelines for mitigating impacts. A future update will include a basis for requesting transportation impact analysis that is not based on VMT.

Regional

Riverside County Congestion Management Program

RCTC is in charge of preparing the Congestion Management Program (CMP) in Riverside County. It is an effort to align land use, transportation, and air quality management efforts to promote reasonable growth management programs that effectively use statewide transportation funds, while ensuring that new development pays its fair share of needed transportation improvements.

The focus of the CMP is the development of an Enhanced Traffic Monitoring System in which real-time traffic count data may be accessed by RCTC to evaluate the condition of the Congestion Management System (CMS), as well as to meet other monitoring requirements at the state and federal levels. RCTC's Long Range Transportation Study, approved in 2019, incorporates the state and federal CMPs into the plan, including performance standards, conformance, monitoring, deficiency plan process, and management strategies.

Per the target of LOS E adopted by RCTC, when a CMS segment falls to LOS F, a deficiency plan must be prepared by the local agency where the deficiency is located. Other agencies identified as contributors to the deficiency will also be required to coordinate with the development of the plan. The plan must contain mitigation measures, including Transportation Demand Management (TDM) strategies and transit alternatives, and a schedule of mitigating the deficiency. To ensure that the CMS is appropriately monitored to reduce the occurrence of CMP deficiencies, it is the responsibility of local agencies to consider the traffic impacts on the CMS when reviewing and approving development proposals.

Southern California Association of Governments' Regional Transportation Plan/ Sustainable Communities Strategy

In September 2020, SCAG adopted the 2020–2045 RTP/SCS (*Connect SoCal*), which includes goals to increase mobility and enhance sustainability for the region's residents and visitors. The 2020–2045 RTP/SCS encompasses three principles to improve the region's future: mobility, economy, and sustainability. The 2020–2045 RTP/SCS includes population, housing, and employment growth projections for 2045. These growth projections are used in SCAG's transportation modeling and shape SCAG's regional planning efforts, as outlined in the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS minimizes increases in regional traffic congestion by focusing growth, density, and land use intensity within existing urbanized area as the general land use growth pattern for the region while enhancing the existing transportation system and integrating land use into transportation planning. The 2020–2045 RTP/SCS recommends local governments accommodate future growth within existing urbanized areas to reduce VMT, congestion, and greenhouse gas emissions.

Local

Walk Riverside: Routes & Trails

In partnership with the County of Riverside Department of Health, the City prepared its Walk Riverside: Routes & Trails in 2005 using a grant from Kaiser Permanente. Walk Riverside details the locations of various walking routes throughout the City, along with their distances, terrain type, major cross streets, and available parking.

Riverside General Plan 2025

GP 2025's Circulation and Community Mobility Element contains goals and policies intended to manage and plan for the City's transportation network. Table 3.12-3 presents policies that are relevant to the Project.

Circulation and Community Mobility Element

The Circulation and Community Mobility Element (amended February 2018) addresses the City's transportation needs by incorporating objectives and goals "focusing future development near existing transportation corridors, ensuring land uses are supported by an efficient local roadway network, embracing innovative solutions to congestion on freeways and regional arterials, supporting alternative modes of transportation such as walking, biking and transit and ensuring that transportation options are maximized for all community members as necessary components of an effective and safe circulation system for Riverside."

Riverside Municipal Code

Chapter 13.18, Trails Master Plan

Riverside Municipal Code (RMC) Chapter 13.18, *Trails Master Plan*, provides minimum standards for recreational trails to safeguard the health, property, and public welfare by regulating the design, construction, quality of materials, location, and maintenance of recreational trails shown on the GP 2025 Trails Master Plan Map, and to require that the City's recreational trails be developed according to approved standards and design elements as set forth in the Trails Master Plan. As previously mentioned, the PACT is currently being completed and is updating the Trails Master Plan.

Chapter 16.64, Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact Fees

According to RMC Chapter 16.64, *Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact Fees*, new private development in the City increases the amount of traffic using the City street system, thereby requiring installation of additional traffic signals, railroad signals, and street improvements at specified locations to increase or improve transportation capacity to protect the public health, safety, and welfare and that such private new development should pay its fair share of such improvements. This chapter further notes the following:

- Section 16.64.030, *Traffic Signal and Railroad Signal Mitigation Fees*: A traffic signal and railroad signal mitigation fee is hereby imposed on the construction of all new nonresidential units, dwelling units and mobile home spaces in accordance with the schedule of fees that may be established by the City Council by resolution. No fee shall be assessed on any City, County, state or federal governmental use. Fees required by this section shall be paid upon application to the City for a building permit for any construction which adds a nonresidential unit, new dwelling

unit or new mobile home space to any parcel of real property. No building permit shall be issued until the fee is paid.

- Section 16.64.040, *Transportation Impact Fee*: A transportation impact fee is hereby imposed on the construction of all new dwelling units and mobile home spaces in accordance with the schedule of fees that may be established by the City Council by resolution. Fees required by this section shall be paid upon application to the City for a building permit for any construction which adds a new dwelling unit or new mobile home space to any parcel of real property. No building permit shall be issued until the fee is paid.
- Section 16.64.050, *Use of Traffic Signal and Railroad Signal Mitigation Fees*: A special traffic signal and railroad crossing improvement mitigation fee account is hereby established and all fees collected pursuant to Section 16.07.030 shall be deposited therein. Such funds shall be expended solely for the purchase and installation of traffic signals and railroad signals.
- Section 16.64.060, *Use of Transportation Impact Fees*: A special transportation impact fee account is established and all fees collected pursuant to RMC Section 16.07.040 shall be deposited therein. Such funds shall be expended solely for the construction of improvements on those streets or portions thereof as designated from time to time by the City Council, in order to increase or improve the transportation capacity of such streets.

Chapter 16.68, Transportation Uniform Mitigation Fee

RMC Chapter 16.68, *Transportation Uniform Mitigation Fee*, is known as the “Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance of 2009.” The City is a member agency of WRCOG. Acting in concert, the WRCOG member agencies developed a plan whereby the shortfall in funds needed to enlarge the capacity of the regional system of highways and arterials in western Riverside County could be made up in part by a Transportation Uniform Mitigation Fee on future residential, commercial, and industrial development. Compliance with the Transportation Uniform Mitigation Fee Program, in accordance with the provisions established in this RMC chapter (i.e., payment of fees), is intended to ensure that each development contributes its fair share of the total program costs.

Chapter 19.120, Mixed Use Zones (MU-N, MU-V, MU-U)

According to RMC Chapter 19.120, *Mixed-Use Zones (MU-N, MU-V, MU-U)*, the mixed-use zones are established to encourage a mixture of compatible and synergistic land uses, such as residential with compatible non-residential uses including office, retail, personal services, public spaces, and other community amenities. The permitted uses in these zones are detailed in RMC Section 19.120.020, *Permitted Land Uses*, and the standards are specified in RMC Section 19.120.060, *Development Standards*, and RMC Section 19.120.070, *Design Standards and Guidelines*.

Table 3.12-3 presents an overview of GP 2025 and other local plans, policies, and programs related to transportation.

Table 3.12-3. Relevant Riverside General Plan and Specific Plan Policies

Plan	Policy
Riverside General Plan 2025	
Circulation and Community Mobility Element	Policy CCM-2.1: Complete the Master Plan of Roadways shown on Figure CCM-4 (Master Plan of Roadways)
	Policy CCM-3.5: Apply neighborhood traffic control measures as warranted on the parallel local residential streets to limit cut-through, non-local traffic

Plan	Policy
	Policy CCM-5.2: Support implementation of the SCAG Regional Transportation Plan.
	Policy CCM-5.5: Participate in programs to mitigate regional traffic congestion.
	Policy CCM-6.1: Encourage the reduction of vehicle miles, reduce the total number of daily peak hour vehicular trips, increase the vehicle occupancy rate and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD and County of Riverside TDM Guidelines.
	Policy CCM-9.1: Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors.
	Policy CCM-9.5: Incorporate facilities for transit and other alternative modes of transportation, such as park-and-ride lots and bus turnouts, in the design of future developments.
	Policy CCM-10.1: Ensure the provision of bicycle facilities consistent with the Bicycle Master Plan.
	Policy CCM-10.2: Incorporate bicycle and pedestrian trails and bicycle racks in future development projects.
	Policy CCM-10.4: Identify and seek to eliminate hazards to safe, efficient bicycle or pedestrian movement citywide.
	Policy CCM-10.8: Maximize links between trails and major activity centers, residential neighborhoods, schools, shopping centers and employment centers.
	Policy CCM-10.10: Evaluate the needs of bicycle traffic in the planning, design, construction and operation of all roadway projects funded by the City.
	Policy PR-2.3: Improve and create more connections and increase the safety of the bicycling, equestrian and pedestrian trail system within the City.
Specific Plans	
Canyon Springs Business Park Specific Plan	There are no applicable policies relevant to the Project regarding transportation.
Downtown Specific Plan	Policy C-1-2: Provide enhanced transit amenities within the Downtown, including bus stops and a downtown transit center.
	Policy C-1-10: Provide bike lanes on major streets approaching Downtown and within downtown where feasible.
	Policy C-1-11: Provide for pedestrian circulation at ground level. Do not provide grade-separated pedestrian facilities (except freeway over crossing).
Hunter Business Park Specific Plan	There are no applicable policies relevant to the Project regarding transportation.
La Sierra University Specific Plan	Policy LSU-1.14 The mixed use community shall be designed to foster pedestrian circulation among various land uses including a pedestrian path along the new arterial street, and pedestrian paths that link the planned residential areas with the campus, neighborhood schools, parks, and the community multi-use trail proposed along the flood control channel, and the Five Points shopping area.
	Policy 2.2: Consider the implementation of off-street shared parking with parking signage improvements, consolidation of driveways, installation of

Plan	Policy
Magnolia Avenue Specific Plan	raised landscaped medians, bus turnouts, traffic signal enhancements, special pavement treatments at pedestrian crossings and intersections, curb extensions, signalized/enhanced crosswalks, wider sidewalks and other appropriate measures which enhance traffic flow, transit efficiency and pedestrian movements
	Policy 2.4: Improve Magnolia Avenue to a standard Class II bike lane the length of the corridor.
	Policy 2.7: Explore the feasibility of installing signalized midblock crosswalks at heavily used pedestrian areas, meeting warrants, along portions of the corridor where long stretches of roadway exist between signalized intersections.
Riverside Marketplace Specific Plan	There are no applicable policies relevant to the Project regarding transportation.
University Avenue Specific Plan	There are no applicable policies relevant to the Project regarding transportation.
Northside Specific Plan	There are no applicable policies relevant to the Project regarding transportation, only design guidelines related to streets within the Specific Plan.

Sources: City of Riverside 1991, 2002, 2005, 2007, 2009, 2017a, 2017b, 2018, 2020.

Policy Consistency

The Project would be consistent with GP 2025 and Specific Plan goals and policies as described in Table 3.12-3. As discussed in Chapter 2, *Project Description*, one of the objectives of the Project is to ensure affordable housing is added across the City and not concentrated in areas with lower access to amenities or near sources of pollution. The Housing Element Update includes a guiding principle that seeks to equitably distribute a mix of housing types, including ownership and rental, that is safe and affordable for people of all income levels, backgrounds, and ages and that meets the needs of current and future City residents.

The principles, policies, actions, and programs within the Housing Element Update relate directly to and must be consistent with other elements of GP 2025. As part of the adoption of the Housing Element Update, the City will modify applicable policies in other elements as necessary to maintain consistency. Pursuant to new California law, the City is updating the Public Safety Element concurrent with the Housing Element to include an analysis of fire, flood, geologic, seismic, transportation, and public safety hazards and policies to reduce the potential loss of life from these hazards. The Public Safety Element Update will address new California requirements including environmental justice issues and climate change adaptation and resilience.

3.12.4 Methodology and Thresholds of Significance

The analysis of the Project's impacts on transportation was conducted using a review of the most current population and housing statistics and projections available for the City. These statistics include SCAG's 2021–2029 6th Regional Housing Needs Assessment cycle, Riverside's 2021–2029 Housing Element data, Riverside's GP 2025 background data, and SCAG estimates and projections. The following information on population, housing, and employment for the planning area was used in this analysis from several sources:

- **SCAG:** SCAG produces land use projections that represent future year conditions and a financially constrained list of transportation projects as part of the RTP/SCS. These assumptions were used to project future transportation trends in the regional model produced by WRCOG as described below.
- **WRCOG:** WRCOG utilizes SCAG’s data and regional travel demand model to produce and maintain RIVTAM. RIVTAM has a base year of 2012 and a future year of 2040 and was used to evaluate baseline and future-year VMT. Note that when this Project initiated the technical studies, RIVTAM had not yet been updated to reflect the 2020–2045 SCAG RTP/SCS. WRCOG is in the process of finalizing a new model for Riverside County, RIVCOM, that will reflect the SCAG 2020–2045 RTP/SCS, but that model was not yet available when technical studies for this Project were initiated.
- **City of Riverside:** The City’s assumptions for land use growth under the 2021–2029 Housing Element were used to develop land use estimates for the scenarios modeled that included the Project.

Thresholds of Significance

An initial study was prepared for the Project in April 2021. The following environmental threshold was identified as having a less-than-significant impact in the initial study and is therefore not addressed in this EIR section:

- Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

For a complete discussion of the environmental issues that were scoped out from this Draft EIR, refer to Section 3.15, *Effects Not Found to Be Significant*.

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities
- Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)

The City adopted the following thresholds of significance in accordance with State CEQA Guidelines Section 15064.3, subdivision (b):

A project would result in a significant project-generated VMT impact if the following conditions are satisfied:

1. For residential projects: the baseline or cumulative project-generated VMT per capita exceeds 15% below the current jurisdictional baseline VMT per capita or
2. For office and industrial projects: the baseline or cumulative project generated VMT per employee exceeds 15% below the current jurisdictional baseline VMT per employee or
3. For new retail & other land use projects, utilizing a threshold consistent with the net total VMT of the jurisdiction.

For projects inconsistent with the General Plan or RTP/SCS, or those found to have an impact using efficiency-based metrics (above), additional assessment is needed. In these instances, the project’s effect on VMT would be considered significant if it resulted in either of the conditions to be satisfied:

1. For residential projects: The baseline or cumulative link-level boundary VMT per capita (City) to increase under the plus project condition compared to the no project condition, or
2. For office projects: the baseline or cumulative link-level boundary VMT per employee (City) to increase under the plus project condition compared to the no project condition.
3. For retail & other land use projects: the baseline or cumulative link-level boundary VMT (City) to increase under the plus project condition compared to the no project condition.

Project-Generated VMT Metrics

Project-generated VMT includes trips that start or end within the City. VMT is calculated by multiplying the Project trip length by the number of trips. Ideally, those trips are tracked to their ultimate destinations and the whole of the trip length is included. RIVTAM includes a six-county region: Riverside, San Bernardino, San Diego, Los Angeles, Imperial, and Orange Counties. Given the City's central location within this region, the majority of all trip lengths is accounted for in the model.

The City's adopted VMT thresholds are presented by land use types and do not specifically identify how to evaluate mixed-use projects. Although the Project is primarily a residential project, there is also a mix of commercial and housing uses planned within the Housing Element Update in the mixed-use zones and certain Specific Plans. Also, some of the identified Opportunity Sites have existing land uses on them that would transition over to new development. As such, the Project is mixed-use in nature.

