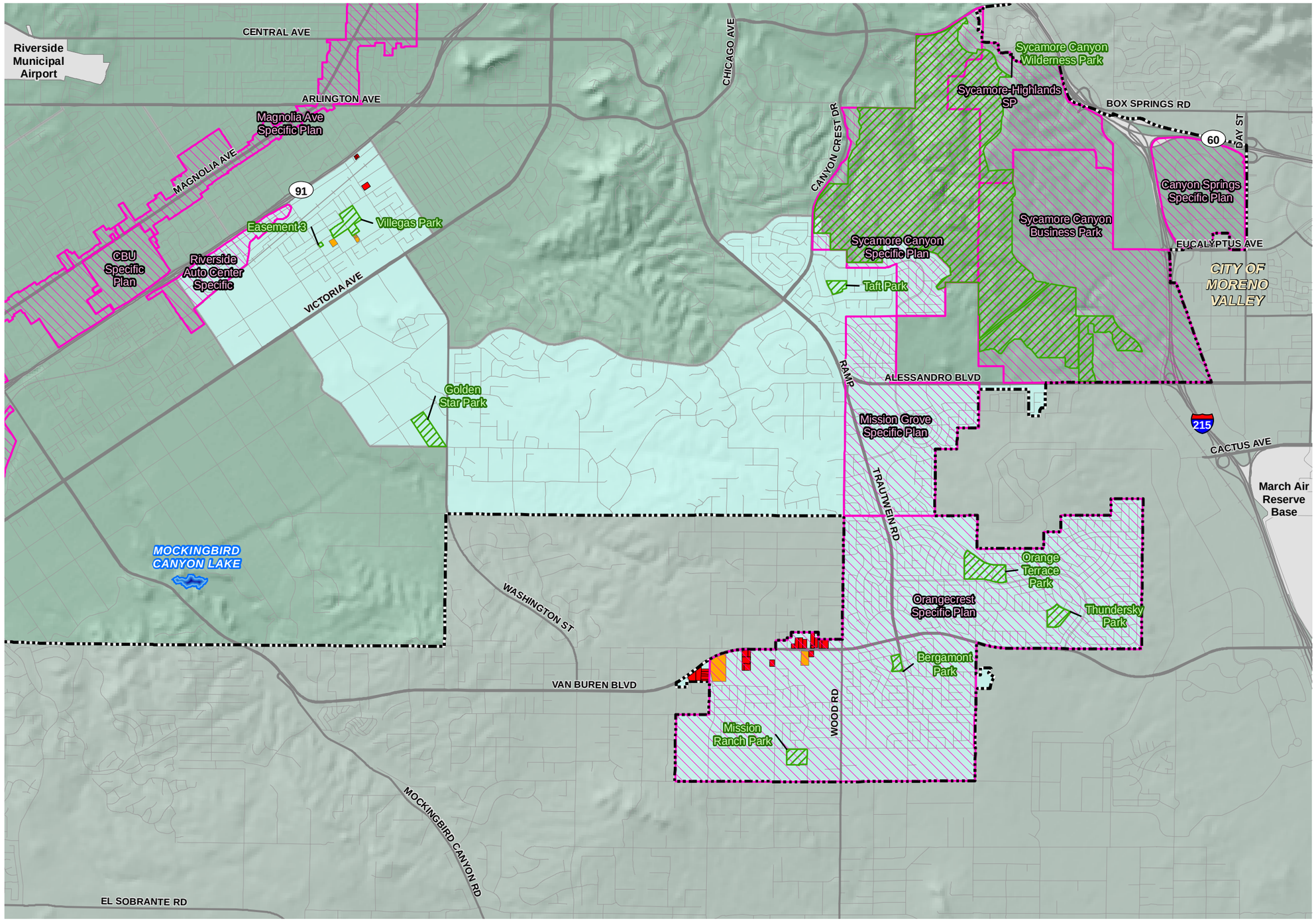

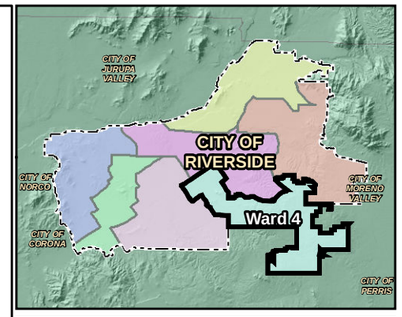

Legend

- Riverside City Limits
- Ward 4
- Specific Plan Boundary
- Park/Recreation Facility

Opportunity Sites

- No Zone Changes
- Zone Changes

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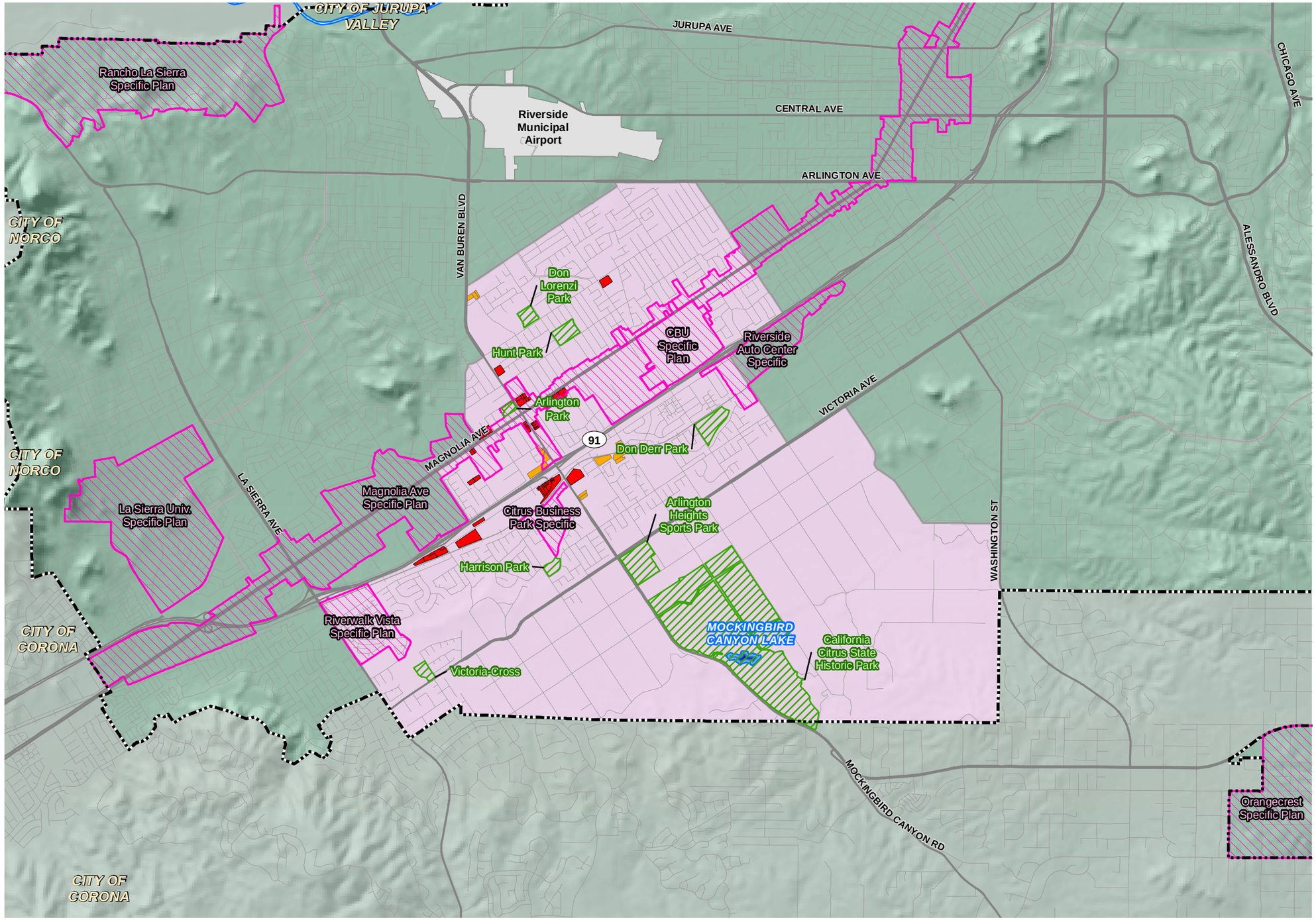
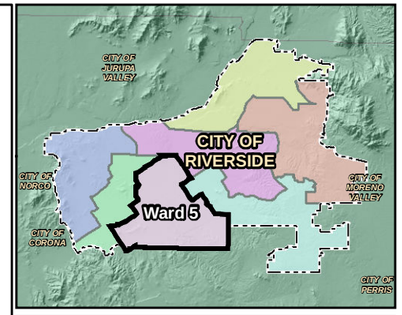
1:48,000

N

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





Legend

- Riverside City Limits
- Ward 5
- Specific Plan Boundary
- Park/Recreation Facility

Opportunity Sites

- No Zone Changes
- Zone Changes

ICF

N

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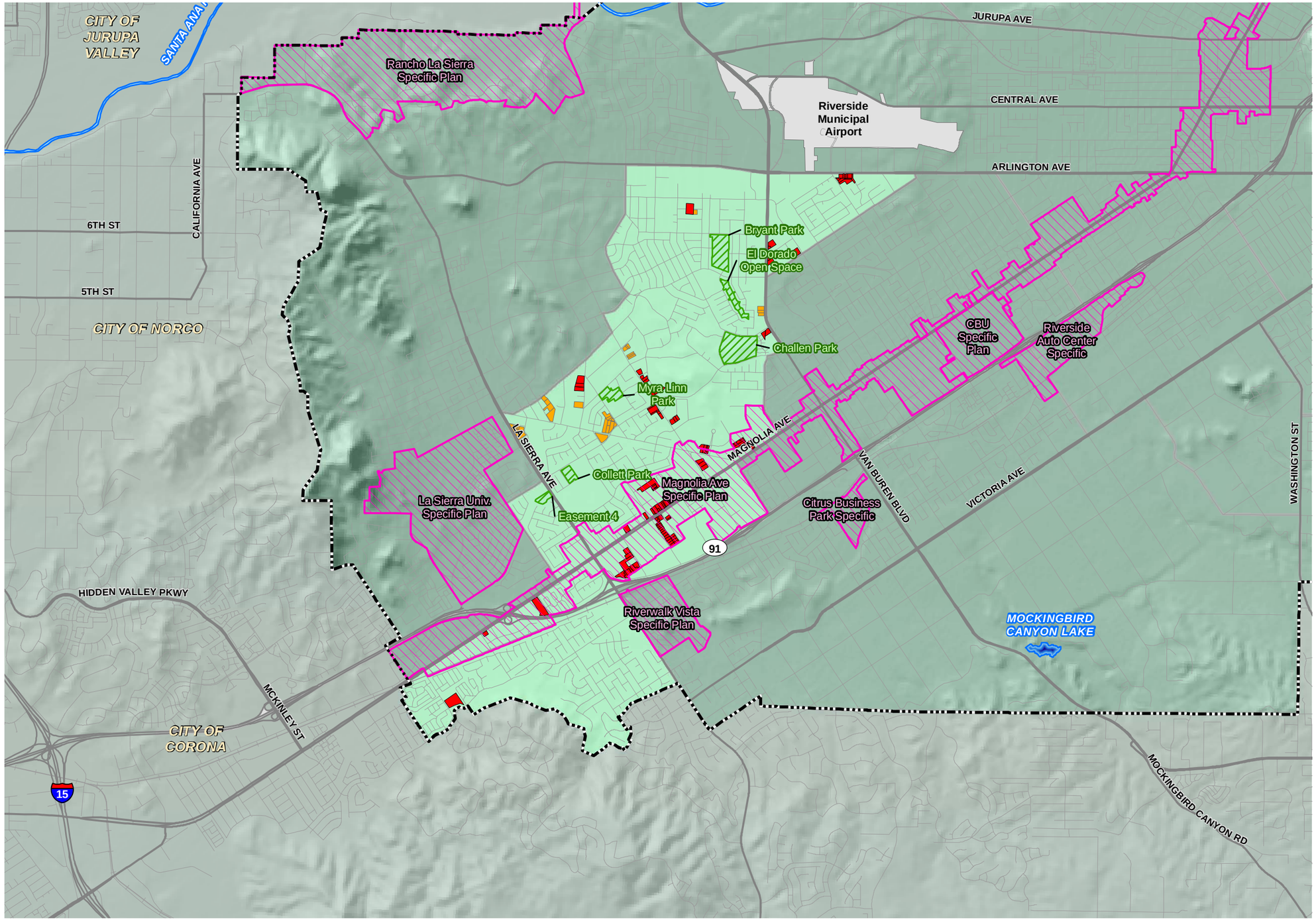
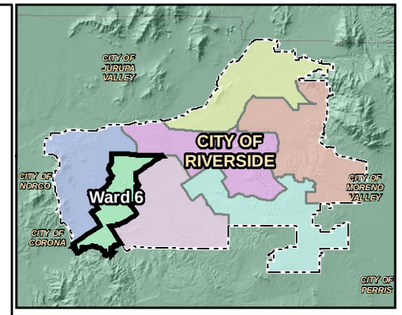
Figure 3.11-1 - Sheet 5
Ward 5 - Opportunity Sites & Recreational Resources for City of Riverside
Riverside General Plan Update





Legend

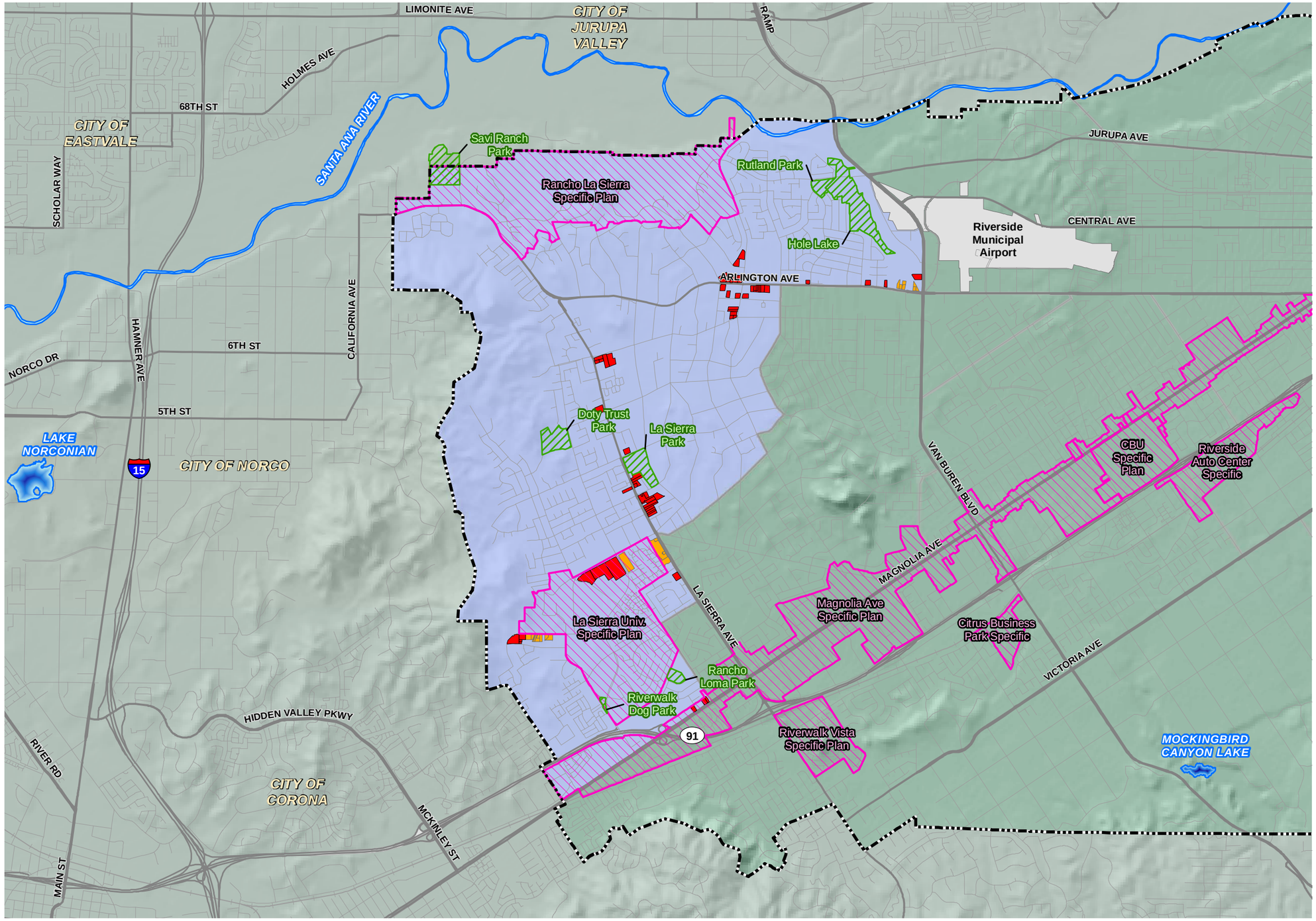
- Riverside City Limits
- Ward 6
- Specific Plan Boundary
- Park/Recreation Facility

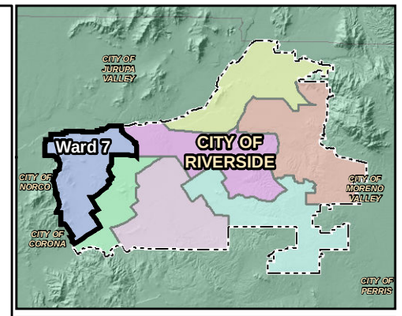
Opportunity Sites

- No Zone Changes
- Zone Changes

0 0.5 1 Miles
1:48,000

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





Legend

- Riverside City Limits
- Ward 7
- Specific Plan Boundary
- Park/Recreation Facility

Opportunity Sites

- No Zone Changes
- Zone Changes

0 0.5 1 Miles

1:48,000

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 14th 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	• Objective PR-1: Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents. ○ 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
	appropriate, to minimize maintenance demands, encourage the planting of native landscapes, and to incorporate xeriscape (low-water demand) principles where feasible. • ○ 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. • Objective PR-2: Increase access to existing and future parks and expand pedestrian linkages between park and recreational facilities throughout Riverside. ○ 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.
Open Space and Conservation Element	• Objective OS-1: In conjunction with the County, RCRCD, 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
	○ 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. ○ 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. ○ 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. ○ 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. ○ 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.
Land Use and Urban Design Element	• 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
	• Objective LU-7: Preserve and protect significant areas of native wildlife and plant habitat, including endangered species. ○ 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. ○ 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. ○ 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
	○ 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. ○ 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. ○ 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	• Objective PF-2: Find new and expanded uses for recycled wastewater. ○ 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. ○ 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. ○ 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	• Policy LSU-5.4 The tops of natural hill forms shall be developed as landscaped open spaces.
Magnolia Avenue Specific Plan	• 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. ○ 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, barbeque 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 paratheses 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.

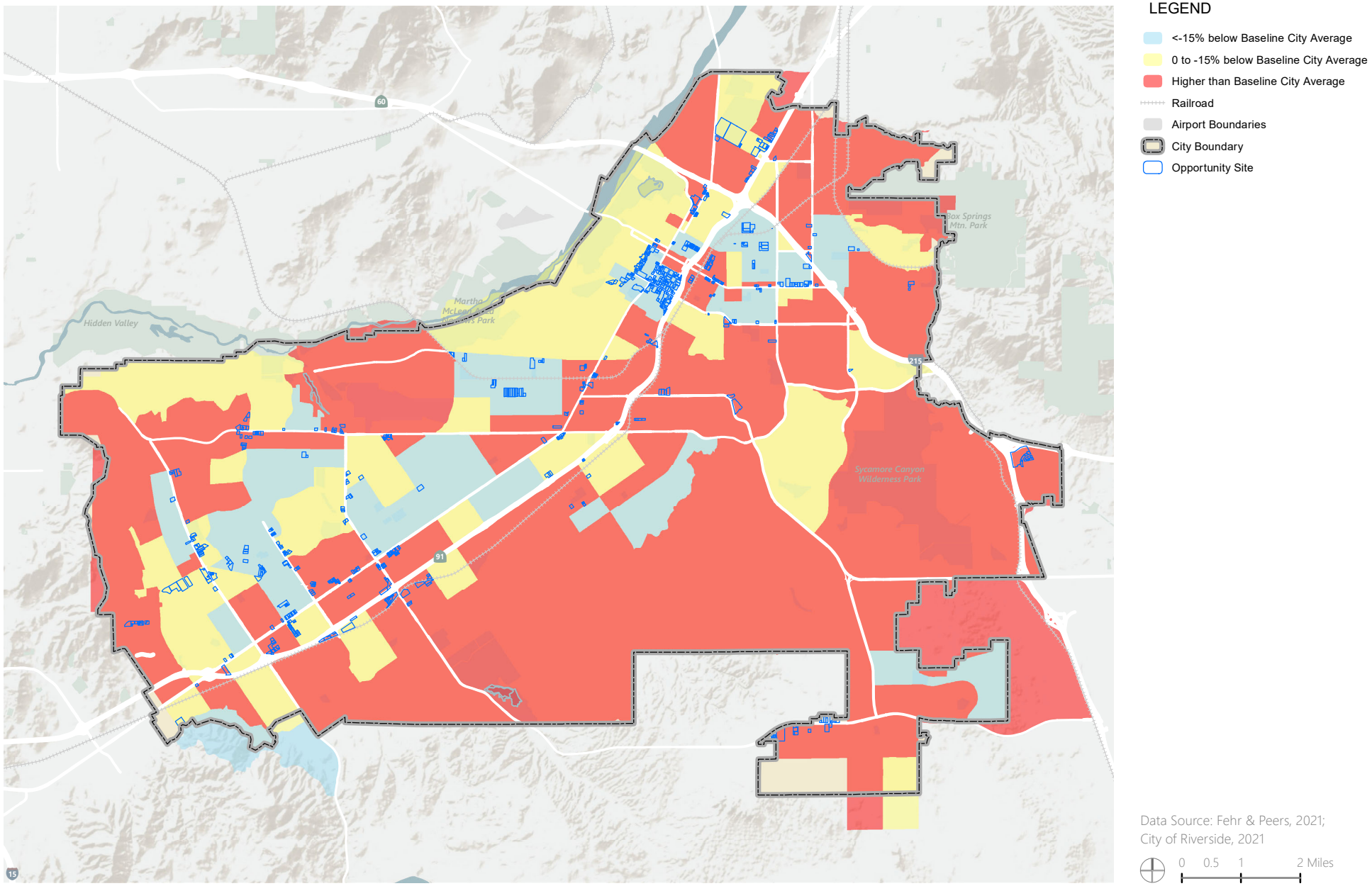
MM-TRA-1: Implement VMT mitigation options.

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 measures[4] 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 Statues 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	**Policy HP-1.3:** The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable state and federal cultural resources protection and management laws in its planning and project review process. **Policy HP-2.1:** The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources. **Policy HP-2.3:** The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Plan	Policy
	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. **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. **Policy HP-7.2:** The City shall incorporate preservation as an integral part of its specific plans, general plan, and environmental processes.
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	☒	☒
Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office	Patricia Garcia-Plotkin – Director, Tribal Historic Preservation Office		☒
Augustine Band of Cahuilla Indians	Amanda Vance -Chairperson		☒
Cabazon Band of Mission Indians	Doug Welmas – Chairperson		☒
Cahuilla Band of Indians	Daniel Salgado - Chairperson		☒
Cahuilla Band of Indians	Bobby Ray Esparza – Cultural Coordinator	☒	
Gabrieleño Band of Mission Indians - Kizh Nation	Andrew Salas - Chairperson	☒	☒
Gabrieleno/Tongva San Gabriel Band of Mission Indians	Anthony Morales – Chairperson	☒	☒
Gabrielino Tongva Indians of California Tribal Council	Robert Dorame – Tribal Chair, Cultural Resources		☒
Gabrielino/Tongva Nation	Sandonne Goad - Chairperson		☒
Gabrilelino-Tongva Tribe	Charles Alvarez - Chairperson		☒
Juaneno Band of Mission Indians Acjachemen Nation	Joyce Perry – Tribal Manager		☒
Juaneno Band of Mission Indians Acjachemen Nation	Matias Belardes – Chairperson		☒
Los Coyotes Band of Cahuilla and Cupeño Indians	Shane Chapparosa - Chairperson		☒
Morongo Band of Mission Indians	Robert Martin - Chairperson	☒	☒
Morongo Band of Mission Indians	Denisa Torres – Cultural Resources Manager		☒
Pala Band of Mission Indians	Shasta Gaughen, PhD – Tribal Historic Preservation Officer		☒
Pechanga Band of Luiseño Indians	Mark Macarro - Chairperson		☒
Pechanga Band of Luiseño Indians	Paul Macarro – Cultural Resources Coordinator		☒
Pechanga Cultural Resources Department	Ebru T. Ozdil – Planning Specialist	☒	
Quechan Tribe of the Fort Yuma Reservation	Manfred Scott – Acting Chairman		☒

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

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 Actual	2020	2025	2030	2035	2040
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

	Year				
Types	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	• Objective PF-1: Provide superior water service to customers. ○ Policy PF-1.1: Coordinate the demands of new development with the capacity of the water system. ○ Policy PF-1.2: Support the efforts of the Riverside Public Utilities Department, Eastern Municipal Water District and Western Municipal Water District to work together for coordination of water services. ○ Policy PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.

Policy Title	Summary
	○ 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. ○ 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. ○ 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	• 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	• 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.

3.15 Effects Not Found to Be Significant

As discussed in Chapter 1, *Introduction and Scope of Environmental Impact Report*, the City of Riverside (City), acting as the Lead Agency for the planning and environmental review of the Project, has prepared this Draft EIR in compliance with CEQA, including the State CEQA Guidelines. Section 15128 of the State CEQA Guidelines requires a brief description of any possible significant effects that were determined not to be significant and were not analyzed in detail within the environmental analysis. Therefore, this section has been included in this Draft EIR as required by CEQA.

The discussion below presents the analysis of the effects related to aesthetics; agriculture and forestry resources; air quality; biological resources; cultural resources; energy; geology, soils, and paleontological resources; hazards and hazardous materials; hydrology and water quality; mineral resources; population and housing; transportation; utilities and service systems; and wildfire not found to be significant. Any items not addressed in this section are addressed in Chapter 3, *Impact Analysis*, of this Draft EIR.

3.15.1 Aesthetics

Threshold: Would the Project have a substantial adverse effect on a scenic vista?

Less-than-Significant Impact. *Riverside General Plan 2025* (GP 2025), Figure LU-3, *Riverside Parks*, identifies the City's natural and scenic vistas (City of Riverside 2019a). Within the northwest portion of the City is the Santa Ana River floodplain. To the east, southeast, and west, the uplands and low mountains include Box Springs Mountain, Alessandro Heights, Arlington Mountain, and La Sierra/Norco Hills. A variety of prominent natural features in the City include Mount Rubidoux, Pachappa Hill, Sycamore Canyon, Hawarden Hills, distinctive arroyos, and isolated hills. Open space areas include the Santa Ana River Corridor, Box Springs Mountain Regional Park, Sycamore Canyon Wilderness Park, Mount Rubidoux Park, and California Citrus State Historic Park.

Development under the Project would increase residential densities and nonresidential land use intensities in specific areas and would be concentrated in existing transit corridors or urban areas and not in open space areas and would not block scenic views of the surrounding mountains or the Santa Ana River. Pursuant to Riverside Municipal Code (RMC) standards and as part of each future development's design review process (RMC Chapter 19.710), all development under the Project would require design review and must demonstrate conformance with relevant GP 2025 policies and RMC standards. For example, future development must demonstrate conformance with GP 2025 Objective LU-3 policies, which are intended to preserve prominent ridgelines and hillsides as important community visual assets (i.e., Policy LU-3.1). In addition, future development must comply with GP 2025 Objective OS-2 policies, which are intended to minimize the extent of urban development in the hillsides and mitigate any significant adverse consequences associated with urbanization (i.e., Policies OS-2.1 through OS 2.4). RMC standards would regulate land uses, building heights, setbacks, landscaping, parking, fences and walls, and other development characteristics to protect the City's hills and ridgelines. The Project would not have a substantial adverse effect on a scenic vista, and the impact would be less than significant.

Threshold: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?

Less-than-Significant Impact. The City does not include a State Scenic Highway. However, the *City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report 2025* (GP FPEIR) identifies the City's scenic parkways in Table 5.1-B, *Scenic Parkways* (City of Riverside 2007). According to GP FPEIR Table 5.1-B, the City's scenic parkways include:

- Victoria Avenue
- Magnolia Avenue/Market Street
- University Avenue
- Van Buren Boulevard
- Riverwalk Parkway
- La Sierra Avenue
- Overlook Parkway
- Canyon Crest Drive
- Arlington Avenue

The Project would not result in any effects on scenic highways or scenic resources. Many of the Opportunity Sites are near GP 2025-designated scenic parkways, particularly Magnolia Avenue/ Market Street, University Avenue, Van Buren Boulevard, and Arlington Avenue.

There would be no development under the Project on sites with rock outcroppings, and no scenic historic resources would be removed. Project-related impacts would be reduced to less than significant through compliance with the RMC and the *Riverside Citywide Design Guidelines and Sign Guidelines* (City of Riverside 2019b). Pursuant to RMC requirements and as part of the design review process, the City would assess all future development proposals on a project-by-project basis. The RMC would regulate land uses, building heights, setbacks, landscaping, parking, fences and walls, and other development standards to protect the City's scenic parkways and resources. Compliance with the RMC and the *Riverside Citywide Design Guidelines and Sign Guidelines* would ensure Project impacts remain less than significant.

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

Less-than-Significant Impact. The Project would not result in any effects on visual character or quality. The City includes a mixture of developed, partially developed, and vacant land anticipated for future development. Where Zoning Code and Specific Plan amendments occur on vacant, rural, or agricultural land uses, implementation of the Project would have the potential to alter the existing visual character or quality of these sites. However, compliance with GP 2025 policies and RMC and

Specific Plan standards, as well as the *Riverside Citywide Design Guidelines and Sign Guidelines* (City of Riverside 2019b), would ensure no substantial degradation of visual character and quality, and Project impacts would be less than significant.