In accordance with the City's adopted threshold for residential projects, home-based VMT per capita was calculated and is presented below. Home-based VMT is all VMT that starts or ends at a residence. *Per capita* indicates this is an efficiency metric; in this case, home-based VMT is presented on a per-resident basis. This metric represents the average daily VMT for City residents for trips that start or end at their homes.

However, as the Project would include retail and other uses, the net total VMT is also presented. Net total VMT is the sum of all VMT that starts or ends in the City (at a residence, place of work, or any other location). This is not an efficiency metric and is not presented on a per-person basis.

These metrics evaluate how much, if at all, the Project would change the average home-based travel per capita and the total travel in the City. The Housing Element Update proposes additional housing and commercial land use growth, which would influence travel in the City. The total VMT-per-service-population metric captures all trip types and measures the change in average total VMT due to the Project. This metric represents the average daily VMT for City residents and employees for all trips that start or end in the City and is also presented below.

Although RIVTAM is the best available tool to estimate VMT in the City, there are limitations within the model that should be disclosed. There is a small amount of City VMT that is truncated at the model boundary. Given the small amount of VMT that exits this large area and that the Project is benchmarked against existing travel that also exits the model boundary area, this limitation is inherent in the tools available for assessing VMT impacts from the Project but would not affect the significance findings in this section. Additionally, to estimate VMT generated by only residential uses in the City, VMT is extracted at the *production-attraction* level before trips exiting the model boundary are included. The VMT-per-service-population metrics are extracted at the *origin-destination* level, which includes trips that exit the model boundary; however, trips are aggregated by this point in the model and VMT by land use type cannot be separated for use in this assessment.

The origin-destination-based VMT provides a more comprehensive estimate of VMT and is consistent with how VMT is estimated for other sections of this EIR; however, based on the City's desire to also look at only home-based VMT, the production-attraction information has been included for reference and consistency with the City's guidelines.

All of these VMT metrics are presented below in Impact TRA-2 to provide full disclosure of the Project impacts.

Project Effect on VMT Metrics

As with the Project-generated VMT metrics discussed above, the Project's effects on VMT thresholds are presented by land use type.

Link-level boundary VMT includes all vehicles on a roadway within a designated boundary. VMT is calculated by multiplying the number of vehicles on each roadway by the length of that roadway.

As discussed above, the Project is primarily a residential project, so link-level boundary VMT per capita is specified within the City's adopted threshold. However, link-level boundary VMT captures all trip purposes, not only trips produced by residents of the City, and this is not considered an appropriate efficiency metric for the Project's effect on VMT. Additionally, boundary VMT includes trips that pass through the City and do not stop (such as a trip on SR-91 that originates in San Bernardino and ends in Orange County), which, although this VMT is not attributable to the City, is included in these estimates.

The total link-level boundary VMT was calculated and is presented below. To provide the full context of how average VMT would change for all residents and employees, link-level boundary VMT per service population is also presented below.

VMT metrics are presented below in Impact TRA-2.

3.12.5 Impacts and Mitigation Measures

Impact TRA-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Because site specific designs showing driveway locations have not been developed, there are no specific details to review and assess impacts on pedestrian, bicycle, and transit facilities. As part of the standard development review process, the City would require all future development of identified Opportunity Sites to go through a review of pedestrian, bicycle, and transit facilities in the area surrounding the individual development project to ensure that future developments do not conflict with existing or planned facilities supporting those travel modes. All pedestrian, bicycle, and transit facilities proposed would be designed using the appropriate design standards. Furthermore, implementation of the Environmental Justice Policies is policy-based and does not identify any changes to the transportation network or to land use growth in the City. The impact would be less than significant.

Public Safety Element Update and Environmental Justice Policies

Implementation of the Public Safety Element Updates and related Environmental Justice Policies is policy-based and does not identify any changes to the transportation network or to land use growth in the City. The Public Safety Element Update would not result in any changes to daily VMT because proposed policy changes would improve the risk of death, injuries, property damage, and economic and social disruption resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards, and would not affect daily travel patterns.

Public Safety Element policies and implementing actions would encourage the design and construction of planned developments, such as addition of design elements related to emergency access and pedestrian safety. This update would not have any significant environmental effects related to transportation and impacts would be less than significant.

Impact TRA-2: The Project would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), as the Project would affect the VMT in the City of Riverside. This impact would be significant and unavoidable.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

The Project would affect the VMT in the City. Because the Project would increase population and employment within the City, VMT would increase. However, as shown in the table, the VMT per service population would decrease within the City, showing that travel on a per-person basis would be more efficient with the addition of the Project.

As discussed above, the City adopted thresholds of significance that evaluate the Project-generated VMT and the Project’s effect on VMT in the baseline and cumulative conditions. If any of these thresholds are exceeded, the Project is considered to have significant transportation impacts.

Table 3.12-4. City of Riverside Project-Generated VMT Summary

	Threshold	No Project Baseline ¹	Project Baseline ²	No Project Cumulative ³	Project Cumulative ⁴
Residential: Home-Based VMT per Capita ⁵	9.1 ⁶	10.7	10.8	9.8	9.6
Retail: Net Total VMT ⁷	No Project ⁸	12,311,159	13,985,353	20,946,604	21,665,761
Other: Total VMT per Service Population ⁷	23.7 ⁹	27.6	25.6	30.96	28.9

Source: Fehr & Peers 2021.

Bold font indicates a significant impact.

¹ No Project baseline results shown are the City total/average VMT in the model (RIVTAM) base year without the addition of the Project.

² Project baseline results shown are the City total/average VMT in the model (RIVTAM) base year with the addition of the Project land uses.

³ No Project cumulative results shown are the City total/average VMT in the model (RIVTAM) future year without the addition of the Project.

⁴ Project cumulative results shown are the City total/average VMT in the model (RIVTAM) future year with the addition of the Project land uses.

⁵ Home-based VMT was calculated using the production-attraction trip matrices generated and does not include any VMT from trips to/from the model boundary. See text for more information.

⁶ Home-based VMT-per-capita threshold is 15% below the No Project baseline City average home-based VMT per capita.

⁷ Total VMT and VMT/service population uses the origin-destination matrix and includes VMT to/from the model boundary (although it truncates the trips at the model boundary). See text for additional information.

⁸ Net total VMT threshold is the No Project baseline City net total VMT for the Project baseline result, and No Project cumulative City net total VMT for the Project cumulative result.

⁹ Total VMT-per-service-population threshold is 15% below the No Project baseline City average total VMT per service population.

As shown in Table 3.12-4, the Project would result in an increase in Project-generated VMT from No Project baseline conditions, which is considered a significant impact for all VMT metrics presented.

The home-based VMT per capita would increase between the No Project and Project conditions in the base year, and the Project VMT per capita (10.8) would be approximately 18 percent above the threshold of 9.1 VMT per capita. The home-based VMT per capita would decrease between the No Project and Project conditions in the future year; however, despite this Project benefit, the VMT per capita (9.6) would be approximately 5 percent above the threshold of 9.1 VMT per capita.

Net total VMT would increase between the No Project and Project conditions in the base and future years, which is the criterion for a significant impact.

The total VMT per service population would decrease between the No Project and Project conditions in the base and future years; however, despite this Project benefit, the VMT per service population (25.6 and 28.9, respectively) would be approximately 8 percent and 22 percent above the current No Project baseline threshold of 23.7 VMT per service population.

It should be noted that under No Project cumulative conditions (e.g., year 2045), some of the proposed population and employment growth was already anticipated; specifically, approximately 32 percent of households and approximately 59 percent of jobs were already assumed in the SCAG 2020–2045 RTP/SCS land use growth forecasts. Therefore, the increase in VMT from No Project baseline to Project baseline is larger than the increase from No Project cumulative to Project cumulative conditions.

Table 3.12-5. City of Riverside Project Effect on VMT Summary

	Threshold	No Project Baseline ¹	Project Baseline ²	No Project Cumulative ³	Project Cumulative ⁴
Link-Level Boundary VMT ⁵	No Project ⁶	5,482,137	5,911,828	8,495,877	8,715,231
Link-Level Boundary VMT per Service Population ⁵	No Project ⁶	12.42	10.83	12.56	11.66

Source: Fehr & Peers 2021.

Bold font indicates a significant impact.

¹ No Project baseline results shown are the City total/average VMT in the model (RIVTAM) base year without the addition of the Project.

² Project baseline results shown are the City total/average VMT in the model (RIVTAM) base year with the addition of the Project land uses.

³ No Project cumulative results shown are the City total/average VMT in the model (RIVTAM) future year without the addition of the Project.

⁴ Project cumulative results shown are the City total/average VMT in the model (RIVTAM) future year with the addition of the Project land uses.

⁵ Boundary VMT presents the sum of all VMT on roadways within the City boundary (e.g., total trips on each roadway segment in the City multiplied by the length of that segment). See text for additional information.

⁶ Threshold is the No Project baseline City for the Project baseline result, and No Project cumulative City for the Project cumulative result.

As shown in Table 3.12-5, the Project's effect on VMT is considered a significant impact for the total link-level boundary VMT, and a less-than-significant impact for the link-level boundary VMT per service population.

The results show that the total link-level VMT within the City boundary would increase with the addition of the Project in the base and future years. Because the Project would increase population and employment within the City, VMT would increase. However, as shown in the table, the VMT per service population would decrease within the City, showing that travel on a per-person basis would be more efficient with the addition of the Project.

Mitigation Measure **MM-TRA-1** would be required to reduce impacts, as the Project would affect the VMT in the City. Given the uncertainty in some components of the measure that influence VMT (such as the cost of fuel) combined with the City's inability to influence other measures that would have the largest effect on VMT (such as implementation of a VMT tax or an increase in the fuel tax), the effectiveness of these TDM measures cannot be guaranteed to reduce impacts and the impact is considered significant and unavoidable.

Implementation of Mitigation Measure **MM-TRA-1** would reduce this impact, but not to less-than-significant levels. The impact would be significant and unavoidable.

Public Safety Element Update and Environmental Justice Policies

The Project also includes an update to the Public Safety Element to incorporate information on natural and human-caused hazards, along with new policies related to environmental justice, climate change, and pandemic preparedness and response, among others. The goal of the City's Public Safety Element is to reduce the potential short- and long-term risk of death, injury, property damage, and economic and social disruption resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. Other locally relevant safety issues—such as emergency response, hazardous materials spills, crime reduction, and response to global pandemics like COVID-19 beginning in 2020—are included. The Project would not result in conflicts with other land use plans, policies, and regulations (e.g., the SCAG RTP/SCS, the Zoning Code, Specific Plans) or affect VMT. Impacts would be less than significant.

Mitigation Measures

The potential impacts of the Project described in this section would be reduced with implementation of the following mitigation measure.

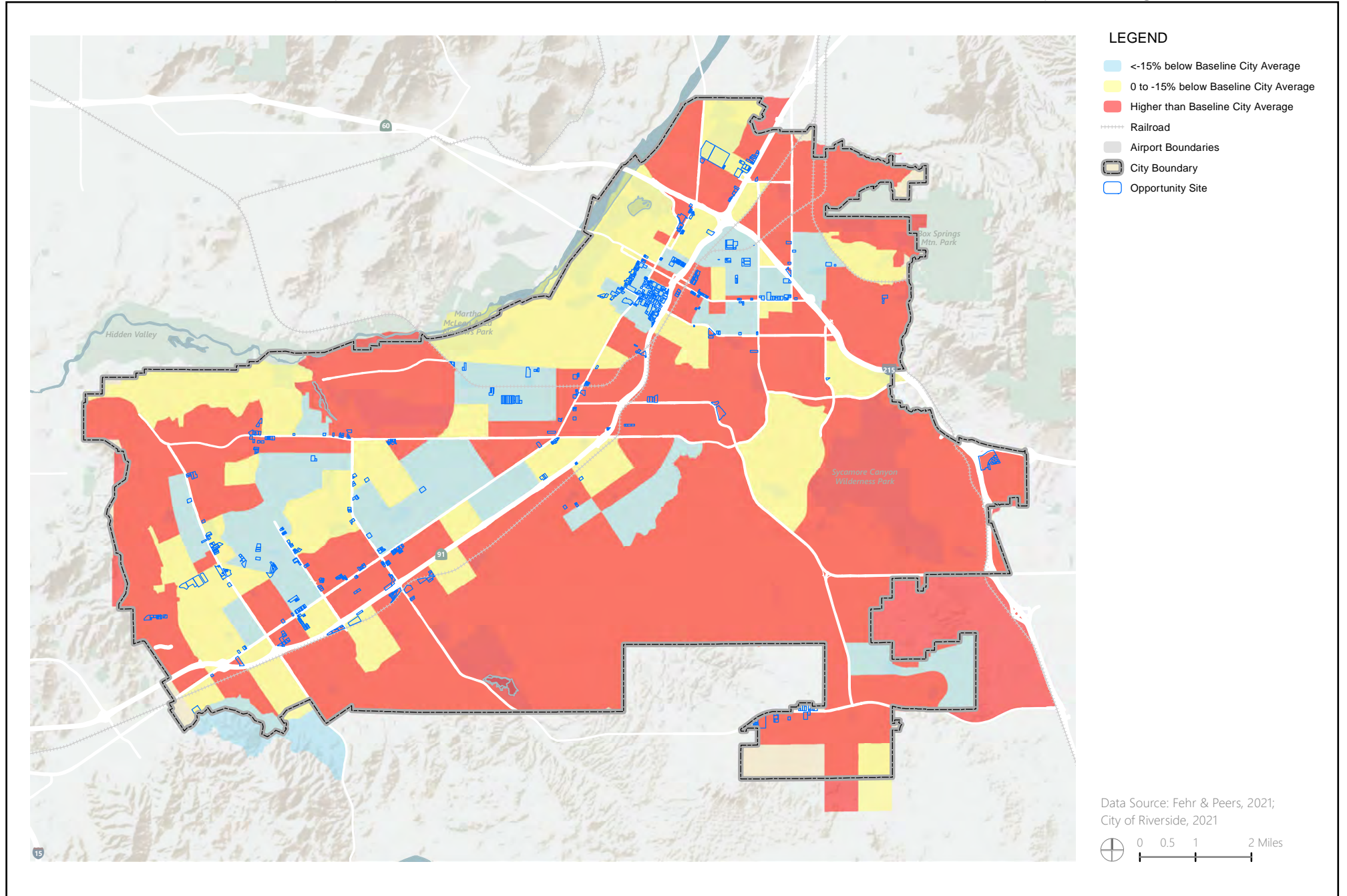
MM-TRA-1: Implement VMT mitigation options.

As individual Opportunity Sites are developed, future development projects shall implement all feasible mitigation measures to reduce VMT.

The amount and type of mitigation needed will vary based on the type and location of projects, as development in some areas of the City will generate VMT that is 15 percent below the existing VMT, some will generate VMT that is 0–15 percent below the City average, and others are in areas with VMT higher than the City average. Figure 3.12-1 shows the VMT per service population for each transportation analysis zone in the City and summarizes these three different efficiency areas of the City.

Figure 3.12-1

Cumulative Build-Out Daily VMT per Service Population Compared to Baseline City Average



Opportunity Site development projects in very efficient areas (e.g., more than 15 percent below the City average) shown in blue on the figure can be presumed not to have a significant VMT impact and would not need any VMT mitigation due to their location efficiency.

Opportunity Site development projects in moderately efficient areas (e.g., between 0 percent and 15 percent below the City average) proposed pursuant to the Project shown in yellow on the figure shall incorporate a moderate amount of VMT mitigation. Potential measures for each individual development include, but are not limited to:

- Consider incorporating affordable housing into the Opportunity Site project (expected range of effectiveness 0.04–1.20 percent VMT reduction).²
- Connect the Opportunity Site project to transit, bicycle, and pedestrian facilities (expected range of effectiveness 0.25–0.5 percent VMT reduction).²
- Provide bicycle parking (expected range of effectiveness 0.05–0.14 percent VMT reduction).²
- Consider unbundling parking costs (expected range of effectiveness 2.6–13.0 percent VMT reduction).²
- Provide car-sharing, bike sharing, or ride-sharing programs (expected range of effectiveness 0.4–15.0 percent VMT reduction).²
- Provide transit passes (expected range of effectiveness 0.3–20.0 percent VMT reduction).²
- Increase Opportunity Site project density up to maximum zoning density to the extent feasible (expected range of effectiveness 0.8–30.0 percent VMT reduction).²
- For Opportunity Site projects that are 2 acres or larger, provide publicly accessible shared-mobility zones.³

Opportunity Site development projects in the least-efficient areas (e.g., higher VMT per service population than the City average) shown in red on the figure shall be subject to the maximum amount of TDM considered feasible in the City. These measures⁴ include, but are not limited to:

- Identify measures for moderately efficient areas.
- Improve or increase access to transit (expected range of effectiveness 0.5–24.6 percent VMT reduction).²
- Increase access to common goods and services, such as groceries, schools, and daycare (expected range of effectiveness 6.7–20.0 percent VMT reduction).²
- Improve pedestrian or bicycle networks or transit service (expected range of effectiveness 0.02–8.2 percent VMT reduction).²

² Expected range of effectiveness in VMT reduction from *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). Expected range of effectiveness will vary based on specific project implementation. Measures' effectiveness will dampen as multiple measures are applied together.

³ The California Air Pollution Control Officers Association does not provide an estimated range of effectiveness for shared-mobility zones.

⁴ TDM measures are consistent with those identified in the WRCOG Implementation Pathway Study as documented in the TDM Strategy Assessment (Fehr & Peers 2019).

- For Opportunity Site projects that are 3 acres or larger, provide traffic calming on site in accordance with the Complete Streets Ordinance (expected range of effectiveness 0.25–1.0 percent VMT reduction).²
- Increase connectivity and/or intersection density on the Opportunity Site projects that are 3 or more acres (expected range of effectiveness 3.0–21.3 percent VMT reduction).²

The maximum total reduction potential for suburban development from TDM strategies described above is 15 percent (CAPCOA 2010). Recent research indicates that other factors such as building tenants play a substantial role in maximum TDM reduction potential. For the City, outside of the Downtown core, a maximum TDM reduction potential of between 3 percent and 5 percent is expected.

In addition to onsite TDM measures noted above, Opportunity Sites could potentially contribute to future VMT mitigation fee programs, banks, or exchanges. No regional VMT mitigation programs currently exist; however, if a relevant program that provides VMT mitigation is available through the City, the County of Riverside, or other regional entity, development projects could potentially pay into a fee program or purchase mitigation credits to achieve needed VMT mitigation instead of, or in addition to, onsite TDM measures.

It should be noted that the California Air Resources Board's Scoping Plan has shown that VMT per person has continued to grow throughout California even though the regional 2020–2045 RTP/SCS predicted that VMT would decrease. The Scoping Plan supports two key observations that are relevant to the findings in this EIR:

1. VMT is influenced by a variety of factors that are outside of local land use control and are not sensitive enough in regional travel demand forecasting tools, including the price of fuel, income levels, and auto accessibility, among other factors.
2. California has more ability to influence VMT reduction through legislative action (e.g., VMT tax, increase in fuel tax, vehicle registration fees) than the regional agencies or the City of Riverside Community & Economic Development Department, Planning Division does through their regional planning and local land use authority.

Given the uncertainty in some components that influence VMT (such as the cost of fuel) combined with the City's inability to influence other measures that would have the largest effect on VMT (such as implementation of a VMT tax or an increase in the fuel tax), the effectiveness of these TDM measures cannot be guaranteed to reduce impacts and the impact is considered significant and unavoidable.

Implementation of this measure would reduce this impact, but not to less-than-significant levels. The impact would be significant and unavoidable.

3.13 Tribal Cultural Resources

3.13.1 Introduction

This section describes existing conditions and applicable laws and regulations pertaining to tribal cultural resources (TCRs), with an analysis of the potential impacts on TCRs that could result from implementation of the Project. The analysis and assessment are based on consultation with Native American tribes traditionally and culturally affiliated with the City of Riverside (City), and other cultural resources studies recently conducted by ICF for the City. Refer to Section 3.3, *Cultural Resources*, of this Draft EIR for additional details regarding archaeological and historical resources on the Opportunity Sites. Details on the location of the Project and a description of Project activities are included in Chapter 2, *Project Description*, of this EIR.

A TCR is a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a recognized Native American tribe. The resource may be in or eligible for listing in the California Register of Historical Resources (CRHR) or a local historic register, or a lead agency may choose to treat a resource as a TCR. The City is near an ethnographic transition zone between the Gabrielino/Tongva, Serrano, Luiseño, and Cahuilla Native American tribes.

3.13.2 Environmental Setting

Natural Setting

The City is in the South Coast subregion of the southwestern California region and within the California Floristic Province (Baldwin et al. 2012). The natural vegetation of the subregion consists primarily of chaparral, sage scrub, annual grasslands, woodland, and riparian scrub and forest. Much of the natural vegetation occurs in preserved open space or fragmented patches in undeveloped areas. Additional detailed environmental setting information is provided in Section 3.3, *Cultural Resources*.

Ethnohistoric Setting

The City is near an ethnographic transition zone between multiple Native American groups, including the Gabrielino/Tongva, Serrano, Luiseño, and Cahuilla. All four groups are speakers of Takic languages, which are part of the Uto-Aztecan linguistic stock. Because the Project, including the boundaries of the City and individual Opportunity Sites, occupies a transitional zone among these groups, it is necessary to consider all four groups to fully understand the occupation history of the City and adjacent region. The ethnographic contexts presented in Section 3.3, *Cultural Resources*, of this report are drawn from ethnographic sources and were often recorded and written by non-Indian authors; they do not necessarily represent the individual perspectives of the Native American tribes that are represented by this Project. Native American groups have occupied this region for many millennia. The City and the surrounding region contains numerous archaeological remnants of this occupation history. A discussion of the archaeological background for this Project is presented in detail in Section 3.3, *Cultural Resources*.

3.13.3 Regulatory Setting

The Project is subject to a number of federal, state, and local regulations that are pertinent to the delineation, treatment, and discussion of TCRs. Detailed discussion of the applicable regulatory statutes are provided in Section 3.3, *Cultural Resources*. Federal statutes that are applicable in some way to the treatment of TCRs include Section 106 of the National Historic Preservation Act, the Native American Graves Protection and Repatriation Act of 1990, and the American Indian Religious Freedom Act. Pertinent state regulations include CEQA and Public Resources Code (PRC) Section 5024.1 (CRHR), Government Code Section 65352.3 (Senate Bill [SB] 18), Assembly Bill (AB) 52, PRC Section 5097, Health and Safety Code Section 7050.5, California Government Code Section 6254(r) and 6254.10, and the California Native American Graves Protection and Repatriation Act of 2001. Local regulatory guidance includes the Historic Preservation Element of the *Riverside General Plan 2025* (GP 2025) (see Table 3.13-1 for specific policies that are applicable for the study of TCRs) and Title 20 (Cultural Resources) of the City of Riverside Municipal Code.

Federal

See Section 3.3, *Cultural Resources*, for federal regulations that pertain to the Project.

State

Government Code Section 65352.3 (Senate Bill 18)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to approvals and amendments of both general plans (defined in Government Code §65300 et seq.) and specific plans (defined in Government Code §65450 et seq.).

Prior to the approval or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the Native American Heritage Commission [NAHC]) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts on, cultural places on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code §65352.3).

Assembly Bill 52

On September 25, 2014, California Governor Jerry Brown signed into law Assembly Bill (AB) 52, which amended PRC Section 5097.94 and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to establish a new category of environmental resources that must be considered under CEQA: TCRs. This amendment took effect on July 1, 2015. TCRs are defined as either (1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are included in the CRHR or a local register of historical resources, or that are determined to be eligible for inclusion in the CRHR; or (2) resources determined by the lead agency, in its discretion, to be significant based on the criteria for listing in the CRHR. For projects with applications filed on or after July 1, 2015, lead agencies are also required to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project, including tribes that may not be federally

recognized, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area, and the tribe requests consultation prior to determining whether a negative declaration, mitigated negative declaration, or EIR is required for a project.

Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Furthermore, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects on TCRs, the consultation must include those topics (PRC Section 21080.3.2(a)). The environmental document and the mitigation monitoring and reporting program (where applicable) must include any mitigation measures that are adopted (PRC Section 21082.3(a)).

Assembly Bill 168

AB 168 became law on September 25, 2020. AB 168 amends Sections 65400, 65913.4, and 65941.1 of the Government Code and was written to address an “oversight” in SB 35 (Chapter 366 of the Statutes of 2017) that did not consider potential destruction of TCRs that are either listed on registers or are potential TCRs. SB 35 provides for a streamlined ministerial approval process of multi-family housing. AB 168 requires projects applying for SB 35 approval to submit a notice of intent to submit an application, which includes a preliminary application. AB 168 provides requirements for the local agency to engage in scoping consultation with Native American tribes for projects seeking review under the ministerial approval process outlined in SB 35. Local agencies must engage in consultation with Native American tribes traditionally and culturally affiliated with the geographic area of the project, and contact the NAHC to assist in identifying the appropriate Native American tribe(s) for consultation. The consultation must proceed on a timeline whereby the local government formally notifies each tribe within 30 days of receiving the preliminary application, the tribe has 30 days to accept the invitation to engage in consultation, and the local government must initiate consultation within 30 days of the tribe’s acceptance. CEQA does not apply to the consultation process (Government Code 65913.(b)(1)(E)).

If the parties in consultation agree that there is no potential impact on TCRs as a result of the project, then the proponent may submit an application for a ministerial approval per SB 35. If a potential impact on TCRs is identified through consultation, then a mutually accepted agreement must be made that identifies methods and conditions for treatment of TCRs. The agreement is a condition of approval for the project application under SB 35. Tribal consultation concludes upon the documentation of an agreement for how TCRs will be treated at the project site (if present) or if the parties in consultation, acting in good faith and after a reasonable effort, conclude that a mutual agreement cannot be reached. If consulting parties do not reach an agreement for treatment of TCRs, then the project proponent is not eligible for ministerial approval under AB 35.

To qualify for SB 35 ministerial approval the following conditions must be met:

- A tribe that has received notice of a project proponent’s submission of a pre-application does not respond to the invitation for consultation within 30 days.
- A tribe accepts the invitation to conduct consultation, but does not engage the local agency after repeated attempts by the location agency.

- The consultation between the tribe(s) and the local agency agrees that there is no potential harm to TCRs that will result from the proposed project.
- Consultation has identified potential impacts on TCRs, and an agreement has been documented that provides the methods for treatment of the potentially affected TCRs.

If after consultation it is determined that no TCRs would be affected by the project, then no further documentation is necessary. If an agreement between a tribe and the lead agency is reached for treatment of potentially affected TCRs, then that agreement must be attached to the approved application for SB 35 ministerial exemption. If consultation results in denial of the project for SB 35 ministerial approval, the local agency must provide written documentation of the explanation of the project’s denial to the project proponent and the tribe(s) participating in consultation. If changes are made to the project after consultation has been closed, then the local agency must engage in additional, subsequent consultation.

A project will not be eligible for SB 35 streamlined ministerial process if:

- There is a TCR present that is on a national, state, tribal, or local historic register.
- There is a potential TCR that could be affected by the proposed project and the consulting parties cannot reach an agreement on the treatment of the TCR.
- Consulting parties do not agree as to whether a potential TCR will be affected by the project.

Local

Riverside General Plan 2025

GP 2025 aims to “provide guidance in developing and implementing activities that ensure that the identification, designation, and protection of cultural resources are part of the City’s community planning development and permitting processes” (City of Riverside 2012). The Historic Preservation Element acknowledges that the California Office of Historic Preservation State Historic Preservation Officer has recognized Riverside’s historic preservation program with a designation as a Certified Local Government. The Historic Preservation Element provides historic context with themes important for identifying and evaluating cultural resources within the City.

Table 3.13-1. Relevant Riverside General Plan and Specific Plan Policies

Plan	Policy
Riverside General Plan 2025	
Historic Preservation Element	<p>Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable state and federal cultural resources protection and management laws in its planning and project review process.</p> <p>Policy HP-2.1: The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.</p> <p>Policy HP-2.3: The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.</p>

Plan	Policy
	<p>Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.</p> <p>Policy HP-7.1: The City shall apply code enforcement, zoning actions, and building safety/construction regulations as tools for helping to protect cultural resources.</p> <p>Policy HP-7.2: The City shall incorporate preservation as an integral part of its specific plans, general plan, and environmental processes.</p>
Specific Plans	
Canyon Springs Business Park Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.
Downtown Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.
Hunter Business Park Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.
La Sierra University Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.
Magnolia Avenue Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.
Riverside Marketplace Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.
University Avenue Specific Plan	There are no applicable policies relevant to the Project regarding TCRs.

Source: City of Riverside 1991, 2002, 2005, 2007, 2009, 2012, 2017a, 2017b.

Policy Consistency

The Project would be consistent with GP 2025 Historic Preservation Element policies related to TCRs as listed in Table 3.13-1 because it complies with state laws and the Cultural Resources Ordinance aimed at identifying and protecting cultural resources and TCRs.

3.13.4 Methodology and Thresholds of Significance

Efforts to identify TCRs included a Sacred Lands File search with the NAHC and invitations to Native American tribes to consult on the EIR pursuant to AB 52 and SB 18.

Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential significant impacts on TCRs, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2). Information may also be available from the NAHC’s Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

On the City’s behalf, ICF contacted the NAHC on January 25, 2021, requesting a search of the Sacred Lands File and a listing of potentially interested Native American groups and individuals. The NAHC responded on February 8, 2021, stating that the search was positive. While the NAHC did not identify the locations of any resources, it recommended contacting the Gabrieleño Band of Mission

Indians – Kizh Nation and the Los Coyotes Band of Cahuilla and Cupeño Indians for additional information. Additionally, the NAHC provided a list of 31 Native Americans who may also have knowledge of cultural resources in the City.

The City sent the NAHC a Notice of Preparation (NOP) of a Draft EIR on April 5, 2021. The NAHC responded to the City on April 6, 2021, confirming receipt of the NOP and providing applicable CEQA, AB 52, and SB 18 regulatory language and recommending that a search of the Sacred Lands File be conducted.