Future residential and mixed-use development must demonstrate conformance with GP 2025 Objective OS-4 policies, which are intended to preserve designated buffers between urban and rural uses for their open space and aesthetic benefits (i.e., Policies OS-4.1 and OS-4.2) (City of Riverside 2012). Pursuant to RMC requirements and as part of the design review process, the City would assess all future development proposals on a project-by-project basis to prevent nonconforming uses and structures with the potential to affect the City's visual character. The RMC regulates land uses, building heights, setbacks, landscaping, parking, fences and walls, and other development characteristics to protect the City's visual character. Compliance with GP 2025 Objective OS-4 policies, among others, as well as RMC standards would ensure impacts on visual character would be less than significant.

Threshold: Would the Project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Less-than-Significant Impact. The development of new housing units and associated Zoning Code and Specific Plan amendments to accommodate housing and mixed-use development could introduce new sources of light or glare with the potential to adversely affect daytime or nighttime views in some areas. The Riverside County Light Pollution Ordinance (Riverside County Ordinance No. 655) restricts nighttime lighting for areas within a 15-mile radius (Zone A) and a 45-mile radius (Zone B) of the Palomar Observatory. As shown in GP FPEIR Figure 5.1-1, *Palomar Observatory Lighting Impact Zone*, the southeastern portion of the City is within Zone B, or within a 45-mile radius of the observatory (45-mile Radius Lighting Impact Zone) (City of Riverside 2007). No Opportunity Sites are within this buffer area.

The City requires all residential and mixed-used development that introduces light sources, or modifications to existing light sources, to incorporate shielding devices or other light pollution–limiting design features (e.g., hoods or lumen restrictions); refer to GP FPEIR Mitigation Measure AES-1. Pursuant to RMC standards and the *Riverside Citywide Design Guidelines and Sign Guidelines* (City of Riverside 2019b), the City would assess all future development proposals on a project-by-project basis, as part of the design review process, to regulate site lighting with the potential to result in light and glare impacts. RMC Section 19.556, Lighting, and Section 19.590.070, Light and Glare, include standards intended to prevent adverse light and glare impacts. Compliance with Riverside County Ordinance No. 655 requirements, existing GP FPEIR Mitigation Measure AES-1, and RMC Sections 19.556 and 19.590.070, would ensure that future development facilitated pursuant to the Project would not introduce new sources of substantial light or glare. The impact would be less than significant.

3.15.2 Agricultural and Forestry Resources

Threshold: Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. In 2005, Riverside County had a total of 223,848 acres of harvested crops. In 2018, the number had dropped to 194,346 harvested acres (Riverside County Agricultural Commissioner 2018). This represents a loss of 29,502 acres in 15 years, or approximately 13 percent. The Riverside County Agricultural Commissioner's office also reports statistics for regions of Riverside County, including the Riverside/Corona District, which is where the Project is located. For the 2005 to 2016 timeframe, the latest reported, the Riverside/Corona District went from 14,340 harvested acres to 7,020 harvested acres, a reduction of approximately 51 percent (Riverside County Agricultural Commissioner 2018). This shows that the development pressure faced in the western end of the county, where the City is located, is more rapid than in the overall county.

The citrus industry was influential in the establishment of the City in the late nineteenth century, and its influence continues today. The largest area of agriculture within City limits is the Arlington Heights Greenbelt. The City's Sphere of Influence (SOI) still contains large citrus groves, especially in the Highgrove, Woodcrest, and Rancho El Sobrante areas; however, over time, many of the large agricultural and citriculture areas of the City have been converted to suburban uses.

The California Department of Conservation Farmland Mapping and Monitoring Program designates the majority of the City as Urban and Built-Up Land (CDOC 2020). Several small areas of the City are designated as Important Farmland, Farmland of Statewide Importance, Unique Farmland, and Other Land (CDOC 2020). The areas designated as such occur primarily near the southern boundary of the City, south of Victoria Avenue and west of Washington Street within the Arlington Heights Neighborhood. The northeastern area of the City also contains land designated as Important Farmland, Farmland of Statewide Importance, Unique Farmland, and Other Land (CDOC 2020). The areas designated as such occur primarily within the University of California, Riverside West Campus, consisting primarily of agricultural research fields. The Project would not propose any new development in areas designated as Important Farmland, Farmland of Statewide Importance, Unique Farmland, or Other Land. As such, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no impacts would occur.

Threshold: Would the Project conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?

No Impact. In 1979, City voters passed Proposition R: "Taxpayer's Initiative to Reduce Costly Urban Sprawl by Preserving the City of Riverside's Citrus and Agricultural Lands, Its Unique Hills, Arroyos and Victoria Avenue." The two main features of Proposition R relate to: 1) preservation of agriculture through application of the RA-5 - Residential Agricultural Zone to two specific areas of the City, and 2) protection of hillside areas through application of the RC - Residential Conservation Zone to areas of the City based on slopes over 15 percent. The two areas of the City that were zoned to RA-5 are: (1) the Arlington Heights Greenbelt and (2) an area commonly known as the Arlanza-La Sierra Lands, a blufftop area above the Santa Ana River bordered by Tyler Street on the east and Arlington Avenue and the City limit on the west. Eight years later, City voters approved Measure C as

an amendment to Proposition R, titled "Citizens' Rights Initiative to Reduce Costly Urban Sprawl, to Reduce Traffic Congestion, to Minimize Utility Rate Increases and to Facilitate Preservation of the City of Riverside's Citrus and Agricultural Lands, its Scenic Hills, Ridgelines, Arroyos and Wildlife Areas." Measure C amended Proposition R by adding policies to promote agriculture. Measure C relates to the Arlington Heights Greenbelt, the Arlanza-La Sierra Lands, and any areas designated for agricultural use in the existing GP 2025 or Zoning Code.

There are ten Williamson Act contract parcels within the City. Four parcels are in the Prenda neighborhood, and six are in the southeastern portion of the City in the Woodcrest area. Review of the GP 2025 Open Space and Conservation Element indicates none of the Opportunity Sites are within Williamson Act preserves or contracted land (City of Riverside 2012). As such, the Project would have no impact related to agricultural zoning or Williamson Act contract lands, and no conflicts with existing zoning for agricultural uses would occur.

Threshold: Would the Project conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The Project does not identify Opportunity Sites zoned for forest land. In addition, there are no lands zoned as forest land, timberland, or timberland zoned Timberland Production areas (as defined in Public Resources Code [PRC] 12220(g) and PRC 4526 or Government Code 51104(g)) within the City. The Project would not affect forest land or timberland or conflict with existing zoning for forest land.

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As described above, the Project and Zoning Code and Specific Plan amendments do not identify Opportunity Sites zoned for forest land. As such, no impacts related to the loss of forest land or conversion of forest land to non-forest use would occur.

Threshold: Would the Project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As mentioned above, no agricultural farmland or forest land resources are on the identified Opportunity Sites. The Opportunity Sites are within a developed urban area and are concentrated in major transit corridors. None of the Opportunity Sites are on agricultural land. The Project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. As such, no impacts related to the conversion of agricultural or forest land to other land uses would occur.

3.15.3 Air Quality

Threshold: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-than-Significant Impact. According to the California Air Resources Board's (CARB's) CEQA Air Quality and Land Use Handbook, land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, auto body shops, coating operations, fiberglass manufacturing facilities, foundries, rendering plants, and livestock operations (CARB 2005). The Project would not include any of the odor-related uses identified by the South Coast Air Quality Management District.

The Project would not directly result in any construction activities. However, future residential and mixed-use development in the City facilitated by the Project could result in construction activities, which could generate detectable odors from heavy-duty equipment exhaust. These construction-related odors would be short term in nature and would cease once construction was completed. In addition, South Coast Air Quality Management District Rule 402, Nuisance, prohibits the discharge of air contaminants that cause a nuisance or annoyance for the public, including odors. All future development facilitated by the Project would be required to comply with this rule. As such, the impact of other emissions, including those leading to odors, would be less than significant.

3.15.4 Biological Resources

Threshold: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less-than-Significant Impact. The City does not have an adopted Tree Protection Ordinance. Construction and/or operational activities associated with the Project could require pruning or tree removal during vegetation clearing and grading and other construction activities. Operational activities designed to keep housing and public safety areas landscaped, clear, and accessible would require vegetation management, which could involve tree-trimming and/or tree removal. The trimming or removal of street trees would be subject to local tree policies and ordinances, regardless of whether the work was being performed as a part of construction or operational activities.

Any future residential and mixed-use development facilitated by the Project within the City's boundaries that proposes planting, pruning, or removing a street tree within a City right-of-way must follow the requirements of the *Urban Forestry Policy Manual*. The manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute.

In addition, any future development facilitated by the Project within the City would be required to comply with the RMC and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) mitigation fees, and the Stephens' Kangaroo Rat Habitat Conservation Plan (HCP) Fee Assessment Area and mitigation fees. Any future applicant of any proposed development within

MSHCP/HCP plan boundaries would be required to pay a fee, also, Title 16 of the RMC provides for payment of development fees to protect biological resources where applicable.

The City is in the plan area for the Upper Santa Ana River HCP, the May 2021 draft of which is available for public review (www.uppersarhcp.com/Additional.aspx). Species like least Bell's vireo, Santa Ana sucker, Santa Ana River woolly-star, burrowing owl, and 18 others are covered in this HCP (Upper Santa Ana River Sustainable Resources Alliance 2021). Also, GP 2025 includes policies[1] to ensure that future development would not conflict with any local policies or ordinances that protect biological resources.

With Project compliance with City policies and ordinances, it is anticipated that any construction- and/or operations-related activities associated with the Project would have a less-than-significant impact, either directly or through habitat modifications, on any local policies or ordinances that protect biological resources.

3.15.5 Cultural Resources

Threshold: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Less-than-Significant Impact. State law, including Health and Safety Code Section 7050.5 and PRC Section 5097.98, provides guidance regarding how sites containing human remains must be treated. PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. PRC Section 5097.5 considers it a misdemeanor to knowingly and willfully excavate, remove, destroy, injure, or deface any historic or prehistoric ruins; burial grounds; archaeological or vertebrate paleontological site, including fossilized footprints; inscriptions made by human agency; rock art; or any other archaeological, paleontological, or historical feature situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. The disposition of Native American burials falls within the jurisdiction of the Native American Heritage Commission (NAHC), which prohibits willfully damaging any historic, archaeological, or vertebrate paleontological site or feature on public lands (PRC Section 5097.9). PRC Section 5097.98 stipulates that whenever the NAHC receives notification of a discovery of Native American human remains from a county corner, it must immediately notify those people it believes to be the most likely descendants of the deceased Native American. The descendants may inspect the site of discovery and make recommendations on the removal or reburial of the remains.

Health and Safety Code Section 7050.5 addresses the protection of human remains discovered in any location other than a dedicated cemetery and makes it a misdemeanor for any person to knowingly mutilate or disinter, wantonly disturb, or willfully remove any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in PRC Section 5097.99. The code further states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the

[1] Open Space Element, Policies OS-1.1–O.S-1.5, OS-1.8–OS-1.15, OS-2.2, OS-2.4, OS-4.2, OS-4.3, OS-5.1–OS-5.4, OS-6.1–OS-6.4, and OS-7.3; Air Quality Element, Policy AQ-1.9; Land Use Element, Policies LU-2.2, LU-3.1, LU-3.2, LU-4.1–LU-4.5, LU-5.1–LU-5.6, LU-7.1–LU-7.4, and LU-13.2; and Circulation and Community Mobility Element, Policies CCM-4.1–CCM-4.4).

coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions concerning investigation of the circumstances, manner, and cause of any death and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

Because previous archaeological studies have identified the presence of Native American human remains within the City and adjacent areas, development projects proposed on vacant lands or on other Opportunity Sites have the potential to discover previously unknown Native American human remains. As such, development facilitated by the Project has the potential to disturb human remains, including those outside dedicated cemeteries. However, if human remains should be discovered on vacant lands or other Opportunity Sites, however unlikely, their treatment would be subject to applicable codes and regulations, notably PRC Section 5097 and Health and Safety Code Section 7050.5, which would ensure that impacts would be less than significant.

3.15.6 Energy

Threshold: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Less-than-Significant Impact. Within the City is a broad array of land uses, ranging from high-density residential and commercial to semi-rural and agricultural. The Project, through facilitation of potential development projects, may result in a commitment of energy resources such as diesel fuel, gasoline, and electricity during construction and operation. Energy refers to the power supply required for implementation of the Project within the City. Power is supplied primarily by non-renewable sources, such as coal and natural gas, as well as nuclear power (City of Riverside 2012). This discussion focuses on electricity and natural gas as energy sources. For a comprehensive context of existing energy services and regulations, please refer to the Project's Initial Study (Appendix A).

The Project would not directly result in an impact on energy resources. In particular, the Housing Element Update is strictly a policy document that contains guiding principles, policies, and actions aimed at accommodating up to 24,000 new housing units by 2029 to meet the Regional Housing Needs Assessment (RHNA); however, the Housing Element itself does not provide any entitlements for the construction of these units. The Project would allow up to 31,654 total units to be built, including the 18,458 units required by the RHNA plus an additional buffer as described in Chapter 2, *Project Description*. The Housing Element Update encourages development in areas where the density can be supported by existing infrastructure. Opportunity Sites have been identified for accommodation of future residential and mixed-use development to meet the housing demand. These Opportunity Sites are described in Chapter 2. In addition, although residential dwellings would be the largest type of development in the City resulting from the Housing Element Update, implementation of proposed Zoning Code and Specific Plan amendments to allow fulfillment of the City's RHNA would also facilitate the development of mixed-uses as well, including some commercial/retail, office, and potentially live/work uses. It is anticipated that approximately

3,181,930 square feet of new nonresidential development could be accommodated in the proposed mixed-use zones under the Project. The Public Safety Element is a policy-level document only and does not identify specific projects that could occur in the future in accordance with its policies.

Although the Housing Element Update and Zoning Code and Specific Plan amendments themselves would not directly result in increased energy use, future developments in the City facilitated by the Project could result in an increased consumption of energy resources. However, construction and operation of new residential and mixed-use development in the City would be required to comply with all applicable state, regional, and local plans, ordinances, and regulations related to energy efficiency.

Construction Energy Use

Future development throughout the City facilitated through Project implementation is intended to meet existing and future residents' varied housing needs. This future development would occur on parcels that are currently vacant or under-utilized as well as fully improved. Such development would result in construction-related energy demand and consumption related to the use of transportation fuels such as gasoline and diesel for construction workers' vehicle trips, hauling and material delivery, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to meet additional electricity demands from temporary onsite lighting and welding, and from supplying energy to areas of the construction site where electricity cannot be obtained through a hookup to the existing grid.

Unlike an individual development project for which project-specific construction information is available, it is impractical to quantify construction-related energy consumption for all future development that could contribute incrementally to construction emissions throughout the City. The amount of fuel consumed by these construction activities for each development would vary substantially, depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel. However, the construction of future housing, public infrastructure, and mixed-use developments would involve construction activities typical of most land use developments within the City. None of these future developments would be expected to require an extraordinary amount of energy consumption during construction, as may occur with large industrial facilities such as new power plants or large infrastructure facilities such as dams. Because construction activities are considered to be relatively short term and would cease once construction of an individual development is complete, they would represent a relatively short demand on local and regional fuel supplies that would be easily accommodated. The operation of construction equipment for future residential and mixed-use development would also be required to comply with the latest U.S. Environmental Protection Agency and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Because of increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. Overall, construction fuel consumption associated with future development in the City would not be any more inefficient, wasteful, or unnecessary than other similar land use development projects of this nature. Impacts would be less than significant.

Operational Energy Use

Energy use associated with operation of future development in the City facilitated by the Project would include electricity for interior and exterior building lighting; heating, ventilating, and air conditioning (HVAC); stoves and other kitchen appliances; cleaning equipment; electronic systems; security systems; and more. Maintenance activities during operations, such as landscape maintenance, could involve the use of electric or gas-powered equipment. However, future developments would be required to comply with the applicable Title 24 Building Energy Efficiency Standards, which have been established for both residential and nonresidential uses to provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. The electricity provider, which for a majority of the City is Riverside Public Utilities (RPU), is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources that are naturally replenished within a human timescale, such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources in addition to compliance with applicable standards including Title 24 ensure future residential and mixed-use development facilitated by the Project would not result in the waste of the finite energy resources.

In addition to onsite energy uses, future development facilitated by the Project would also result in transportation energy use associated with vehicle trips generated by the future residential and mixed-use developments. Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle fuel standards and revising existing standards. Vehicles associated with future residential and mixed-use development facilitated by the Project would be subject to future compliance with federal fuel economy standards. In addition, Project implementation would accommodate future housing development throughout the City to meet the residents' varied housing needs. Future housing and mixed-use development in the City facilitated by the Project would not result in any unusual characteristics that would result in excessive operational fuel consumption. Some of these future developments would occur on parcels that are currently vacant or under-utilized in the City, which could reduce vehicle miles traveled by future residents where housing is located within walking distance to commercial and other community-serving uses. The new mixed-use developments, by their nature, would also reduce dependency on automobiles and the number of vehicle miles traveled. Fuel consumption associated with individual development-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar development in the region.

Overall, future development activities would adhere to all federal, state, and local requirements for energy efficiency, including Title 24 standards, and would not result in a substantial increase in demand or transmission service or the need for new or expanded sources of energy supply, new or expanded energy delivery systems, or infrastructure. Residential and mixed-use development facilitated by the Project would not result in a significant environmental impact due to a wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. A less-than-significant impact would occur.

Threshold: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less-than-Significant Impact. As discussed above, energy consumption would result from construction and operation of future residential and some nonresidential uses in the City that would be facilitated by the Project. All future residential and mixed-use development facilitated by the Project would be required to comply with the latest requirements of the California Building Code (CBC), which contains the mandatory California Green Building Standards (CALGreen) Code, along with the Building Energy-Efficiency Standards. As proposed, all future development projects would be required to obtain appropriate building permits and meet all current building standards, including, but not limited to, the CBC, California Electrical Code, and California Energy Code (Title 24).

California Green Building Standards Code

The California Building Standards Code (CBSC) (California Code of Regulations, Title 24) is the minimum standard established in law for the design and construction of buildings and structures in California. Within the CBSC, the CBC 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 CBSC, which expand 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 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 2019).

Future development facilitated by the Project would be subject to all relevant provisions of the most recent update to the CBSC, including the Building Energy-Efficiency Standards. Adherence to the most recent CALGreen Code and Building Energy-Efficiency Standards would ensure that future residential and mixed-use development on identified Opportunity Sites would consume energy efficiently. Required compliance with the CBSC would ensure that the building energy use associated with such future development would not be wasteful, inefficient, or unnecessary. In addition, electricity supplied to future residential and mixed-use development by RPU would comply with the state's RPS, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and 60 percent by 2030. As such, a portion of the energy consumed during operations would originate from renewable sources.

Given that future development facilitated by the Project would comply with all federal, state, and local requirements for energy efficiency, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and a less-than-significant impact would result.

3.15.7 Geology, Soils, and Paleontological Resources

Threshold: Would the Project be affected by the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less-than-Significant Impact. The City lies in a seismically active area of the United States; however, no Alquist-Priolo Fault Zones or active faults have been mapped within the City (City of Riverside 2018). As shown on Figure 7-1 of GP 2025, the active faults include the San Andreas fault, the San Jacinto fault, and the Elsinore fault. In a seismically active area, the potential of future faulting occurring in areas where faults have not been mapped exists; however, the risk of surface fault rupture in the City is considered low.

The Project could facilitate the development and construction of new residential and mixed-use development. Although the Project would provide the framework for future development, no specific development projects are proposed as part of these changes. Policy PS-1.1 of GP 2025 ensures that all new residential and mixed-use development in the City abides by the most recently adopted City and state seismic and geotechnical requirements. As such, any future development facilitated by the Project would require a geotechnical investigation and/or compliance with the CBC, which would address the risk of fault rupture. The Project would not exacerbate the risk of surface fault rupture. Development facilitated by the Project would be required to prepare a geotechnical investigation prior to issuance of permits pursuant to Riverside Municipal Code Section 16.08.185 for any property identified as being subject to the potential of liquefaction or within a seismic hazard zone disclosing the site-specific risk of fault rupture at a future development site. Because the Project would not exacerbate the risk of surface fault rupture, this impact would be less than significant.

Threshold: Would the Project be affected by strong seismic ground shaking?

Less-than-Significant Impact. Ground shaking is the most widespread hazardous phenomenon associated with seismic activity, and the City is within a seismically active area. Several known faults in the region have the potential to generate significant seismic ground shaking. The San Andreas fault is within 11 miles of Downtown and capable of producing an 8.3 magnitude (M) earthquake, the San Jacinto fault is approximately 7 miles from Downtown and capable of producing a 7.0 M earthquake, and the Elsinore fault is within 13 miles of Downtown and capable of producing a 6.0 M earthquake (City of Riverside 2018). The risk of seismic ground shaking in the City is considered high.

Because the City is in a seismically active area near several active faults that can produce earthquakes of 6.0 M or greater, seismic ground shaking could be felt throughout the City. The Project could result in the development and construction of new residential and mixed-use development. As such, future development facilitated by the Project could experience seismically related ground shaking during an earthquake. However, future development resulting from the Project would be required to comply with GP 2025 policies, RMC standards and CBSC requirements, which would require preparation of a geotechnical investigation, thereby reducing risks to life from damage to newly constructed buildings and structures as the result of seismic ground shaking. As the Project would not exacerbate the risk of ground shaking, and future developments facilitated by the Project would be required to comply with GP 2025 policies, RMC standards, and building code requirements, this impact would be less than significant.

Threshold: Would the Project be affected by seismically related ground failure, including liquefaction?

Less-than-Significant Impact. Liquefaction occurs when saturated soils lose cohesion, strength, and stiffness with applied shaking, such as that from an earthquake. The lack of cohesion causes solid soil to behave like a liquid, resulting in ground failure. When a load such as a structure is placed on ground that is subject to liquefaction, ground failure can result in the structure sinking and soil being displaced. Ground failure can take on many forms, including flow failures, lateral spreading, lowering of the ground surface, ground settlement, loss of bearing strength, ground fissures, and sand boils. Liquefaction within subsurface layers, which can occur during ground shaking associated with an earthquake, can also result in ground settlement.

The majority of the City has not been evaluated for liquefaction by the California Geological Survey (California Geological Survey 2021). However, soils prone to liquefaction are located throughout the City, particularly along watercourses, arroyos, and the Santa Ana River. The highest liquefaction risk is concentrated in four areas: the area along the Santa Ana River, the area south and west of Riverside Municipal Airport, an area in western Riverside spanning La Sierra Avenue, and a smaller area along the City's southern boundary primarily between Polk Street and Tyler Street, extending south from just north of California Avenue and to Dufferin Avenue. Although the Project would not include any individual development, development could be proposed on parcels that are underlain by liquefiable soils. However, future development facilitated by the Project would be required to comply with GP 2025 policies, such as Policy PS-1.6, which requires the City building official to explore and implement, where feasible, best practices and latest technologies to minimize damage to structures in areas determined to have a high liquefaction potential during seismic activities. In addition, future residential and mixed-use development facilitated by the Project would comply with CBSC requirements (e.g., submission of a preliminary soils report and a soils engineering analysis).

The report would identify any liquefiable soils at the development site and provide recommendations to reduce the risk associated with liquefaction. Because any future development facilitated by the Project on potentially liquefiable soils would comply with GP 2025 policies and CBSC requirements and may require a soils report and engineering analysis that would provide recommendations to reduce the risk of liquefaction during a seismic event, the Project would result in a less-than-significant impact related to liquefaction. In rare cases where the risk of liquefaction could not be avoided or minimized through site-specific analysis, subsequent CEQA analysis and a finding of significant and unavoidable impacts would be required.

Threshold: Would the Project be affected by expansive soils and weak soils?

Less-than-Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (i.e., shrink and swell) due to variations in moisture content. Expansive soils are typically very fine grained and have a high to very high percentage of clay. They can damage structures and buried utilities and increase maintenance requirements. The presence of expansive soils is typically associated with high clay content. Generally, future development in areas with expansive soils may require special building foundations or grade preparation, such as the removal of problematic soils and replacement with engineered soils. However, the relative strength or weakness of alluvial soils also depends on the combination of clay and sand.

Soils considered to have a high shrink-swell potential occur primarily west of Riverside Municipal Airport and within the Lake Mathews drainage area but can be found throughout the City (City of Riverside 2018). The highest risk of impacts resulting from expansive soils are expected to be near the airport and the Lake Mathews drainage area, though other areas may be affected as well.

Weak soils can compress or collapse under the weight of buildings and fill, causing settlement relative to the thickness of the weak soil. Usually the thickness of weak soil varies, and differential settlement does occur. Some weak soils, specifically unconsolidated settlements, can amplify shaking during an earthquake and, when saturated, can be susceptible to liquefaction. Soil associations in the City are generally well-drained sandy loams that are moderately deep; however, weak soils have been found in the northwestern portion of the City, in the area surrounding State Route 91 (Albert A. Webb Associates 2007). The highest risk of impact resulting from weak soils is expected to be in the northeastern part of the City, though other areas may be affected as well.

Weak soils are present in different areas of the City, and although the Project would not include any individual development, future development of Opportunity Sites could be proposed on these soils. However, as discussed above regarding liquefaction, future development resulting from the Project would comply with CBSC requirements, which could require the submission of a preliminary soils report and a soils engineering analysis, depending on the site. The report would identify any weak soils at development sites and provide recommendations to reduce the risks associated with construction on these parcels. Because any future residential and mixed-use development facilitated by the Project would comply with the recommendations in the applicable soils report, as well as standard regulations required by the CBSC, the Project would result in a less-than-significant impact related to weak soils.

Threshold: Would the Project be affected by lateral spreading?

Less-than-Significant Impact. Lateral spreading is a phenomenon in which a surficial soil displaces along a shear zone that formed within an underlying liquefied layer. The surficial blocks are

transported downslope or in the direction of a free face, such as a bay or creek, by earthquake and gravitational forces. Lateral spreading is generally the most pervasive and damaging type of liquefaction-induced ground failure generated by earthquakes. In general, for lateral spreading to occur, soils must consist of saturated, cohesionless sandy sediments in an area where there is a high groundwater table and an open face such as a cliff or streambank. The risk of lateral spreading in the City is highest near the Santa Ana River and along arroyos and watercourses; none of the Opportunity Sites are in these areas. While the Project would not include any individual development, the Project could provide for future development of residential and mixed-use development at Opportunity Sites, which could place development in areas that are at risk of lateral spreading. However, any development resulting from the Project would be required to comply with standard regulatory requirements of the CBSC, which would require construction, including foundations, to be designed to minimize risk resulting from lateral spreading. Future development would also be subject to GP 2025 Policy PS-1.1, which would ensure that all new development in the City would abide by the most recently adopted City and state seismic and geotechnical requirements. The Project would result in a less-than-significant impact related to lateral spreading.

Threshold: Would the Project be affected by landslides?

Less-than-Significant Impact. Landslides occur when the stability of a slope changes from a stable to an unstable condition. The stability of a slope is affected by the following primary factors: inclination, material type, moisture content, orientation of layering, and vegetative cover. In general, steeper slopes are less stable than more gently inclined ones. Although most of the City is relatively flat, the western and northeastern portions of the City are susceptible to landslides and rockfalls (City of Riverside 2018). The Project would not include any individual development project, but it could facilitate the development and construction of new residential and mixed-use development on Opportunity Sites. However, GP 2025 includes policies that limit development on steep or unstable slopes, and none of the Opportunity Sites are in these areas, which have been specifically identified to avoid hillsides, arroyos, and canyons as well as areas within the RC – Residential Conservation Zone. Policy PS-1.4 recommends the use of open space easements and other regulatory techniques to prohibit development and avoid creating public safety hazards where geologic instability is identified and cannot be mitigated. Because future development projects facilitated by the Project would comply with policies in GP 2025 and RMC standards, the Project would result in a less-than-significant impact related to landslides.

Threshold: Would the Project result in substantial soil erosion or the loss of topsoil?

Less-than-Significant Impact. Soil erosion is a natural process by which soil particles are removed by wind, water, or gravity. Different soils will have different susceptibilities to erosion, depending on particle size, gradation, organic structure, and permeability. In addition, topography, including the length and steepness of a slope, and the presence of vegetative cover influence a soil's susceptibility to erosion. Soils containing a high percentage of silt or very fine clay are generally the most erodible. Although the Project would not include any individual projects, it could result in the development and construction of new residential and mixed-use development at Opportunity Sites. As a result, new development facilitated by the Project could occur on a variety of slopes, grades, and soil types where erosion could occur. Soils with a high susceptibility to erosion are located throughout the City but are especially prevalent in the northwest portion near Arlington Avenue and in the southeastern portion near Gentian Avenue. Development facilitated by the Project could require excavation,

stockpiling of spoil materials, and grading, which could expose soils to erosion or lead to the loss of topsoil. However, as discussed in Section 3.15.9, *Hydrology and Water Quality*, development of sites one acre or larger facilitated by the Project would require a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the Construction General Permit, local stormwater ordinances, and other related requirements. The SWPPP would require best management practices (BMPs) for earthmoving and clearing activities to minimize any mobilization of sediment, stabilize disturbed areas, and control sediment. Because the Project itself would not include any construction that could lead to erosion, and future developments facilitated by the Project would be required to implement a SWPPP that would include erosion control BMPs, this impact would be less than significant.

Threshold: Would the Project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less-than-Significant Impact. The City is situated north of the Peninsular Ranges and south of the Transverse Range, with the San Bernardino Mountains to the north and the San Jacinto Mountains to the east. Elevations in the City range from approximately 700 feet above mean sea level near the Santa Ana River to almost 1,400 feet above mean sea level west of La Sierra Avenue. Land within the City is mostly flat, with natural slopes of less than 15 percent, although some slopes of 25 percent are found in the southeastern and western portions of the City. Steeper slopes exist outside the City but within its SOI. The City is generally underlain with subsurface deposits dating from the Mesozoic period, consisting of granite, adamellite, Mesozoic granitic rock, granodiorite, and Mesozoic basic intrusive rocks. Alluvium deposits date from the Quaternary (Albert A. Webb Associates 2007).