As part of the effort to determine whether the Project may result in impacts on TCRs, the City sent letters on April 1, 2021, via email and certified U.S. Mail, to the tribes listed below in Table 3.13-2 as formal notification of the Project and to invite them to consult on the Project under AB 52 and SB 18:

Table 3.13-2. List of Tribes Sent AB 52 and/or SB 18 Letters

Tribe	Representative	AB 52	SB 18
Agua Caliente Band of Cahuilla Indians	Jeff Grubbe - Chairperson	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office	Patricia Garcia-Plotkin – Director, Tribal Historic Preservation Office		<input checked="" type="checkbox"/>
Augustine Band of Cahuilla Indians	Amanda Vance -Chairperson		<input checked="" type="checkbox"/>
Cabazon Band of Mission Indians	Doug Welmas – Chairperson		<input checked="" type="checkbox"/>
Cahuilla Band of Indians	Daniel Salgado - Chairperson		<input checked="" type="checkbox"/>
Cahuilla Band of Indians	Bobby Ray Esparza – Cultural Coordinator	<input checked="" type="checkbox"/>	
Gabrieleño Band of Mission Indians - Kizh Nation	Andrew Salas - Chairperson	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Gabrieleno/Tongva San Gabriel Band of Mission Indians	Anthony Morales – Chairperson	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Gabrielino Tongva Indians of California Tribal Council	Robert Dorame – Tribal Chair, Cultural Resources		<input checked="" type="checkbox"/>
Gabrielino/Tongva Nation	Sandonne Goad - Chairperson		<input checked="" type="checkbox"/>
Gabrielino-Tongva Tribe	Charles Alvarez - Chairperson		<input checked="" type="checkbox"/>
Juaneno Band of Mission Indians Acjachemen Nation	Joyce Perry – Tribal Manager		<input checked="" type="checkbox"/>
Juaneno Band of Mission Indians Acjachemen Nation	Matias Belardes – Chairperson		<input checked="" type="checkbox"/>
Los Coyotes Band of Cahuilla and Cupeño Indians	Shane Chapparosa - Chairperson		<input checked="" type="checkbox"/>
Morongó Band of Mission Indians	Robert Martin - Chairperson	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Morongó Band of Mission Indians	Denisa Torres – Cultural Resources Manager		<input checked="" type="checkbox"/>
Pala Band of Mission Indians	Shasta Gaughen, PhD – Tribal Historic Preservation Officer		<input checked="" type="checkbox"/>
Pechanga Band of Luiseño Indians	Mark Macarro - Chairperson		<input checked="" type="checkbox"/>
Pechanga Band of Luiseño Indians	Paul Macarro – Cultural Resources Coordinator		<input checked="" type="checkbox"/>
Pechanga Cultural Resources Department	Ebru T. Ozdil – Planning Specialist	<input checked="" type="checkbox"/>	
Quechan Tribe of the Fort Yuma Reservation	Manfred Scott – Acting Chairman		<input checked="" type="checkbox"/>

Tribe	Representative	AB 52	SB 18
Quechan Tribe of the Fort Yuma Reservation	Jill McCormick – Tribal Historic Preservation Officer		<input checked="" type="checkbox"/>
Ramona Band of Cahuilla	Joseph Hamilton Chairperson		<input checked="" type="checkbox"/>
Ramona Band of Cahuilla	John Gomez – Environmental Coordinator		<input checked="" type="checkbox"/>
Rincon Band of Luiseño Indians	Bo Mazzetti - Chairperson		<input checked="" type="checkbox"/>
Rincon Band of Mission Indians	Cheryl Madrigal – Tribal Historic Preservation Officer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
San Manuel Band of Mission Indians	Jessica Mauck – Director of Cultural Resources Management	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Santa Rosa Band of Cahuilla Indians	Lovina Redner - Chairperson		<input checked="" type="checkbox"/>
Serrano Nation of Mission Indians	Wayne Walker – Co-Chairperson		<input checked="" type="checkbox"/>
Serrano Nation of Mission Indians	Mark Cochrane – Co-Chairperson		<input checked="" type="checkbox"/>
Soboba Band of Luiseno Indians	Scott Cozart - Chairperson		<input checked="" type="checkbox"/>
Soboba Band of Luiseno Indians	Joseph Ontiveros – Cultural Resource Director	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Torres-Martinez Desert Cahuilla Indians	Mary Resvaloso - Chairperson		<input checked="" type="checkbox"/>

At the time of this report, six tribes responded to invitation to consult letters from the City. Table 3.13-3 below presents the results of consultation to this point.

Table 3.13-3. Native American Consultation

Tribe	Response Date	Response
San Manuel Band of Mission Indians – Ryan Nordness (Cultural Resources Analyst)	April 13, 2021	The tribe initially requested consultation, then declined. Upon clarification requests from the City, the tribe decided to consult. Consultation occurred between the City and San Manuel.
	June 23, 2021	The tribe requested to close out consultation with the City.
Pechanga Band of Luiseño Indians – Juan Ochoa (Assistant Tribal Historic Preservation Officer)	April 14, 2021	The tribe formally requested consultation under SB 18. The tribe also requested notification and involvement in the entire CEQA environmental review process for the duration of the Project. The tribe indicated that the area is culturally sensitive and identified types of resources that exist within the City that could be considered TCRs.
Gabrieleño Band of Mission Indians – Kizh Nation - Brandy Salas (Administrative Specialist)	April 22, 2021	The tribe has stated that there is no need for consultation because no ground disturbance will take place. If ground disturbance occurs in the future, the tribe would like to consult.
Agua Caliente Tribal Historic Preservation Office - Lacy Padilla (Archaeologist)	May 7, 2021	The tribe stated that the City is not within the boundaries of the Agua Caliente Band of Cahuilla Indians Reservation but is within the tribe's Traditional Use Area. The tribe requested copies of any cultural resources documentation generated in connection with the Project.

Tribe	Response Date	Response
Soboba Band of Luiseño Indians – Joseph Ontiveros (Tribal Historic Preservation Officer)	June 15, 2021	Although the Project is outside of the existing reservation, the City falls within the bounds of the Tribal Traditional Use Areas. The Project is in proximity to known sites, is a shared use area that was used in ongoing trade between tribes, and is considered to be culturally sensitive by the people of Soboba. The tribe requests government-to-government consultation and that Native American monitor(s) be present during any ground-disturbing activities, including surveys and archaeological testing.
Rincon Band of Luiseño Indians – Cheryl Madrigal (Tribal Historic Preservation Officer)	May 7, 2021	The tribe stated that the Project is not within the boundaries of the reservation; however it is within the tribe's Traditional Use Area. The tribe requested consultation. Consultation between the City and the tribe was conducted.
	July 7, 2021	The tribe requested to close out consultation with the City.

At the time of this writing, responses to requests for consultation have not been received from the Cahuilla Band of Indians, the Morongo Band of Mission Indians, or the San Gabriel Band of Mission Indians. The period for responses to the City's request for consultation ended on June 29, 2021.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would:

- Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k)
- Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.13.5 Impacts and Mitigation Measures

Impact TCR-1: The Project could cause a substantial adverse change in the significance of a tribal cultural resource that has cultural value to a California Native American tribe and that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). Implementation of Mitigation Measures MM-CUL-2 through MM-CUL-9, MM-TCR-1, and MM-TCR-2 would reduce this impact to less-than-significant levels.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Opportunity Sites selected by the City are distributed throughout Riverside. Using data from citywide records searches, Applied EarthWorks, Inc. (2007) conducted an archaeological sensitivity analysis, as described in the *Cultural Resources Study for the City of Riverside General Plan 2025 Update Program EIR*. Through this analysis, areas of high, medium, low, and unknown sensitivity were identified within the city limits. Substantial portions of the City were identified as unknown due to a lack of archaeological survey in these areas. Because Opportunity Site-specific records searches were not conducted for this analysis, the results of the 2007 study were used for analytical purposes. It is likely that numerous archaeological studies have taken place since this study was conducted 15 years ago, so a similar study with current data may yield slightly different results. However, this work can be viewed as a proxy for understanding relative archaeological sensitivity throughout the City and at Opportunity Sites. In Section 3.3 (Figure 3.3-2), the results of the Applied Earthworks study are overlain with the locations of Opportunity Sites in the City. The results of this analysis are presented in Section 3.3 (Table 3.3-2) in terms of total acreage and numbers of Opportunity Sites within the sensitivity categories defined by Applied Earthworks.

Most of the Opportunity Sites identified for this Project are in areas of unknown archaeological sensitivity, while a smaller number of these sites are in areas of low to high archaeological sensitivity. The locations with unknown archaeological sensitivity are areas where archaeological studies had not been conducted at the time of the 2007 study. It is likely that many archaeological surveys have been conducted throughout the City since the Applied Earthworks study, and many additional archaeological sites have been recorded and evaluated. Because the Opportunity Sites under the proposed Housing Element Update are situated throughout the City in mostly urban and developed areas and in mostly unsurveyed areas, the potential for Opportunity Sites to encounter archaeological resources is unknown. Some prehistoric resources may be considered TCRs and can include sites, features, and objects that are listed in the CRHR, eligible to be listed in the CRHR, or locally listed as defined in PRC Section 5020.1(k). Future cultural resource studies at Opportunity Site locations (see Mitigation Measure **MM-CUL-2**) could identify both archaeological resources and/or TCRs through survey and consultation with Native American tribes.

The City has provided information about the Project to nine tribes who have requested formal notification in accordance with AB 52 and 31 individuals in accordance with SB 18. Six tribes have responded to AB 52 consultation requests. The Pechanga Band of Luiseño Indians, the Rincon Band of Luiseño Indians, the Soboba Band of Luiseño Indians, and the San Manuel Band of Mission Indians requested formal consultation. Additionally, Pechanga and Soboba indicated that the area is

culturally sensitive and identified types of resources that exist in the City that could be considered TCRs, although the specific locations of such resources were not provided. Therefore, it is unknown whether such resources are listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k). It is likely, however, that resources such as those described by Pechanga (e.g., rock art, pictographs, petroglyphs) would be considered eligible TCRs and are likely to be identified as such. Additionally, the NAHC has identified the City as being positive for Sacred Lands, although the locations are unspecified. The NAHC recommended contacting the Gabrieleño Band of Mission Indians – Kizh Nation and the Los Coyotes Band of Cahuilla and Cupeño Indians for additional information. Through continued consultation with tribes on a project-specific basis and implementation of Mitigation Measure **MM-CUL-2**, it is possible that the City will be able to determine whether specific Opportunity Sites overlap with known locations of TCRs.

Development of Opportunity Sites would potentially include the excavation of soils in undeveloped (vacant) areas and demolition of existing structures in developed areas. Excavation and demolition activities, particularly those that involve disturbance of previously unexcavated native soil, could result in the discovery of previously unidentified resources that might be considered TCRs. At least one tribe has described the presence of resources that could be considered TCRs in the City. Therefore, ground-disturbing activities could result in disturbance or destruction of TCRs, which would be a potentially significant impact. For Opportunity Site projects that are not eligible for the ministerial approval process (and not projects per CEQA), and with continued consultation with Native American tribes, implementation of Mitigation Measures **MM-CUL-2** through **MM-CUL-9** (presented in Section 3.3, *Cultural Resources*), **MM-TCR-1**, and **MM-TCR-2** would reduce this impact to less-than-significant levels.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural and human-caused hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; climate change; and other safety issues. These policies would not enable future development and they would not demolish, physically alter, or otherwise diminish the integrity of a TCR. No specific infrastructure improvements or projects are identified in the Public Safety Element Update. As this is a policy document, this update would not cause a substantial adverse change in the significance of a TCR. Policies related to environmental justice under the proposed Public Safety Element Update would not involve future development or the construction of new development (housing, public safety infrastructure, and mixed-use development). Rather, these policies describe treatment of hazardous materials associated with contaminated sites within environmental justice communities; access to affordable housing, health care, and emergency services; consideration of the needs of environmental justice communities in planning for emergency response and recovery; health implications for land use decisions that could involve hazardous uses; and the potential for vehicular and pedestrian accidents in underserved areas.

Policy HP-EJ-1.0, proposed for incorporation within the existing Historic Preservation Element of GP 2025, encourages the identification and preservation of historic and cultural resources associated with communities whose histories and historical contributions are not well documented. This policy could result in the preservation of a particular archaeological resource (prehistoric or historic period in age), and, by extension, TCRs. Rather than being destructive, this policy would work to preserve archaeological resources (and TCRs) if it is enacted and would not result in ground

disturbance. Therefore, this policy would not cause a substantial adverse change in the significance of a TCR.

Mitigation Measures

The potential impacts of the Project described in this section would be reduced to less-than-significant levels with implementation of the following mitigation measures.

Implementation of Mitigation Measures **MM-CUL-2** through **MM-CUL-9** (described in Section 3.3, *Cultural Resources*) would reduce potential impacts on TCRs to less-than-significant levels.

- MM-CUL-2: Conduct an archaeological study.
- MM-CUL-3: Avoid archaeological sites through establishment of Environmentally Sensitive Areas (ESAs).
- MM-CUL-4: Develop and implement an Archaeological Treatment Plan (ATP) for evaluation of newly discovered and/or unevaluated archaeological resources.
- MM-CUL-5: Implement data recovery for CRHR-eligible sites that cannot be avoided.
- MM-CUL-6: Retain an on-call archaeologist for monitoring.
- MM-CUL-7: Conduct archaeological and Native American monitoring.
- MM-CUL-8: Employ procedures for treatment and disposition of cultural resources.
- MM-CUL-9: Conduct cultural sensitivity training.

MM-TCR-1: Implement tribal cultural resources protocols and measures determined through consultation.

During project-level CEQA review, when required, of Opportunity Site projects that would cause a substantial adverse change in the significance of a TCR, the City can and should develop project-level protocols and mitigation measures with consulting tribes, consistent with PRC Section 21080.3.2(a), to avoid or reduce impacts on TCRs during construction and operation of future development projects. Individual project proponents shall fund the effort to identify these resources through records searches, survey, consultation, or other means, to develop minimization and avoidance methods where possible and to consult with Native American tribes participating in AB 52 consultation to develop mitigation measures for TCRs that may experience substantial adverse changes.

In the absence of any specific mitigation measures developed during AB 52 consultation, the City shall develop standard mitigation measures set forth in PRC Section 21084.3(b).

The following are standard mitigation measures for TCRs.

1. Avoid and preserve the resources in place including, but not limited to, planning and constructing to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria.
2. Treat the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to:

- a. Protecting the cultural character and integrity of the resource
- b. Protecting the traditional use of the resource
- c. Protecting the confidentiality of the resource
- d. Creating permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places
- e. Protecting the resource

MM-TCR-2: Conduct consultation with City and applicant.

Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the applicant or project sponsor and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur among the City, 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 individual development sites. The City and the applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible on the individual development 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 tribes to provide tribal monitoring for ground-disturbing activities.

Impact TCR-2: The Project could cause a substantial adverse change in the significance of a tribal cultural resource that has cultural value to a California Native American tribe and that is a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Implementation of Mitigation Measures MM-CUL-2 through MM-CUL-9, MM-TCR-1, and MM-TCR-2 would reduce this impact to less-than-significant levels.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

As discussed above, the development of Opportunity Sites has the potential to encounter prehistoric archaeological resources that could be considered or have elements that could be considered TCRs. A determination would have to be made on a project-by-project basis as to whether an Opportunity Site has any known TCRs; however, it is possible that ground-disturbing activities could result in the discovery of previously unknown TCRs as well.

As stated above, no TCRs have been identified specifically for the Project; however, at least one tribe has discussed types of resources that could be considered TCRs within the City. In addition, the NAHC has identified the City as being positive for Sacred Lands and has suggested the City conduct additional consultation with Native American tribes to gather more information about them. Resources listed as Sacred Lands are likely to be considered TCRs, and the delineation of the locations of such resources would be necessary prior to construction activities at any one

Opportunity Site. Additionally, because the Project could result in impacts on prehistoric archaeological sites that might be considered TCRs or have elements that might be considered TCRs, it is possible that individual projects could cause a substantial adverse change in the significance of a TCR with value to a California Native American tribe and that is a resource determined by the lead agency to be significant.

Not all tribes responded to the City's invitation to consult under AB 52 and SB 18, and the period to request consultation ended on June 29, 2021. During individual project-by-project CEQA analysis and/or consultation under AB 168 (for ministerial projects), it is possible locations of individual TCRs can be delineated and a determination can be made as to whether TCRs would be affected. As such, any ground-disturbing activities associated with proposed development of Opportunity Sites that have not had a cultural resources study at them within the past 5 years could cause a substantial adverse change in the significance of a TCR that has cultural value to a California Native American tribe and that is a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. For Opportunity Site projects that are not eligible for the ministerial approval process (and not projects per CEQA), and through continued consultation with Native American tribes, implementation of Mitigation Measures **MM-CUL-2** through **MM-CUL-9** (listed in Section 3.3, *Cultural Resources*), **MM-TCR-1**, and **MM-TCR-2** would reduce these impacts to less-than-significant levels. These mitigation measures would ensure that the project applicant is aware of the potential of TCRs on individual Opportunity Sites; additionally, these mitigation measures provide procedures for implementing proper cultural resource studies, consultation, unanticipated discovery procedures, preservation in place (if possible), and methods for identification, evaluation, and treatment of resources (including TCRs) if necessary such that potential impacts on TCRs are reduced to a level that is less than significant.

Public Safety Element Update and Environmental Justice Policies

As presented previously, the Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; climate change; and other safety issues. However, no specific infrastructure improvements or projects are identified in the Public Safety Element Update. As this is a policy document, this update would not cause a substantial adverse change in the significance of a TCR that has cultural value to a California Native American tribe and that is a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Policies related to environmental justice under the proposed Public Safety Element Update would not involve future development or the construction of new development (housing, public safety infrastructure, and mixed-use). Rather, these policies describe treatment of hazardous materials associated with contaminated sites within environmental justice communities; access to affordable housing, health care, and emergency services; consideration of the needs of environmental justice communities in planning for emergency response and recovery; health implications for land use decisions that could involve hazardous uses; and the potential for vehicular and pedestrian accidents in underserved areas.

Policy HP-EJ-1.0 encourages the identification and preservation of historic and cultural resources associated with communities whose histories and historical contributions are not well documented. This policy could result in the preservation of a particular archaeological resource (prehistoric or historic period in age) and, by extension, TCRs. Rather than being destructive, this policy would work to preserve archaeological resources (and TCRs) if it is enacted and would not result in ground

disturbance. Therefore, this policy would not cause a substantial adverse change in the significance of a TCR.

Mitigation Measures

The potential impacts of the Project described in this section would be reduced to less-than-significant levels with implementation of the following mitigation measures.

Implementation of Mitigation Measures **MM-CUL-2** through **MM-CUL-9** (described in Section 3.3, *Cultural Resources*), **MM-TCR-1**, and **MM-TCR-2** (described under Impact TCR-1) would reduce potential impacts on TCRs to less-than-significant levels.

- MM-CUL-2: Conduct an archaeological study.
- MM-CUL-3: Avoid archaeological sites through establishment of Environmentally Sensitive Areas (ESAs).
- MM-CUL-4: Develop and implement an Archaeological Treatment Plan (ATP) for evaluation of newly discovered and/or unevaluated archaeological resources.
- MM-CUL-5: Implement data recovery for CRHR-eligible sites that cannot be avoided.
- MM-CUL-6: Retain an on-call archaeologist for monitoring.
- MM-CUL-7: Conduct archaeological and Native American monitoring.
- MM-CUL-8: Employ procedures for treatment and disposition of cultural resources.
- MM-CUL-9: Conduct cultural sensitivity training.
- MM-TCR-1: Implement tribal cultural resources protocols and measures determined through consultation.
- MM-TCR-2: Conduct consultation with City and applicant.

3.14 Utilities and Service Systems

3.14.1 Introduction

This section discusses the environmental and regulatory setting of utilities and service systems for the Project and provides an analysis of potential impacts that could occur with implementation of the Project. The analysis examines the degree to which the Project may result in changes to utility and service system demands in the City of Riverside (City) and includes analysis of potential impacts. Analysis methods, data sources, significance thresholds, and terminology used in this section are described. This section discusses the existing conditions and assesses the potential Project impacts. Mitigation measures to avoid or lessen potential impacts are identified, where necessary. Details on the location of the Project and a description of Project activities are included in Chapter 2, *Project Description*, of this EIR.

3.14.2 Environmental Setting

Water

The Riverside Public Utilities (RPU) water service area covers the majority of customers within the City boundaries, with the exception of a small southeasterly area, known as the Orangecrest community, which is within Western Municipal Water District's (WMWD's) service area, and a small easterly area within Eastern Municipal Water District's service area. Additionally, RPU provides water service to customers within a small portion of the city of Corona and Home Gardens (a census-designated community in Riverside County), generally from the City of Riverside boundary to the Magnolia Avenue and McKinley Street intersection.

In general, the City's northerly portion is within the RPU service area, while the southeasterly portion is within the WMWD service area.

Riverside Public Utilities

Water Sources and Supplies

RPU adopted its latest Urban Water Management Plan (UWMP) in June of 2016, which summarizes water demands by sector and characterizes the source waters available to meet those demands for the years 2020 through 2040. The purpose of the UWMP is to improve sustainability by managing the quantity and quality of groundwater resources. Water for the City is mainly supplied by RPU. RPU supplied 18,345 million gallons of water for its in-service area retail customers (750 million gallons wholesale) through more than 66,000 connections to over 331,000 people within its 68-square-mile service area in 2020 (RPU 2021b). The City extracts domestic water from the Bunker Hill, Riverside North, and Riverside South groundwater basins through wells operated by RPU and the Gage Canal Company. Forty-six wells then pump water from the aquifers to treatment plants, reservoirs, and customers and around the City through more than 951 miles of transmission and distribution pipelines. RPU's potable distribution system delivers water to RPU retail customers, the Home Gardens County Water District, WMWD, and the city of Norco. RPU's non-potable canal system delivers water to the Gage Canal Company and WMWD. All of RPU's customers are metered.

Additionally, RPU uses non-potable recycled water from the Riverside Regional Water Quality Control Plant (RWQCP). The RWQCP is in the City at 5959 Acorn Street, and provides preliminary, primary, secondary, and tertiary wastewater treatment in addition to recycled water infrastructure. The RWQCP is operated and maintained by the City's Public Works Department.

RPU's water supply consists primarily of local groundwater, with 60 percent originating from the Bunker Hill Basin, which is bounded on the northwest by the San Gabriel Mountains, on the northeast by the San Bernardino Mountains, and on the south by the Crafton Hills and the Badlands. RPU's wells at Bunker Hill Basin are generally located in the section of the basin with the greatest thickness of water-bearing layers. Therefore, RPU's water supply from the Bunker Hill Basin is considered reliable during single- and multi-year dry periods (RPU 2016). RPU also extracts groundwater from the Riverside North and Riverside South sub-basins and the Rialto-Colton Basin. None of these basins are currently in a critical overdraft condition (RPU 2016).

Additionally, RPU has the ability to purchase State Water Project water from WMWD through a connection at the Metropolitan Water District of Southern California's Henry J. Mills Treatment Plant. Up to 30 cubic feet per second or 19.4 million gallons per day (mgd) of imported water can be purchased from Metropolitan Water District through an existing agreement and conveyed through existing infrastructure. However, RPU has implemented several measures to maximize the use of local water resources and eliminate reliance on imported water, and this connection has not been utilized since 2008. According to Table 7-8 in the UWMP, eight water supply projects have been identified by RPU to maximize use of local water resources. For example, RPU intends to augment natural groundwater resources at Bunker Hill Basin Groundwater Banking Project through conjunctive-use projects as well as develop other forms of conservation to increase water supply reliability (e.g., recycled water) (RPU 2016).

Planned Sources of Water

The UWMP describes the reliability of RPU's water supplies and discusses RPU's water shortage contingency plan during a catastrophic event or drought conditions. Table 3.14-1 identifies the RPU UWMP water supplies for planning years 2020 to 2040. The RPU UWMP accounts for population growth as a result of development within the remaining vacant land, increased density within areas already developed as part of *Riverside General Plan 2025 (GP 2025)*, and water demand associated with growth and expansion at University of California Riverside and Cal Baptist University. According to the RPU UWMP, the City's conservation and long-range planning efforts have made it such that identified supplies exceed demands through planning year 2040.

As shown in Table 3.14-1, the RPU UWMP projects supplying 124,703 acre-feet (AF) (40,634 million gallons) of water by 2040 to meet increasing demand under anticipated build-out from GP 2025. In 2015, RPU received 75,126 AF of water from two sources: approximately 99 percent (74,926 AF) was local groundwater supplies and less than 1 percent (200 AF) was recycled water from the RWQCP (RPU 2016). All of RPU's groundwater is retrieved from the Bunker Hill and Riverside Basins (City of Riverside 2017a).

Table 3.14-1. Riverside Public Utility Actual and Projected Water Supply

Water Supply	Water Supply Source	2015	2020	2025	2030	2035	2040
		Actual					
Groundwater	Bunker Hill	53,793	55,263	55,263	55,263	55,263	55,263
Groundwater	Banking Bunker Hill Conjunctive Use	0	0	2,000	2,000	2,000	2,000
Groundwater	Seven Oaks Enhanced Phase II	0	1,000	1,000	1,000	1,000	1,000
Groundwater	Bunker Hill Active Recharge 2025	0	0	1,500	1,500	1,500	1,500
Groundwater	Riverside North	6,357	10,902	10,902	10,902	10,902	10,902
Groundwater	Riverside North Aquifer Storage and Recovery Project	0	2,000	2,000	2,000	2,000	2,000
Groundwater	Riverside South	13,571	16,880	16,880	16,880	16,880	16,880
Groundwater	Box Springs	0	0	0	2,800	2,800	2,800
Groundwater	Columbia, Etc. Stormwater	0	0	1,500	1,500	1,500	1,500
Groundwater	Rialto-Colton	1,205	2,728	2,728	2,728	2,728	2,728
Groundwater	RWQCP	200	6,430	6,430	6,430	6,430	6,430
Recycled Water	From WMWD	0	21,700	21,700	21,700	21,700	21,700
Total		75,126	116,903	121,903	124,703	124,703	124,703

Source: RPU 2016.
Units shown in acre-feet (AF)

RPU has historically met water demand from groundwater sources and imported water has only been purchased during the peak demand months when needed (RPU 2016). According to RPU's UWMP and as shown in Table 3.14-2, RPU's identified water supplies exceed estimated demand projections through 2040 under normal and multiple-dry-year conditions but may result in a shortage under 2040 single dry-year conditions (RPU 2016). During a period of multiple dry years, the expected supplies are slightly higher because of the higher average availability of water from the State Water Project (RPU 2016).

Table 3.14-2. Riverside Public Utility Projected Supply and Demand

Types	Year				
	2020	2025	2030	2035	2040
Water Supply (AFY)					
Normal Year	116,903	121,903	124,703	124,703	124,703
Single Dry Year	96,288	101,288	104,088	104,088	104,088
Multiple Dry Year 1st, 2nd, and 3rd Year Supply	102,364	107,364	110,164	110,164	110,164
Water Demand (AFY)					
All Conditions	95,221	96,534	99,015	101,589	104,257
Difference (AFY)					
Normal Year	21,682	25,369	25,688	23,114	20,446
Single Dry Year	1,067	4,754	5,073	2,499	(169)
Multiple Dry Year 1st, 2nd, and 3rd Year Supply	7,143	10,830	11,149	8,575	5,907

Source: RPU 2016.

AFY = acre-feet per year

Western Municipal Water District (WMWD)

Water Sources and Supplies

As discussed in Section 3.14.1, WMWD also provides water to the Orangecrest community, located at the southeastern end of the City, that is approximately 10,000 square miles in size, and Eastern Municipal Water District provides water to a small easterly area within City limits that serves approximately 104 residential customers. In 2020, WMWD received 74,925 AF of water from two sources: approximately 94 percent (70,112 AF) was imported and purchased supplies from Metropolitan Water District of Southern California or Meeks and Daley Water Company, and approximately 6 percent (4,814 AF) was local supplies from WMWD's existing desalter system (WMWD 2020).

Planned Sources of Water

The UWMP identifies water supplies for planning years 2025 through 2045, which are shown in Table 3.14-3. The WMWD UWMP estimates population growth based on population estimates and projections developed by the Southern California Association of Governments' (SCAG's) 2020–2045 Regional Transportation Plan/Sustainable Community Strategy (SCAG 2020). According to the UWMP, WMWD's supplies exceed demands for normal year and multiple dry-year conditions through 2045.

Table 3.14-3. Western Municipal Water District Actual and Projected Water Supply (in acre-feet per year)

Water Supply	2015 Actual	2025	2030	2035	2040	2045
Metropolitan I	70,112	91,816	95,908	101,261	107,664	116,443
Arlington Desalter	4,814	5,000	5,000	5,000	5,000	5,000
Total	74,925	96,816	100,908	106,261	112,664	121,443

Source: WMWD 2016.

Wastewater

The majority of Riverside's wastewater (generally that which originates in areas northeast of Van Buren Boulevard) is treated at the Public Works Department's RWQCP, which is at 5950 Acorn Street. Areas southwest of Van Buren Boulevard are treated at WMWD's Western Riverside County Regional Wastewater Authority (WRCRWA) Treatment Plant at 14634 Riverside Road in Corona, or at the Western Water Recycling Facility near March Air Reserve Base (WMWD 2021).

Public Works Department Sewer Division

The transport, treatment, and disposal of wastewater generated in the City is provided by the Public Works Department Sewer Division. The Public Works Department operates and maintains the treatment works and a wastewater collection system including over 800 miles of public sewer mains and 400 miles of City-owned laterals throughout the City (City of Riverside 2021a).

Riverside Water Quality Control Plant

The RWQCP provides preliminary, primary, secondary, and tertiary treatment with a hydraulic rated capacity of 46 mgd average dry-weather flow (City of Riverside 2021b). Wastewater is treated using two separate treatment trains, Activated Treatment Train and Membrane Bioreactor Train, with a combined effluent available for reclaimed water use or discharge to the Santa Ana River. As of 2020, the average daily influent flows are 25.3 mgd (City of Riverside Public Works Department 2021). RWQCP operations are subject to the waste discharge requirements outlined under Order No. R8-2013-0016, National Pollutant Discharge Elimination System (NPDES) Permit No. CA0105350.

Western Municipal Water District

WMWD provides wastewater services to relatively small areas in the southeastern portion of the City. Water in these areas is conveyed for treatment at the WRCRWA Treatment Plant or at the Western Water Recycling Facility described below.

Western Riverside County Regional Wastewater Authority

WRCRWA has a design capacity of 14 mgd and currently treats an average of approximately 8 mgd. WRCRWA operations are subject to the waste discharge requirements outlined under Order No. R8-2015-0013, NPDES Permit No. CA8000316.

Western Water Recycling Facility

The Western Water Recycling Facility is adjacent to Interstate 215 near the March Air Reserve Base. It was expanded in 2011 to achieve a design capacity of 3 mgd and currently processes an average

flow of 0.8 mgd (or 0.25 percent capacity). Treated wastewater from this facility is used for irrigation for the City's parks, schools, groves, and nurseries. Western Water Recycling Facility operations are subject to waste discharge requirements outlined under Order No. R8-3002-0113. The facility does not operate under an NPDES Permit.