Although the Project would not include any specific projects, the Project could result in the development and construction of new residential and mixed-use development, which could be located on parcels that are underlain by liquefiable soils.

Soil type and groundwater depth vary across the City, but it is assumed that the risk of lateral spreading is highest near the Santa Ana River and along arroyos and watercourses, areas where the risk for liquefaction is higher than it is in the rest of the City.

Although the Project would not include any specific projects, future developments that could result from the Project could be placed on a geologic unit or soil that is unstable or that would become unstable because of the Project. However, any development facilitated by the Project would be required to comply with CBSC requirements, which require submission of a preliminary soils report and a soils engineering analysis to identify unstable geologic units and/or soils. The report would provide recommendations to reduce the risk associated any potential instability at a future development site. Future developments would also be subject to GP 2025 Policy PS-1.1, which would ensure that all new development in the City would abide by the most recently adopted state seismic and geotechnical requirements. Because the Project would not directly construct any new development, and future development facilitated by the Project would be required to comply with CBSC requirements and City policies, the Project would result in a less-than-significant impact related to the placement of structures on an unstable geologic unit or soil.

Threshold: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less-than-Significant Impact. The City is underlain by soils with a high shrink-swell potential, particularly in the area west of Riverside Municipal Airport. Although the Project would not include any specific developments, future developments that could result from the Project could be placed on expansive soils. However, future development facilitated by the Project would comply with CBSC requirements, which require the submission of a preliminary soils report and a soils engineering analysis. The report would identify any expansive soils at development sites and provide recommendations to reduce the risks associated with construction on these parcels. Because any future development facilitated by the Project would comply with the recommendations in the applicable soils report, as well as standard regulations required by the CBSC, the Project would result in a less-than-significant impact related to expansive soils.

Threshold: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?

Less-than-Significant Impact. Although the Project would not include any individual development projects, the Project could result in the development and construction of new residential and mixed-use development. The Opportunity Sites are located near existing wastewater infrastructure. Development facilitated by the Project would connect predominantly to existing water and wastewater disposal lines maintained by the City of Riverside Public Works Department and would not rely on septic tanks or alternative wastewater disposal systems. However, it is possible that some dwelling units, such as accessory dwelling units, could be constructed on sites that are served by septic systems. This residential development is expected to be minimal and a negligible percentage of overall housing development. For those areas currently accommodated by septic tanks, development would be required to meet minimum standards for any additional septic systems, including those that might located on soils incapable of adequately supporting the use of alternative wastewater disposal systems. As such, the impact would be less than significant.

3.15.8 Hazards and Hazardous Materials

Threshold: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-than-Significant Impact. Implementation of the Project would facilitate additional development as well as other land use activities that would require the routine transport, use, or disposal of hazardous materials and hazardous wastes within the City. If accidentally released, these materials could result in exposure risks for construction personnel and nearby residents. Such transport, use, and disposal must comply with applicable federal and state regulations, such as the Resource Conservation and Recovery Act and Department of Transportation Hazardous Materials Regulations. Although fuel, paint products, lubricants, solvents, cleaning products, and fertilizers would be transported, used, and disposed of, these materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials.

For facilities that handle hazardous materials during operations, California Health and Safety Code Section 25507 requires businesses to establish and implement a Hazardous Materials Business Plan for emergency response to a release or threatened release of a hazardous material. This requirement applies to businesses that handle a hazardous material or a mixture above the thresholds described in Section 25507.

Because of the nature of residential and some commercial development, especially mixed-use development, only common hazardous materials, such as solvents, paints, and fuels, would be used—infrequently and in small amounts. Releases involving these materials would be localized and cleaned up as they occur. The routine transport, use, or disposal of hazardous materials facilitated by the Project would be a less-than-significant impact.

Threshold: Would the Project be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the City?

Less-than-Significant Impact. Airport Influence Areas (AIAs) are used in land use planning to identify areas that are commonly overflown by aircraft as they approach and depart an airport or as they fly within established airport traffic patterns. Riverside Municipal Airport is within the western portion of the City limits (and is the only airport within the City). The airport includes two intersecting runways and occupies some 441 acres. March Air Reserve Base and Flabob Airport are adjacent to the City, in Riverside County and Jurupa Valley, respectively. Because of the citywide nature of the Project, the potential exists for development to occur within Riverside Municipal Airport's AIA and to be subject to noise level restrictions, along with intensity and height limitations within aircraft hazard zones (County of Riverside 2005a). According to the 2005 Riverside County Airport Land Use Compatibility Plan Policy Document (County of Riverside 2005b), the AIA for Riverside Municipal Airport is characterized as follows: The instrument approach route and typical extent of the airport traffic pattern define the AIA boundary for Riverside Municipal Airport. To the east and west, this boundary coincides mostly with the outer edge of the airport's Federal Aviation Regulations Part 77 conical surface. A westward extension encompasses locations where aircraft on a precision instrument approach are lower than 1,000 feet above the airport elevation.

As mentioned, construction facilitated as a result the Project would be required to adhere to intensity and height limitations within aircraft hazard zones. Flabob Airport is a small public-use airport north of the Sana Ana River in the city of Jurupa Valley. March Air Reserve Base is also outside the City; however, it is not a public use airport. The Project would not propose future residential and/or mixed-use development on Opportunity Sites within a restricted AIA for any of the airports within or adjacent to the City, and the Opportunity Sites were identified based on compatible land use criteria and established Land Use Compatibility Zones of the Riverside County Airport Land Use Compatibility Plan Policy Document. The Project would not result in a change in air traffic patterns or result in a safety hazard for people residing or working in the City, and there would be a less-than-significant impact.

Although development occurring within an AIA would be subject to noise-level restrictions, the potential exists for noise impacts to result in potentially significant effects due to proximity to an airport. This could require further consideration to identify mitigation to reduce potential impacts. Additional details are provided in this Draft EIR under Section 3.8, *Noise*.

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. Disaster preparedness and emergency response are important for establishing the most effective and efficient ways to address issues regarding hazards and minimize their effects on life and property, reduce the potential for disasters, and recover from the effects of disasters as quickly as possible. The City's Office of Emergency Management, also known as the Riverside Fire Department (RFD) Emergency Services Division, administers an all-hazards community-based emergency management program. RFD ensures multi-jurisdictional cooperation and communication for emergency planning and response management through activation of the Standardized Emergency Management System (SEMS). Also, pursuant to requirements of the Disaster Mitigation Act of 2000, the City, along with the County of Riverside, prepared the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan (most recent iteration was prepared in July 2018). The purpose of the plan is to identify Riverside County's hazards (including within the City), review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks and reduce or eliminate long-term risks to people and property from natural and human-made hazards (County of Riverside 2018).

GP 2025 includes several policies related to emergency plan implementation. Policies PS-9.1 and PS-9.3 require the City to maintain and test the City's Emergency Operations Plan. Policy PS-9.5 ensures that the City will provide information to the public regarding disaster preparedness. Policies PS-9.7 and PS-9.8 require the City to identify actions to reduce the severity and risk to the community from hazards. Policy PS-10.3 ensures that public safety infrastructure and staff resources will keep pace with new development. Policy PS-10.4 ensures that development will have adequate ingress and egress. Policy PS-10.5 requires coordination to educate the community about hazard safety. Policy PS-10.6 ensures coordination between the City and public safety departments. Policy PS-10.7 and Policy PS-10.8 encourage funding for emergency response programs. Policy PS-10.9 requires the City to maintain the Emergency Operations Center and allow for expansion (City of Riverside 2018). The updates to the Public Safety Element, as part of the Project, would also address emergency response and preparedness in the City, including the provision of high-quality and responsive emergency management services to all residents and businesses in Riverside (refer to Appendix B for proposed Public Safety Element policies).

With continued use of SEMS and the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan, as well as implementation of GP 2025 policies and Public Safety Element principles, policies, and actions developed for the Project, the Project would result in less-than-significant impacts.

3.15.9 Hydrology and Water Quality

Threshold: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less-than-Significant Impact. The City is predominantly within the Regional Water Quality Control Board Middle Santa Ana River Watershed Management Area and the Santa Ana Hydrologic Unit/Watershed. A small area in the southeastern section of the City is in the Perris Valley drainage area of the San Jacinto Watershed. The major surface water feature in the City is the Santa Ana River

on the northern boundary of the City, along with several arroyos and canals that cross the City, including Riverside Canal, Sycamore Canyon, Gage Canal, and Spring Brook River/Wash. There are 11 primary drainage areas, 10 of which eventually flow into the Santa Ana River. Surface drainage generally flows in a northerly direction. Approximately 80 percent of the City is covered with impervious surfaces (City of Riverside 2016). Local drainage facilities generally consist of underground closed conduits and storm drains, primarily in developed portions of the City. These collect and convey stormwater to regional facilities, including the Santa Ana River.

Water quality in a typical surface water body is influenced by processes and activities that take place within the watershed. The quality of the stormwater runoff from within the City is typical of urban watersheds where water quality is affected primarily by discharges from both point and nonpoint sources, including winter storms, overland flows, exposed soils, roofs, parking lots, and streets. Water quality in the vicinity is affected directly by stormwater runoff from streets and properties, which deliver fertilizers; pesticides; automobile/traffic-related pollutants (e.g., oil, grease, metals); sediment, with associated attached pollutants from soil erosion; trash; and other pollutants.

Constituents or pollutants in stormwater runoff vary with surrounding land uses, impervious surface area, and topography as well as with the intensity and frequency of rainfall or irrigation. The City is generally developed. The ground surface is covered by pavement (roads and parking lots) or structures (homes, offices, and commercial buildings); however, there are also open space areas. Street surfaces are the primary sources of pollutants in stormwater runoff in urban areas. Common sources of stormwater pollution in urban areas include construction sites; parking lots; large landscaped areas, with associated fertilizers and pesticides; and household and industrial sites. Grading and earthmoving activities associated with new construction can accelerate soil erosion. Grease, oil, hydrocarbons, and metals deposited by vehicles and heavy equipment accumulate on streets and paved parking lots and are eventually carried into storm drains by runoff. The Santa Ana River (Reach 3) is 303(d) listed as impaired for copper, indicator bacteria, and lead. The Middle Santa Ana River Waterbodies – Nitrogen Compounds TMDLs (total maximum daily load) was approved on May 16, 2007 (State Water Resources Control Board 2018).

Construction and development facilitated by the Project would have the potential to temporarily increase sediment loads and affect surface water quality. The Project could result in the need for ground disturbance, such as landscaping or maintenance, during operations of individual development projects as well. Individual development projects facilitated by the Project involving land disturbance of 1 acre or more would be subject to National Pollutant Discharge Elimination System (NPDES) requirements, and a project-specific SWPPP would be developed and implemented in compliance with the Construction General Permit, local stormwater ordinances, and other related requirements. Also, individual development projects would generally require grading permits and interim erosion control plans to be submitted prior to construction. Construction BMPs would control or prevent the discharge of pollutants, including concrete, waste from pavement cutting, petroleum products, chemicals, wastewater, sediments, and non-stormwater discharges, to storm drains and watercourses. In addition, construction materials and wastes would be stored, handled, and disposed of in compliance with applicable regulations to prevent contact with stormwater. Earthmoving and clearing activities would be performed during dry weather only to minimize any mobilization of sediment. Temporary erosion controls, as applicable, would be implemented to stabilize disturbed areas until permanent erosion controls can be established.

Future residential and mixed-use development, consistent with and facilitated by the Project, would increase the impervious surface area in the City. Operation could increase the levels of pollutants

(e.g., trash, oil, grease, pesticides) and introduce pollutants into storm drains that would have the potential to degrade water quality. However, the City requires individual development projects to comply with existing State Water Resources Control Board and City stormwater regulations, including compliance with NPDES requirements related to preventing the transport of pollutants. The Santa Ana Drainage Area Management Plan (DAMP) provides a selection of BMPs, as required by NPDES. Project-specific Water Quality Management Plans (WQMPs) would be prepared that would outline the low-impact development (LID) BMPs required to meet water quality standards and reduce stormwater runoff. This is a standard requirement for all projects creating or replacing more than 5,000 square feet of pervious area.[2] LID project design features may include infiltration beds, swales, or basins; stormwater retention in detention ponds or constructed wetlands; rain harvesting; catchment technologies, such as rain gardens and cisterns; and permeable paving elements (City of Riverside 2019b). Implementation of the City's Municipal Separate Storm Sewer System (MS4) permit, DAMP, and WQMP would provide the most comprehensive and effective approach to reducing water quality impacts from urbanization.

The Northside Specific Plan EIR also analyzed water quality concerns and includes measures addressing water quality, including the creation of regional water quality basins. An updated hydrology and water quality study is currently underway. In addition, onsite detention, stormwater infiltration measures such as swales, rain gardens, permeable paving, and other stormwater management BMPs encouraged by the City's Water Efficient Landscaping and Irrigation ordinance (RMC chapter 19.570) and the Citywide Water Efficient Landscaping and Irrigation Design Guidelines would be implemented by future development facilitated by the Project, where feasible (City of Riverside 2019b). The WQMP also identifies the appropriate BMPs to be implemented on a project-specific basis. These stormwater management BMPs are required to meet minimum water quality standards. Design recommendations included in the ordinance and guidelines are not requirements but can be implemented to meet WQMP guidelines as required for a given project. The Citywide Green Action Plan also includes goals related to protecting water quality, including maintaining high water quality through appropriate recharge, conservation, management of sources, source water protection, and contaminated source remediation. The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality. Impacts would be less than significant.

Threshold: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less-than-Significant Impact. The City is predominantly within the Riverside-Arlington subbasin, within the larger Upper Santa Ana Valley Groundwater Basin (Department of Water Resources Basin Number 8-002.03). A small area in the eastern portion of the City is within the San Jacinto Groundwater Basin (Department of Water Resources Basin Number 8-005). Because of topography and underlying geology, some areas of the City are not within a recognized groundwater basin. Because the Upper Santa Ana Valley – Riverside-Arlington subbasin is designated as a very low-priority basin, a groundwater sustainability plan under the Sustainable Groundwater Management Act is not required. The San Jacinto Groundwater Basin is designated as a high-priority basin. The Eastern Municipal Water District's Board of Directors became the exclusive groundwater sustainability agency for the western portion of the San Jacinto Groundwater Basin on April 24,

[2] City of Riverside Public Works Department Water Quality Management Plans Applicability Checklist

2017. Because the basin is not critically overdrafted, a groundwater sustainability plan will be submitted to the Department of Water Resources by January 31, 2022.

Groundwater basins are recharged from natural runoff/infiltration from precipitation, treated wastewater, and imported water as well as infiltration from Santa Ana River flows, underflows from the neighboring Chino Subbasin, and return irrigation flows (California Department of Water Resources 2004). Inorganic constituents were present at high concentrations in about 33 percent of the primary aquifers and at moderate concentrations in about 29 percent of the primary aquifers. Nutrients (nitrate plus nitrite) were present at high concentrations in approximately 25 percent of the primary aquifers and at moderate concentrations in about 25 percent of the primary aquifers (Kent and Belitz 2012).

Drinking water supplies in the City, primarily from groundwater supplies, are provided by RPU. Additional water is also provided by the Western Municipal Water District, the Eastern Municipal Water District, and the Riverside Highland Water Company from both groundwater and importation. Development facilitated by the Project would increase the population, which would increase the demand for water supplies. 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 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

For all subsequent development projects that meet any of these thresholds, the potential to increase groundwater supplies would be analyzed in individual project-specific assessments through a Water Supply Assessment prior to project approvals. The City extracts domestic water from the Bunker Hill, Riverside North, and Riverside South basins through wells operated by RPU and the Gage Canal Company. Water for domestic use is not extracted from the Arlington and Rialto-Colton basins because of poor water quality and the lack of transmission lines. RPU's water supplies are supplied predominantly by local groundwater originating from the Bunker Hill Basin, also known as the San Bernardino subbasin, within the larger Upper Santa Ana Valley Groundwater Basin. RPU's water supply from the Bunker Hill Basin is considered reliable during single- and multi-year dry periods. The Bunker Hill Basin is adjudicated, and its safe-yield and export rights are well defined and managed. Other groundwater supply basins for the City (i.e., the Colton, Riverside North, and Riverside South basins) are subject to groundwater management under a 1969 judgment (Langridge

et al. 2016).[3] None of these basins is currently in a critical overdraft condition (City of Riverside 2016; California Department of Water Resources 2020). 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. To increase water supply reliability, RPU intends to augment natural recharge in the Bunker Hill and Riverside basins through conjunctive use projects and develop other forms of conservation (e.g., recycled water) (City of Riverside 2016).

Future residential and mixed-use development may either increase or decrease the impervious area on the individual project site. For instance, an increase in impervious surfaces associated with development of a vacant unpaved site would result in an increase in impervious area, whereas redevelopment of a mostly paved site with additional landscaping and open space areas could result in an overall decrease in impervious area. In any case, any change in impervious cover would impact potential groundwater recharge. Implementation of some of the individual development projects facilitated by the Project would increase the impervious surface area and potentially decrease groundwater recharge. However, some of the individual development facilitated by the Project could decrease the impervious surface area through the addition of pervious surfaces and landscaping compared to existing conditions and potentially increase groundwater recharge. Also, the Riverside Citywide Water Efficient Landscaping and Irrigation Design Guidelines (City of Riverside 2019b) encourage the use of stormwater infiltration measures such as infiltration beds, swales, basins, and permeable paving. These features would be implemented for future development facilitated by the Project, where feasible, and would allow runoff to infiltrate the soil media and percolate into the ground. Landscape features would allow groundwater recharge and increase recharge potential within individual project areas. In addition, a Western Municipal Water District recharge basin is located at Victoria Avenue and Jackson Street, but there are no Opportunity Sites in the immediate vicinity. Given the above, the Project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the Project would impede sustainable management of the basin. Impacts are considered less than significant.

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off-site?

Less-than-Significant Impact. Construction activities facilitated by the Project would temporarily alter existing drainage patterns and could result in temporary onsite erosion and siltation. Generally, the City is largely built out and urbanized. As a result, impacts related to erosion or siltation would not be significant for future development occurring on partially or fully developed sites. Where development would occur on undeveloped properties, the potential exists to alter the existing drainage pattern of the site or area. However, new development would be subject to NPDES requirements. Projects with 1 acre or more of disturbance would prepare and implement a SWPPP. The SWPPP would reduce the potential for erosion, siltation, or other contamination and prevent runoff from construction sites during storm events. Erosion, siltation, and other possible pollutants

[3] The 1969 Western Judgment adjudicated three basins: the Colton Basin Area (Rialto-Colton Basin), the Riverside Basin Area, and the San Bernardino Basin Area (with Lytle and Bunker Hill basins). Each of these three basin areas was thought to have surface and groundwater connections that could affect the minimum flows at Riverside Narrows required by the Orange County Judgment. In addition, exporters in downstream Riverside County were concerned about the sustainability of groundwater withdrawals over time.

associated with the implementation of development would be addressed during the WQMP and grading permit process. Project-specific WQMPs would outline the LID BMPs required to adequately reduce stormwater runoff and erosion.

GP 2025 includes numerous policies related to stormwater control and the protection of drainage courses in the City. The updates to the Public Safety Element as part of the Project would also address flood hazards in the City, including minimizing the risks and consequences associated with natural hazards, including floods. Also, development-related runoff would be evaluated individually prior to approvals and construction and would be required to be attenuated on site. As a result, offsite discharges would be the same as the undeveloped or baseline condition, and alterations in existing drainage patterns would be minimized. Citywide landscaping, irrigation, and mixed-use design guidelines provided in the *Riverside Citywide Design Guidelines and Sign Guidelines* (City of Riverside 2019b) include design features such as planters, permeable pavers, and other LIDs that allow drainage. Runoff from impervious areas would be directed to permeable surfaces, landscaping, or other LID areas. In addition, storm drain infrastructure would be designed and maintained in compliance with the City's MS4 permit and applicable GP 2025 policies and ordinances. The Project would not alter the existing drainage pattern of future development sites in a manner that would result in substantial erosion or siltation. Impacts would be less than significant.

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Less-than-Significant Impact. Flooding in the City could result from intense storms or dam failure. The City is predominantly outside the Federal Emergency Management Agency (FEMA) 100-year floodplain in Zone X, an area with minimal flood hazard above the 500-year flood level. However, some areas of the City are within the FEMA 100-year floodplain (Zones A and AE). This includes about one-third of the Northside Specific Plan area. Flood hazards are greatest within and adjacent to channels, creeks, streams, and arroyos, including the Santa Ana River and several dams. Some portions of the Santa Ana River are also within the 100-year floodway (Zone AE). Moderate flood hazards, between the limits of the 100-year and 500-year floods (Zone X [shaded]), and areas with reduced flood risks because of levees are also present in the City. A portion of the southeastern section of the City is in FEMA Zone D (i.e., areas with possible but undermined flood hazards where no flood hazard analysis has been conducted) (FEMA 2008).

Some of the future development facilitated by the Project could increase the amount of impervious surface area compared with existing conditions, likely resulting in a net increase in the volume of runoff and floodwater leaving some of the individual Opportunity Sites. However, the City is predominantly outside the FEMA 100-year floodplain. Because the City participates in the National Flood Insurance Program, it must ensure that individual development projects meet federal standards for flood protection. To avoid flooding and/or placing new development within flood areas, the City requires building pads to be elevated above flood levels. Also, underground storm drains and streets must be designed to accommodate the 10-year storm from curb to curb, while 100-year storms are accommodated within street rights-of-way. In addition, the Riverside County Flood Control and Water Conservation District (RCFCWCD) requires improvements to comply with its standards for flood control. Project runoff for new development facilitated by the Project would

be evaluated prior to approvals and construction and would be attenuated on site. As a result, offsite discharges would be the same as the undeveloped or baseline condition. Project-specific WQMPs, as applicable, would be prepared, outlining the LID BMPs required to reduce stormwater runoff. Future development must implement the BMPs identified in the project-specific SWPPP prior to the commencement of construction to reduce on- or offsite flooding. Onsite stormwater runoff and flooding would be minimized through site development using citywide landscape and irrigation and mixed-use design guidelines provided in the *Riverside Citywide Design Guidelines and Sign Guidelines* (City of Riverside 2019b). In addition, GP 2025 includes numerous policies related to stormwater control and reduced flood risks. An engineering review of drainage calculations and development plans by the City of Riverside Department of Public Works would further ensure that no significant increases in peak-flow rates or runoff volumes would occur. The grading and drainage plans for individual development projects would be reviewed by the City to ensure that onsite drainage and LID features would be adequate with respect to preventing on- or offsite flooding. Updates to the Public Safety Element would reduce the risks associated with flooding, with policies and actions incorporated. The Public Safety Element Update indicates where existing flood hazard areas are located and where building in flood hazard areas should be avoided. It also provides guidance regarding where development and flood control infrastructure should be located to avoid contributing to flood hazards. The Project would not alter the existing drainage pattern of the site in a manner that would result in a substantial increase in runoff or flooding, and impacts would be less than significant.

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less-than-Significant Impact. All future individual construction projects more than 1 acre in size facilitated by the Project would be required to have coverage under the state's General Permit for Construction, including implementation of a SWPPP. BMPs would be implemented to reduce adverse water quality impacts resulting from development. Development would also be required to comply with water quality measures pursuant to the City's MS4 permit.

Future development facilitated by the Project would increase the amount of impervious surface area and associated runoff in the City. Runoff may carry pollutants and potentially degrade water quality. As discussed previously, new development of a certain size facilitated by the Project would be required to prepare and implement a project-specific WQMP. The WQMP would outline the BMPs required to adequately reduce stormwater runoff; these would be approved prior to development approvals and issuance of grading permits.

Each new development or redevelopment project within the City that is subject to CEQA would be required, as part of the CEQA process or entitlement process, to demonstrate that stormwater runoff from the individual development site would not result in an exceedance of the capacity of the existing or future storm drain system, meaning that other developments in the area could not negatively affect storm system capacity. RCFCWCD and the City have identified facilities that are currently undersized. Facilities would be expanded and/or new facilities would be constructed to accommodate both existing and planned development, as needed.

The City has developed a 5-year Capital Improvement Program (CIP), which includes a Storm Drain Program. The City would continue to fund and undertake storm drain improvement projects identified in the CIP. Storm drain improvements are prioritized to ensure that drainage improvements are installed concurrently with street improvement projects, in coordination with RCFCWCD projects. This program would include improvement projects that eliminate flooding during major storm events. Although the CIP addresses issues regarding existing undersized drainage facilities, not runoff increases anticipated due to general plan implementation, the City is required to routinely monitor and evaluate the effectiveness of the storm drain system and adjust as needed. In addition, the City requires development pads to be elevated above flood levels. Underground storm drains and streets are designed to accommodate the 10-year storm, and 100-year storms are accommodated within street rights-of-way. The Northside Specific Plan EIR also analyzed hydrology infrastructure concerns. The undeveloped areas within Northside require improvements to storm drain infrastructure to support additional development. The creation of regional water quality basins could be used for hydromodification management flow control for development projects (City of Riverside 2020a). The Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would impede or redirect floodflows?

Less-than-Significant Impact. Some areas of the City are within the FEMA 100-year floodplain, including areas within and adjacent to creeks, arroyos, and rivers, such as the Santa Ana River. GP 2025 includes numerous policies related to preventing flood risks, deterring development near flood-prone areas, and requiring feasible mitigation of flood risk impacts on applicable development projects. Portions of the Northside Specific Plan area lie within or partially within the 100-year flood zone of the Santa Ana River and there are other areas of the City subject to dam inundation (refer to Figure PS-4, *Flood Hazard Areas*, of GP 2025). Goal 4 of the Local Hazard Mitigation Plan is designed to protect the community from flood and storm-related losses (City of Riverside 2018) and sets forth several mitigation strategies to minimize impacts from flooding. The updates to the Public Safety Element as part of the Project would further address flood hazards, augmenting existing policies and minimizing the risks and consequences of natural hazards, like flood hazards, within the City. The Public Safety Element Update indicates where flood zone areas are located and the policies the City requires to protect these areas from flood hazards. In general, flood-prone areas are designated for open space and recreational uses rather than sensitive facilities and development. Because of the proximity of the Santa Ana River, potential flood risks are associated with dams and reservoirs in and close to the City, canals and arroyos, and low-lying areas that are routinely subject to flooding during heavy rains. Flood mitigation projects in the City include the Challen and Ryan Bonaminio Park Storm Preparation Projects and the Mount Rubidoux Roadway Drainage Improvements (City of Riverside 2018).

The City would review all development proposals to determine if an individual development project is proposed in a flood hazard area. New construction within a 100-year flood zone would be required to mitigate flood hazards by providing onsite drainage, using anchoring to prevent floating structures, elevating buildings above flood levels, and including flood proofing. Buildings would be inspected and certified by a professional engineer, surveyor, or building inspector. As discussed

previously, building pads would be elevated above flood levels. Underground storm drains and streets would be designed to accommodate the 10-year storm, and 100-year storms would be accommodated within street rights-of-way. Runoff from new development facilitated by the Project would be evaluated and attenuated on site if located within a 100-year flood zone. Various areas within Northside do not have sufficient drainage capacity, and flooding occurs in developed areas located directly adjacent to the existing channel alignment. Floodplain areas designated on FEMA maps would require a detailed hydraulic analysis, which would need to be processed through FEMA (City of Riverside 2020b). All of these impacts were evaluated in the Northside Neighborhood and Pellissier Ranch Specific Plan (City of Riverside 2020a). Stormwater infiltration measures such as infiltration beds, swales, basins, and other landscape features encouraged by the Citywide Water Efficient Landscaping and Irrigation Design Guidelines would be implemented on future development under the Project where feasible. These features would increase onsite infiltration and minimize the potential for overland floodflows.

Updates to the Public Safety Element would reduce risks associated with flooding. The Public Safety Element Update indicates where existing flood hazard areas are located to avoid building in flood hazard areas; it also provides policies regarding flood control infrastructure. The Project would not impede or redirect floodflows, and impacts would be less than significant.

Threshold: Would the Project be located in flood hazard, tsunami, or seiche zones, and risk release of pollutants due to Project inundation?

Less-than-Significant Impact. The City is not in a coastal area and is not prone to inundation due to tsunamis. Seiche occurs in an enclosed or partially enclosed body of water, such as a lake or reservoir. Lake Evans in Fairmont Park may be subject to seiche. However, Lake Evans, which is surrounded by a park area, outlets directly to the Santa Ana River; the risk of inundation related to a seiche in Lake Evans is considered minimal. In the event of a flood hazard, to reduce the risk of a pollutant release, individual projects facilitated by the Project would comply with the requirements of local water quality programs and associated municipal stormwater-related NPDES permits (e.g., MS4 permit, DAMP, project-specific WQMP) as well as GP 2025 policies and the Public Safety Element Update to manage flood risk and water quality. Compliance with these requirements would minimize risks related to a release of pollutants due to any potential inundation in a flood hazard, tsunami, or seiche zone.

Updates to the Public Safety Element would reduce flood risks and any associated release of pollutants. The Public Safety Element Update indicates where existing flood hazard areas are located and where building construction, including associated storage areas for pollutants, should be avoided. Public Safety Element policies require measures to minimize risks associated with the storage, transport, and disposal of hazardous materials as well as associated impacts on surface and groundwater. The Project would not release pollutants because of inundation by flood, tsunami, or seiche. Impacts would be less than significant.