Stormwater

Regional stormwater drainage facilities within the City are managed by the Riverside County Flood Control and Water Conservation District. The City's smaller drainage facilities (storm drain inlets or pipes less than 36 inches in diameter and some open channels) are maintained by the City (City of Riverside 2017a). The majority of stormwater flows directly into the City's storm drain system, which then discharges into the Santa Ana River and greater Santa Ana Watershed. The City has 11 principal drainage areas, ten of which flow into the Santa Ana River (City of Riverside 2017a). These ten drainage areas include Box Springs, Central Riverside, Home Gardens, La Sierra, Mead Valley, Monroe, Moreno Valley West End, Norco, Southwest Riverside, and University (City of Riverside 2017a). A small portion of the Orangecrest area drains to the Perris Valley drainage area, which eventually discharges to Canyon Lake and Lake Elsinore.

Electric Power, Natural Gas, and Telecommunications Facilities

RPU is the main electric power provider within the City. RPU serves more than 106,000 metered electric customers in and around the City, with an infrastructure that includes more than 800 miles of underground distribution lines, 513 miles of overhead distribution lines, approximately 23,000 power poles, and 15 substations (RPU 2015, 2018). RPU's electrical interconnection with the California transmission grid is established at Southern California Edison's (SCE's) Vista Substation, northeast of the RPU system. RPU currently takes delivery of the electric supply at 69 kilovolts (kV) through two 280-megavolt-ampere transformers (RPU 2018). RPU generates, transmits, and distributes electricity to a 90-square-mile territory to a service area population of 325,801 (RPU 2018). According to RPU's Integrated Resource Plan, RPU is a vertically integrated utility that operates electric generation, subtransmission, and distribution facilities. RPU receives most of its system power through the regional bulk transmission system owned by SCE and operated by the California Independent System Operator (RPU 2018). RPU has obtained permission to provide a second connection to the state power transmission grid through SCE, known as the Riverside Transmission Reliability Project (RTRP). In addition, a second substation will improve distribution (RPU 2021b). Power is supplied primarily by natural gas, hydroelectric, and nuclear (California Energy Commission 2018).

Electricity for the City's Sphere of Influence is additionally provided to the City by SCE. SCE serves approximately 15 million people over a 50,000-square-mile service area (SCE 2021). This service area includes 195 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses (Edison International and SCE 2019). SCE's electricity system includes 12,635 miles of transmission lines, 91,375 miles of distribution lines, 1,433,336 electric poles, 720,800 distribution transformers, and 2,959 substation transformers (SCE 2021). As stated in RPU's 2018 Integrated Resource Plan, RPU and SCE are planning on moving forward with the RTRP. The RTRP will provide additional transmission capacity to meet future projected load growth, along with a second point of interconnection for system reliability and transmission capacity to import bulk electric power (RPU 2018).

Fiber optic and telecommunication facilities are located throughout the City. According to the California Public Utilities Commission, the majority of the City’s telecommunication and fiber optics services are provided by AT&T. There are more than 45 cellular tower sites throughout the City (City of Riverside 2018). RPU also offers dark fiber leases on its 120-mile network, which connects office buildings, industrial properties, and data centers and serves 5G-ready sites throughout the City limits. Internet service providers or wireless operators can lease fiber and use it to deliver connectivity to customers, and businesses can use it to create their own wide area enterprise networks. More locations will be added, with the goal of making dark fiber connections available to industrial and commercial customers everywhere in the City (RPU 2021a).

The City’s natural gas services are provided by Southern California Gas Company (SoCalGas). SoCalGas provides energy to 21.8 million consumers through over 3,600 miles of pipelines in more than 500 communities. The service territory encompasses approximately 24,000 square miles throughout Central and Southern California (SoCalGas 2021).

Solid Waste

The City of Riverside Public Works Department is responsible for the collection and disposal of approximately 70 percent of the City’s residential and commercial solid waste. The remainder of the City’s residential solid waste disposal needs are met by a private contractor, Burrtec Waste. Non-hazardous waste is processed through the County of Riverside–owned Robert A. Nelson Transfer Station under a 20-year contract by Burrtec Waste Inc. (California Integrated Waste Management Board 2002). Waste is then transferred to the Badlands Landfill for disposal. In addition, the Riverside County Department of Waste Resources operates four other Class III landfills that also serve the City. Refer to Table 3.14-4 for the locations and capacities of the landfills that serve the City. The Riverside County Department of Waste Resources operates the Agua Mansa Permanent Household Hazardous Waste Facility, which provides the City a location for hazardous household waste disposal.

Table 3.14-4. Existing Disposal Facilities

Disposal Facility	Location	Maximum Permitted Capacity (Cubic Yards)	Remaining Capacity (Cubic Yards)	Estimated Closure Date	Maximum Daily Load (Tons/Day)
Badlands Sanitary Landfill	31125 Ironwood Ave, Moreno Valley 92555	34,400,000	15,748,799	1/1/2022	4,800
El Sobrante Landfill	10910 Dawson Canyon Rd, Corona 91719	6,229,670	3,834,470	8/1/2047	400
Lamb Canyon Sanitary Landfill	16411 State Highway 79, Beaumont 92223	38,935,653	19,242,950	4/1/2029	5,000
Mid-Valley Sanitary Landfill	2390 N Alder Ave, Rialto 92377	101,300,000	61,219,377	4/1/2045	7,500
Total		180,865,323	100,045,596	-	17,700

Source: CalRecycle 2021a, 2021b, 2021c, 2021d

The Public Works Department also provides recycling collection services for business and residential customers within the City. The California Integrated Waste Management Act of 1999

required local jurisdictions to divert at least 20 percent of all solid waste by January 1, 2000, and at least 50 percent on and after January 1, 2004. The City has historically met the state requirements until July 2020, when the City was required to pay for recycling rather than it being free. The City is currently achieving a 31-percent diversion rate, which is below the state diversion requirements. To comply with the state requirements, the City has implemented numerous waste reduction and recycling programs including the Assembly Bill (AB) 341 Mandatory Commercial Recycling and AB 1826 Mandatory Commercial Organic Recycling program to oversee the implementation of waste management plans and recycling/reuse programs. Additionally, the City has partnered with the haulers to send out non-compliance notifications to businesses and multi-family residences to encourage them to subscribe to the services. The City has also made continuous efforts to provide recycling education to the community via Zoom, its webpage, and flyers.

In addition, the California Green Building Standards Code (CALGreen) required all developments to divert 50 percent of nonhazardous construction and demolition debris and 100 percent of excavated soil and debris from land clearing associated with all nonresidential projects beginning January 1, 2011 (California Legislative Information 2021).

3.14.3 Regulatory Setting

Water

Federal

Federal Safe Drinking Water Act of 1974

The Safe Drinking Water Act was established to protect the quality of drinking water in the U.S. It authorizes the U.S. Environmental Protection Agency (EPA) to set national health-based standards for drinking water to protect against both naturally occurring and manmade contaminants that may be found in drinking water. EPA, states, and water systems then work together to make sure that these standards are met. Originally, the act focused primarily on treatment as the means of providing safe drinking water at the tap. The 1996 amendments greatly enhanced the existing law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by protecting it from source to tap. The act applies to every public water system in the United States. There are currently over 148,000 public water systems providing water to most Americans.

State

State of California Recycled Water Policy

On January 22, 2013, the California State Water Resources Control Board (SWRCB) adopted a revision of a 2009 statewide recycled water policy, with the ultimate goal of increasing the use of recycled water from municipal wastewater sources. Included in the statewide policy is the mandate to increase the use of recycled water in California to 1.5 million acre-feet per year (AFY) by 2020, and an additional 2.5 million AFY by 2030. The plan also states that the SWRCB expects to increase the use of stormwater from 2007 levels to at least 500,000 AFY by 2020 and 1 million AFY by 2030.

California Code of Regulations, Title 22, Division 4

The SWRCB – Division of Drinking Water is authorized to set the criteria for recycled water production and use. Title 22, Division 4 of the California Code of Regulations (CCR) defines these criteria, which pertain to treatment processes, water quality, and reliability. It establishes minimum water quality criteria requirements for various use categories, including irrigation, wetlands, and industrial uses. For unrestricted reuse, including use at parks and playgrounds, schoolyards, and other unrestricted access facilities, and specifies disinfected tertiary treatment. Title 22 also specifies that for disinfected tertiary-treated water, there must be a separation of 50 feet between areas irrigated with recycled water and domestic groundwater wells.

California Code of Regulations, Title 17

Title 17, Section 7584 of the CCR requires the water supplier to protect the public water supply from contamination by implementing a cross-connection control program. This program must include, but not be limited to, surveys to identify water use premises where cross-connections are likely to occur, and provisions of backflow protection by the water user downstream (after) the user's connection to the public water system.

In accordance with Title 17, Section 7604 of the CCR, the type of protection required to prevent backflow into the public water supply is determined by the degree of hazard that exists on the consumer's property. Required backflow devices must include, but not be limited to, a double-check valve assembly reduced-pressure principal device, and air-gap separation. The required backflow protection device is determined by the City and/or the appropriate state agency.

Urban Water Management Act

The Urban Water Management Plan Act (UWMP Act) was passed in 1983 and codified as Water Code Sections 10610 through 10657. Since its adoption in 1983, the UWMP Act has been amended on several occasions. The act requires every public and private urban water supplier that directly or indirectly provides water for municipal purposes to more than 3,000 customers or supplying more than 3,000 AF of water annually to prepare and adopt, in accordance with prescribed requirements, a UWMP and to update its plan once every 5 years.

Senate Bill 610

Senate Bill (SB) 610 (Water Code Sections 10910 et seq.) requires the preparation of a water supply assessment for projects within cities and counties that propose certain projects. The Water Code requires that a water supply assessment be prepared for any "project" that would consist of one or more of the following:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space
- A proposed hotel or motel, or both, having more than 500 rooms

- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- A mixed use project that includes one or more of the projects specified above
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project

Senate Bill 221

SB 221 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and land use at the tentative map preparation phase of a project. SB 610 and SB 221 are companion measures that seek to:

- Promote more collaborative planning between local water suppliers and cities and counties
- Require detailed information regarding water availability be provided to city and county decisionmakers prior to approval of specific large development projects
- Require that this detailed information be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects
- Recognize local control and decision making regarding the availability of water for projects and the approval of projects

Efficiency Standards

CCR Title 24 contains the California Building Code, including the California Plumbing Code (Part 5), which promotes water conservation. CCR Title 20 addresses public utilities and energy and includes appliance efficiency standards that promote water conservation. In addition, a number of California laws listed below require water-efficient plumbing fixtures in structures:

- CCR Title 20 Section 1604(g) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, sink faucets, and tub spout diverters.
- CCR Title 20 Section 1606 prohibits the sale of fixtures that do not comply with established efficiency regulations.
- CCR Title 24 Sections 25352(i) and (j) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. Insulation of water-heating systems is also required.
- Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in virtually all buildings.

Regional

There are no regional regulations directly applicable to water supply and utility service with respect to this Project.

Local

2015 Urban Water Management Plan for Riverside Public Utilities Water Division

The City established RPU in 1913. RPU provides water services to an approximately 68-square-mile service area, which includes the City and areas within its Sphere of Influence. The RPU UWMP summarizes RPU's projected retail and wholesale water demands and identifies water supplies available to meet those demands for planning years 2020 through 2040. The 2015 RPU UWMP also discusses RPU's supply reliability and offers a water shortage contingency plan for use during catastrophic events or drought conditions.

Western Municipal Water District Urban Water Management Plan

WMWD provides water services to an approximately 9.85 square mile area within southeast Riverside. The WMWD UWMP (WMWD 2016) analyzes long-term water supply and plans for future wholesale and retail demands for planning years 2020 through 2040.

Riverside Public Utilities Utility 2.0 Strategic Plan

RPU developed the Utility 2.0 Strategic Plan, a 10-year plan that calls for sustainable consumption of water and electricity resources. The strategic plan identifies goals, strategies, objectives, and key performance indicators to guide the allocation of resources and management of water and electricity assets (City of Riverside 2017a). The Utility 2.0 Strategic Plan's key goals concern reliability and resiliency, affordability, sustainability, customer experience, and operational excellence. To achieve compliance with statewide targets related to water and electricity efficiency, renewable resources, and greenhouse gas emissions, the City has put into effect local policy provisions. All standards presented in the Utility 2.0 Strategic Plan respond to the needs of development by achieving more efficient and sustainable uses for resources.

Public Facilities and Infrastructure Element

The Public Facilities and Infrastructure Element of GP 2025 addresses the City's public facilities (i.e., libraries, hospitals, and community centers) and infrastructure, including water service and supply, wastewater, stormwater control, solid waste, electric power, and telecommunications. The element includes goals and policies intended to ensure the City supports well-designed and adequately maintained infrastructure and quality public facilities for its residents.

The Public Facilities and Infrastructure Element policies relevant to the Project are addressed in this section. Policies relevant to the Project are shown in Table 3.14-5.

Riverside Municipal Code, Title 14 Public Utilities, Chapter 14.22

Water Conservation Chapter 14.22, Water Conservation, of the Riverside Municipal Code (RMC) establishes procedures for implementing and enforcing water conservation measures. Section 14.22.010 establishes unreasonable water uses in the City, including, among others, application of potable water to outdoor landscapes in a manner that causes runoff to adjacent property, non-irrigated areas, or walkways; non-recirculating fountains or water features that use potable water; and application of potable water to outdoor landscaping within 48 hours of measurable rainfall. The ordinance also establishes a four-stage Water Conservation Program, where stages increase with the severity of the water shortage. The four stages of the Water Conservation Program are as follows:

- **Stage One:** Normal Water Supply. The City can meet all water demands, but baseline conservation measures, such as time restrictions on non-agricultural irrigation, still apply.
- **Stage Two:** Minimum Water Shortage. There is a reasonable probability that the City will not be able to meet all of its water demands. Stage One restrictions apply, as well as other restrictions on irrigation and plumbing leaks. Customers will be asked to reduce monthly water consumption by up to 15 percent, and construction operations are not authorized to use water unnecessarily for any purpose, other than those required by regulatory agencies.
- **Stage Three:** Moderate Water Shortage. All measures from preceding stages apply and more restrictive irrigation measures are implemented. Water customers will be asked to reduce monthly consumption by up to 20 percent.
- **Stage Four:** Severe Water Shortage. The City's ability to meet water demand is seriously impaired. Stage Four includes the most restrictive irrigation measures, including a prohibition on outdoor lawn watering, as well as prohibitions on automobile washing and pool filling. Concurrently with a Stage Three or Stage Four declaration, the City Council may proclaim a Water Shortage Emergency. During such time, no new construction meters may be issued, no construction water may be used for earthwork including dust control, and no new building permits may be issued unless such projects meet certain water conservation requirements.

RPU is operating currently under Stage One of the Water Conservation Program (RPU n.d.).

Wastewater

Federal

Federal Clean Water Act (33 United States Code Sections 1251, et seq.)

The Clean Water Act's (CWA) primary goals are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the NPDES, effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. EPA has delegated the responsibility for administration of CWA portions to state and regional agencies. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality.