Threshold: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-than-Significant Impact. Implementation of the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Some of the potential future development or redevelopment facilitated by the Project would result in an increase in impervious area, which could decrease groundwater recharge capacity and increase the

volume of runoff and associated pollutants. Future development facilitated by the Project would be required to comply with the appropriate water quality objectives for the region. Commonly practiced BMPs would be implemented to control construction site runoff and reduce discharges of pollutants (i.e., stormwater and other nonpoint-source runoff) to storm drain systems. As part of compliance with permit requirements during ground-disturbing or construction activities, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including water quality objectives that protect designated beneficial uses of surface water and groundwater, as defined in the Water Quality Control Plan for the Santa Ana River Basin (Region 8). The NPDES Construction General Permit also requires stormwater discharges not to contain pollutants that cause or contribute to an exceedance of any applicable water quality objectives or water quality standards, including designated beneficial uses. The Regional Water Quality Control Board has determined that implementation of the DAMP and MS4 permit would also protect the beneficial uses of all receiving waters. In addition, GP 2025 policies would require a sustainable groundwater management plan to protect groundwater recharge areas and groundwater resources. Citywide Water Efficient Landscaping and Irrigation Design Guidelines provided in the *Riverside Citywide Design Guidelines and Sign Guidelines* (City of Riverside 2019b) include the use of stormwater infiltration measures such as infiltration beds, swales, basins, permeable paving, and other landscape features. These features would allow water to percolate into the ground and groundwater to recharge. A groundwater sustainability plan is not required for the Upper Santa Ana Valley – Riverside-Arlington subbasin because it is designated as a very low-priority basin. A groundwater sustainability plan for the San Jacinto Groundwater Basin will be submitted to the Department of Water Resources by January 31, 2022. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and the impact would be less than significant.

3.15.10 Mineral Resources

Threshold: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. Historically, the quarrying of granitic rock was a significant industry in the City. However, such operations have not been active for decades, and most extraction sites are now beyond the urban periphery (City of Riverside 2012). Although mineral extraction no longer plays a major role in Riverside's economy, the area south of State Route 60 that traverses the southern tip of Fairmount Park and is bounded to the northwest by the Santa Ana River, to the south by Mission Inn Avenue, and to the east by Market Street is a state-classified mineral resource zone (MRZ) (i.e., MRZ-2) (City of Riverside 2012). Areas in the SOI and areas located generally within the eastern half of the City are designated MRZ-3, indicating that they contain known or inferred mineral occurrences of undetermined mineral resource significance (City of Riverside 2012).

The State Mining and Geology Board establishes MRZs to designate lands that contain mineral deposits (State Mining and Geology Board 2000). The classifications used by the state to define MRZs are as follows:

- MRZ-1: Areas where the available geologic information indicates no significant likelihood of significant mineral deposits
- MRZ-2a: Areas where the available geologic information indicates that there are significant mineral deposits

- MRZ-2b: Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits
- MRZ-3a: Areas where the available geologic information indicates that mineral deposits exist; however, the significance of the deposit is undetermined
- MRZ-3b: Areas where the available geologic information indicates that mineral deposits are likely to exist; however, the significance of the deposit is undetermined
- MRZ-4: Areas where there is not enough information available to determine the presence or absence of mineral deposits

The proposed Opportunity Sites are in areas classified MRZ-2 and MRZ-3, described in the Open Space and Conservation Element of GP 2025; however, mineral extraction does not play a major role in the City's economy and there are no known substantial mineral deposits. Development facilitated by the Project over MRZ-2 and MRZ-3 designated areas would not result in a loss of known mineral resources that would be of value to the region and residents of the state. There would be no impact related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Threshold: Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. Because of existing conditions within the City, implementation of the Project would not result in the loss of availability of a locally important mineral resource recovery site delineated in GP 2025, a Specific Plan, or any other land use plan. Also, the area south of State Route 60 that traverses the southern tip of Fairmount Park and is bounded to the northwest by the Santa Ana River, to the south by Mission Inn Avenue, and to the east by Market Street, which is a state-classified MRZ (MRZ-2), would not be affected by the Project because there are no Opportunity Sites in this area. There would be no impact.

3.15.11 Population and Housing

Threshold: Would the Project displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less-than-Significant Impact. The Project is a policy-level planning effort that encourages and facilitates the development and redevelopment of a range of housing types and affordability levels as well as mixed-use development. The Project would not include individual development proposals. Because the sites to be rezoned are located throughout the City, the potential exists for an increase in the number of new dwelling units, up to approximately 31,564. Some redevelopment could result in the removal of existing housing (up to approximately 389 dwelling units), but this is anticipated to be minimal and would not displace a substantial number of people or existing housing units relative to the overall scale of the Project. Any existing units removed through redevelopment would be replaced with new units per the requirements of Senate Bill 166 (No Net Loss). The impact would be less than significant.

3.15.12 Transportation

Threshold: Would the Project substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less-than-Significant Impact. The Project would not directly result in any activities that would substantially increase hazards because of a geometric design feature through implementation of policy changes and updates, rezoning, and Specific Plan amendments. Because the Project is policy based, construction of an additional 31,564 housing units as well as other nonresidential development in the City facilitated by the Project would not necessarily result in direct traffic hazards (i.e., vehicle, bicyclist, pedestrian accidents). However, future development projects facilitated by the Project may not yet be designed that could lead to traffic hazards. Furthermore, future roadways would be designed in compliance with City codes and standards (Chapter 19.102), which would be verified in design review and plan check on a project-by-project basis. Additionally, the GP 2025 policies would help reduce potential hazards due to design features. This impact would be less than significant.

Threshold: Would the Project result in inadequate emergency access?

Less-than-Significant Impact. The Project would not directly result in any activities that would result in inadequate emergency access through implementation of the Project. The Project would not be expected to impair emergency access because Opportunity Sites are proposed near essential services and transportation routes. GP 2025 contains policies to encourage development of safe transportation systems and ensure that development does not conflict with emergency response or access during Project operations. The City continues to implement adopted road standards and, as a result, new roadways would be designed to avoid unsafe design and provide adequate emergency access. The City has an Emergency Operations Plan and RFD provides response management through activation of SEMS. GP 2025 also provides policies to identify methods of implementing the emergency plan. Additionally, the updates to the Public Safety Element as part of the Project would also address emergency preparedness and response, including through provision of high-quality and responsive emergency management services to all residents and businesses in the City (refer to Appendix B for proposed Public Safety Element policies). Therefore, impacts on emergency access would be less than significant.

3.15.13 Utilities and Service Systems

Threshold: Would the Project conflict with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-Significant Impact. The California Integrated Waste Management Act, under the PRC, required local jurisdictions to divert at least 25 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 341 Mandatory Commercial Recycling and Assembly

Bill 1826 Mandatory Commercial Organic Recycling programs 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, 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). Development and redevelopment facilitated by the Project would comply with City waste disposal requirements as well as CALGreen requirements; as such, the Project would not conflict with any federal, state, or local regulations related to solid waste. The impact would be less than significant.

3.15.14 Wildfire

Threshold: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. No part of the City is immune to fire danger. Structural and automobile fires represent the most common types of fire in urban areas and can be caused by a variety of human, mechanical, and natural factors. Urban fires have the potential to spread to other structures or areas, particularly if not quickly extinguished. Proactive efforts, such as fire sprinkler systems, fire alarms, fire-resistant roofing, and construction methods, can collectively lessen the likelihood and reduce the severity of urban fires. Areas of dense, dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. Development in and near these natural landscapes would increase potential risks related to fire for people and personal property. In case of fire, the City would be served by RFD. According to the California Fire Hazard Severity Zone Viewer, portions of the City are in areas classified as Very High Fire Hazard Severity Zones (California Department of Forestry and Fire Protection 2020).

According to the GP 2025 Public Safety Element (City of Riverside 2018), the major urban/rural interface areas with a high-fire risk are Mount Rubidoux, the Santa Ana River Basin, Lake Hills, Mockingbird Canyon/Monroe Hills, Sycamore Canyon, Box Springs Mountain, and La Sierra/Norco Hills. The introduction of residential and mixed-use development into these natural landscapes would increase potential risks related to fire for people and property.

As discussed in Section 3.6, *Hazards and Hazardous Materials*, RFD ensures multi-jurisdictional cooperation and communication for emergency planning and response management through activation of the SEMS. Also, the City and County of Riverside prepared the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan (the most recent iteration was prepared in July 2018). The purpose of the Local Hazard Mitigation Plan is to identify Riverside County's hazards (including those within the City), review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks and reduce or eliminate long-term risks for people and property from natural and human-made hazards (County of Riverside 2018).

GP 2025 includes several policies related to emergency plan implementation. Policies PS-9.1 and PS 9.3 require the City to maintain and test the City's Emergency Operations Plan. Policy PS-9.5 ensures that the City will provide information to the public regarding disaster preparedness. Policies PS-9.7 and PS-9.8 require the City to identify actions to reduce the severity and risk to the community from

hazards. Policy PS-10.3 ensures that public safety infrastructure and staff resources will keep pace with new development. Policy PS-10.4 ensures that development will have adequate ingress and egress. Policy PS-10.5 requires coordination to educate people about hazard safety. Policy PS-10.6 ensures coordination between the City and public safety departments. Policies PS-10.7 and PS-10.8 encourage funding for emergency response programs. Policy PS-10.9 requires the City to maintain the Emergency Operations Center and allow for expansion (City of Riverside 2018).

The updates to the Public Safety Element, as part of the Project, would also proactively address wildfire hazards by minimizing the risks and consequences associated with natural and human-caused hazards within the City through the development of principles, policies, and actions (refer to Chapter 2 and Appendix B). In addition, the Project would not directly involve any activities that would result in inadequate emergency access. Construction of an additional 31,564 housing units plus other mixed-use development, per the Housing Element Update, could require additional public services for future residents. However, the Project is not expected to impair emergency access because Opportunity Sites are proposed near existing essential services.

The Project represents a policy-level planning effort that facilitates but would not directly implement development proposals. Future development within the City would be required to comply with local regulations, including GP 2025 and the City's development code. Also, the Opportunity Sites identified for rezoning are in developed areas of the City or on vacant lots and not designated as open space. Impacts related to impairing an adopted emergency response or evacuation plan would be less than significant.

Threshold: Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less-than-Significant Impact. Three primary factors are used in assessing wildfire hazards: topography, weather, and fuel. Future development facilitated by the Project could be affected by weather conditions. The Project would not include housing and mixed-use development within wildfire hazard areas. The Project is a policy-level planning effort that would not include individual development proposals. Future development would be required to comply with local regulations, including GP 2025 and the RMC. Also, the Opportunity Sites identified for rezoning are largely in developed areas of the City. Impacts related to exacerbating wildfire risks would be less than significant.

Threshold: Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?

Less-than-Significant Impact. Future development facilitated by the Project may require new public infrastructure and utilities, which would be installed to meet fire service requirements. However, the Project is a policy-level planning effort that would not provide site-specific development or design proposals. All improvements would be subject to City development standards and verified as part of either a building permit or construction approval process. During the standard development review process, the City's Development Review Committee, which includes the Fire Department and Building & Safety Division, evaluates developments in high fire-

risk areas to ensure that improvements meet their requirements. This coordination is independent of the CEQA process; it would be unaffected by the Project. Because future development within the City, including installation or maintenance of associated infrastructure, would be required to comply with local regulations, including the City's development review process, implementation of GP 2025 policies, and compliance with the City's development code, impacts related to fire risk due to the installation or maintenance of associated infrastructure would be less than significant.

Threshold: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less-than-Significant Impact. The creation of additional impermeable surfaces in association with the Project could exacerbate an existing flooding issue. However, the Project is a policy-level planning effort that would not provide site-specific development or design proposals. All future development would be subject to City development standards and verified as part of either a building permit or construction approval process. Impacts related to downstream flooding and drainage changes would be less than significant.

Development associated with the Project would not be susceptible to landslides (refer to Section 3.15.7 of this chapter). Grading and construction would be completed in compliance with 2019 CBSC regulations, County of Riverside ordinances, and the RMC related to grading, thereby reducing the potential for slope instability to occur. Also, Opportunity Sites are not proposed on the steepest slopes.[4] In addition, implementation of the Project would not directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving landslides. Some of the Opportunity Sites would be in flood hazard areas, such as near the Santa Ana River or in areas susceptible to dam inundation (see Figure PS-4, *Flood Hazard Areas*, of GP 2025). Flood hazards in the Northside Specific Plan area were analyzed in the EIR for that plan (City of Riverside 2020a). Various areas within Northside do not have sufficient drainage capacity, and flooding occurs in developed areas directly adjacent to the existing channel alignment. Floodplain areas designated on FEMA maps would require a detailed hydraulic analysis, which would need to be processed through FEMA (City of Riverside 2020b). The potential for downstream flooding, as well as changes in drainage patterns, would be lessened through regulations such as the Local Hazard Mitigation Plan (City of Riverside 2018), which sets forth several mitigation strategies to minimize impacts from flooding. Furthermore, compliance with Public Safety Element policies that address flood hazards and conditions placed on individual development projects during development review, including requirements to mitigate flood hazards by providing onsite drainage, using anchoring to prevent floating structures, elevating buildings above flood levels, and including flood proofing, and the like, would attenuate runoff on site and minimize flood hazards. Given the lack of landslide evidence, compliance with CBSC regulations and applicable local codes and ordinances including the RMC would ensure that potential impacts associated with post-fire flooding, runoff, or slope instability would be less than significant.

[4] During the development of the Opportunity Sites Inventory, slopes greater than 10 percent were generally precluded from further consideration, with some exceptions for sites that exhibit exceptional development potential and are not otherwise environmentally constrained.

3.16 Cumulative Impacts

Cumulative impacts may be analyzed by considering a list of past, present, and possible future projects producing related or cumulative impacts (State CEQA Guidelines Section 15130(b)(1)(A)) or through a summary of projections adopted in a local, regional, or statewide plan (State CEQA Guidelines Section 15130(b)). An EIR is to focus the discussion on the cumulative impacts of a project when the project's incremental effect is cumulatively considerable (State CEQA Guidelines Section 15130).

As set forth in the State CEQA Guidelines (Section 15130(b)), the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. The analysis should be guided by the standards of practicality and reasonableness, and it should focus on the cumulative impacts to which the other identified projects contribute to the cumulative impact. "The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the project's incremental effects are cumulatively considerable" (State CEQA Guidelines Section 15064(h)(4)).

A cumulative impact is not considered significant if the impact can be reduced to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (14 California Code of Regulations 15130(a)(3) and 15130(b)(5)).

Based on the direction provided by the State CEQA Guidelines, the analysis in this section provides:

- Long-range demographic forecasts based on adopted local and regional plans
- A determination of whether the long-term impacts of all related past, present, and future plans and projects would cause a cumulatively significant impact

This section includes a determination as to whether implementation of the Project would have a "cumulatively considerable" contribution to any significant cumulative impact (see State CEQA Guidelines Sections 15130(a) and 15130(b), 15355(b), 15064(h), and 15065(c)).

The cumulative impact analysis considers the long-term effects of the Project (i.e., over the 8-year implementation period of the Housing Element Update, in accordance with the City of Riverside's [City's] obligations under the Regional Housing Needs Assessment [RHNA]). These impacts may not be apparent in the near term but may evolve into beneficial or adverse impacts in the long term. In the case of the Project, beneficial impacts also include those associated with addition of policies and actions to reduce public safety impacts or greater outreach to and engagement with environmental justice communities in the City.

The cumulative impact analysis utilizes the summary-of-projections method as allowed under CEQA and reviews build-out of the general plans and Capital Improvement Programs (CIPs) of the County of Riverside, as well as the adjacent cities of Norco, Jurupa Valley, Moreno Valley, Colton, Corona, and Grand Terrace, an area encompassing part of the Inland Empire. For population and housing, the analysis considers the Southern California Association of Governments' (SCAG's) 2020–2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) for build-out of the

six-county SCAG region. The following impact analysis considers whether the Project would have impacts that are individually limited but cumulatively considerable (*cumulatively considerable* means that the incremental effects of a project are considerable [i.e., notably large in size, amount, or extent] when viewed in connection with the effects of past projects, other current projects, and probable future projects).

The geographic area affected by cumulative projects (i.e., other proposed projects within the geographic extent of this cumulative impact analysis) varies depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise; Project air emissions would generally affect the entire air basin; and population and housing impacts would relate to the area covered by SCAG, the metropolitan planning organization responsible for demographic growth projections. The geographic scope for utilities and service systems covers the service areas for the various service providers. This section considers the potential cumulative effects of the Project in combination with other local and infrastructure development generally occurring within the City and nearby areas of Riverside County in the adjacent cities of Norco, Jurupa Valley, Moreno Valley, Colton, Corona, and Grand Terrace. For public services, recreation, and utilities, projects funded under CIPs are also considered for the analysis.

3.16.1 Air Quality

Potential cumulative air quality impacts would result when other projects' pollutant emissions combine to degrade air quality conditions below acceptable levels. This could occur on a local level (e.g., increased vehicle emissions at congested intersections or concurrent construction activities at sensitive receptor locations) or a regional level (e.g., potential ozone [O_3] impacts from multiple past, present, and reasonably foreseeable projects within the South Coast Air Basin [Basin]). Given that both localized and regional pollution is regulated at the air basin level, the Basin is the resource study area for the purposes of air quality.

The Basin experiences chronic exceedances of the National Ambient Air Quality Standards and California Ambient Air Quality Standards and is currently in nonattainment status for O_3 (federal and state standards), particulate matter 10 microns or smaller in diameter (PM_{10}) (state standards only), and particulate matter 2.5 microns or smaller in diameter ($PM_{2.5}$) (federal and state standards). Consequently, cumulative development in the Basin as a whole could violate an air quality standard or contribute to an existing or projected air quality violation, resulting in a significant cumulative impact. Based on the South Coast Air Quality Management District's (SCAQMD's) cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the Project region is in nonattainment under an applicable federal or state ambient air quality standard. Conversely, if a project's emissions do not exceed the recommended daily thresholds for project-specific impacts, its impacts would not be cumulatively considerable and would not contribute to nonattainment of applicable air quality standards in the Basin.

As previously discussed under Threshold AQ-1 in Section 3.1, *Air Quality*, the Project would not be consistent with the Air Quality Management Plan (AQMP), which is intended to bring the Basin into attainment for all criteria pollutants. Daily construction emissions generated by the Project could exceed SCAQMD's daily significance thresholds and operation could result in long-term regional emissions of criteria air pollutants and O_3 precursors that could exceed SCAQMD's applicable

thresholds. Exceedance of these thresholds could obstruct SCAQMD's efforts to achieve attainment of ambient air quality standards for criteria pollutants for which it is currently not in attainment (i.e., O_3, PM10, and PM2.5), or jeopardize the current attainment status of the Basin for other criteria pollutants. Implementation of Mitigation Measures **MM-AQ-2** and **MM-AQ-3** would ensure the Project is reducing emissions during construction and operation; however, the impact would still be considered significant and unavoidable. Additionally, the changes that would occur with implementation of the Project would result in additional growth above what is assumed in the *Riverside General Plan 2025* (GP 2025) and in SCAG's growth assumptions in the 2016 RTP/SCS, which were used to develop the emissions inventory in the 2016 AQMP. Therefore, future development under the Project would exceed SCAG's projections in the 2016 RTP/SCS upon which the regional emissions inventory for the Basin in the AQMP was based, and the Project could interfere with attainment in the Basin, resulting in a potentially significant cumulative impact. Incorporation of Mitigation Measure **MM-AQ-1** requires coordination with SCAQMD and SCAG to update the AQMP and State Implementation Plan with growth projections reflective of the Project. However, even with incorporation of mitigation, impacts from the Project would be considered cumulatively significant.

The other local and infrastructure development occurring within the City and nearby areas of Riverside and San Bernardino Counties and the adjacent cities of Norco, Jurupa Valley, Moreno Valley, Colton, Corona, and Grand Terrace would also be required to undergo environmental review under CEQA, which would include analyzing the potential environmental impacts associated with air quality and identification of mitigation measures in the event significant environmental impacts are identified.

3.16.2 Biological Resources

The geographic extent for considering Project-related cumulative impacts on biological resources includes the City limits and the extent of similar habitat within the region because this distance encompasses a reasonable representative range for populations of sensitive species, such as special-status species and nesting birds, identified in the impact analysis for the Project. The scope for considering cumulative impacts on biological resources includes cumulative projects in the region that could potentially have an adverse effect on special-status plant and wildlife species, sensitive natural communities, protected wetlands or non-wetland waters of the U.S., local policies or ordinances protecting biological resources, and/or adopted habitat conservation plans (HCPs)/multiple-species habitat conservation plans (MSHCPs).

Future development facilitated by the Project along with other cumulative projects could include ground disturbance and vegetation removal (including mature trees and shrubs), resulting in potential direct and indirect impacts on special-status plant and wildlife species, nesting birds, sensitive natural communities, wetlands and potentially jurisdictional aquatic resources, wildlife movement corridors and nursery sites, and adopted HCPs/MSHCPs. Impacts from the Project would be less than significant for all of these biological resources with implementation of Mitigation Measure **MM-BIO-1** and individual project-specific consistency with the Western Riverside County MSHCP (WRC MSHCP), as described under Impact BIO-1 in Section 3.2, *Biological Resources*. Similar measures would be applied for other cumulative projects in the region as needed to comply with the MSHCP and minimize individual project impacts.

Construction of development facilitated by the Project could potentially affect special-status plant and/or wildlife species, including WRC MSHCP covered species, through the permanent removal and

temporary disturbance of suitable habitat, as well as introduction of temporary indirect disturbance from construction-related activities. Development under the Project would be required to comply with all applicable laws and regulations related to special-status species. Moreover, the Project would implement Mitigation Measure **MM-BIO-1** (Impact BIO-1) and would ensure that individual development projects are consistent with the WRC MSHCP so that impacts on special-status plant and wildlife species, including WRC MSHCP covered species, would be less than significant. Other similar projects in the geographic area considered for the cumulative impact analysis would also be required to comply with all applicable laws and regulations related to special-status species, including obtaining all required regulatory permits and achieving consistency with the WRC MSHCP, and would implement similar mitigation measures for any impacts incurred with development of sites in the City and the larger region for the Project and other cumulative projects. Therefore, the Project, in combination with other projects within the cumulative context, would not result in a cumulative significant impact on special-status species.

Project implementation also could have direct and indirect impacts on sensitive natural communities as a result of construction of future development under the Housing Element Update. However, impacts are expected to be minor given the placement of the Opportunity Sites within urban, developed areas. In addition, the Project would implement Mitigation Measure **MM-BIO-1** and would ensure that individual development projects are consistent with the WRC MSHCP so that impacts on biological resources would be less than significant. Similar measures would be applied for other cumulative projects in the region to reduce impacts, and other cumulative projects would be required to comply with all applicable regulatory permitting requirements and to be consistent with the WRC MSHCP prior to construction. Therefore, no significant cumulative impacts on sensitive natural communities would occur with implementation of the Project and other cumulative projects within the geographic context.

Project implementation could have direct and indirect impacts on potential federal and state jurisdictional aquatic features and/or WRC MSHCP-designated Riparian/Riverine habitats as a result of construction of future development under the Housing Element Update and brush clearing under the Public Safety Element. However, should these features be determined to be jurisdictional, then future development facilitated by the Project would be required to comply with all applicable sections of the Clean Water Act, as well as with state and local streambed and stormwater regulations and applicable permit conditions. In addition, the Project would implement Mitigation Measure **MM-BIO-1** and would ensure that individual development projects are consistent with the WRC MSHCP so that impacts on aquatic resources would be less than significant. Similar measures would be applied for other cumulative projects in the region to reduce impacts in compliance with permit requirements from resource agencies like the U.S. Army Corps of Engineers and California Department of Fish and Wildlife, as well as consistency with the WRC MSHCP. Therefore, the Project, in combination with other projects within the cumulative context, would not result in significant cumulative impacts on wetlands and/or potentially jurisdictional aquatic resources.

Construction of development facilitated by the Project may result in temporary changes to wildlife nursery sites (i.e., native resident and/or migratory nesting birds) due to tree and shrub removal and indirect disturbance from construction and brush clearing-related activities (e.g., noise, increased human presence). Impacts on wildlife nursery sites would be localized and indirect disturbance would be temporary in nature. Nesting habitat for birds would also not be substantially reduced. The Project would implement Mitigation Measure **MM-BIO-1** and would ensure that individual development projects are consistent with the WRC MSHCP so that any potential impacts on nesting birds from construction or brush-clearing activities that could result from the Project

would be avoided or minimized. As such, Project impacts on wildlife nursery sites would be less than significant. Wildlife movement corridors, including WRC MSHCP cores and linkages, would not be directly or indirectly affected under either the Housing Element Update or Public Safety Element Update, because construction is not proposed as this is a programmatic document and as the Opportunity Sites are proposed within previously urbanized areas of the City. Therefore, the Project, in combination with other projects within the cumulative context, would not result significant cumulative impacts on wetlands and/or potentially jurisdictional aquatic resources.

After implementation of Mitigation Measure **MM-BIO-1** and individual development project compliance and consistency with the WRC MSHCP, construction of the development facilitated by the Project would not conflict with the provisions of an adopted HCP, natural community conservation plan, or other approved local, regional, or state HCP. Like the Project, cumulative projects in the region would be expected to comply with provisions, goals, and objectives of any HCPs within the Project region and pay any necessary fees associated with those HCPs. Therefore, the Project would not result in a cumulatively significant impact on the goals of any adopted HCPs, including the Western Riverside County MSHCP and Stephens' Kangaroo Rat HCP.

For the reasons discussed previously, the Project, in combination with other projects within the geographic context, would not substantially reduce the number or restrict the range of any special-status plant or wildlife species, damage or destroy any sensitive natural communities, harm protected wetlands or non-wetland waters of the U.S., threaten to reduce or eliminate a wildlife nursery site, or conflict with the provisions of an adopted HCP, and no significant cumulative impact would occur.

3.16.3 Cultural Resources

The geographic scope of analysis for the cumulative cultural resource impacts varies for archaeological and built historical resources. For archaeological resources, the geographic scope includes the City, the larger region encompassing the City, and several surrounding cities and communities that compose the settled area of the various Native American tribes that inhabited this region. Archaeological resources are within the City limits and throughout the surrounding region, and can be affected both directly and indirectly as a result of increased development related to the Project. The geographic context for analysis of built historical resources depends on the type of resource but generally includes the City because built historical resources are present all throughout the City, including on and adjacent to Opportunity Sites. In addition, the Innovation District contains several clusters of historic buildings.

A significant cumulative impact on cultural resources would result if the Project, in combination with the effects of past, present, and reasonably foreseeable future projects in the City and the larger region, would contribute to cumulative impacts on significant built historical resources, archaeological resources, and/or inadvertently discovered human remains. The Opportunity Sites are scattered throughout the City and future development related to the Project could affect built historical and archaeological resources.

Construction at Opportunity Sites could involve impacts on archaeological resources whether previously known or newly discovered during construction. Indirect impacts on archaeological sites can include increased pedestrian traffic on known archaeological sites due to increased population density. Additionally, increases in population density can require infrastructure that might affect archaeological resources both within the City and regionally. Such impacts on archaeological sites

could occur at the locations of Opportunity Sites specifically and at other locations within the City or larger region. Future development projects occurring on Opportunity Sites such as in historic districts or the Innovation District could also include demolition or material alteration of known built historical resources; structural reuse requiring rehabilitation, restoration, reconstruction, and/or additions; or new construction or infill that has the potential to change the local landscape by modifying the setting of nearby built historical resources. Such construction could similarly occur on newly identified, or potential and previously unstudied, built historical resources.

The cumulative effects of multiple planned projects in the City and the larger region in combination with development at Opportunity Sites could mean cumulative adverse effects on archaeological resources. Such effects could include increases in vehicular and pedestrian traffic, increased population and more robust use of roadways and open space, and increased access to archaeological sites, resulting in the potential for looting or defacement of the physical components of archaeological resources. These direct and indirect impacts could cause adverse effects on the characteristics of known and unknown archaeological resources. Direct impacts could include complete removal of features and cultural constituents on portions of sites and removal of yet-undocumented potential subsurface components relating to construction activities. Indirect impacts include loss of setting, loss of traditional viewsheds, and increases in noise and vehicular and pedestrian traffic. As such, the Project, in combination with other planned projects in the City and in the larger region, could result in adverse cumulative effects on known and unknown archaeological resources eligible for the California Register of Historical Resources that might be identified within the proposed development locations. Therefore, the incremental impacts of the Project—when considered with past, present, and future projects in the Project vicinity—would result in a significant cumulative impact on archaeological resources.

As discussed in Section 3.3, *Cultural Resources*, ground-disturbing activities associated with construction at Opportunity Sites could result in the discovery of previously unidentified archaeological resources and destruction of known archaeological resources. This impact would remain significant and unavoidable after implementation of Mitigation Measures **MM-CUL-2** through **MM-CUL-9**. Therefore, the contribution of the Project to the cumulative impact on archaeological resources and human remains would be cumulatively considerable.

Cumulative impacts on historic resources could occur if the Project in combination with other development within the City results in adverse effects on previously identified CEQA historical resources as well as buildings that have not yet been surveyed or evaluated as potential historical resources and are over 50 years old at the time of development. Adverse effects could include a reduction in the number, intensity, concentration, and integrity of a certain historical property type or architectural style within the geographic context. However, all development is subject to the City's Cultural Resources Ordinance and Historic Preservation Element, which provide a process and policies for the protection and preservation of eligible and designated built historical resources. These would continue to apply to present and reasonably foreseeable future projects within the City.

Furthermore, the Project would be subject to implementation of Mitigation Measure **MM-CUL-1**, which would require historical resource assessments to identify buildings that meet applicable criteria as historical resources, and compliance with Title 20 (Cultural Resources) of the Riverside Municipal Code to minimize potential impacts on historic resources. Similar measures would be applied to other projects within the City that occur outside of the Opportunity Sites. Because development under the Project and throughout the City would be subject to these requirements to

avoid or minimize impacts on historic resources, a cumulative impact on built historical resources from past, present, and future projects would not occur.

3.16.4 Paleontological Resources

All significant paleontological resources are unique and nonrenewable resources. Unlike archaeological resources, which are site specific, paleontological resources can occur throughout a sensitive geologic unit, regardless of location. Therefore, the geographic context for paleontological resources encompasses the complete extent of geologic units with high or undetermined paleontological sensitivity that underlie the Project. It is likely that significant paleontological resources in these geologic units have been and could in future be destroyed by development. Therefore, a cumulative impact on paleontological resources in the geographic context exists.

Development in the geographic context has removed the upper layers of geologic units in many areas and replaced it with artificial fill. However, this fill is underlain in many areas by geologic units of high or undetermined paleontological sensitivity at varying depths below ground surface. Therefore, the Project, in combination with other foreseeable development in the identified geographic context, has the potential to encounter and damage or destroy previously unknown paleontological resources during both construction and operation. However, Mitigation Measures **MM-PAL-1**, **MM-PAL-2**, and **MM-PAL-3**—which would require individual projects to conduct paleontological resource investigations, avoid paleontological resources or conduct monitoring, and avoid/minimize impacts on paleontological resources during operations—would avoid or minimize the Project's impacts on paleontological resources to the extent that the contribution of the Project to the cumulative impact on paleontological resources would not be considerable.

3.16.5 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions and climate change are exclusively cumulative impacts; as climate change is the result of cumulative global emissions, there are no non-cumulative GHG emissions impacts from a climate change perspective. No single project, when considered in isolation, can cause climate change because a single project's emissions are not enough to change the radiative balance of the atmosphere. Because climate change is the result of GHG emissions and GHGs are emitted by innumerable sources worldwide, global climate change will have a significant cumulative impact on the natural environment as well as human development and activity. As such, GHGs and climate change are cumulatively considerable, even though the contribution may be individually limited.

As discussed in Section 3.5, *Greenhouse Gas Emissions*, the Project would contribute GHG emissions to the cumulative condition. Equipment and vehicles used during construction (e.g., on-road motor vehicles and heavy equipment) and operations (e.g., vehicle trips, electricity consumption, and waste generation) would result in a net increase in GHG emissions over existing conditions and over what is currently proposed in GP 2025. As discussed under Impact GHG-1 and shown in Table 3.5-8 in Section 3.5, implementation of the Project would result in emissions that would be below the numerical efficiency target for horizon year 2029. This target was developed with best available data and represents the emissions level the Project would need to achieve to align with the statewide GHG reduction goals established by Senate Bill (SB) 32 for 2030. However, because the City has not adopted a qualified GHG reduction plan (per State CEQA Guidelines Section 15183.5) that meets the statewide GHG goal established by SB 32 for 2030, it cannot be stated with certainty

that the Project would result in emissions that would represent a fair share of the requisite reductions toward the statewide 2030 target.

Additionally, the Project would not fully comply with local and statewide plans, policies, and regulatory programs outlined in GP 2025 the adopted Scoping Plan, and plans adopted or recommended by the California Air Resources Board or other California agencies for the purpose of reducing the emissions of GHGs. Notably, the Project would result in increased vehicle miles traveled (VMT) that exceed the California Air Resources Board's regional VMT target necessary to achieve the state's long-term GHG emissions-reduction trajectory. Implementation of Mitigation Measures **MM-TRA-1**, and **MM-GHG-1** through **MM-GHG-3** would be required to reduce GHG emissions from the Project during construction and operation, and ensure compliance with local and statewide plans, policies, and regulatory programs designed to reduce GHG emissions. Similar measures would be applied for other cumulative projects in the region to reduce impacts. However, even after incorporation of mitigation, the Project could result in a cumulatively considerable impact related to GHG emissions because it may impede achievement of state reduction targets.

3.16.6 Hazards and Hazardous Materials

The geographic context for an analysis of cumulative impacts with regard to hazards and hazardous materials is the City, including contaminated sites throughout the City. Development as an indirect result of the Project would have the potential to contribute to cumulative impacts related to hazards and hazardous materials, if, in combination with other projects within the City, it creates a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions; involves emissions/handling of hazardous materials or acutely hazardous materials and/or waste within 0.25 mile of an existing or proposed school; or is on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

In general, cumulative impacts related to hazards and hazardous materials are most often associated with commercial or industrial land uses rather than residential and mixed-use development. Past, present, and reasonably foreseeable projects could result in significant hazardous material impacts if they are on a hazardous material site or include industrial activities that could result in soil or ground contamination. Hazardous materials in California are highly regulated, primarily by the Department of Toxic Substances Control but also by the California Environmental Protection Agency. Numerous federal, state, and local regulations govern the use, generation, transport, and disposal of hazardous materials. The State of California also has several programs to prevent accidental releases of toxic contaminants and require the preparation of Hazardous Materials Release Response Plans.

Furthermore, projects and plans that do not substantially increase the potential for industrial activity are not considered to generate cumulatively significant impacts. Therefore, direct and indirect development as a result of the Project would result in a low potential for hazardous material risk. Any future development (as a direct or indirect result of the Project or other development projects within the City) would be required to comply with applicable federal, state, and local regulations related to the handling, disposal, and remediation of hazardous materials. For the Project, this would include implementation of Mitigation Measure **MM-HAZ-1** and compliance with applicable regulations and programs. Therefore, the Project, in combination with other projects within the geographic context, would not result in a significant cumulative impact related to hazards and hazardous materials.

3.16.7 Land Use

The geographic context for an analysis of cumulative land use impacts includes the cities adjacent to Riverside—Norco, Corona, Grand Terrace, Jurupa Valley, Moreno Valley, and Colton—as well as adjacent portions of unincorporated western Riverside County. The general plans of these jurisdictions were reviewed to provide a foundation for planned cumulative growth in this geographic context.

The Project has the potential to result in a cumulatively considerable impact on land use and planning, if, in combination with other projects within the Inland Empire, it would cause a conflict with adopted land use goals, objectives, or policies of applicable land use plans adopted for the purpose of avoiding or mitigating an environmental impact. The cumulative growth and development in the Inland Empire are expected to be largely consistent with the land use plans that have been established to guide and regulate growth patterns and infrastructure improvements and are not expected to conflict with those plans. Regional planning documents, such as SCAG's Regional Comprehensive Plan and the 2020–2045 RTP/SCS, are used for planning within the Inland Empire. However, some strategies may not be consistent with the general plans of city and county areas when it comes to land use patterns and development intensities. On a local level, goals and policies in the local jurisdictions' general plans supersede strategies in the 2020–2045 RTP/SCS. Therefore, past, present, and reasonably foreseeable development is not anticipated to conflict with land use plans and policies and no significant cumulative impact would occur.

Cumulative development would be evaluated at the project level when individual projects are proposed, including undergoing the plan review process for consistency with adopted land use plans and policies in accordance with the requirements of CEQA, California Zoning and Planning Law, and the California Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Each cumulative project would be analyzed independently and within the context of its respective land use and regulatory settings. Therefore, past, present, and reasonably foreseeable development is anticipated to be consistent with land use plans and policies and no significant cumulative condition exists.

The Project would assist the City in meeting its state-required RHNA obligations and would update the existing Housing Element so that it is fully compliant with current state housing law. The Project would not physically divide an established community, as the Project would focus development in already urbanized parts of the City, near existing infrastructure, rather than spreading growth to the urban fringes, and no major roadway (e.g., expressway or freeway) that would traverse an existing community or neighborhood is proposed under the Project. All development facilitated by the Project would be processed in accordance with GP 2025 and the Riverside Municipal Code. The proposed rezoning identifies Opportunity Sites, which would permit multi-family residential and mixed-use development by right pursuant to California Government Code Section 65583.2(h) (e.g., without a Conditional Use Permit, Planned Unit Development Permit, or other discretionary action). Therefore, the impact of the Project on land use along with other cumulative development in adjacent cities and the county would be less than cumulatively considerable.

3.16.8 Noise

The geographic context for the cumulative noise analysis is the City. Development of new residential or mixed-used development could increase both stationary and mobile sources of noise from

heating, ventilating, and air conditioning (HVAC) and other equipment, as well as vehicles. Construction activities could also generate significant cumulative noise and vibration effects if in proximity to one another or in combination with operational or vehicular noise.

Vibration generated by construction equipment has the potential to be substantial and exceed the Federal Transit Administration criteria for human annoyance and structural damage, if construction occurred in close proximity to other construction. Therefore, both construction and operation activities could expose sensitive receptors to excessive noise or groundborne vibration, constituting a significant impact. Consequently, implementation of the Project in combination with other projects within the City would result in a cumulative impact related to noise and vibration.

Any future development facilitated by the Project would be required to comply with City requirements for both construction and operational noise and vibration, including those within the Riverside Municipal Code, GP 2025, and City standard conditions of approval. Individual projects also would likely prescribe project-specific mitigation measures that would reduce individual project-related impacts. Construction-related vibration impacts generally would be localized to the area where construction activities would take place, and would occur within the times prescribed by the Riverside Municipal Code, which would exempt construction noise. Therefore, there would be no significant cumulative noise and vibration impact related to construction.

Build-out of the Opportunity Sites facilitated by the Project, along with other projects throughout the City, would result in noise level increases throughout the local roadway networks (Table 3.8-16).

Impacts from stationary operational noise sources also would occur with build-out associated with the Project in combination with other development throughout the City. As noise generated by a stationary noise source, or "point source," decreases by approximately 6 A-weighted decibels (dBA) over hard surfaces (e.g., reflective surfaces, such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces, such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance, it is reasonable to assume that new stationary noise sources associated with new projects would have to be located next to each other. Together with impacts associated with increased roadway noise, this increase in noise from stationary sources would result in a cumulative noise impact.

While roadway noise increases associated with the Project would be on the order of 0.5 decibel or less, the Project contribution would be considered cumulatively considerable. Furthermore, if future development within the Opportunity Sites were to occur in close proximity to other new development projects, the Project's contribution to noise from stationary noise sources could also be considered cumulatively considerable. Implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI-3** would reduce potential Project impacts. However, even with the inclusion of mitigation measures, impacts from the Project could make a cumulatively considerable contribution to cumulative noise and vibration impacts.

3.16.9 Population and Housing

The geographic context for an analysis of cumulative population and housing impacts is the area covered by SCAG, the metropolitan planning organization responsible for demographic growth projections for the region including the City. The basis for this cumulative analysis is the 2020–2045 SCAG RTP/SCS. The individual general plans for the adjacent cities of Norco, Corona, Grand Terrace, Colton, Jurupa Valley, and Moreno Valley and adjacent areas of unincorporated Riverside County were also considered.

The Project has the potential to result in a cumulatively considerable impact on population and housing if, in combination with other projects within the SCAG region, it would induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure) or displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere.

Past projects in the SCAG region have converted undeveloped and agricultural land to urban uses, resulting in residential and employment population increases. Currently, there is no question that there is an ongoing housing crisis throughout California. A variety of measures indicate the extent of the crisis, including overcrowding and cost-burdened households, but the underlying cause is insufficient housing supply together with continuing population growth over recent decades. Planning documents, such as general plans prepared by cities, generally reflect the growth projections in SCAG's 2020–2045 RTP/SCS. Build-out under the RTP/SCS would consist of a variety land uses, including roadway improvements, residential development, habitat reconstruction, water treatment and infrastructure, commercial development, and recreation, which could reasonably be expected to contribute to population increases in the region. While general plans in the cumulative geographic context aim to be consistent with regional growth projections, given the current housing shortage and the high RHNA obligations for the 6th cycle, it is reasonably foreseeable that future cumulative development could exceed growth projections of the 2020–2045 RTP/SCS. For example, Colton would exceed growth projections of the 2020–2045 RTP/SCS based on its RHNA obligation and it is anticipated that at least some other cities within the SCAG region would similarly result in exceedances of growth projections. Table 3.16-1 compares the projections of the general plans of the cities adjacent to the City and Riverside County with the SCAG growth projections in the 2020–2045 RTP/SCS.

Development pursuant to the Project would result in a further increase in the population and available housing stock within the City. The population increase from the Project would exceed growth forecasts within SCAG's 2020–2045 RTP/SCS. There is no feasible mitigation available to reduce this impact. Consequently, the Project would make a considerable contribution to cumulative impacts on population and housing. Therefore, impacts of the Project on population and housing would be cumulatively considerable and the impact would be cumulatively significant.

Table 3.16-1. Comparison of General Plan and SCAG Growth Projections (Cities Adjacent to the City of Riverside and Riverside County)

Jurisdiction	GP Housing Projections	GP Population Projections	SCAG 2020–2045 RTP/SCS Housing (2016)	SCAG 2020–2045 RTP/SCS Housing (2045)	SCAG 2020–2045 RTP/SCS Housing Growth	SCAG 2020–2045 RTP/SCS Population (2016)	SCAG 2020–2045 RTP/SCS Population (2045)	SCAG 2020–2045 RTP/SCS Population Growth	6th Cycle RHNA Housing Obligation	6th Cycle RHNA Population Projections (2.90 PPH)
County of Riverside	724,506	2,347,828	716,000	1,086,000	370,00	2,364,000	3,252,000	888,000	167,351	485,318
Colton	14,971	52,690	15,000	21,700	6,700	53,700	70,700	17,000	5,434	15,759
Corona	45,165	152,374	46,900	52,400	5,500	165,800	185,100	19,300	6,088	17,655
Grand Terrace	4,458	12,025	4,400	5,600	1,200	12,400	14,500	2,100	630	1,827
Jurupa Valley	26,874	93,817	25,300	31,800	6,500	100,100	117,800	17,700	4,497	13,041
Moreno Valley	39,155	247,780	52,700	76,200	23,500	205,700	266,800	61,100	13,627	39,518
Norco	7,090	22,632	7,100	7,100	-	27,100	27,300	200	454	1,317

GP = general plan; PPH = persons per household, as used by SCAG for forecasting purposes

3.16.10 Public Services

The geographic context for an analysis of cumulative impacts with regard to public services is the local service areas within the City for police and fire services, schools, and libraries. Riverside Fire Department provides fire protection for the City. Riverside Fire Department's major facilities include 14 fire stations throughout the City, administration and prevention offices, an Emergency Operations Center, and a training center. Riverside County Fire Department provides service to the unincorporated territory within the City's Sphere of Influence. Four Riverside Police Department stations serve the City. The City is served by two public school districts: Riverside Unified School District, which has 47 schools, and Alvord Unified School District, which has 23 schools. Riverside Public Libraries maintains eight existing libraries that serve the City, with an additional library (Main Library) to be opened in 2021. Four university and college libraries also serve the City.

Past and present development has resulted in increased population, which in turn has resulted in an increase in demand for all public services. Growth in the City to date has been consistent with the growth projections in the City's GP 2025. Furthermore, each of the public service providers conducts an annual budgeting process where future facility/staffing needs are identified. Because past and present development is consistent with growth identified in GP 2025 and there are mechanisms in place to ensure provision of adequate service, there would be no significant cumulative condition with respect to public services within the defined geographic area.

The Opportunity Sites are located throughout the City and future development pursuant to the Project would increase demand and affect the provision of public services and facilities. Compliance with state and local regulations as well as established budgeting processes would ensure that there would be sufficient facilities and service to accommodate additional public services resulting from development and associated population growth facilitated by the Project. While there are no development impact fees that would fund the Riverside Public Library system, compliance with GP 2025 would help ensure that future development would not affect the City's ability to provide adequate library services. Should population growth associated with the Project, and more broadly within the cumulative context, necessitate the expansion of existing libraries or construction of new facilities, the impacts of such development would be analyzed at a project-specific level.

As additional development occurs in the geographic context, there would be an overall increase in the demand for public services, which could cause physical deterioration of existing facilities. Future development facilitated by the Project would be consistent with GP 2025 and new policies from the Public Safety Element Update. However, increases in demand are routinely assessed by fire and law enforcement agencies as part of the budgeting processes, as noted, and law enforcement and fire protection services are anticipated to be adequate to accommodate future growth in the City. This is partially accomplished through collection of development impact fees. Similarly, school districts routinely assess increases in growth and would ensure that there would be sufficient school facilities to accommodate associated population growth through collection of development impact fees. Other cumulative projects in the Inland Empire would also require collection of development impact fees to accommodate increases in demand for public services. Such fees would be utilized to help fund construction of required new or expanded facilities, and the impacts of such development would be analyzed at a project-specific level.

Cumulative related projects pursuant to build-out of general plans and CIPs in the Inland Empire consist of a variety of developments, including roadway improvements, residential development,

habitat reconstruction, water treatment and infrastructure, electrical infrastructure, airport improvements, commercial development, and recreation, among others. All cumulative projects would be consistent with the applicable land use plans and CIPs. Public service providers in the cumulative context have similar annual budgeting processes to assess the adequacy of facilities and staffing. Furthermore, as development of new and expanded library, school, fire, and police facilities would be required to go through the applicable local entitlement and approval processes, including CEQA review, such development is expected to occur in a manner that would avoid cumulative impacts. Any significant impacts would be disclosed and mitigated, as feasible, at a project-specific level. Therefore, the cumulative public services impact would be less than significant. Consequently, the Project, in combination with cumulative projects in the defined geographic context, would not result in a significant cumulative impact on public services.

3.16.11 Recreation

The geographic context for an analysis of cumulative impacts on recreation is the City, as this geographic area contains the regional, community, and neighborhood recreational resources most used by local residents and visitors.

Population growth from past and present development in the City has led to an increased demand for neighborhood, community, and regional parks and recreational facilities. The City has a goal of 2 acres of community, 1 acre of neighborhood park, and 5 acres overall per 1,000 residents. City parkland ratio goals versus parkland ratios with implementation of the Project would decrease the 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.

Implementation of the Project in the City has the potential to increase population to the point where parkland-to-resident ratios are exceeded, and overuse and deterioration of existing parks and recreational facilities could occur. As noted in Section 3.11, *Recreation*, the deterioration that would occur to neighborhood parks and recreational facilities from population growth in the City may be offset with funding from new development such as in-lieu fees for parks or donation of parkland pursuant to the Quimby Act. The Quimby Act is a funding mechanism for parkland acquisition for jurisdictions. As allowed by this act, the City has park dedication ordinances as part of its municipal code, which require most residential subdivisions to dedicate parkland or pay in-lieu fees to enable the City to acquire parkland. To accommodate future demand for park and recreational facilities from implementation of the Project in the City, additional park and recreational facilities would be developed and constructed throughout the City, including those future projects listed in Section 3.11.

Cumulative development throughout the City would incrementally increase the need for new or expanded facilities, which would have the potential to result in adverse environmental effects. Such effects would be assessed on a project-specific basis, with individual projects undergoing separate CEQA analysis and proposing mitigation, as needed to address potential impacts. As such, the Project, in combination with cumulative projects defined in the geographic context, would not result in a significant cumulative impact with respect to parks and recreation in the City.

3.16.12 Transportation

The geographic context for an analysis of cumulative transportation impacts considers total development within the City plus regional growth consistent with the SCAG RTP/SCS as represented in the Riverside County Traffic Analysis Model forecasting model. The cumulative condition considers full build-out of GP 2025 and the City's CIP as it relates to roadway improvements in addition to the RTP/SCS financially constrained transportation improvements.

The Project, in combination with other projects in the City, would result in an increase in VMT. The Project would result in an increase in the total origin-destination VMT compared to the base year, which exceeds the City's VMT threshold of significance. The Project would also result in an increase in VMT within the City boundary with the addition of the Project in the base and future years. These are both attributable to the fact that the Project would increase population and employment within the City, which would increase VMT. However, 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. 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 Transportation Demand Management measures to mitigate VMT cannot be guaranteed to reduce impacts and the impact is considered significant and unavoidable. Together with other projects within the cumulative context, this would result in a significant cumulative impact.

Project implementation is not expected to substantially increase the number of individuals using the airport facilities at Riverside Municipal Airport, Flabob Airport, or March Air Reserve Base. The Project would not result in a change in air traffic patterns or in a safety hazard for people residing or working in the City. Other future projects would be required to also analyze and minimize impacts related to airport facilities.

Project implementation could result in inadequate emergency access. The City continues to implement adopted road standards and, as a result, new roadways would be designed to avoid unsafe design and provide adequate emergency access. The City has an Emergency Operations Plan, and the Riverside Fire Department provides response management through activation of the Standardized Emergency Management System. GP 2025 also provides policies to identify methods of implementing the emergency plan. Additionally, the Public Safety Element Update as part of the Project would address emergency preparedness and response, including through provision of high-quality and responsive emergency management services to all residents and businesses in the City (refer to Appendix B for proposed Public Safety Element policies). All projects within the City would be required to comply with these plans and policies, which would minimize any impacts related to emergency access.

Implementation of the Project as well as other cumulative projects in the City would not conflict with adopted policies, plans, or programs supporting alternative transportation. Major principles for the Project include focusing future development near existing transportation corridors, ensuring land uses are supported by an efficient local roadway network, and supporting alternative modes of transportation such as walking, biking, and transit. GP 2025 and the Project and their relevant policies would support, rather than conflict with, policies, plans, and programs concerning alternative transportation, thereby limiting impact of the Project and other projects within the City.

Implementation of the Project, in conjunction with other cumulative projects, would result in less-than-significant impacts following compliance with the specified GP 2025 policies and applicable regulations for hazards due to a design feature, emergency access, and policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, as concluded above. All future development in the City would be reviewed on a case-by-case basis for consistency with applicable regulatory requirements, including GP 2025 goals and policies and Riverside Municipal Code standards, intended to reduce and/or avoid potential impacts involving transportation and traffic. Cumulative impacts on transportation and traffic would be mitigated on a project-by-project level, and in accordance with the established regulatory framework, through the established regulatory review process.

Mitigation Measure **MM TRA-1** could reduce VMT, but the effectiveness would vary by type and location of future specific projects, and outside influences on travel such as the price of fuel cannot be fully controlled. Consequently, the Project would make a considerable contribution to cumulative impacts on transportation. Therefore, impacts of the Project on transportation would be cumulatively considerable and the impact would be cumulatively significant.

3.16.13 Tribal Cultural Resources

The geographic scope for an analysis of cumulative impacts on tribal cultural resources (TCRs) includes the City, the larger region encompassing the City, and several surrounding cities and communities that compose the settled area of the various Native American tribes that inhabited this region. A cumulatively considerable impact on TCRs would result if, in combination with build-out of the past, present, and reasonably foreseeable future plans, the Project's incremental contribution to significant cumulative TCR impacts would be considerable.

Opportunity Sites and surrounding areas consist of urban land that has been almost entirely developed with buildings, roadways, or park landscape. Therefore, due to the nature of the Project, it is unlikely that significant TCRs would be encountered during implementation at Opportunity Sites. Any potential TCRs inadvertently discovered during construction activities would be evaluated and protected in compliance with Assembly Bill 52. However, past projects within the geographic scope have resulted in the urban development seen today, which most likely also affected TCRs that were previously within those projects' footprints. Because the past and present projects have drastically changed the cultural setting of the immediate region, cumulative impacts from past, present, and probable future projects could be cumulatively significant.

The impacts from past development projects on TCRs is unknown; however, they are assumed to have occurred, as cultural resource laws and regulations were not in place when much of the City was developed. TCRs can be sites, features, places, cultural landscapes, or sacred places, and it is assumed that such features existed within the boundaries of the City. Given the known existence of TCRs through oral histories and statements from Native American tribes that occupied and continue to occupy this region, it is assumed that some TCRs may have been affected by past development. While individual present and future projects may not affect known TCRs, it is possible that currently unknown TCRs such as buried archaeological sites, sacred features, or as-yet-undefined cultural landscapes could be affected. The possibility that the Project and subsequent development within the geographic context could affect currently unknown TCRs, in combination with the impacts of past projects which are assumed to have occurred, would result in a potential cumulative impact on TCRs.

A search of the Native American Heritage Commission's Sacred Lands File was positive for cultural resources. While it is unknown where these resources are located, as this information is kept confidential by the Native American Heritage Commission, it is likely that they would be considered TCRs. Additionally, the Pechanga Band of Luiseño Indians has indicated that the area is culturally sensitive and identified types of resources that exist in the City that could be considered TCRs. The Soboba Band of Luiseño Indians also indicated that the Project is in proximity to known sites, is within a shared use area involved in intertribal trade, and is considered culturally sensitive by the people of Soboba. As discussed in Section 3.13, *Tribal Cultural Resources*, significant TCRs are potentially present within portions of the City, though it is unknown whether such TCRs are located at specific Opportunity Sites and whether such TCRs are 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). It is likely, however, that resources such as those described by Pechanga (rock art, pictographs, and petroglyphs) would be considered eligible TCRs and are likely to be identified as such.

Demolition and construction of new structures associated with development of Opportunity Sites could include varying depths of excavation and ground disturbance, and similar activities would likely occur with other development within the geographic context. If ground-disturbing activities were to occur in areas identified as sensitive by Native American tribes, these activities could damage or destroy TCRs, which would be a significant impact. In addition, ground-disturbing activities associated with each of these categories could damage or destroy currently undiscovered TCRs, which would also be a significant impact.

While a significant cumulative impact on TCRs would occur within the geographic context, the Project's contribution to this impact would not be cumulatively considerable with implementation of Mitigation Measures **MM-CUL-2** through **MM-CUL-9, MM-TCR-1**, and **MM-TCR-2**. As described in Section 3.13, *Tribal Cultural Resources*, these measures would reduce the impacts of the Project to a less-than-significant level by requiring consultation with the City (by the applicant) and tribal representatives prior to issuance of a grading permit; implementation of TCR protocols and measures determined through consultation with tribes; preparation of archaeological studies, treatment plans, and monitoring; and implementation of data recovery procedures. These measures would help avoid or minimize Project effects on TCRs to the extent that the Project's contribution to the cumulative impact would be minimal.

3.16.14 Utilities and Service Systems

The geographic context for cumulative impacts from the Project on utilities and service systems is the local utility service areas for the individual providers. For the cumulative impact analysis for water sources and supplies, stormwater, and solid waste, this consists of the City and areas within the City's Sphere of Influence. The geographic context for cumulative impact analysis of electricity is the Southern California Edison service area, which provides electricity for the City's Sphere of Influence and provides the interconnection to the state's transmission grid to Riverside Public Utilities (RPU), the City's main electric power provider. The geographic context for the cumulative impact analysis of natural gas is the Southern California Gas Company service area.

Water

A majority of the City is within the RPU service area, while the southeasterly portion is within the Western Municipal Water District (WMWD) service area. Water for the City is mainly supplied by

RPU. According to the RPU Urban Water Management Plan, the City's conservation and long-range planning efforts have made it such that identified supplies exceed demands through planning year 2040. According to the WMWD Urban Water Management Plan, WMWD's supplies exceed demands for normal year and multiple dry-year conditions through 2040. Past, present, and reasonably foreseeable future development would result in increased demand for water. While there is a statewide drought condition, the supply for the WMWD service area is adequate to accommodate growth through 2040. There would be no significant cumulative condition with respect to water supply.

Implementation of the Project would facilitate the development of the Opportunity Sites, thereby resulting in more demand for water resources over existing conditions. The increased demand would not be accommodated in accordance with the 2015 RPU Urban Water Management Plan. 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. However, construction activities associated with future development would be subject to compliance with local, state, and federal laws, ordinances, and regulations necessary to ensure construction-related impacts are not significant. Therefore, the future increase in demand for water supply from implementation of the Project would not result in the extension, relocation, and expansion of new water facilities and the impact would be less than significant.

Cumulative projects would also be required to coordinate demands with the capacity of the water system and work with RPU and WMWD to coordinate water services. While full build-out of the Project could result in an increase in demand in exceedance of the 2015 RPU Urban Water Management Plan projections, groundwater use augments supply for future projects that is provided by RPU and WMWD. Additionally, in compliance with SB 221 and SB 610 requirements, future development that meets certain size thresholds 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 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 requires the City to periodically review population and development trends with respect to water sources and supply to ensure that growth facilitated by the Project can be accommodated with present and expected water sources. This would further reduce impacts related to the provision of water services for the Project and other cumulative projects within the geographic context. Therefore, there would be no significant cumulative impact on water supply.

Wastewater Treatment

Riverside's wastewater treatment is provided by the City of Riverside Public Works Department's Riverside Regional Water Quality Control Plant (RWQCP) and WMWD. Public Works operates and maintains the treatment facility and a wastewater collection system including over 800 miles of public sewer mains and 400 miles of City-owned laterals throughout the City. The RWQCP provides preliminary, primary, secondary, and tertiary treatment with a hydraulic rated capacity of 46 million gallons per day (mgd) average dry-weather flow. As of 2020, the average daily influent flows are 25.3 mgd (0.54 percent capacity). Western Riverside County Regional Wastewater Authority has a design capacity of 14 mgd and currently treats an average of approximately 8 mgd (or 0.57 percent capacity). The Western Water Recycling Facility has a capacity of 3 mgd and currently processes an

average flow of 0.8 mgd (or 0.25 percent capacity). Past, present, and reasonably foreseeable development have not resulted in inadequate capacity of the wastewater treatment system. As described in Section 3.14, there is remaining capacity for RPU to meet the future increase in wastewater treatment demand within its service area.

Development facilitated by the Project could result in additional housing units that would cause increased demand for wastewater treatment services. At maximum build-out, the Project would generate an estimated 9.5 mgd within the City's wastewater service area, which would be adequately treated by the RWQCP because it would not exceed its treatment capacity of 46 mgd. It is anticipated that RWQCP treatment facilities would be able to meet increased demand for wastewater. To serve future population growth facilitated by the Project, sewer lines would have to be expanded within the City; this could occur with other cumulative projects as well. While development of the Project and other projects within the geographic context 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 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. Additionally, cumulative projects would undergo separate CEQA analyses and implement mitigation measures as necessary to reduce impacts on wastewater demand and ensure consistency with applicable wastewater management plans. For these reasons, the Project's impact, in combination with cumulative projects, would not result in a significant cumulative impact for wastewater treatment.

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 are maintained by the City. The City has 11 principal drainage areas, 10 of which flow into the Santa Ana River. A small portion of the Orangecrest area drains to the Perris Valley drainage area, which eventually discharges to Canyon Lake and Lake Elsinore.

Past development has resulted in increases in impervious surfaces in the geographic context, causing an increase in stormwater runoff into storm drain systems. Past and present development has not resulted in inadequate capacity of the wastewater treatment system. Future development will comply with all applicable regulations related to stormwater, and therefore is not anticipated to change the cumulative condition.

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 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. Additionally, the cumulative projects would be required to conduct separate CEQA analyses and implement mitigation measures as necessary to reduce impacts on stormwater drainage facilities. All projects would comply with applicable regulations related to stormwater discharge. Therefore, the Project's impact, combined with the cumulative projects, would not result in a significant stormwater impact.