U.S. Environmental Protection Agency

EPA is responsible for implementing the federal Clean Air Act, which was first enacted in 1955 and has been amended numerous times. The act gives EPA authority to limit emissions of air pollutants coming from sources such as utilities, among others. Wastewater is mainly treated at RPU's RWQCP at 5950 Acorn Street. However, areas southwest of Van Buren Boulevard receive wastewater services from WMWD's WRCRWA Treatment Plant at 14634 Riverside Road, Corona, and Western Water Recycling Facility (formerly the March Wastewater Treatment Plant), near March Air Reserve Base. In order for the wastewater treatment facilities to conform to Clean Air Act requirements, their design capacities are based on the regional growth forecast adopted by SCAG; refer to Section

5.3, *Growth-Inducing Impacts*. Specific SCAG regional growth forecast policies are incorporated into the Clean Air Plans prepared by air quality management districts.

State

Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989, also known as AB 939, requires that each city or county prepare a new integrated waste management plan. The act also required each city to prepare a Source Reduction and Recycling Element by July 1, 1991. Each Source Reduction and Recycling Element includes a plan for achieving a solid waste goal of 25 percent by January 1, 1995, and 50 percent by January 1, 2000. In 2011, AB 341 was passed, which directs the California Department of Resources Recycling and Recovery to require local agencies to include strategies to enable the diversion of 75 percent of all solid waste by 2020.

Regional

Regional Water Quality Control Board

EPA NPDES permits are required for operators of municipal separate storm sewer systems, construction projects, and industrial facilities. These permits specify limits on the amount of pollutants that can be contained in the discharge of each facility of property. The City operates its wastewater treatment plant (RWQCP) and wastewater collection and disposal systems pursuant to the requirements of Order No R8-2013-0016, issued by the Santa Ana RWQCB.

Local

City of Riverside Wastewater Collection and Treatment Facilities Integrated Master Plan

The City's Wastewater Collection and Treatment Facilities Integrated Master Plan was approved in February of 2008. The document serves as a planning document for facility planning for the City's RWQCP and collection system. The plan is intended to enable the RWQCP to continue to reliably provide wastewater treatment to the City as wastewater flows increase with projected population growth. The plan addresses facility needs up until 2025.

Public Facilities and Infrastructure Element

Refer to the regulatory discussion under the *Water* section above for a description of the Public Facilities and Infrastructure Element. Policies relevant to the Project are shown in Table 3.14-5.

Riverside Municipal Code, Title 18 Subdivision Code Drainage Fees

This section of the RMC requires the payment of fees for the construction of drainage facilities as a condition of the division of land. Whenever land that is proposed to be divided lies within the boundaries of an area drainage plan, adopted by resolution of the City Council, a drainage fee in the amount set forth in the adopted plan shall be paid as a condition of approval of the filing of a final map or parcel map, or as a condition of the waiver of the filing of a parcel map.

Riverside Municipal Code, Chapter 14.04, Sewer Service Charges

RMC Chapter 14.04, Sewer Service Charges, stipulates that every person whose premises are served by a connection with the City's system of sewerage whereby the sewage or industrial water wastes or either or both are disposed of by the City through the sewage treatment plant or otherwise shall pay a sewer service charge as set by resolution by the City Council. The City Council shall set such charge by resolution and may, from time to time, in its discretion, revise such charges. In setting such charges the City Council shall take into consideration the amount and type of sewage discharged into the system by a particular type of land usage and may also take into consideration any factor such as added pumping costs that might justify a charge in one area of the City that might vary from charges in other areas of the City. In setting such charge, the City Council may make allowances for vacancies in apartment houses served by master electric meters wherein the number of vacant dwelling units cannot readily be ascertained by the City.

Stormwater**Federal****National Pollutant Discharge Elimination System**

Refer to the regulatory discussion under the *Wastewater* section above.

State

There are no state regulations directly applicable to wastewater with respect to this Project.

Regional**Regional Water Quality Control Board**

EPA NPDES permits are required for operators of municipal separate storm sewer systems, construction projects, and industrial facilities. These permits specify limits on the amount of pollutants that can be contained in the discharge of each facility of property. The City operates its wastewater treatment plant (RWQCP) and wastewater collection and disposal systems pursuant to the requirements of Order No R8-2013-0016, issued by the Santa Ana RWQCB.

Local**Riverside General Plan 2025*****Public Facilities and Infrastructure Element***

Refer to the regulatory discussion under the *Water* section above for a description of the Public Facilities and Infrastructure Element. Policies relevant to the Project are shown in Table 3.14-5.

Electric Power, Natural Gas, and Telecommunications Facilities**Federal**

There are no federal regulations directly applicable to electric power, natural gas, or telecommunications facilities with respect to this Project.

State

California Green Building Standards Code

CALGreen (CCR Title 24) is the minimum standard established in law for the design and construction of buildings and structures in California. The California Building Code contains the mandatory CALGreen standards for residential and nonresidential structures, including the 2019 Building Energy Efficiency Standards. The requirements of CALGreen include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of electric vehicle charging infrastructure in residential and nonresidential structures
- Mandatory periodic inspections of energy systems (i.e., furnace, air conditioner, mechanical equipment) for nonresidential buildings of more than 10,000 square feet to ensure that all are working at their maximum capacity according to their design efficiencies
- Mandatory use of low-pollutant-emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board
- For some single-family and low-rise residential development developed after January 1, 2020, mandatory onsite solar energy systems capable of producing 100 percent of the electricity demand created by the residence(s). Certain residential developments, including those developments that are subject to substantial shading, rendering the use of onsite solar photovoltaic systems infeasible, are exempted from the foregoing requirement.

Building Energy Efficiency Standards

The 2019 Building Energy Efficiency Standards represent a portion of the California Building Standards Code, which expands upon energy-efficiency measures from the 2016 Building Energy Efficiency Standards. The 2019 Building Energy Efficiency Standards are in effect for building permit applications submitted after January 1, 2020. The 2019 standards provide for additional efficiency improvements beyond the current 2016 standards. Nonresidential buildings built in compliance with the 2019 standards are anticipated to use approximately 30 percent less energy compared with buildings built in compliance with the 2016 standards, primarily due to lighting upgrades (California Energy Commission 2019). For residences, compliance with the 2019 standards will result in homes using approximately 7 percent less energy because of energy efficiency measures compared with homes built under the 2016 standards. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use approximately 53 percent less energy than those built under the 2016 standards (California Energy Commission 2018).

California Public Utilities Commission

The California Public Utilities Commission regulates privately owned electric, natural gas, telecommunications, water, railway, and passenger transportation companies. It is a court and an administrative agency, with both legislative and judicial powers. It may take testimony in the same manner as a court, issue decisions and orders, cite for contempt, and subpoena records of regulated utilities.

Regional

There are no regional regulations directly applicable to electric power, natural gas, or communication utility service with respect to this Project.

Local

Riverside General Plan 2025

Public Facilities and Infrastructure Element

Refer to the regulatory discussion under the *Water* section above for a description of the Public Facilities and Infrastructure Element. Policies relevant to the Project are shown in Table 3.14-5.

Riverside Public Utilities Utility 2.0 Strategic Plan

Refer to the local policy discussion under *Water*, above.

Riverside Municipal Code, Chapter 19.530 – Wireless Telecommunication Facilities

The City's Wireless Telecommunication Facilities code warrants that wireless telecommunication facilities and adjacent land use and properties be compatible with adjacent land uses to avoid impacts associated with uses, which encouraging orderly development of wireless communication infrastructure within the City. A wireless telecommunications facility is permitted to be sited in the City subject to applicable requirements, which may include a design review process, a conditional use permit application process, or both. These processes are intended to permit wireless telecommunications facilities that blend with their existing surroundings and do not negatively affect the environment, historic properties, or public safety.

Solid Waste

Federal

There are no federal regulations directly applicable to solid waste with respect to this Project.

State

California Integrated Waste Management Act

AB 939, known as the California Integrated Waste Management Act of 1989 (California Public Resources Code, Sections 40000 et seq.), was passed due to the increase in the waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 requires a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25 percent by 1995 and 50 percent by the year 2000. AB 341 amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter.

Regional

There are no regional regulations directly applicable to solid waste with respect to this Project.

Local

Countywide Integrated Waste Management Plan

The Riverside Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939). AB 939 redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. AB 939 required each city and unincorporated portions of counties throughout the state to divert a minimum of 25 percent by 1995 and 50 percent of solid waste landfilled by the year 2000. To achieve these disposal reduction goals, AB 939 established a planning hierarchy utilizing new integrated solid waste management practices, including requiring local governments to prepare and implement plans to improve the management of waste resources.

The CIWMP’s components include the Countywide Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element, the Household Hazardous Waste Element, and the Non-Disposal Facility Element. The Countywide Summary Plan summarizes the steps needed to cooperatively implement programs among the county’s jurisdictions to meet and maintain the 50-percent diversion mandates. The Siting Element demonstrates that there are at least 15 years of remaining disposal capacity to serve all the jurisdictions in the county. If there is not adequate capacity, a discussion of alternative disposal sites and additional diversion programs must be included in the Siting Element. The Source Reduction and Recycling Element was developed separately by each Riverside County jurisdiction, including the unincorporated county, and their purpose was to analyze the local waste stream to determine where to focus diversion efforts, including programs and funding. The Household Hazardous Waste Element was developed by jurisdictions and provides a framework for recycling, treatment, and disposal practices for Household Hazardous Waste programs. The Non-Disposal Facility Element identifies and describes existing and proposed facilities, other than landfills and transformation facilities, requiring a solid waste permit to operate. Non-disposal facilities are also those facilities that will be used by a jurisdiction to meet its diversion goals.

Riverside General Plan 2025

Public Facilities and Infrastructure Element

Refer to the regulatory discussion under the *Water* section above for a description of the Public Facilities and Infrastructure Element. Policies relevant to the Project are shown in Table 3.14-5.

Table 3.14-5. Relevant General Plan and Specific Plan Policies

Policy Title	Summary
Riverside General Plan 2025	
Public Facilities and Infrastructure Element	<ul style="list-style-type: none"> ● Objective PF-1: Provide superior water service to customers. <ul style="list-style-type: none"> ○ Policy PF-1.1: Coordinate the demands of new development with the capacity of the water system. ○ Policy PF-1.2: Support the efforts of the Riverside Public Utilities Department, Eastern Municipal Water District and Western Municipal Water District to work together for coordination of water services. ○ Policy PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.

Policy Title	Summary
	<ul style="list-style-type: none"> ○ Policy PF-1.4: Ensure the provision of water services consistent with the growth planned for the General Plan area, including the Sphere of Influence, working with other providers. ○ Objective PF-3: Maintain sufficient levels of wastewater service throughout the community. ○ Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system. ○ Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service. ○ Policy PF-3.3: Pursue improvements and upgrades to the City’s wastewater collection facilities consistent with current master plans and the City’s Capital Improvement Program. ● Objective PF-4: Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows. <ul style="list-style-type: none"> ○ Policy PF-4.1: Continue to fund and undertake storm drain improvement projects as identified in the City of Riverside Capital Improvement Plan. ○ Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program. ○ Policy PF-4.3: Ensure that youth activities and programs are provided or are accessible by all neighborhoods, either in City facilities or through joint-use or cooperative agreements with other service providers. ● Objective PF-5: Minimize the volume of waste materials entering regional landfills. <ul style="list-style-type: none"> ○ Policy PF-5.1: Develop innovative methods and strategies to reduce the amount of waste materials entering landfills. The City should aim to achieve 100% recycling citywide for both residential and nonresidential development.

Specific Plans	
Canyon Springs Business Park Specific Plan	There are no applicable policies relevant to the Project regarding utilities and service systems.
Downtown Specific Plan	There are no applicable policies relevant to the Project regarding utilities and service systems.
Hunter Business Park Specific Plan	<ul style="list-style-type: none"> ● Policy 1.4: All existing and new utilities 12kv or less within the project area along adjacent major arterials (Columbia, Iowa, Marlborough and Spruce Avenues) shall be installed underground. Funding for the undergrounding of these lines shall be accomplished by means of an assessment district as provided for in Chapter IV: Implementation. All 69kv lines are required to remain above ground. Other lines on the 69kv poles shall be undergrounded. For subdivision approvals the installation of cable conduits in the public right-of-way is required to the Public Works and Public Utilities Departments.
La Sierra University Specific Plan	<ul style="list-style-type: none"> ● Policy LSU:4: To provide planned infrastructure (streets and utilities) that meets the needs of the development in an efficient and cost-effective manner, and reduces dependency on the automobile.
Magnolia Avenue Specific Plan	There are no applicable policies relevant to the Project regarding utilities and service systems.

Policy Title	Summary
University Avenue Specific Plan	There are no applicable policies relevant to the Project regarding utilities and service systems.

Sources: City of Riverside 1994, 2002, 2007, 2009, 2012, 2017b, 2017c.

Policy Consistency

CEQA regulations require a discussion of inconsistencies or conflicts between a proposed project and federal, state, regional, or local plans and laws. Several federal and state laws and regional policies pertain to utilities and service systems. Implementation of the Project would be consistent with all relevant plans and laws. As discussed in Chapter 2, *Project Description*, one of the objectives of the Project, through the Housing Element Update, is to develop design standards that promote sustainable buildings, advance technological changes (such as those in alternative energy sources that increase energy efficiency), reduce water and energy consumption, reduce waste, and minimize environmental impacts, all of which would help reduce housing costs. Therefore, implementation of the Project would be consistent with all relevant plans and laws.

3.14.4 Methodology and Thresholds of Significance

GP 2025 and the City of Riverside UWMP were consulted to obtain the information required for the environmental and regulatory setting related to water supplies. This impact analysis considers the potential water supply impacts associated with implementation of the Project. Because the existing population would change under build-out of the Project, this analysis is based on a comparison of the demand of existing utility and service systems with the increase in demand necessary to serve the population under the Project.

Thresholds of Significance

An Initial Study was prepared for the EIR in April 2021 and is available on the City's website. The below environmental threshold was scoped out from detailed review in this section of the Draft EIR in the Initial Study because the impact was determined to be less than significant:

- Comply with federal, state, and local management and reduction statutes related to solid waste

For a complete discussion of the environmental issues that were scoped out from this Draft EIR, refer to Section 3.15, *Effects Not Found to Be Significant*.

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would:

- Result in relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, with the potential to cause significant environmental effects
- Result in insufficient water supply to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

- Result in generation of solid waste in exceedance of state or local standards or in excess of the capacity of local infrastructure, or other impediment to the attainment of solid waste reduction goals

3.14.5 Impacts and Mitigation Measures

Impact UT-1: The Project would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities. This impact would be less than significant and no mitigation is required.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Future development would increase demand for utilities over time. Potential impacts would include greater demands for water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities, potentially resulting in the need for the relocation or construction of facilities in order to maintain utility demands. Additionally, future development would increase the use of existing utilities services, which could cause physical deterioration of public infrastructure.

Water Supply

As stated in Table 3.14-3, water supplies are estimated to accommodate demand projections through 2040 under normal and multiple dry-year conditions, but may result in a shortage under 2040 single dry-year conditions. According to the RPU UWMP, the average base daily per-capita water use was 266 gallons per capita per day. Implementation of the Project could result in the future development of an additional 31,564 housing units. This increase in housing units could increase population by approximately 103,530 residents and would result in a permanent increase in demand for water supply.