Electricity, Natural Gas, and Telecommunications Facilities

Electric services within the City limits are provided almost solely by RPU. The City's Sphere of Influence and a handful of residential units in the City are provided electricity by Southern California Edison. Natural gas services are provided by the Southern California Gas Company. According to the California Public Utilities Commission, the majority of the City's telecommunication and fiber optics services are provided by AT&T.

Electricity, natural gas, and telecommunications services are intended to support existing and future growth; that is, as demands grow, the related infrastructure grows. Service providers undertake extensive short- and long-term planning efforts coordinated throughout the state and with state agencies to ensure that there is adequate energy and telecommunications infrastructure in place to accommodate projected growth, including growth associated with expanding housing supply and jobs. Each of the utility providers routinely assesses demands and prepares comprehensive infrastructure plans and reports outlining the state of the resource and future needs. Because of the growth considered in these plans, reasonably foreseeable future development would similarly be accommodated by the utility providers. Therefore, there would be no significant cumulative condition related to these utilities.

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 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 addition, even though growth under the Project would exceed SCAG growth projections, electrical, natural gas, and telecommunication service providers consider growth in their service areas in their infrastructure plans and through other projections and project-specific requests for service and do not simply rely on SCAG projections. Therefore, the impact of the Project on these dry utilities would be less than significant. Cumulative projects would be required to conduct separate CEQA analyses and implement mitigation measures as necessary to reduce impacts on dry utilities. The Project's impact would not be cumulatively considerable for electric power, natural gas, or telecommunications.

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 solid waste disposal needs are met by private contractors, including Burrtec Waste Industries for residential development and Burrtec Waste Industries, Athens Services, and CR&R Waste Services for commercial development. The City has a comprehensive waste management program that ensures projects comply with waste-reduction ordinances and programs. While there is a shortage of landfills statewide, recycling programs and regulations continue to evolve to help ensure adequate disposal capacity. Reasonably foreseeable future development would similarly comply with waste-reduction regulations.

Development of the Project in conjunction with other cumulative projects within the geographic context for cumulative impacts would generate additional demand for solid waste services, depending on net increases in population, square footage, and intensification of uses. These projects would contribute to the overall regional demand for solid waste. Concurrent with the increased

demand generated by past and present development, recycling programs are being improved and developed to reduce the amount of solid waste disposed of in landfills. Such programs help offset the demand associated with waste-generating development. Additionally, cumulative projects would comply with all waste-reduction requirements and be required to conduct separate CEQA analyses and implement mitigation measures as necessary to reduce impacts on solid waste disposal capacity.

Future development associated with the Project would result in increased housing units and mixed-use development and new residents in the City, which would result in an increase in solid waste generation over existing conditions. Future development associated with the Project would result in an increase of up to 31,564 housing units and 103,530 new residents, which would result in an increase in solid waste generation over existing conditions. The Project would not generate solid waste in excess of state or local standards or impair the attainment of solid waste reduction goals. Among the four landfills that would serve the Project, there is a remaining capacity of approximately 100 million cubic yards.

Cumulative related projects pursuant to build-out of general plans and CIPs in the Inland Empire consist of a variety of land uses, including roadway improvements, residential development, habitat reconstruction, water treatment and infrastructure, commercial development, and recreation, among others. As discussed in Section 3.14, *Utilities and Service Systems*, implementation of the Project would result in less-than-significant impacts on utilities and service systems throughout the City. Because the Project, along with other cumulative projects developed within the geographic context, would be compliant with all applicable regulatory and environmental review requirements to ensure that there is adequate capacity to meet the demand they generate, there would be no significant cumulative impact related to solid waste services.

Chapter 4
Alternatives Analysis

CEQA requires that an EIR examine a reasonable range of feasible alternatives to a project or project location that could substantially reduce one or more of the project's significant environmental impacts while meeting most or all of its objectives. The EIR is required to analyze the potential environmental impacts of each alternative, though not at the same level of detail as the project. However, there must be sufficient detail to enable comparison of the merits of the respective alternatives.

The key provisions of State CEQA Guidelines Section 15126.6 that relate to alternatives analyses are summarized below.

- The discussion of alternatives shall focus on alternatives to the project or project location that are feasible, would meet most or all of the project objectives, and would substantially reduce one or more of its significant impacts.
- The range of alternatives must include the No Project Alternative. The no project analysis will discuss the existing conditions at the time the Notice of Preparation was published, as well as conditions that would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative is not required to be feasible, meet any of the project objectives, or reduce the project's expected impacts to any degree.
- The range of alternatives required is governed by a "rule of reason." The EIR must evaluate only those alternatives necessary to permit a reasoned choice. An EIR is not required to analyze every conceivable alternative to a project.
- An EIR does not need to consider an alternative that would not achieve the basic project objectives, for which effects cannot be reasonably ascertained, or for which implementation is remote and speculative.

4.1 Objectives and Impacts

4.1.1 Project Objectives

Project objectives include the following:

- Plan for a maximum allowable development under the Project (31,564 units) to meet the City of Riverside's (City's) minimum Regional Housing Needs Assessment (RHNA) obligation (18,458 units with a 30 percent No Net Loss buffer for approximately 24,000 units) across all wards.
- Affirmatively further fair housing and identify potential environmental justice and social equity issues to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.
- Ensure affordable housing is added across the City and not concentrated in areas with lower access to amenities or near sources of pollution.

- Add a variety of housing opportunities that will make Riverside a more accessible and resilient community.
- Locate new housing in areas readily accessible to services, parks and other amenities, transit, jobs, and activity centers.
- Identify vacant or under-developed sites, meaning sites with substantial unused land or development potential.
- Limit or prevent housing development in areas with development constraints, such as agricultural and conservation lands, airport influence areas, and, to the extent feasible, fire and flood hazard zones.
- Address the public safety and public health needs and concerns of residents, businesses, institutions, and visitors, and set forth a proactive and coordinated program of protection for all foreseeable natural and human-caused hazards.
- Reduce the potential adverse impacts of housing near inconsistent land uses, along major corridors, or near similar uses.

4.1.2 Significant Impacts

Alternatives are to provide a means of substantially reducing the level of one or more significant impacts that would otherwise result from implementation of the Project. Absent mitigation, the Project would result in significant and unavoidable impacts on the following resources.

- Air quality
- Greenhouse gas emissions
- Noise
- Population and Housing
- Transportation

4.2 Methodology and Screening Criteria

A range of potential alternatives was developed and subjected to the screening criteria. The EIR preparers considered several representative alternatives. There was no attempt to include every conceivable alternative. The following criteria were used to screen potential alternatives.

- Does the alternative meet most or all of the Project objectives?
- Is the alternative potentially feasible?
- Would the alternative substantially reduce one or more of the significant impacts associated with the Project?

According to State CEQA Guidelines Section 15364, *feasible* is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather that an alternative be

potentially feasible. Accordingly, no economic studies have been prepared regarding the economic feasibility of the selected alternatives.

The significant effects of the Project may include those that are significant and unavoidable as well as those that are less than significant with mitigation. The alternatives should provide a means of reducing the level of impact that would otherwise result from implementation of the Project. Those alternatives that meet the Project objectives, that are potentially feasible, and that would reduce one or more Project impacts are discussed in greater detail in Section 4.4. Alternatives that were considered but rejected are also briefly described below, along with the reasons for their rejection.

4.3 Alternatives Considered but Rejected During the Scoping and Project Development Process

According to CEQA, "among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts" (State CEQA Guidelines § 15126.6(c)).

Alternative Locations. State law requires the City to adopt a long-range, comprehensive general plan. The City is authorized to adopt Specific Plans that are consistent with the general plan. The Project consists of an update of the City's Housing Element and Public Safety Element of the *Riverside General Plan 2025* (GP 2025) and the addition of Environmental Justice Policies. Consideration of an alternative location for the general plan is not feasible because the general plan must address the lands within the City limits and any adjoining land (sphere of influence) that is of planning interest to the City. As such, this alternative was considered but rejected from further consideration.

Early Versions of the Opportunity Sites Alternative. Throughout development of the Project, multiple iterations of Opportunity Site configurations resulted in different totals of housing units and nonresidential development with the same intent of meeting the City's obligation to provide housing opportunities for all income levels pursuant to Housing Element law and the City's regional housing share. These early drafts were instrumental in the development of what ultimately became the Project evaluated in this Draft EIR, but these early versions were not selected as the Project. Some of these RHNA scenarios included numbers that exceeded the RHNA obligation (including up to 50,000 units). Other RHNA scenarios placed some housing Opportunity Sites in less densely populated areas, farther away from existing infrastructure, services, and transit, which could lead to increased costs for housing and result in greater impacts on air quality, greenhouse gases (GHG), transportation, and other factors supporting sustainable development. As the Project would meet the RHNA obligation and the Project objectives, all other early drafts were considered but rejected for further consideration.

Historical Development Pattern Alternative. This alternative would allow for housing units based on the historical development pattern of the City. The City approved 2,970 housing units between 2010 and 2020. This averages to 297 dwelling units per year during this period. If the City were to proceed with development of housing as in the past decade, its RHNA obligation would not be met and would not be in compliance with state law. Therefore, this alternative would not achieve the Project objectives and was rejected for further consideration.

No Rezoning Alternative. Including Opportunity Sites that do not require rezoning would not meet the RHNA obligation, as adequate sites for only 7,333 units have been identified that would not require rezoning. As this number is less than the RHNA obligation of 18,458 units and would not meet the City's objectives to meet its RHNA obligation and provide a variety of new housing opportunities throughout the City, this alternative was considered but rejected from further consideration.

4.4 Alternatives Analyzed in this EIR

CEQA generally requires analysis of a No Project Alternative (i.e., the environmental impacts of continuing existing conditions). As such, the No Project Alternative would include what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. Additional alternatives also considered include Alternative 2—Dispersed Growth Alternative, Alternative 3—Focused Growth Alternative, and Alternative 4—Limited Opportunity Sites Alternative, which vary by density proposed or housing types or a combination of these factors. These alternatives are considered in the EIR along with the Project and are described in detail below.

4.4.1 Alternative 1—No Project Alternative

Like the analysis of the Project throughout this EIR, the analysis of the No Project Alternative compares the alternative to existing conditions in Riverside. The impacts of the No Project Alternative are examined qualitatively to allow comparison with the Project.

According to State CEQA Guidelines Section 15126.6(e), the No Project Alternative must include the assumption that conditions at the time of the Notice of Preparation (i.e., baseline environmental conditions) would not be changed, because the Project would not be implemented. As GP 2025 and applicable Specific Plans already allow for additional development to occur and to continue to occur according to historical development trends in the City, it is not reasonable to assume that additional development would not occur without the Project. As such, the analysis of the No Project Alternative focuses on development in accordance with GP 2025 and applicable Specific Plans already adopted for the City.

Alternative 1, the No Project Alternative, consists of retaining the current GP 2025, including the 2014–2021 Housing Element, the previous Public Safety Element, and the various subsidiary plans (e.g., seven Specific Plans and Zoning Code) unchanged and not including additional Environmental Justice Policies. No changes to existing zoning or allowed development on identified Opportunity Sites would occur. The No Project Alternative would not meet the City's RHNA goal of 18,458 units. The No Project Alternative would also not meet the various objectives set forth by the City, namely to support a variety of new housing throughout the City to meet the City's RHNA obligation, further fair housing and environmental justice and social equity issues, and set forth a proactive and coordinated public safety and public health program. The No Project Alternative would not update the Housing Element and Public Safety Element as required by state law and, furthermore, would not provide the benefit of inclusion of Environmental Justice Policies, also mandated by recent legislation. Future development would be consistent with the population density and land use intensity set out in the current GP 2025 and its subsidiary land use plans.

Air Quality

The South Coast Air Basin is currently classified as a nonattainment area for the federal and state ozone (O_3) standards and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$) standards, and a nonattainment area for state particulate matter less than or equal to 10 microns (PM_{10}) standards (U.S. Environmental Protection Agency 2021; SCAQMD 2017). The South Coast Air Quality Management District (SCAQMD) has developed air quality management plans (AQMPs) to control these pollutants and reach attainment levels. SCAQMD's most recent plan to achieve air quality standards is the 2016 AQMP, adopted by the SCAQMD Governing Board on March 3, 2017. A project is deemed inconsistent with an AQMP if it would result in population and/or employment growth that exceeds estimates used to develop the applicable AQMP, which, in turn, would generate emissions not accounted for in the regional emissions budgets. The 2014–2021 Housing Element, which contains the development planned for the No Project Alternative, was adopted in June 2018 and proposed a net new development of 11,649 dwelling units and as much as 5.9 million square feet of nonresidential development in the City. Given that the most recent AQMP for SCAQMD was adopted in 2017, the proposed development contained in the 2014–2021 Housing Element was not accounted for when developing the plan for the region to attain the state and federal standards. Therefore, while development under the No Project Alternative would be less than that of the Project, it would still increase emissions of criteria pollutants that would contribute to the South Coast Air Basin's failure to meet its O_3 and particulate matter compliance targets. The impact would be less than that of the Project but would still be significant and unavoidable.

Similar to under the Project, construction and operation of new development projects in the City under the No Project Alternative would generate criteria pollutant emissions that could exceed SCAQMD's significance thresholds. Although the No Project Alternative would result in less growth than the Project, construction of a single development project or the concurrent construction of a multitude of individual development projects at any one time in the City could generate criteria pollutant emissions on a daily basis that would exceed SCAQMD's criteria pollutant thresholds. The No Project Alternative would be required to comply with all state and local rules and regulations to control criteria pollutant emissions. Additionally, construction emissions from future development projects in the City would be reduced through best available control technologies identified in mitigation measures in the Final EIR prepared for the 2014–2021 Housing Element Update Housing Implementation Plan or project-specific environmental documents, as applicable. However, there may be instances where implementation of best available control technologies and mitigation would not be sufficient to reduce emissions to below SCAQMD's pollutant thresholds. As such, while air quality impacts related to construction emissions under the No Project Alternative would be less than those anticipated for the Project, they could potentially be significant and unavoidable.

Given that development under the No Project Alternative would be less than under the Project, operation would result in lower emissions at build-out than the Project. However, compared to existing conditions, the No Project Alternative would still result in a net new development of 11,649 dwelling units and as much as 5.9 million square feet of nonresidential development in the City. Given this amount of net new development, it is likely that the net increase in O_3 precursors and PM_{10} and $PM_{2.5}$ emissions generated under this alternative would remain in exceedance of SCAQMD's project-level thresholds for these criteria pollutants, similar to that of the Project, although to a lesser degree. This impact would remain significant and unavoidable.

Similar to under the Project, new development associated with the No Project Alternative would expose new and existing sensitive receptors within the City to significant health risks from exposure

to ambient toxic air contaminants (TACs), including construction- and operations-related diesel particulate matter emissions. However, the degree to which new and existing sensitive receptors would be exposed to health risks from TACs would be less than under the Project, as the No Project Alternative would result in less overall development in the City, thereby reducing the total number of these exposure incidences. Emissions would be reduced through best available control technologies identified in mitigation measures in project-specific environmental documents or the 2014–2021 Housing Element Update Housing Implementation Plan Final EIR but would nonetheless remain significant and unavoidable.

Biological Resources

The No Project Alternative would result in new development pursuant to the current GP 2025. Open Space and Conservation Element Policy OS-1-1 (protect and preserve open space and natural habitat), Policy OS-2.2 (limit extent and intensity of uses and development in areas of arroyos and other critical environmental areas), and other related policies require the consideration and protection of biological resources to regulate the impacts of development through federal and state laws (e.g., the federal Clean Water Act, the federal and California Endangered Species Acts). Furthermore, implementation of other policies and mitigation measures (MM Bio 1) adopted in the GP 2025 EIR would ensure that impacts would be reduced to a less-than-significant level. New development projects would be subject to project-specific CEQA review, Western Riverside County Multiple Species Habitat Conservation Plan (WRC MSHCP) compliance, and mitigation and/or biological equivalency and would be required to obtain any necessary federal and state permits prior to proceeding, as applicable. The impact for the No Project Alternative would be less than significant and less than that of the Project, as less development would occur.

Cultural Resources/Tribal Cultural Resources

The No Project Alternative would result in new development pursuant to the current GP 2025. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), Policy HP-4.3 (work with appropriate tribes to identify and address cultural resources and tribal sacred sites through the development review process), Policy HP-5.1 (use the design and plot plan review processes to encourage new construction to be compatible with cultural resources and historic districts), and other policies, there are currently potential unknown cultural and tribal cultural resources within the City that could be adversely affected by new development. Tribal cultural resources include spiritual values that are not always amenable to standard mitigation measures. It is assumed, however, that mitigation measures would be developed as a consequence of implementation of the aforementioned Historic Preservation Element Policies and associated project-specific studies. For the No Project Alternative, implementation of mitigation measures (MM Cultural 1 through MM Cultural 6) adopted in the GP 2025 EIR would reduce cultural resource impacts but potentially not to a level below significance. Mitigation developed as a result of the implementation of Historic Preservation Element Polices and associated additional studies would be required to ensure that impacts would be reduced to a level below significance. Accordingly, the impact for the No Project Alternative would be less than significant with compliance with GP 2025 and associated project-specific mitigation and less than under the Project, as less development would occur.

Paleontological Resources

New development under the No Project Alternative pursuant to the current GP 2025 would result in ground disturbance. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), impacts could be significant, and implementation of similar measures to those of the Project (conducting paleontological resources investigations, avoiding paleontological resources or conducting monitoring, avoiding/minimizing impacts on paleontological resources) would require project applicants and/or private developers to identify whether future development sites are in areas of high or undetermined paleontological sensitivity and to mitigate any substantial adverse effect on the significance of paleontological resources. With implementation of measures to reduce impacts on paleontological resources on a project-by-project basis in compliance with GP 2025, impacts for the No Project Alternative would be less than significant and less than those of the Project, as less development would occur.

Greenhouse Gas Emissions

The No Project Alternative would contribute to GHG emissions from construction and operation of new development pursuant to the current GP 2025. Although the No Project Alternative would result in less growth than under the Project, the No Project Alternative could result in emissions that exceed SCAQMD numerical thresholds. Additionally, the City's *Economic Prosperity Action Plan and Climate Action Plan* (CAP) does not account for growth associated with the 2014–2021 Housing Element; therefore, growth under the No Project Alternative would exceed the projections in the CAP. As such, the No Project Alternative would conflict with the City's CAP.[1] Because the No Project Alternative would result in less development than under the Project and thus would result in fewer GHG-emitting sources, the impacts would be reduced as compared to those from the Project. However, because growth could exceed thresholds and would exceed growth assumption in the CAP, impacts for the No Project Alternative would likely still be significant and unavoidable.

Hazards and Hazardous Materials

The City supports several industrial operations that handle hazardous materials and, like for most cities, several sites may be contaminated by hazardous materials. Like the Project, development under the No Project Alternative consistent with the current GP 2025 has the potential to introduce new sensitive receptors, such as new housing, into proximity with existing operations that handle hazardous materials or on sites containing them. However, this would constitute an impact of the environment on the Project, and it therefore is not an environmental impact under CEQA (*California Building Industry Assoc. v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). This alternative would result in a similar impact as the Project, as hazardous materials impacts are largely mitigated and standard mitigation measures avoid development on or adjacent to highly

[1] The City adopted its CAP in January 2016. The CAP includes an inventory of existing (2007) emissions from community-wide operations, which includes residents and businesses within the City, as well as emissions from governmental operations. The CAP also provides community-wide and government operations emissions forecasts for 2020 and 2035 based on growth associated with build-out of GP 2025. The CAP establishes a reduction goal of approximately 26 percent below 2007 baseline emission levels (3,024,066 metric tons of carbon dioxide equivalent [$MTCO_2e$] community-wide, and 122,525 $MTCO_2e$ for government operations) by 2020 to reach the goals set forth in Assembly Bill 32 (1990 levels by 2020). The CAP proposes measures and policies on community-wide and government levels that will support the City's reduction goals.

contaminated sites. GP 2025 policies such as Policy PS 3-1 (hazardous materials used in business and industry are handled properly) and Policy PS 3-3 (work with responsible federal, state, and county agencies to identify and regulate the disposal of toxic materials) would reduce impacts related to hazards and hazardous materials.

In some cases, new development may exacerbate an existing environmental hazard—for example, where new development is being undertaken on a contaminated site with the potential to release contamination into the environment. However, such an occurrence is unlikely given the existing regulatory structure that requires preconstruction testing and remediation of hazardous conditions (refer to Section 3.6, *Hazards and Hazardous Materials*, for a discussion of the regulatory environment). Similar to under the Project, the impact for the No Project Alternative would be less than significant with preparation of site-specific hazardous material site assessments for projects consistent with GP 2025 involving soil disturbance. Impacts would be less than those of the Project, as less development would occur.

Land Use and Planning

The No Project Alternative would retain the current GP 2025 and its policies, including the 2014–2021 Housing Element, the previous Public Safety Element, and the various subsidiary plans (e.g., seven Specific Plans and Zoning Code) unchanged and not include additional Environmental Justice Policies. No changes to existing zoning or allowed development on identified Opportunity Sites would occur. Due to the urbanized character of the City, development pursuant to the No Project Alternative would not physically divide established communities, as new development would be consistent with GP 2025 and would be reviewed on a project-specific basis to ensure compliance with design standards and guidelines such that division of communities would not occur. As stated in Section 3.7, *Land Use and Planning*, the Project is generally consistent with the GP 2025 and 2020–2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) goals and relevant planning documents and a less-than-significant impact would occur. Implementation of the No Project Alternative would result in a substantial reduction in opportunities for housing development and would not as effectively meet the City's land use objectives or the regional 2020–2045 RTP/SCS goals.

Furthermore, the No Project Alternative lacks policies (and related land use changes) that would promote the goals of the Southern California Association of Governments' (SCAG's) 2020–2045 RTP/SCS to the same extent as the Project, such as:

- Encouraging the development of diverse housing types in areas that are supported by multiple transportation options
- Supporting healthy and equitable communities
- Increasing person and goods movement and travel choices within the transportation system
- Reducing GHG emissions and improving air quality as there would be a higher reliance on vehicle travel and vehicle travel would be less efficient under the No Project Alternative compared to the Project
- Adapting to a changing climate and supporting an integrated regional development pattern and transportation network

Therefore, the No Project Alternative likely would have a greater impact on land use and planning compared to the Project with respect to conflicts with land use plans adopted for the purpose of

avoiding or mitigating environmental effects. In particular, reductions in environmental effects associated with compliance with the RTP/SCS would not be achieved as readily under the No Project Alternative. Beneficial policies included in the Project related to land use, infill development, and affordable housing would not be implemented, and future land use approvals would continue based on the City's existing policy framework, such that the reduction in environmental effects intended to be achieved through the Project's policy updates and Zoning Code amendments would not be realized. Furthermore, under the No Project Alternative, GP 2025 would not be updated to include new Public Safety Element policies related to a review of updated hazards in the City, including climate resilience and adaptation, or include new policies and implementing actions regarding Environmental Justice Policies; as such, the No Project Alternative would result in greater impacts than the Project.

Noise

Under the No Project Alternative, development would occur in association with the current GP 2025.

Construction activities associated with new development pursuant to the current GP 2025 would generate elevated noise and vibration from construction and have the potential to affect noise-sensitive land uses. Development under the current GP 2025 would increase development and traffic levels along high-volume roadways. Because there would still be an increase in new housing units and nonresidential development with the No Project Alternative, impacts related to stationary noise sources, traffic noise, and vibration would occur but would be less for the No Project Alternative compared to the Project. Because the No Project Alternative would result in increases in similar new noise sources, implementation of the No Project Alternative would not reduce any significant noise impacts of the Project below a level of significance and impacts would be significant.

Population and Housing

Development under the No Project Alternative would result in an increase in the City's population and its housing supply. However, future development would be consistent with the population density and land use intensity set out in the current GP 2025 and its subsidiary land use plans as well as the projections in the 2020–2045 RTP/SCS. Build-out of GP 2025 under the No Project Alternative would potentially displace existing housing units where GP 2025 anticipates different land uses than that which currently exist; however, this displacement would be less than that which could occur under the Project. The No Project Alternative would result in less growth pursuant to the current GP 2025 in comparison to the Project and no changes to the Zoning Code and Specific Plan amendments would be required to accommodate as much future housing and other development.

The No Project Alternative would be consistent with GP 2025 and SCAG's population projections in that growth projections would not be exceeded, whereas implementation of the Project would exceed the SCAG's population projections. However, implementation of the No Project Alternative would not meet or be consistent with the City's RHNA goal of 18,458 units and would not be as effective meeting the goals and policies of the 2020–2045 RTP/SCS that aim to provide a variety of new housing and various income levels near transit. Overall, this would be a less-than-significant impact, as this alternative would not induce substantial unplanned population growth in the City either directly or indirectly because the No Project Alternative would be consistent with population

projections and would not displace existing people or housing. Impacts would be less than those of the Project and the No Project Alternative would reduce a significant impact of the Project.

Public Services

The No Project Alternative would result in less population growth and less nonresidential development than the Project, and less of a demand on public services like police and fire protection, schools, parks, libraries, and other services to the City. As less development would occur with the No Project Alternative compared to the Project, the impact would also have a less-than-significant demand on public service and the impact would be less than that of the Project.

Furthermore, under the No Project Alternative, GP 2025 would not be updated to include new Public Safety Element policies related to a review of updated hazards and fire protection in the City, including climate resilience and adaptation, or include new implementing actions regarding Environmental Justice Policies; as such, the No Project Alternative would have fewer beneficial impacts than under the Project. Nevertheless, impacts would be less than those of the Project.

Recreation

Implementation of the No Project Alternative would result in an increase in the City's population, which would result in greater demand on recreational facilities. However, the City requires that private developers proposing residential projects in the City include open space within their projects and pay Park Development Impact Fees to fund future recreational facilities, as described in Section 3.11, *Recreation*. Because the No Project Alternative would include fewer new housing units than the Project, the No Project Alternative would be expected to result in less of a demand for parks and recreational facilities; therefore, substantial physical deterioration of parks facilities would be less than significant. While impacts would be somewhat reduced under the No Project Alternative as compared to the Project, the conclusion would remain the same. Consequently, similar to under the Project, substantial physical deterioration of parks facilities would be less than significant.

With regard to the construction or expansion of recreational facilities that might have an adverse physical effect on the environment, typical impacts of new recreational facilities include short-term noise, air quality, and traffic impacts during construction; and noise, light (if night lighting is installed), and traffic during operations. Such impacts related to construction of park and recreational facilities would still occur under the No Project Alternative; however, given the reduced number of new residential units, construction or expansion of recreational facilities would likely occur to a lesser degree than under the Project. Because such construction would be required to comply with City ordinances and with mitigation imposed on specific projects to reduce short-term impacts, construction impacts likely would be less than significant. Operational impacts may be significant; however, typical neighborhood park design includes limited use during nighttime hours and provisions to confine lighting on site through the selection and location of fixtures. Neighborhood parks do not typically generate substantial automobile trips and are served by the City's road network; traffic impacts are typically less than significant. Therefore, similar to under the Project, the impact for the No Project Alternative would be less than significant. Because less population is proposed under the No Project Alternative, the impact would be less than that of the Project.

Transportation

The No Project Alternative would retain the current GP 2025. The No Project condition was evaluated from a transportation assessment based on RTP/SCS projections, which are consistent with GP 2025 and summarized in Section 3.12, *Transportation*, and Table 3.12-4. As shown, while the Project would add to overall vehicle miles traveled (VMT), the No Project Alternative (under cumulative conditions) would generate greater home-based VMT per capita and greater total VMT per service population than the Project under cumulative conditions. However, the No Project Alternative would result in lower net total VMT as compared to the Project. This indicates that while overall the increase in VMT would be greater under the Project than under the No Project Alternative, given the increase in overall development, travel on a per-person basis (using home-based trips as an indicator) would be less efficient under the No Project Alternative as compared to the Project (equating to lower home-based VMT), given that new housing under the Project would be closer to transit and other destinations. As such, while the No Project Alternative would not result in as high a level of overall VMT as the Project, it would still result in a significant impact and potentially greater transportation impact than the Project.

Utilities and Service Systems

The No Project Alternative proposes maintenance of the status quo and increases in planned development would happen independent of the Project and as individual development projects pursuant to GP 2025 are proposed. The No Project Alternative would also have sufficient water supplies available and adequate capacity for projected wastewater treatment and solid waste demand. Because the No Project Alternative would include fewer new housing units and nonresidential development than the Project, this alternative would be expected to result in less of a demand for utilities and service systems. As less development would occur with the No Project Alternative, the impact would be less than significant and less than that of the Project.

4.4.2 Alternative 2—Dispersed Growth Alternative

The Dispersed Growth Alternative would be similar to the Project, with the same population growth and nonresidential development proposed at Opportunity Sites (31,564 dwelling units and 103,530 residents). However, housing development would be spread more widely across almost all Opportunity Sites, generally at lower densities, resulting in less intensive but more widespread land use changes. This alternative would exceed the City's goal of 18,458 RHNA units and meet the Project objectives.

This alternative was introduced on January 27, 2021, during the second public informational meeting as an RHNA scenario for consideration as the project that would meet the RHNA target through less-intense growth over a larger area. During that public meeting, the Dispersed Growth Alternative was summarized as including:

- Less-intense development
- More land affected by zoning changes
- Less likelihood to provide densities needed for affordable housing
- Fewer homes to be located near transit and other destinations
- Less-efficient use of existing infrastructure

- Preservation of less industrial and commercial land

Air Quality

As stated previously, a project is deemed inconsistent with an AQMP if it would result in population and/or employment growth that exceeds estimates used to develop the applicable AQMP, which, in turn, would generate emissions not accounted for in the regional emissions budgets. Similar to the Project, the Dispersed Growth Alternative would result in growth not previously considered in the SCAG growth assumptions used for development of the 2017 AQMP. Therefore, the Dispersed Growth Alternative would result in growth that would be inconsistent with the applicable air quality plan. The current GP 2025 contains policies, including those in the Air Quality Element, that would encourage sustainable development that reduces air pollutants and VMT within the City. However, the Dispersed Growth Alternative would result in new residential and nonresidential development that would likely exceed SCAQMD's AQMP regional significance thresholds, resulting in a significant and unavoidable impact. The impact would be significant and greater than that of the Project, as development is dispersed throughout the City and farther from transit and other key destinations in the City.

Similar to under the Project, construction and operation of new development projects in the City under the Dispersed Growth Alternative would generate criteria pollutant emissions that could exceed SCAQMD's significance thresholds. Construction of a single development project or the concurrent construction of a multitude of individual development projects at any one time with the Dispersed Growth Alternative could generate criteria pollutant emissions on a daily basis that would exceed SCAQMD's criteria pollutant thresholds. The Dispersed Growth Alternative would be required to comply with all state and local rules and regulations to control criteria pollutant emissions. Additionally, construction emissions from future development projects in the City would be reduced through best available control technologies identified in mitigation measures in project-specific environmental documents. However, there may be instances where implementation of best available control technologies and mitigation would not be sufficient to reduce emissions to below SCAQMD's pollutant thresholds. As such, similar to under the Project, air quality impacts related to construction emissions under the Dispersed Growth Alternative would be significant and unavoidable.

Compared to the Project, the Dispersed Growth Alternative would be more dispersed throughout the City with fewer homes near transit and other destinations. As a result, there would be a greater reliance on vehicle travel with the Dispersed Growth Alternative, thereby resulting in more vehicle trips than under the Project, resulting in an increase in vehicle emissions. Similar to under the Project, the net increase in O_3 precursors and PM_{10} and $PM_{2.5}$ emissions generated under the Dispersed Growth Alternative would exceed SCAQMD's project-level thresholds for these criteria pollutants. This impact would remain significant and unavoidable.

Similar to under the Project, new development associated with the Dispersed Growth Alternative would expose new and existing sensitive receptors within the City to significant health risks from exposure to ambient TACs, including construction- and operations-related diesel particulate matter emissions. The development proposed for the Dispersed Growth Alternative would be more dispersed throughout City as compared to the Project. Given that there would be less intensive development on the individual sites, it is possible that the health risk to sensitive receptors could be less. However, the dispersed nature of development would lead to a higher number of potential health risk exposure incidences throughout the City. Emissions would be reduced through best

available control technologies identified in mitigation measures in project-specific environmental documents, but impacts would nonetheless remain significant and unavoidable.

Biological Resources

The Dispersed Growth Alternative would result in new development similar to that of the Project, although on more sites than under the Project, affecting a greater area of the City. Open Space and Conservation Element Policy OS-1-1 (protect and preserve open space and natural habitat), Policy OS-2.2 (limit extent and intensity of uses and development in areas of arroyos and other critical environmental areas), and other related policies require the consideration and protection of biological resources to regulate the impacts of development through federal and state laws (e.g., the federal Clean Water Act, the federal and California Endangered Species Acts). Furthermore, implementation of other policies and mitigation measures (MM Bio 1) adopted in the GP 2025 EIR would ensure that impacts would be reduced to a less-than-significant level. New development projects would be subject to project-specific CEQA review and mitigation and would be required to obtain any necessary federal and state permits prior to proceeding, as applicable. With the Dispersed Growth Alternative, more sites would need to be evaluated for potential impacts on biological and aquatic resources, resulting in potentially more impacts because a larger area of land would be affected. With implementation of policies and mitigation, the impact would be less than significant but greater than that of the Project, as development on more sites could occur.

Cultural Resources/Tribal Cultural Resources

The Dispersed Growth Alternative would result in new development on a greater number of sites than the Project, as development is more dispersed throughout the City. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), Policy HP-4.3 (work with appropriate tribes to identify and address cultural resources and tribal sacred sites through the development review process), Policy HP-5.1 (use its design and plot plan review processes to encourage new construction to be compatible with cultural resources and historic districts), and other policies, there are currently unknown cultural and tribal cultural resources within the City that could be adversely affected by new development. Similar to under the Project, implementation of Mitigation Measure **MM-CUL-1** would reduce impacts for historical, archaeological, and tribal cultural resources to less-than-significant levels with mitigation. If archaeological resources are discovered during an archaeological study (Mitigation Measure **MM-CUL-2**), or if archaeological resources are identified as inadvertent discoveries during ground-disturbing activities, then Mitigation Measures **MM-CUL-3** through **MM-CUL-8** would reduce this impact to less-than-significant levels. Accordingly, the impact would be greater than that of the Project, as development of the Opportunity Sites would be spread out on a larger number of sites with a proportionally increased potential for disturbing cultural and tribal cultural resources.

Paleontological Resources

New development under the Dispersed Growth Alternative would result in ground disturbance on a greater number of sites than under the Project, as development would be more dispersed throughout the City. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in

its planning and project review process), impacts could be significant, and implementation of similar measures to those under the Project (Mitigation Measure **MM-PAL-1**, conducting paleontological resources investigations; Mitigation Measure **MM-PAL-2**, avoiding paleontological resources, and Mitigation Measure **MM-PAL-3**, or avoiding/minimizing impacts during operations) would require project applicants and/or private developers to identify whether future development sites are in areas of high or undetermined paleontological sensitivity and to mitigate any substantial adverse effect on the significance of paleontological resources. With implementation of similar measures as under the Project to reduce impacts on paleontological resources on a project-by-project basis, impacts would be less than significant but greater than those of the Project, as development of the Opportunity Sites would be spread out on a larger number of sites with the potential for more ground disturbance that could disturb paleontological resources.

Greenhouse Gas Emissions

The Dispersed Growth Alternative would contribute to GHG emissions from construction and operation of new development. The Dispersed Growth Alternative would result in fewer homes near transit and other destinations, which would result in increased VMT in the City. This increase in VMT could result in emissions that exceed SCAQMD numerical thresholds. Additionally, the City's CAP does not account for growth associated with the Dispersed Growth Alternative. Therefore, growth under the Dispersed Growth Alternative would conflict with the City's CAP, as it would exceed the projections therein. Given that the Dispersed Growth Alternative would result in greater VMT when compared to the Project and thus greater GHG emissions, the impacts would be more than those expected from the Project and would be significant and unavoidable.

Hazards and Hazardous Materials

The Dispersed Growth Alternative would result in new development on a greater number of sites than the Project, as development is more dispersed throughout the City. For development proposed pursuant to the Dispersed Growth Alternative, compliance with and oversight by appropriate and applicable federal, state, and local agencies related to the handling and storage or hazardous materials and implementation of policies and mitigation measures similar to those under the Project (Mitigation Measure **MM-HAZ-1**, conduct project-level hazardous material site assessment) would ensure that impacts would be reduced to a less-than-significant level. As with the Project, development under the Dispersed Growth Alternative would be required to evaluate the site for potential contamination prior to approval of site disturbance, as well as comply with all applicable federal, state, and local regulations regarding hazardous materials. Therefore, similar to under the Project, impacts on public health and safety related to hazardous materials under the Dispersed Growth Alternative would be less than significant and similar to those of the Project.

Land Use and Planning

The Dispersed Growth Alternative would involve a greater number of Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project, as development would be more dispersed throughout the City. Similar to the Project, the Dispersed Growth Alternative would require Zoning Code changes and amendments to various subsidiary plans (e.g., seven Specific Plans and Zoning Code) although to a larger degree than the Project, as more sites would be rezoned. As with the Project, future development under the Dispersed Growth Alternative would be required to comply with City requirements that address environmental effects from development, including relevant GP 2025 Land Use and Urban Design Element policies that establish

the overall policy direction for land use planning decisions in the City. This element also addresses housing/jobs balance objectives through the provision of housing for all income levels while providing a diverse collection of housing types, employment-generating land uses, and opportunities for mixed-use development. Due to the urbanized character of the City, development pursuant to the Dispersed Growth Alternative would not physically divide established communities, as new development would be consistent with GP 2025 and would be reviewed on a project-specific basis to ensure compliance with design standards and guidelines such that division of communities would not occur. Even though the increase in Opportunity Sites would allow the City to meet the land use objectives of the regional 2020–2045 RTP/SCS goals, similar to under the Project, the goals would be met in a less efficient way, as future development would occur on more sites. Overall, this alternative would result in less-than-significant land use and planning impacts. This impact would be similar to that of the Project, although more sites in the City would require rezoning, amendments to various subsidiary plans, or other land use changes.

Noise

The Dispersed Growth Alternative would result in new housing and nonresidential development, although on more Opportunity Sites than the Project as development would be more dispersed throughout the City, affecting a greater number of sites and sensitive receptors. Additional residents would be exposed to elevated traffic-related noise levels under the growth anticipated in this alternative because development would occur on more sites than under the Project and more sensitive land uses would be affected adjacent to the Opportunity Sites. As discussed in Section 3.8, *Noise*, the Project would result in potentially significant impacts related to noise and vibration during construction and operation, including traffic and stationary noise. Future development under the Dispersed Growth Alternative, like all development in the City, would be required to adhere to the Riverside Municipal Code noise requirements regarding allowable times and hours of work and noise-control measures. As development under the Dispersed Growth Alternative would be of lower density than under the Project, it is expected that new development would result in lower local traffic volumes (and, as such, lower traffic noise levels in the immediate vicinity of Opportunity Sites) spread throughout the City when compared to the Project's proposed Opportunity Sites. Development under this alternative would result in an increase in construction-related vibration impacts, similar to under the Project. Operational vibration would not increase, similar to under the Project, as residential and mixed-use land uses generally are not substantial sources of vibration. Noise increases could exceed noise significance thresholds and have the potential to affect noise-sensitive receptors. Because the Dispersed Growth Alternative would result in increases in similar new noise sources, implementation of this alternative would not reduce any significant noise impacts of the Project below a level of significance and would require mitigation. However, impacts for the Dispersed Growth Alternative would be similar to those of the Project and may affect a greater number of sensitive receptors adjacent to proposed Opportunity Sites, as new noise sources would be dispersed to more areas than under the Project with less dense development. Similar to those of the Project, impacts from this alternative would be significant and unavoidable.

Population and Housing

Development under the Dispersed Growth Alternative would result in the same population growth and nonresidential development as under the Project (31,564 dwelling units and 103,530 residents). As discussed in Section 3.9, *Population and Housing*, the Project would result in a significant population and housing impact because development under the Housing Element would

substantially exceed the population and housing projections in the 2020–2045 RTP/SCS. The Dispersed Growth Alternative would involve a similar development-intensive project alternative with the same population growth as under the Project but would require more Opportunity Sites than the Project to achieve the same development potential. The Dispersed Growth Alternative would have the same impact as the Project, as this alternative would induce the same amount of unplanned population growth in the City and would not be consistent with population projections. However, the Dispersed Growth Alternative would not be as effective in meeting the goals and policies of the 2020–2045 RTP/SCS that aim to provide a variety of new housing at various income levels near transit. Similar to the Project, the Dispersed Growth Alternative would not displace a substantial number of existing people or housing; however, given the greater number of sites, it could displace more residents than the Project. Impacts from displacement of residents and housing would be less than significant, the same as for the Project. Impacts would be substantially similar to those of the Project and the Dispersed Growth Alternative would not reduce the Project's significant impact with respect to population growth.

Public Services

The Dispersed Growth Alternative would involve a greater number of Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project, as development would be more dispersed throughout the City. Furthermore, this alternative would result in the same population growth and nonresidential development as the Project, and the demand on public services such as police and fire protection, schools, parks, libraries, and other services would be the same as that of the Project but more spread out throughout the City. As the same level of development would occur with the Dispersed Growth Alternative, the impact would be less than significant and similar to that of the Project.

Recreation

The Dispersed Growth Alternative would involve a greater number of Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project. Furthermore, implementation of the Dispersed Growth Alternative would result in the same increase in the City's population as under the Project, which would result in the same demand on recreational facilities as under the Project. Because the Dispersed Growth Alternative would involve more sites for new housing units than the Project, the demand for parks and recreational facilities would be more spread out throughout the City but the demand for each existing facility would be smaller, as less intense development would occur for the Dispersed Growth Alternative.

With regard to the construction or expansion of recreational facilities that might have an adverse physical effect on the environment, typical impacts of new recreational facilities include short-term noise, air quality, and traffic impacts during construction; and noise, light (if night lighting is installed), and traffic during operations, as discussed previously. Similar to under the Project, construction and operational impacts for the Dispersed Growth Alternative would be less than significant. The impact would be substantially similar to that of the Project but the demand for parks and recreational facilities would be dispersed throughout the City rather than concentrated in fewer areas.

Transportation

The Dispersed Growth Alternative would involve more Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project, as development would be more dispersed throughout the City.

The Urban Land Institute's *Growing Cooler: The Evidence on Urban Development and Climate Change* indicates that compact, high-density development has lower traffic generation rates (resulting in substantially fewer VMT) than conventional development densities (Ewing et al. 2008), translating to fewer VMT generated. This research also discusses how the variables of smart growth (density of land use, diversity of land use, destination accessibility [e.g., location near urban centers], distance to transit, demographics, design [e.g., block density and connectivity for bicyclists and pedestrians]) reduce either the number of trips made or the length of those trips, both of which are beneficial from a VMT-generation perspective. Because the dispersed land use pattern decreases these variables, VMT per person would be expected to increase.

The Dispersed Growth Alternative would have a significant impact and a greater impact on transportation given the increase in VMT generated per person compared to the Project.

Utilities and Service Systems

The Dispersed Growth Alternative would involve more Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project, as development would be more dispersed throughout the City. Furthermore, this alternative would result in the same population growth and nonresidential development as the Project, and the demand on utilities and service systems like water, wastewater, dry utilities, solid waste, and other services would be the same as under the Project but more spread out throughout the City. 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. The Project would also have sufficient water supplies available to serve the Project and adequate capacity to serve projected wastewater treatment and solid waste demand. Because the Dispersed Growth Alternative would include the same amount of housing units and nonresidential development as the Project, this alternative would be expected to result in the same demand for utilities and service systems. As the same level of development would occur with the Dispersed Growth Alternative, the impact would be less than significant and similar to that of the Project, although the demand would be more spread out throughout the City.

4.4.3 Alternative 3—Focused Growth Alternative

The Focused Growth Alternative would be similar to the Project, with the same population growth and nonresidential development proposed at Opportunity Sites (31,564 dwelling units and 103,530 residents). However, housing development would be limited to strategic locations with superior access to transportation, employment, services, and amenities, generally at higher densities and more intensive land use changes. This alternative would exceed the City's goal of 18,458 RHNA units and meet the Project objectives.

This alternative was introduced on January 27, 2021, during the second public informational meeting as an RHNA scenario for consideration as the project that would meet the RHNA target

through higher-intensity growth over a more focused area. During that public meeting, the Focused Growth Alternative was summarized as including:

- Higher-intensity development
- Less land affected by zoning changes
- More likelihood to provide densities needed for affordable housing
- More homes to be located near transit and other destinations
- More efficient use of existing infrastructure
- Preservation of more industrial and commercial land

Air Quality

As stated previously, a project is deemed inconsistent with an AQMP if it would result in population and/or employment growth that exceeds estimates used to develop the applicable AQMP, which, in turn, would generate emissions not accounted for in the regional emissions budgets. Similar to the Project, the Focused Growth Alternative would result in growth not previously considered in the SCAG growth assumptions used for development of the 2017 AQMP. Therefore, the Focused Growth would result in growth that would be inconsistent with the applicable air quality plan. The current GP 2025 contains policies, including those in the Air Quality Element, that would encourage sustainable development that reduces air pollutants and VMT within the City. However, Focused Growth Alternative would result in new residential and nonresidential development that would likely exceed SCAQMD's AQMP regional significance thresholds, resulting in a significant and unavoidable impact. The impact would be significant but less than under the Project, as development would be focused near transit and other key destinations in the City, reducing the reliance on vehicle travel.

Similar to under the Project, construction and operation of new development projects in the City under the Focused Growth Alternative would generate criteria pollutant emissions that could exceed SCAQMD's significance thresholds. Construction of a single development project or the concurrent construction of a multitude of individual development projects at any one time with the Focused Growth Alternative could generate criteria pollutant emissions on a daily basis that would exceed SCAQMD's criteria pollutant thresholds. The Focused Growth Alternative would be required to comply with all state and local rules and regulations to control criteria pollutant emissions. Additionally, construction emissions from future development projects in the City would be reduced through best available control technologies identified in mitigation measures in project-specific environmental documents. However, there may be instances where implementation of best available control technologies and mitigation would not be sufficient to reduce emissions to below SCAQMD's pollutant thresholds. As such, similar to those of the Project, air quality impacts related to construction emissions under the Focused Growth Alternative would be significant and unavoidable.

Compared to under the Project, development under the Focused Growth Alternative would occur closer to transit facilities and other key destinations. As a result, there would be less of a reliance on vehicle travel with the Focused Growth Alternative, resulting in fewer vehicle trips than under the Project and a decrease in vehicle emissions. However, similar to under the Project, the net increase in O_3 precursors and PM_{10} and $PM_{2.5}$ emissions generated under the Focused Growth Alternative would exceed SCAQMD's project-level thresholds for these criteria pollutants due to the overall increase in residential and nonresidential development. While air quality impacts related to

operation would be less than those anticipated for the Project, they would remain significant and unavoidable.

Similar to under the Project, new development associated with the Focused Growth Alternative would expose new and existing sensitive receptors within the City to significant health risks from exposure to ambient TACs, including construction- and operations-related diesel particulate matter emissions. The development proposed for the Focused Growth Alternative would be less dispersed throughout City as compared to the Project, which would result in more intense development on the individual Opportunity Sites. As such, it is possible that the health risk to sensitive receptors could be greater at these sites or lesser. Emissions would be reduced through best available control technologies identified in mitigation measures in project-specific environmental documents, but impacts would nonetheless remain significant and unavoidable, and therefore would be similar to those of the Project.

Biological Resources

The Focused Growth Alternative would result in new development similar to that of the Project, although on fewer sites than under the Project, thus affecting a smaller area of the City. Open Space and Conservation Element Policy OS-1-1 (protect and preserve open space and natural habitat), Policy OS-2.2 (limit extent and intensity of uses and development in areas of arroyos and other critical environmental areas), and other related policies require the consideration and protection of biological resources to regulate the impacts of development through federal and state laws (e.g., the federal Clean Water Act, the federal and California Endangered Species Acts). Furthermore, implementation of other policies and mitigation measures (MM Bio 1) adopted in the GP 2025 EIR would ensure that impacts would be reduced to a less-than-significant level. New development projects would be subject to project-specific CEQA review, compliance with the WRC MSHCP, and mitigation and/or biological equivalency would be required to obtain any necessary federal and state permits prior to proceeding, as applicable. With the Focused Growth Alternative, fewer sites would need to be evaluated for potential impacts on biological and aquatic resources, resulting in fewer impacts because a smaller area of land would be affected in comparison to the Project. With implementation of applicable regulations, policies, and mitigation, the impact would be less than significant and smaller than that of the Project, as development on fewer sites is proposed.

Cultural Resources/Tribal Cultural Resources

The Focused Growth Alternative would result in new development on fewer sites than the Project, as development would be focused in more urbanized areas of the City. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), Policy HP-4.3 (work with appropriate tribes to identify and address cultural resources and tribal sacred sites through the development review process), Policy HP-5.1 (use its design and plot plan review processes to encourage new construction to be compatible with cultural resources and historic districts), and other policies, there are currently unknown cultural and tribal cultural resources within the City that could be adversely affected by new development. Similar to under the Project, implementation of Mitigation Measure **MM-CUL-1** would reduce historic resource impacts to less-than-significant levels. If archaeological resources are discovered during an archaeological study (Mitigation Measure **MM-CUL-2**), or if archaeological resources are identified as inadvertent discoveries during ground-disturbing activities, then Mitigation Measures **MM-CUL-3** through **MM-**

CUL-8 would reduce this impact to less-than-significant levels. Accordingly, the impact would be less than significant, the same as the Project, although impacts would be less than under the Project, as development of the Opportunity Sites would be focused on fewer sites.

Paleontological Resources

New development under the Focused Growth Alternative would result in ground disturbance on fewer sites than under the Project. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), impacts could be significant, and implementation of similar measures to those under the Project (Mitigation Measures **MM-PAL-1** through **MM-PAL-3**) would require project applicants and/or private developers to identify whether future development sites are in areas of high or undetermined paleontological sensitivity and to mitigate any substantial adverse effect on the significance of paleontological resources. With implementation of similar mitigation measures as under the Project to reduce impacts on paleontological resources on a project-by-project basis, impacts would be less than significant and less than those of the Project, as development of the Opportunity Sites would be focused on fewer sites.

Greenhouse Gas Emissions

The Focused Growth Alternative would contribute to GHG emissions from construction and operation of new development. The Focused Growth Alternative would result in more homes near transit and other destinations, which would result in decreased VMT in the City. While the Focused Growth Alternative would result in fewer VMT than the Project, this alternative could still result in emissions that exceed SCAQMD numerical thresholds. Additionally, the City's CAP does not account for growth associated with the Focused Growth Alternative. Therefore, growth under the Focused Growth Alternative would conflict with the City's CAP, as it would exceed the projections therein. As the Focused Growth Alternative would result in fewer VMT than the Project and thus fewer GHG emissions, the impacts would be less than those from the Project. However, because growth could exceed thresholds and would exceed the growth assumption in the CAP, impacts for the Focused Growth Alternative would still be significant and unavoidable.

Hazards and Hazardous Materials

The Focused Growth Alternative would result in new development on fewer sites than the Project, as development is focused in more urbanized areas of the City. For development proposed pursuant to the Focused Growth Alternative, compliance with and oversight by appropriate and applicable federal, state, and local agencies related to the handling and storage or hazardous materials and implementation of policies and mitigation measures similar to those under the Project (Mitigation Measure **MM-HAZ-1**, conduct project-level hazardous material site assessment) would ensure that impacts would be reduced to a less-than-significant level. As with the Project, development under the Focused Growth Alternative would be required to evaluate the site for potential contamination prior to approval of site disturbance, as well as comply with all applicable federal, state, and local regulations regarding hazardous materials. Therefore, similar to under the Project, impacts on public health and safety related to hazardous materials under the Focused Growth Alternative would be less than significant and similar to those of the Project.

Land Use and Planning

The Focused Growth Alternative would involve a reduced number of Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project. Similar to the Project, the Focused Growth Alternative would require Zoning Code changes and amendments to various subsidiary plans (e.g., seven Specific Plans and Zoning Code), although to a lesser extent but more intensively than the Project, as fewer sites would be rezoned to accommodate the same amount of development. As with the Project, future development under the Focused Growth Alternative would be required to comply with City requirements that address environmental effects from development, including relevant GP 2025 Land Use and Urban Design Element policies that establish the overall policy direction for land use planning decisions in the City. This element also addresses housing/jobs balance objectives through the provision of housing for all income levels while providing a diverse collection of housing types, employment-generating land uses, and opportunities for mixed-use development. Due to the urbanized character of the City, development pursuant to the Focused Growth Alternative would not physically divide established communities, as new development would be consistent with GP 2025 and would be reviewed on a project-specific basis to ensure compliance with design standards and guidelines such that division of communities would not occur. The reduction in Opportunity Sites would allow the City to effectively meet the land use objectives of the 2020–2045 RTP/SCS goals, similar to under the Project; however, goals would be met in a more efficient way, as future development would occur on fewer sites with superior access to transportation, employment, services, and amenities. Overall, this alternative would result in less-than-significant land use and planning impacts that would be similar to those of the Project. Although fewer sites in the City would require rezoning, amendments to various subsidiary plans, or other land use changes, this alternative would be similarly consistent, as compared to the Project, with policies and plans such as the RTP/SCS that are intended to avoid or minimize environmental effects.

Noise

The Focused Growth Alternative would result in new housing and nonresidential development similar to that of the Project, but development would be limited to strategic locations with superior access to transportation, employment, services, and amenities, generally at higher densities and more intensive land uses throughout the City. Development would be proposed on fewer Opportunity Sites than under the Project and fewer sensitive land uses would be affected adjacent to the Opportunity Sites. As discussed in Section 3.8, *Noise*, the Project would result in potentially significant impacts related to noise and vibration during construction and operation, including traffic and stationary noise. Future development under the Focused Growth Alternative, like all development in the City, would be required to adhere to the Riverside Municipal Code noise requirements regarding allowable times and hours of work and noise-control measures. As development under the Focused Growth Alternative would be more focused than under the Project, it is expected that new development would result in lower traffic generation rates (resulting in less VMT) than conventional development densities, translating to fewer daily automobile trips and lower VMT and, consequently, lower noise levels in the City when compared to the Project's proposed Opportunity Sites. Development under this alternative could result in an increase in construction-related vibration impacts, similar to under the Project, though because fewer locations would be developed, there is the potential that fewer sensitive receptors would be affected by construction noise. Operational vibration would not increase, similar to under the Project, as residential and mixed-use land uses generally are not substantial sources of vibration. Noise

increases could exceed noise significance thresholds and have the potential to affect noise-sensitive receptors. Because the Focused Growth Alternative would result in increases in similar new noise sources, implementation of this alternative would not reduce any significant noise impacts of the Project below a level of significance. However, impacts for the Focused Growth Alternative would be similar to those of the Project but may be reduced at sensitive receptors adjacent to proposed Opportunity Sites, as construction would occur at fewer sites in the City.

Population and Housing

Development under the Focused Growth Alternative would result in the same population growth and nonresidential development as under the Project (31,564 dwelling units and 103,530 residents). As discussed in Section 3.9, *Population and Housing*, the Project would result in a significant population and housing impact because development under the Housing Element would substantially exceed the population and housing projections used in the 2020–2045 RTP/SCS. The Focused Growth Alternative would involve a similar development-intensive project alternative with the same population growth as under the Project but would require fewer Opportunity Sites than the Project to achieve the same development potential. The Focused Growth Alternative would have the same impact as the Project, as this alternative would induce the same amount of unplanned population growth in the City and would not be consistent with population projections. However, the Focused Growth Alternative would be more effective in meeting the goals and policies of the 2020–2045 RTP/SCS that aim to provide a variety of new housing at various income levels near transit. Similar to the Project, the Focused Growth Alternative would not displace a substantial number of existing people or housing; in fact, it would likely result in a slightly smaller displacement compared to the Project. Impacts from displacement of residents and housing would be less than significant, the same as for the Project, and the Focused Growth Alternative would not reduce the Project's significant impact.

Public Services

The Focused Growth Alternative would involve fewer Opportunity Sites to accommodate the same amount of future housing and nonresidential development as the Project, as development would be focused in more urbanized areas of the City. Furthermore, this alternative would result in the same population growth and nonresidential development as the Project, and the demand on public services such as police and fire protection, schools, parks, libraries, and other services would be the same as under the Project but would occur in smaller areas of the City. Therefore, greater burden for services could be placed on individual facilities. However, similar to under the Project, public services can accommodate additional growth. Similar to the Project, the Focused Growth Alternative would comply with state and local regulations to ensure that there would be sufficient fire protection, police, school, and library services and facilities to accommodate additional population resulting from residential and mixed-use development and impacts would be less than significant. The impact would remain similar to that of the Project and would be less than significant.

Recreation

The Focused Growth Alternative would involve fewer Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project, as development would be focused in more urbanized areas of the City. Furthermore, implementation of the Focused Growth Alternative would result in the same increase in the City's population as under the Project, which would result in the same demand on recreational facilities as the Project. The City requires that

private developers proposing residential projects in the City include open space within their projects and pay Park Development Impact Fees to fund future recreational facilities, as described in Section 3.11, *Recreation*. Because the Focused Growth Alternative would involve fewer sites for new housing units than the Project, the demand for parks and recreational facilities would be more focused and concentrated in key areas of the City and the demand for each existing facility in these key areas would be greater on individual facilities, as more intense development would occur for the Focused Growth Alternative.

With regard to the construction or expansion of recreational facilities that might have an adverse physical effect on the environment, typical impacts of new recreational facilities include short-term noise, air quality, and traffic impacts during construction; and noise, light (if night lighting is installed), and traffic during operations, as discussed previously. Similar to under the Project, construction and operational impacts for the Focused Growth Alternative would be less than significant, as construction related to new or expanded facilities would be required to comply with City requirements to avoid or minimize construction impacts. The impact would be substantially similar to that of the Project, but because the demand for parks and recreational facilities under this alternative would be more focused in certain areas in the City, new or expanded parks and recreational facilities would more likely be constructed in already highly developed, urbanized areas of the City. Therefore, under the Focused Growth Alternative, demands on existing recreational facilities would be more concentrated in certain areas of the City and impacts related to the construction of new or expanded facilities could result in somewhat greater construction effects. The difference in the severity of impacts between this alternative and the Project would not be substantial, however, and would remain less than significant with the same mechanisms in place for providing recreational facilities.

Transportation

The Focused Growth Alternative would involve a reduced number of Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project. The Focused Growth Alternative would accommodate the same population growth through residential development and nonresidential development as the Project, and would incorporate the Project's higher residential densities and building intensities in selected areas. However, the higher residential density/building intensity projects, in light of future improvements including bicycle and pedestrian connections, are expected to generate less traffic than conventional development under this alternative. This expectation is based on empirical research, such as the Urban Land Institute's *Growing Cooler: The Evidence on Urban Development and Climate Change*, which indicates that compact, high-density development has lower traffic generation rates (resulting in substantially fewer VMT) than conventional development densities (Ewing et al. 2008), translating to fewer daily automobile trips and lower VMT.

The Focused Growth Alternative would have a reduced impact on transportation compared to that of the Project, although impacts could still be significant.

Utilities and Service Systems

The Focused Growth Alternative would involve fewer Opportunity Sites to locate the same amount of future housing and nonresidential development as the Project, as development would be focused in more urbanized areas of the City. Furthermore, this alternative would result in the same population growth and nonresidential development as the Project, and the demand on utilities and

service systems like water, wastewater, dry utilities, solid waste, and other services would be the same as under the Project but the demand would be more focused and concentrated in key areas of the City. 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. The Project would also have sufficient water supplies available to serve the Project and adequate capacity to serve projected wastewater treatment and solid waste demand. Because the Focused Growth Alternative would include the same amount of housing units and nonresidential development as the Project, this alternative would be expected to result in the same demand for utilities and service systems. As the same level of development would occur with the Focused Growth Alternative, the impact would be less than significant and similar to that of the Project, although the demand would be more focused in concentrated areas in the City.