At full build-out, development facilitated by the Project would increase water demands by approximately 28 million gallons per capita per day (30,848 AFY) over existing conditions. In Table 3.14-3, the estimated maximum water demand is 104,257 AFY with an estimated water supply of 124,703 AFY in year 2040. The increased demand of 30,848 AFY would not be accommodated in accordance with the 2015 RPU UWMP. However, none of the groundwater basins from which RPU extracts water from are currently in a critical overdraft condition (RPU 2016). Adverse environmental impacts are not expected from the use of groundwater sources because groundwater extraction would be within the safe yield of the groundwater basin. Additionally, future development facilitated by the Project would be built using new building standards for water efficiency and would be designed to use less water than existing development. Future development facilitated by the Project would also occur incrementally over time, based on market conditions and other factors, such that existing water services are not overburdened by substantially increased demands at any single point in time. In compliance with SB 221 and SB 610 requirements, future development satisfying certain criteria would require preparation of a water supply assessment in order to verify sufficient water supply is available to meet future development's water demand. Future development associated with the Project would also be required to coordinate its demands with the capacity of the water system and work with RPU and WMWD to coordinate water services

(GP 2025 Policies PF-1.1 and PF-1.2). Future development would also be required to fund fair-share costs associated with the provision of water, and to ensure that the provision of water is consistent with the growth planned for the City including the Sphere of Influence, working with other providers (GP 2025 Policies PF-1.3 and PF 1.4). In addition, existing GP 2025 Final Programmatic EIR Mitigation Measure UTL-1 would require the City to review population and development trends with respect to water sources and supply to ensure that growth facilitated by the Project that can be accommodated with present and expected water sources. This would further reduce impacts related to the provision of water services.

While development facilitated by the Project would require extension, relocation, and expansion of new water lines within and to the Opportunity Sites, construction activities associated with future development would be subject to compliance with the local, state, and federal laws, ordinances, and regulations, as well as any Project-specific mitigation measures necessary to ensure construction-related impacts are not significant. In particular, future development would be required to uphold the goals and objectives of GP 2025 related to water facilities, to ensure the adequate water treatment and distribution systems are planned for concurrent with projected growth. Compliance with the abovementioned existing regulatory framework and implementation of existing GP 2025 Final Programmatic EIR Mitigation Measure UTL-1 would ensure adequate water facilities are available to serve future development facilitated by the Project within the City. Therefore, impacts due to the extension, relocation, and expansion of new water facilities would be less than significant.

Wastewater

Development facilitated by the Project could result in an additional 31,564 housing units over existing conditions in the next 8 years. This increase in housing units would result in an increase in population of 103,530 residents that would result in increased demand for wastewater treatment services.

The majority of wastewater generated in the City flows to the RWQCP. According to the City of Riverside's 2008 Wastewater Collection and Treatment Facilities Integrated Master Plan, historic populations and flows in the City estimated an average flow of 96.6 gallons per capita per day (City of Riverside 2008). Development facilitated by the Project would increase the population by approximately 103,530 residents. At maximum build-out, the Project would generate an estimated 10 mgd within the City's wastewater service area. As of 2019, the RWQCP was treating an average of 27 mgd. The additional wastewater of 10 mgd generated within the City from full build-out of the Project would be adequately treated by the RWQCP because it would not exceed its treatment capacity of 46 mgd.

Future sewer line upgrades and developments within the City would assume their full fair-share costs (GP 2025 Policy PF-3.2) by implementing sewer service charges, which would be deposited with the City (RMC Chapter 14.04, Sewer Service Charge). The Project would maintain sufficient levels of wastewater service throughout the community (GP 2025 Objective PF-3). Sewer line upgrades would be aligned with the goals of the 2008–2021 Wastewater Collection and Treatment Facilities Integrated Master Plan as the sewer line upgrades and improvements associated with the Project would align with the plan's goal to increase system reliability in conjunction with projected population growth in the City (City of Riverside 2008).

To serve future residents of the Project, sewer lines would have to be expanded within the City. However, nearby sewer lines would provide potential connection points. While implementation of the Project would alter the composition of development within the City, future sewer resource

planning efforts are required to be updated every 2 years by SWRCB State Order 2006-0003 (issued May 2, 2006) and as updated in State Order No. WQ 2013-0058-EXEC, and the next update would include the Project if approved. While development of the Project would require extension, relocation, and expansion of new sewer lines within the City, construction activities associated with future development would be subject to compliance with the local, state, and federal laws, ordinances, and regulations, as well as any Project-specific mitigation measures necessary to ensure construction-related impacts are not significant. Therefore, impacts due to the extension, relocation, and expansion of new sewer lines would be less than significant.

Stormwater Drainage

Future development would increase impervious surfaces within the City. As a result, development facilitated by the Project may require the construction of new or expanded stormwater drainage facilities to address alterations in drainage patterns or increased flows. Development associated with the Project would occur incrementally such that existing stormwater drainage facilities are not overburdened by substantially increased demands at a single point in time. There are storm drains within and/or near the opportunity zone sites that could be accessed for future development.

Future development would also be subject to compliance with GP 2025, which requires the City to continue to fund and undertake storm drain improvement projects as identified in the City of Riverside's Capital Improvement Plan (GP 2025 Policy PF-4.1). GP 2025 also requires continued cooperation between the City and regional programs to implement the NPDES, and requires the City to continually monitor and evaluate the effectiveness of its storm drain system and make adjustments as needed (GP 2025 Policies PF-4.2 and PF-4.3) (City of Riverside 2012). Compliance with the abovementioned existing regulatory framework would ensure adequate stormwater drainage facilities are available to serve the Project.

Payment of applicable fees established by the City (RMC Title 18) (CM-US-1a), City of Colton (RMC Chapter 12.34) (CM-US-1b), and County of Riverside (RMC Chapter 12.08.070) (CMUS-2c) would be paid when development associated with the Project is proposed. These fee payments would ensure that stormwater drainage facilities would serve the drainage needs of any future development allowed under the Project. While development facilitated by the Project would require extension, relocation, and construction of new storm drain facilities within the City, construction activities associated with future development would be subject to compliance with the local, state, and federal laws, ordinances, and regulations, as well as any Project-specific mitigation measures necessary to ensure construction-related impacts are not significant. Therefore, impacts due to the extension, relocation, and expansion of new storm drain facilities would be less than significant.

Electric Power, Natural Gas, or Telecommunications Facilities

Electric services are provided to the City by RPU while SCE provides electric service to the areas in the City's Sphere of Influence. Natural gas services are provided by SoCalGas. There are existing telecommunication facilities that serve the City. Any new potential telecommunication facilities would be subject to RMC Chapter 16.530 (Wireless Telecommunication Facilities) (CM-US-3a), which dictates appropriate land uses where telecommunication facilities can be constructed and guidelines. Infrastructure improvements that need to be coordinated with the utility service providers within the City and any capital improvements needed to accommodate an increase in utility services would be organized through the service providers.

RPU provides electric utility services to the City. The RPU Utility 2.0 Strategic Plan identifies goals, strategies, and objectives to meet energy needs resulting from a growing population. Goals for this plan include renewing, replacing, upgrading, modernizing, and extending water and electric system infrastructure. There are existing plans to upgrade RPU facilities to align with the increased energy use with a growing population. RPU's Integrated Resource Plan and RTRP identify needed upgrades to electrical facilities throughout the City. The Project would not result in additional need for upgrades to electrical facilities. Additionally, build-out of the Project would be incremental throughout the 8-year planning period so that existing energy facilities are not overburdened by substantially increased demands at a single point.

Development facilitated by the Project would occur in areas of the City where electrical utility services are already available and would therefore not require the building of new electrical facilities. Upgrades to existing overhead and underground lines would be expected to be completed within existing urban areas. The construction of new, upgraded, or expanded electricity utility facilities is already anticipated and planned in the Project, RPU's Integrated Resource Plan, the Utility 2.0 Strategic Plan, and RTRP.

Any new telecommunication connections would be constructed by the private utility service provider and follow all appropriate regulatory requirements of such a connection. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The Project would not result in the relocation or expansion of telecommunication facilities.

While development of the Project would require extension, relocation, and construction of above-ground and underground electric power, natural gas, or telecommunications facility improvements within the City, construction activities associated with future development would be subject to compliance with the local, state, and federal laws, ordinances, and regulations, as well as any Project-specific mitigation measures necessary to ensure construction-related impacts are not significant. Therefore, impacts due to the extension, relocation, and expansion of new underground and overhead electric power, natural gas, or telecommunications facilities would be less than significant.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; and climate change and resiliency. These policies and implementing actions aim to reduce the risk to the community and to ensure protection from foreseeable natural and human-caused hazards.

Proposed new residential and mixed-use development would be predominantly located in more urbanized areas of the City. Public Safety Element policies and implementing actions could affect the design and construction of planned developments, including addition of design elements related to emergency access and pedestrian safety. The Public Safety Element's updated policies and implementing actions would also involve evaluation of public facilities, including utilities and service systems, with respect to risks of natural hazards, transportation hazards, etc. Public Safety Element policies would not include individual development proposals that would create unplanned growth through extension of roads or other infrastructure.

The Public Safety Element Update policies and implementing actions would also involve additional Environmental Justice Policies to address public safety issues within environmental justice communities. Many Public Safety Element Update policies could result in community benefits. No individual infrastructure improvements or projects are identified in the Public Safety Element Update. As this is a policy document, this update would not have any significant environmental effects related to utilities and service systems. Impacts would be less than significant.

Impact UT-2: The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Future development would increase demand for water supplies over time. Potential impacts would include greater demands for water supplies to serve the City. As shown in Table 3.14-3, the City's water supplies exceed estimated demand projections through 2040 under normal and multiple dry-year conditions but fall short of single dry-year projections in 2040. The increased water demand facilitated by the Project of 30,848 AFY would not be accommodated in accordance with the 2015 RPU UWMP under normal, dry, or multiple-dry years. However, future development would occur incrementally over time, based on market conditions and other factors, such that existing water services are not overburdened by substantially increased demands at any single point in time. In addition, compliance with the existing regulatory framework discussed under Impact UT-1 and implementation of existing GP 2025 Final Programmatic EIR Mitigation Measure UTL-1 would ensure adequate water supplies are available to serve future development associated with the Project under normal, dry, and multiple-dry years. Therefore, impacts would be less than significant.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; and climate change and resiliency. These policies and implementing actions aim to reduce the risk to the community and to ensure protection from foreseeable natural and human-caused hazards.

Proposed new residential and mixed-use development would be predominantly located in more urbanized areas of the City. Public Safety Element policies and implementing actions could affect the design and construction of planned developments, including addition of design elements related to emergency access and pedestrian safety. The Public Safety Element Update policies and implementing actions would also involve evaluation of public facilities, including water supply service systems, with respect to risks of natural hazards, transportation hazards, etc. Public Safety Element policies would not include individual development proposals that would create unplanned growth through extension of roads or other infrastructure.

The Public Safety Element Update policies and implementing actions would also involve additional Environmental Justice Policies to address public safety issues within environmental justice communities. No individual infrastructure improvements or projects are identified in the Public Safety Element Update. Potential environmental impacts on public services could result from planned improvements in emergency access, flood control, and other mitigation measures related to

natural hazards, many of which could result in community benefits. As this is a policy document, this update would not have any significant effects related to water supply. Impacts would be less than significant.

Impact UT-3: The Project has adequate capacity to serve the Project's projected wastewater treatment demand in addition to the provider's existing commitments. This impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Future development would increase demand for wastewater treatment provider services to adequately serve the Project's demand in addition to existing commitments. As discussed in Impact UT-1, this increase in wastewater generation would not exceed the treatment capacity of wastewater treatment facilities that serve the City. Therefore, impacts would be less than significant.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; and climate change and resiliency. These policies and implementing actions aim to reduce the risk to the community and to ensure protection from foreseeable natural and human-caused hazards.

Proposed new residential and mixed-use development would be predominantly located in more urbanized areas of the City. Public Safety Element policies and implementing actions could affect the design and construction of planned developments, including e.g., addition of design elements related to emergency access and pedestrian safety. The Public Safety Element Update policies and implementing actions would also involve evaluation of public facilities, including wastewater treatment service systems. Public Safety Element policies would not include individual development proposals that would create unplanned growth through extension of roads or other infrastructure.

The Public Safety Element Update policies and implementing actions would also involve additional Environmental Justice Policies to address public safety issues within environmental justice communities. Many Public Safety Element Update policies could result in community benefits. No individual infrastructure improvements or projects are identified in the Public Safety Element Update. As this is a policy document, this update would not have any significant environmental effects related to public services. Impacts would be less than significant.

Impact UT-4: The Project would not 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. This impact would be less than significant.

Housing Element Update, Zoning Code Amendments, and Environmental Justice Policies

Future development associated with the Project would result in an increase of 31,564 housing units and 103,530 new residents, which would result in an increase in solid waste generation over

existing conditions. Within the four landfills that would serve the Project, there is a remaining capacity of approximately 100 million cubic yards (Table 3.14-4).

The Project would comply with all sustainability goals as dictated by state and local standards, such as the California Integrated Waste Management Act, AB 341, Riverside County Waste Management Department's Design Guidelines and its Construction and Demolition Recycling Plan, and Riverside's CIWMP. Additionally, the Project build-out would be incremental as to not overwhelm solid waste collectors and landfills with a substantial increase in solid waste at one point in time.

The California Integrated Waste Management Act requires countywide planning to show that there are at least 15 years of remaining disposal capacity to serve all the jurisdictions within the county. Currently, this is demonstrated via the Riverside CIWMP (County of Riverside 1996). If the Project is adopted, future landfill planning would incorporate the updated designations and associated build-out expectations in accordance with the California Integrated Waste Management Act.

Additionally, in compliance with GP 2025 Policy PF-5.1, future development would be subject to compliance with GP 2025 Final Programmatic EIR Mitigation Measure UTL-4, which requires the City to review the County Waste Management Annual Reports to the California Integrated Waste Management Board every 5 years to ensure adequate capacity. If consultation with the California Integrated Waste Management Board determines landfill capacity is becoming limited or exhausted, GP 2025 Final Programmatic EIR Mitigation Measure UTL-4 requires the City to increase solid waste diversion efforts. Compliance with the 2016 (or most recent) CALGreen, AB 939, and GP 2025 Final Programmatic EIR Mitigation Measure UTIL-4 would ensure operational impacts on solid waste disposal are less than significant.

The Project would not generate solid waste in excess of state or local standards or impair the attainment of solid waste reduction goals. The Project would be compliant with all applicable standards, inclusive of the standards that require solid waste regulations and reductions. The City has implemented numerous waste reduction and recycling programs including the AB 341 Mandatory Commercial Recycling and AB 1826 Mandatory Commercial Organic Recycling Program to meet the state-required 50-percent diversion rate. Additionally, compliance with mitigation identified in the GP Programmatic EIR would reduce this impact to less-than-significant levels.

Public Safety Element Update and Environmental Justice Policies

The Public Safety Element Update policies and implementing actions address natural hazards; transportation hazards; police, fire, and emergency services; pandemic preparedness and response; homelessness; and climate change and resiliency. These policies and implementing actions aim to reduce the risk to the community and to ensure protection from foreseeable natural and human-caused hazards.

Proposed new residential and mixed-use development would be predominantly located in more urbanized areas of the City. Public Safety Element policies and implementing actions could affect the design and construction of planned developments, including addition of design elements related to emergency access and pedestrian safety. The Public Safety Element Update policies and implementing actions would also involve evaluation of public facilities, including solid waste service systems, with respect to risks of natural hazards, transportation hazards, etc. Public Safety Element policies would not include individual development proposals that would create unplanned growth through extension of roads or other infrastructure.

The Public Safety Element Update policies and implementing actions would also involve additional Environmental Justice Policies to address public safety issues within environmental justice communities. Many Public Safety Element Update policies could result in community benefits. No individual infrastructure improvements or projects are identified in the Public Safety Element Update. This update would not have any significant effects related to waste reduction goals. Impacts would be less than significant.