4.4.4 Alternative 4—Limited Opportunity Sites Alternative (2020–2045 RTP/SCS Consistency Alternative)

The Limited Opportunity Sites Alternative would involve selection of a reduced number of the identified Opportunity Sites on which to locate future housing development, focused on meeting but not exceeding the RHNA obligation of 18,458 RHNA units. This alternative assumes that identified Opportunity Sites are entitled or built by 2029 at a density that equals or exceeds 18,458 RHNA units and a population increase of 60,542 based on a household size of 3.28 per dwelling unit. This alternative would be consistent with the growth projections in the 2020–2045 RTP/SCS and would meet some, but not all, of the Project objectives.

The 2020–2045 RTP/SCS represents a collective vision for the Southern California region's future, developed with input from local governments (including the City and County of Riverside), county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders.

As discussed in Section 3.9, *Population and Housing*, the Project would result in a significant population and housing impact because development under the Project would substantially exceed the population and housing projections used in the 2020–2045 RTP/SCS. For the City of Riverside, the population and housing estimates for 2045 include a population of 395,860, housing units numbering 115,100, and employment of 188,700 jobs (see Table 3.9-1). Projections for the 2020–2045 RTP/SCS utilize land use designations as approved in the adopted GP 2025. As stated in Section 3.9, the increase in population that would potentially result by adding 31,564 new housing units (103,530 residents) would result in a population increase that would be greater than the SCAG 2045 population projection of 67,645 new residents. As such, implementation of the Housing Element Update would result in additional housing beyond what is currently allowed under the existing GP 2025 and SCAG projections. This could result in an additional net increase of 35,885 in City population beyond what is currently anticipated at build-out under the 2020–2045 RTP/SCS. This reduced Opportunity Sites (2020–2045 RTP/SCS Consistency) alternative represents a less development-intensive project alternative to the Project, with fewer impacts related to population increase, which would be consistent with the growth projections in the 2020–2045 RTP/SCS.

Air Quality

As stated previously, a project is deemed inconsistent with an AQMP if it would result in population and/or employment growth that exceeds estimates used to develop the applicable AQMP, which, in

turn, would generate emissions not accounted for in the regional emissions budgets. Similar to the Project, the Limited Opportunity Sites Alternative would result in growth not previously considered in the SCAG growth assumptions used for development of the 2017 AQMP. The current GP 2025 contains policies, including those in the Air Quality Element, that would encourage sustainable development that reduces air pollutants and VMT within the City. However, the Limited Opportunity Sites Alternative would result in new residential and nonresidential development that would likely exceed SCAQMD's AQMP regional significance thresholds, resulting in a significant and unavoidable impact, although less than that expected with the Project because development under the Limited Opportunity Sites Alternative would be less intensive.

Similar to under the Project, construction and operation of new development projects in the City under the Limited Opportunity Sites Alternative would generate criteria pollutant emissions that could exceed SCAQMD's significance thresholds. Although the Limited Opportunity Sites Alternative would result in less growth than that of the Project, construction of a single development project or the concurrent construction of a multitude of individual development projects at any one time in the City could generate criteria pollutant emissions on a daily basis that would exceed SCAQMD's criteria pollutant thresholds. The Limited Opportunity Sites Alternative would be required to comply with all state and local rules and regulations to control criteria pollutant emissions. Additionally, construction emissions from future development projects in the City would be reduced through best available control technologies identified in mitigation measures in project-specific environmental documents, as applicable. However, there may be instances where implementation of best available control technologies and mitigation would not be sufficient to reduce emissions to below SCAQMD's pollutant thresholds. As such, while air quality impacts related to construction emissions under the Limited Opportunity Sites Alternative would be less than those anticipated for the Project, they could potentially be significant and unavoidable.

Given that development under the Limited Opportunity Sites Alternative would be less than under the Project, operation would result in lower emissions at build-out than under the Project. However, compared to existing conditions, the Limited Opportunity Sites Alternative would still result in a net increase of emissions related to increased population.

Given the increase in new development, it is likely that the net increase in O_3 precursors and PM_{10} and $PM_{2.5}$ emissions generated under this alternative would remain in exceedance of SCAQMD's project-level thresholds for these criteria pollutants, similar to that of the Project, although to a lesser degree. This impact would remain significant and unavoidable.

Similar to under the Project, new development associated with the Limited Opportunity Sites Alternative would expose new and existing sensitive receptors within the City to significant health risks from exposure to ambient TACs, including construction- and operations-related diesel particulate matter emissions. However, the degree to which new and existing sensitive receptors would be exposed to health risks from TACs would be less than under the Project, as the Limited Opportunity Sites Alternative would result in less overall development in the City, thereby reducing the total number of these exposure incidences. Emissions would be reduced through best available control technologies identified in mitigation measures in project-specific environmental documents, as applicable, but would nonetheless remain significant and unavoidable.

Biological Resources

The Limited Opportunity Sites Alternative would result in new development although on fewer sites than under the Project. Open Space and Conservation Element Policy OS-1-1 (protect and preserve open space and natural habitat), Policy OS-2.2 (limit extent and intensity of uses and development in areas of arroyos and other critical environmental areas), and other related policies require the consideration and protection of biological resources to regulate the impacts of development through federal and state laws (e.g., the federal Clean Water Act, the federal and California Endangered Species Acts). Furthermore, implementation of other policies and mitigation measures (MM Bio 1) adopted in the GP 2025 EIR would ensure that impacts would be reduced to a less-than-significant level. New development projects would be subject to project-specific CEQA review, WRC MSHCP compliance, and mitigation and/or biological equivalency would be required to obtain any necessary federal and state permits prior to proceeding, as applicable. The impact would be less than significant and less than that of the Project, as less development would occur.

Cultural Resources/Tribal Cultural Resources

The Limited Opportunity Sites Alternative would result in new development on fewer sites than the Project. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), Policy HP-4.3 (work with appropriate tribes to identify and address cultural resources and tribal sacred sites through the development review process), Policy HP-5.1 (use its design and plot plan review processes to encourage new construction to be compatible with cultural resources and historic districts), and other policies, there are currently unknown cultural and tribal cultural resources within the City that could be adversely affected by new development. Similar to under the Project, implementation of Mitigation Measure **MM-CUL-1** would reduce historic resource impacts to less-than-significant levels. If archaeological resources are discovered during an archaeological study (Mitigation Measure **MM-CUL-2**), or if archaeological resources are identified as inadvertent discoveries during ground-disturbing activities, then Mitigation Measures **MM-CUL-3** through **MM-CUL-8** would reduce this impact to less-than-significant levels. Accordingly, the impact would be less than significant and less than that of the Project, as less development would occur.

Paleontological Resources

New development under the Limited Opportunity Sites Alternative would result in ground disturbance on fewer sites than under the Project. Although new development would be subject to Historic Preservation Element Policy HP-1.3 (protect sites of archaeological and paleontological significance and ensure compliance with applicable state and federal cultural resources protection and management laws in its planning and project review process), impacts could be significant, and implementation of similar measures to those under the Project (Mitigation Measures **MM-PAL-1** through **MM-PAL-3**) would require project applicants and/or private developers to identify whether future development sites are in areas of high or undetermined paleontological sensitivity and to mitigate any substantial adverse effect on the significance of paleontological resources. With implementation of similar measures to those of the Project to reduce impacts on paleontological resources on a project-by-project basis, impacts would be less than significant and less than those of the Project, as less development would occur.

Greenhouse Gas Emissions

The Limited Opportunity Sites Alternative would contribute to GHG emissions from construction and operation of new development. The Limited Opportunity Sites Alternative would contribute to GHG emissions from construction and operation of new development. Although the Limited Opportunity Sites Alternative would result in less growth than the Project, the Limited Opportunity Sites Alternative could result in emissions that exceed SCAQMD numerical thresholds. Additionally, the City's CAP does not account for growth associated with the Limited Opportunity Sites Alternative. Therefore, growth under the Limited Opportunity Sites Alternative would conflict with the City's CAP, as it would exceed the projections therein. Because the Limited Opportunity Sites Alternative would result in less development than the Project and thus fewer GHG-emitting sources, the impacts would be less than those from the Project. However, because growth could exceed thresholds and would exceed the growth assumption in the CAP, impacts for the Limited Opportunity Sites Alternative would still be significant and unavoidable.

Hazards and Hazardous Materials

The Limited Opportunity Sites Alternative would involve a reduced amount of future housing and nonresidential development compared to the Project. For development proposed pursuant to the Limited Opportunity Sites Alternative, compliance with and oversight by appropriate and applicable federal, state, and local agencies related to the handling and storage or hazardous materials and implementation of policies and mitigation measures similar to those of the Project (Mitigation Measure **MM-HAZ-1**, conduct project-level hazardous material site assessment) would ensure that impacts would be reduced to a less-than-significant level. As with the Project, development under the Limited Opportunity Sites Alternative would be required to evaluate the site for potential contamination prior to approval of site disturbance, as well as comply with all applicable federal, state, and local regulations regarding hazardous materials. Therefore, similar to under the Project, impacts on public health and safety related to hazardous materials under the Limited Opportunity Sites Alternative would be less than significant and similar to those of the Project.

Land Use and Planning

The Limited Opportunity Sites Alternative would involve a reduced number of Opportunity Sites to locate future housing and nonresidential development. Similar to the Project, the Limited Opportunity Sites Alternative would require Zoning Code changes and amendments to various subsidiary plans (e.g., seven Specific Plans and Zoning Code) although to a lesser degree than the Project. As with the Project, future development under the Limited Opportunity Sites Alternative with fewer Opportunity Sites would be required to comply with City requirements that address environmental effects from development, including relevant GP 2025 Land Use and Urban Design Element policies that establish the overall policy direction for land use planning decisions in the City. This element also addresses housing/jobs balance objectives through the provision of housing for all income levels while providing a diverse collection of housing types, employment-generating land uses, and opportunities for mixed-use development. Due to the urbanized character of the City, development pursuant to the Limited Opportunity Sites Alternative would not physically divide established communities, as new development would be consistent with the goals and policies of GP 2025 and would be reviewed on a project-specific basis to ensure compliance with design standards and guidelines such that division of communities would not occur. However, the reduction in Opportunity Sites would not as effectively meet the land use objectives of the regional 2020–2045

RTP/SCS goals, including creation of affordable housing, encouragement of land development near transit, and facilitation of infill development. While impacts for this alternative would be similar to those of the Project and would be less than significant, this alternative would not as effectively meet the goals of the SCAG 2020–2045 RTP/SCS, which are intended to avoid or minimize environmental effects. Therefore, impacts related to conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect would be greater than those of the Project.

Noise

The Limited Opportunity Sites Alternative would involve a reduced number of Opportunity Sites to locate future housing and nonresidential development; however, additional residents would be exposed to elevated traffic-related noise levels under the growth anticipated in this alternative. As discussed in Section 3.8, *Noise*, the Project would result in potentially significant impacts related to noise and vibration during construction and operation, including traffic and stationary noise. Future development under the Limited Opportunity Sites Alternative, like all development in the City, would be required to adhere to the Riverside Municipal Code noise requirements regarding allowable times and hours of work and noise-control measures. As development under the Limited Opportunity Sites Alternative would be less intense than under the Project, it is expected that the reduction in new development would result in lower traffic noise impacts as compared to the Project. Development under this alternative would result in an increase in construction-related vibration impacts, similar to but to a lesser degree than under the Project. Operational vibration would not increase, similar to under the Project, as residential and mixed-use land uses generally are not substantial sources of vibration. Noise increases could exceed noise significance thresholds and have the potential to affect noise-sensitive receptors. Because the Limited Opportunity Sites Alternative would result in increases in similar new noise sources, implementation of this alternative would not reduce any significant noise impacts of the Project below a level of significance. However, impacts for the Limited Opportunity Sites Alternative would be less than those of the Project, as impacts may affect a fewer number of sensitive receptors adjacent to proposed Opportunity Sites because less development would occur than under the Project. Similar to those of the Project, impacts from this alternative would be significant and unavoidable.

Population and Housing

Development under the Limited Opportunity Sites Alternative (18,458 dwelling units and 60,542 residents) would result in less population growth and less nonresidential development than under the Project (31,564 dwelling units and 103,530 residents), a difference of 13,106 dwelling units and 42,988 residents. As discussed in Section 3.9, the Project would result in a significant population and housing impact because development under the Project would substantially exceed the population and housing projections used in the SCAG 2020–2045 RTP/SCS. The Limited Opportunity Sites Alternative would involve a less development-intensive alternative to the Project with fewer impacts involving a population increase associated with 18,458 additional dwelling units, which would be consistent with the SCAG projections and 2020–2045 RTP/SCS. The Limited Opportunity Sites Alternative would have a less-than-significant impact, as this alternative would not induce substantial unplanned population growth in the City either directly or indirectly because the Limited Opportunity Sites Alternative would be consistent with population projections. However, the Limited Opportunity Sites Alternative would not be as effective in meeting the goals and policies of the 2020–2045 RTP/SCS that aim to provide a variety of new housing and various income levels near transit. Similar to the Project, the Limited Opportunity Sites Alternative would not displace a

substantial number of existing people or housing. Impacts would be less than those of the Project and the Limited Opportunity Sites Alternative would reduce the Project's significant impact related to population growth.

Public Services

The Limited Opportunity Sites Alternative would involve a reduced number of Opportunity Sites to locate future housing and nonresidential development compared to the Project. As such, this alternative would result in less population growth and less nonresidential development than under the Project. Similar to the Project, this alternative would comply with state and local regulations to ensure that there would be sufficient fire protection, police, school, and library services and facilities to accommodate additional population resulting from residential and mixed-use development and impacts would be less than significant. As less development would occur with the Limited Opportunity Sites Alternative, the impact would be less than that of the Project.

Recreation

The Limited Opportunity Sites Alternative would involve a reduced number of Opportunity Sites to accommodate future housing and nonresidential development. Implementation of the Limited Opportunity Sites Alternative would result in an increase in the City's population, which would result in more demand on recreational facilities. However, the City requires that private developers proposing residential projects in the City include open space within their projects and pay Park Development Impact Fees to fund future recreational facilities, as described in Section 3.11, *Recreation*. Because the Limited Opportunity Sites Alternative would include fewer new housing units than the Project, the Limited Opportunity Sites Alternative would be expected to result in less demand for parks and recreational facilities compared to the Project.

With regard to the construction or expansion of recreational facilities that might have an adverse physical effect on the environment, typical impacts of new recreational facilities include short-term noise, air quality, and traffic impacts during construction; and noise, light (if night lighting is installed), and traffic during operations, as discussed previously. Similar to under the Project, construction and operational impacts for the Limited Opportunity Sites Alternative would be less than significant and less than those of the Project, as less development would occur.

Transportation

The Limited Opportunity Sites Alternative would involve a reduced number of Opportunity Sites to locate future housing and nonresidential development focused on meeting but not exceeding the RHNA obligation of 18,458 units. The Limited Opportunity Sites Alternative would require land use changes to meet the RHNA obligation, but transportation impacts would be similar to those of the Project. Therefore, the Limited Opportunity Sites Alternative would have a similar impact on transportation compared to that of the Project, and impacts could still be significant.

Utilities and Service Systems

The Limited Opportunity Sites Alternative would involve a reduced number of Opportunity Sites to accommodate future housing and nonresidential development, focused on meeting but not exceeding the RHNA obligation of 18,458 units. Similar to the Project, the Limited Opportunity Sites Alternative would not result in the relocation or construction of new or expanded water,

wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities. the Limited Opportunity Sites Alternative would also have sufficient water supplies and adequate capacity to serve projected wastewater treatment and solid waste demand. Because the Limited Opportunity Sites Alternative would include fewer new housing units and nonresidential development than under the Project, this alternative would be expected to result in less of a demand for utilities and service systems. As less development would occur with the Limited Opportunity Sites Alternative, the impact would be less than significant, the same as but less than that of the Project.

4.5 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative (State CEQA Guidelines §15126.6(a) and (e)(2)). The environmentally superior alternative is the alternative that results in the fewest significant environmental impacts from among the other alternatives evaluated if the Project has significant impacts that cannot be mitigated to a less-than-significant level. Based on the analysis presented in Chapter 3, *Impact Analysis*, the Project would result in significant impacts.

Based on the analysis presented in Chapter 3 and in this chapter, both the Project and Alternative 3 (Focused Growth Alternative) are environmentally superior. The Focused Growth Alternative would result in more focused growth in the City and would meet the Project objectives including meeting the RHNA goal. Even though the No Project Alternative would result in less development and facilitate less growth pursuant to GP 2025 than the Project, it would increase significant environmental impacts for land use and planning and transportation, whereas the Focused Growth Alternative would reduce those impacts. Similar to the No Project Alternative, Alternative 4 (Limited Opportunity Sites Alternative) would reduce some of the Project's impacts but would also result in somewhat greater impacts on land use and planning. Alternative 2 (Dispersed Growth Alternative) would result in more impacts than the Project, as more sites would be affected.

Table 4-1 includes a summary comparison of the Project and its alternatives representing the highest level of impact (for example, historic resources for cultural and tribal cultural resources).

Table 4-1. Summary of Comparison of Impacts for the Project and Its Alternatives

Environmental Issue Area	Project	Alternative 1 No Project	Alternative 2 Dispersed Growth Alternative	Alternative 3 Focused Growth Alternative	Alternative 4 Limited Opportunity Sites Alternative
Air Quality	Significant	Significant, Reduced Impact Compared to Project	Significant, Similar Impact Compared to Project	Significant, Reduced Impact Compared to Project	Significant, Reduced Impact Compared to Project
Biological Resources	Less than Significant with Mitigation	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Greater Impact Compared to Project	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Reduced Impact Compared to Project
Cultural and Tribal Cultural Resources	Less than Significant with Mitigation	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Greater Impact Compared to Project	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Reduced Impact Compared to Project
Paleontological Resources	Less than Significant with Mitigation	Less than Significant with Mitigation, Reduced Impact Compared to Project	Less than Significant with Mitigation, Greater Impact Compared to Project	Less than Significant with Mitigation, Reduced Impact Compared to Project	Less than Significant with Mitigation, Reduced Impact Compared to Project
Greenhouse Gas Emissions	Significant	Significant, Reduced Impact Compared to Project	Significant, Greater Impact Compared to Project	Significant, Reduced Impact Compared to Project	Significant, Reduced Impact Compared to Project
Hazards and Hazardous Materials	Less than Significant with Mitigation	Less than Significant with Mitigation, Reduced Impact Compared to Project	Less than Significant with Mitigation, Similar Impact Compared to Project	Less than Significant with Mitigation, Similar Impact Compared to Project	Less than Significant with Mitigation, Similar Impact Compared to Project
Land Use and Planning	Less than Significant	Less than Significant, Greater Impact Compared to Project with No Beneficial Effects	Less than Significant, Similar Impact Compared to Project	Less than Significant, Similar Impact Compared to Project	Less than Significant, Greater Impact Compared to Project
Noise	Significant	Significant, Reduced Impact Compared to Project	Significant, Similar Impact Compared to Project	Significant, Similar Impact Compared to Project	Significant, Reduced Impact Compared to Project

Environmental Issue Area	Project	Alternative 1 No Project	Alternative 2 Dispersed Growth Alternative	Alternative 3 Focused Growth Alternative	Alternative 4 Limited Opportunity Sites Alternative
Population and Housing	Significant	Less than Significant, Reduced Impact Compared to Project with No Beneficial Effects	Significant, Similar Impact Compared to Project	Significant, Similar Impact Compared to Project	Less than Significant, Reduced Compared to Project
Public Services	Less than Significant	Less than Significant, Reduced Impact Compared to Project with No Beneficial Effects	Less than Significant, Similar Impact Compared to Project	Less than Significant, Similar Impact Compared to Project	Less than Significant, Reduced Impact Compared to Project
Parks and Recreation	Less than Significant	Reduced Impacts Compared to Project but No Beneficial Effects	Less than Significant, Similar Impact Compared to Project	Less than Significant, Greater Impact Compared to Project	Less than Significant, Similar Impact Compared to Project
Transportation	Significant	Significant, Greater Impact Compared to Project	Significant, Greater Impact Compared to Project	Significant, Reduced Impact Compared to Project	Significant, Similar Impact Compared to Project
Utilities and Service Systems	Less than Significant	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Similar Impact Compared to Project	Less than Significant, Similar Impact Compared to Project	Less than Significant, Reduced Impact Compared to Project
Meets Project Objectives?	Yes	No	Yes	Yes	Yes

Chapter 5
Other CEQA Considerations

5.1 Overview

Section 15126 of the State CEQA Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify (a) significant environmental effects of the proposed project, (b) significant environmental effects that cannot be avoided if the proposed project is implemented, (c) significant irreversible environmental changes that would be involved in the proposed project should it be implemented, (d) growth-inducing impacts of the proposed project, (e) mitigation measures proposed to minimize significant effects, and (f) alternatives to the proposed project.

A discussion of growth-inducing impacts, significant and unavoidable impacts, and significant irreversible environmental changes is provided in the following sections. All potentially significant environmental effects and proposed mitigation measures are found in Chapter 3, *Impact Analysis*, Sections 3.1–3.15, and alternatives to the Project are found in Chapter 4, *Alternatives*. In addition, cumulative impacts are found in Section 3.16, *Cumulative Impacts*.

5.2 Growth-Inducing Impacts

According to Section 15126.2 (d) of the State CEQA Guidelines, growth-inducing impacts of a proposed project must be discussed in the EIR. Growth-inducing impacts are those effects of a proposed project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without implementation of a proposed project. Typically, the growth-inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. Growth may be induced through the provision of infrastructure or service capacity that would accommodate new development. Based on the definition of growth inducement, a general plan is inherently growth-inducing because it must, by law, accommodate at least projected housing demand. The *Riverside General Plan 2025* (GP 2025) update would provide the framework by which public officials (i.e., Riverside City Council) will be guided in making decisions relative to future development in the City of Riverside (City). However, the creation of growth-inducing potential does not automatically lead to growth, whether it would be below or in exceedance of the projected level. Under CEQA, growth in any area is not necessarily assumed to be either beneficial, detrimental, or of little significance to the environment.

The Project would not include individual development proposals. However, as discussed below, because a part of the Project would include rezoning to allow for additional housing opportunities, it

is anticipated that the Project would lead to additional growth. This EIR, by evaluating the impacts of implementation of the GP 2025 update for the Housing and Public Safety Elements, discloses its growth-inducing impacts. Future development facilitated by the Project would occur as market conditions allow and at the discretion of individual property owners. Development of the Project would encourage a mix of market-rate, affordable rental, and affordable ownership housing and mixed-used development in both new construction and preserved or adaptively reused buildings, which is intended to increase housing of all types in the City, rather than create new housing for people outside of the City in order to meet the City's Regional Housing Needs Assessment (RHNA) obligation. To do this, the Project identifies Opportunity Sites that could be suitable locations for future housing development and proposes rezoning of certain Opportunity Sites to allow higher-density residential and mixed-use development. The rezoning of Opportunity Sites has the potential to increase the City's population if all sites that are rezoned to accommodate the RHNA are developed to their highest zoned capacity and all residents are new to the City. It is also possible that existing residents that are currently sharing homes may relocate to new units. The increase in mixed-use development could increase employment-generating land uses within the City, thereby inducing direct and indirect population growth in the City.

According to the Southern California Association of Governments (SCAG), the population of the City is projected to increase to 395,800 by 2045, which represents an increase of 20.61 percent from the 2020 population of 328,155 (SCAG 2020). The potential increase in population by adding 31,564 new housing units (103,530 persons) would result in a population increase that would be greater than the SCAG 2045 population projection of 67,645 additional residents. Implementation of the Project could also result in additional housing and population beyond what is currently planned for in the existing GP 2025, which anticipates a maximum build-out of 128,170 dwelling units and maximum population of 384,510 persons over existing conditions. As stated in Section 3.9, *Population and Housing*, no mitigation is available to reduce this impact to a less-than significant level and impacts would be significant and unavoidable.

By law, the City is required to adopt "a comprehensive, long-term general plan for the physical development of the county" (California Government Code Section 65300). On a regular basis (now every 8 years), SCAG prepares the RHNA and adopts the associated Regional Housing Needs Plan that establishes the share of projected future housing growth that each jurisdiction is expected to accommodate in its general plan. The Housing Element cycle covering the 2013–2021 period included an RHNA obligation of 8,283 units, of which only a portion were built during the last 8 years. The City's current Housing Element was adopted in 2017 and runs through 2021. This update cycle comes when California faces a major statewide housing shortage that is affecting all Californians by raising the price of housing and the cost of construction, and by increasing homelessness. In the 2021–2029 Housing Element cycle (6th cycle), the City's RHNA obligation is a minimum of 18,458 new housing units. Given that 100 percent of potential housing sites will likely not be developed to full potential, the City has provided a buffer of approximately 5,500 dwelling units (approximately 30 percent over and above the RHNA obligation). Altogether, the City has identified Opportunity Sites with existing and proposed capacity for approximately to 24,000 new homes for the 2021–2029 RHNA cycle. It should be noted that, for the purposes of RHNA, Opportunity Sites are conservatively anticipated to develop up to 75 percent of the maximum capacity established by the Zoning Code, whereas for the analysis presented in this EIR, development up to 100 percent of the maximum is analyzed, thereby accounting for the difference between 24,000 and 31,564 new dwelling units.

5.3 Significant and Unavoidable Impacts

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided even with implementation of feasible mitigation measures. Based on the environmental analysis in Chapter 3, the Project would result in significant and unavoidable impacts after the implementation of mitigation measures.

- **Impact AQ-1**: The Project would conflict with or obstruct implementation of the applicable air quality plan. This impact would be significant and unavoidable with implementation of mitigation.
- **Impact AQ-2**: The Project could result in a cumulatively considerable net increase of criteria pollutants for which the Project region is a nonattainment area for an applicable federal or state ambient air quality standard. This impact would be significant and unavoidable with implementation of mitigation.
- **Impact AQ-3**: The Project could result in the exposure of sensitive receptors to substantial pollutant concentrations. The impact would be significant and unavoidable with implementation of mitigation.
- **Impact GHG-1**: The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. This impact would be significant and unavoidable with implementation of mitigation.
- **Impact GHG-2**: The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. This impact would be significant and unavoidable with implementation of mitigation.
- **Impact NOI-1**: The Project would generate temporary or permanent increases in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards for the City. Implementation of Mitigation Measures **MM-NOI-1** and **MM-NOI-2** would reduce this impact, but not to less-than-significant levels. The impact would be significant and unavoidable.
- **Impact NOI-2**: The Project could generate excessive groundborne vibration or groundborne noise levels. Implementation of Mitigation Measure **MM-NOI-3** would reduce this impact, but not to less-than-significant levels. The impact would be significant and unavoidable.
- **Impact POP-1**: The Project would result in substantial unplanned population growth either directly or indirectly. This impact would be significant and unavoidable.
- **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 vehicle miles traveled in the City of Riverside. This impact would be significant and unavoidable.

5.4 Significant Irreversible Environmental Changes

Pursuant to Section 15126.2(d) of the State CEQA Guidelines, an EIR must consider any significant irreversible environmental changes that would be caused by a proposed project, should it be implemented. Section 15126.2(d) reads as follows:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.
>
> A project would result in significant irreversible environmental changes if:
>
> - The primary and secondary impacts would generally commit future generations to similar uses.
> - The project would involve a large commitment of nonrenewable resources.
> - The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.
> - The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Nonrenewable resources used during construction of future development facilitated by the Project would include construction materials and fuels to power construction equipment. However, as discussed in Section 3.15, *Effects Not Found to Be Significant*, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Nonetheless, the resources used during implementation of the Project would be permanently committed to the Project and, therefore, their use would be irreversible.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with a proposed project or an accidental release of hazardous materials. The Project would not involve the transport or storage of hazardous materials on site. Construction activities may include the temporary use of some hazardous agents, such as paints, oils, solvents, and cleansers, as well as temporary storage of these materials and fuel on site. However, the amounts of chemical agents typically used during construction would be limited. In addition, the residential and mixed-use development that would be facilitated by the Project is not anticipated to create hazards related to the release of hazardous materials. Implementation of Mitigation Measure **MM-HAZ-1** would minimize impacts related to hazards and hazardous materials by requiring a project-level hazardous materials site assessment for construction of an individual project, which would verify the presence or absence of hazardous materials on any Opportunity Site and require subsequent measures if necessary.

5.5 Future Use of this EIR

CEQA has a number of provisions for streamlining the environmental review of later projects that are consistent with the Housing and Public Safety Element Updates. The City will use this EIR as the basis for streamlining CEQA reviews of future residential and mixed-use development on Opportunity Sites consistent with the Housing and Public Safety Element Updates. As the lead agency for future development projects, the City will be responsible for determining which, if any, of CEQA's streamlining methods may apply to a given project. In any case, the City will determine whether the impacts of such projects were adequately analyzed in the GP 2025 EIR or this EIR and, if it finds any project was not, will prepare subsequent CEQA documents to disclose the project-specific impacts and identify feasible mitigation. SCAG has prepared a guide for local governments to use when determining whether a project is consistent with the Sustainable Communities Strategy.

The City will use that guide, to the extent that it is applicable, as one consideration in determining consistency with the Sustainable Communities Strategy. The City prepared an initial study checklist in April 2021 to simplify the process of using this EIR as the basis for environmental analyses, focusing on key environmental issues (refer to Chapter 3). Future development projects associated with the Opportunity Sites that are consistent with the Housing and Public Safety Element Updates and this EIR will be able to use the analysis in this Draft EIR to streamline the environmental review process. This EIR will assist the City in processing future development projects that qualify for CEQA streamlining and identifying any new or more severe significant effects that would require the preparation of additional studies and/or subsequent environmental documents (i.e., addenda, mitigated negative declarations, EIRs). As noted in Chapter 2, *Project Description*, a predevelopment checklist (environmental development checklist) will be developed as part of the Project to support the development review process for applicants proposing to develop Opportunity Sites consistent with the Project.

Chapter 6
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Chapter 7
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7.1 Executive Summary

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