



CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

PLANNING DIVISION

DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 1

1. **Case Number:** PR-2023-001469 General Plan Amendment, Specific Plan Amendment, Rezone, Site Plan Review, Tentative Tract Map 38624, Certificate of Appropriateness
2. **Project Title:** Iron Lofts Mixed-Use Residential Development
3. **Hearing Date:** Cultural Heritage Board – Wednesday, May 20, 2026, at 3:30pm
City Planning Commission – Thursday, May 21, 2026, at 9:00am
4. **Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
5. **Contact Person:** Judy Egüez, Senior Planner
Phone Number: (951) 826-3969
6. **Project Location:** The Project Site is located on the east side of Commerce Street between 5th Street (north side) and Mission Inn Avenue (south side) within Township 2 South, Range 5 West, Section 24, *Riverside East* USGS Quadrangle, Coordinates: Latitude 33.980607°, Longitude -117.365423°
APNs: 211-071-001, -002, 004, -005, -023, -024
211-072-001, -002, -004, -020, -021, -022
Addresses: 3093 and 2993 Mission Inn Avenue, 3596 Commerce Street, 2993 Sixth Street, and 3008 Fifth Street
7. **Project Applicant/Project Sponsor's Name and Address:**

Darrin Olson
Iron Lofts LLC
1201 Dove Street, Suite 520
Newport Beach, CA 92660
8. **Current General Plan Designation:** Business Office Park (B/OP)
Proposed General Plan Designation: Mixed Used-Urban (MU-U)

9. **Current Zoning:** BMP-SP – Business and Manufacturing Park and Specific Plan (Riverside Marketplace) Overlay Zones and BMP-SP-CR – Business and Manufacturing Park, Specific Plan (Riverside Marketplace), and Cultural Resources Overlay Zones

Proposed Zoning: MU-U-SP – Mixed Use-Urban and Specific Plan (Riverside Marketplace) Overlay Zones and MU-U-SP-CR – Mixed Use-Urban and Specific Plan (Riverside Marketplace), and Cultural Resources Overlay Zones

Existing Specific Plan SubArea: Marketplace Business Park

Proposed Specific Plan SubArea: Mixed Use Marketplace SubArea

Overlay Zones: Cultural Resources Overlay Zone (Seventh Street East Historic District)

10. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The Applicant proposes to construct mixed-use development consisting of 291 residential dwelling units and 9 live/work units. The development would consist of two buildings; one, two-story and one, four-story, building within 12 parcels that comprise 6.94 acres along Commerce Street, between Mission Inn Avenue (south end) and 5th Street (north end), that will offer a variety of units including studio, one-bedroom, two bedroom and live/work units, as well as amenities including a dog park, a swimming pool and renovation of an existing historic building on site for reuse as the clubhouse (**Figure 1: Regional Location** and **Figure 2: Project Location**). The Proposed Project would also remove later 1930 (non-contributing) additions to the original 1891 Barley Mills building, vacate a portion of 6th Street and an alleyway that will become part of the Project Site, and offer street dedications along Commerce Street. Access would be provided from Mission Inn Avenue, and 5th Street. Concurrent entitlements include the General Plan Amendment, Specific Plan Amendment, Zoning Code Amendment, Tentative Tract Map (TTM 38624), Site Plan Review, and Certificate of Appropriateness details as follows:

- General Plan Amendment to revise the land use for parcels, right-of-way and street/alley vacations that are the subject to TTM 38624, consisting of 6.94 acres from Business Office Park (B/OP) to Mixed Used-Urban (MW-U). Refer to **Figure 4: General Plan Amendment**.
- Specific Plan Amendment to amend the Riverside Marketplace Specific Plan to expand the Mixed-Use Marketplace Sub Area to include 6.94 acres as identified in TTM 38624.
- Zone Code Amendment to revise the zoning for parcels, right-of-way and street/alley vacations that are subject to TTM 38624, consisting of 6.94 acres from BMP-SP – Business and Manufacturing Park and Specific Plan (Riverside Marketplace) Overlay Zones and BMP-SP-CR – Business and Manufacturing Park, Specific Plan (Riverside Marketplace), and Cultural Resources Overlay Zones to MU-U – Mixed Use-Urban and Specific Plan (Riverside Marketplace) Overlay Zones and MU-U-CR – Mixed Use-Urban and Specific Plan (Riverside Marketplace), and Cultural Resources Overlay Zones. Refer to **Figure 5: Zone Change**.
- Tentative Tract Map 38624 (TTM 38624) to merge parcels 211-071-001, -002, 004, -005, -023, -024, 211-072-001, -002, -004, -020, -021, -022, vacate one alleyway, vacate a portion of 6th Street, provide street dedications to support one parcel consisting of 6.94 acres (refer to **Figure 3: Tentative Tract Map 38624**)

- **Site Plan Review:** The Site Plan review is required to ensure the Proposed Mixed-Use Development complies with all federal, State, and local ordinances and codes.
- **Certificate of Appropriateness:** For the development of the multi-family residential Project incorporates two City Structures of Merit partially within the Seventh Street East Historic District and partially within the boundaries of the Citrus Thematic Industrial Potential Historic District.

Aspects and components of the Proposed Project include the following:

Site Layout and Unit Mix: The Proposed Project would include 300 units including the following:

- Studio (447 SF): 51 units (17 percent)
- 1 Bedroom (609 SF and 636 SF): 147 units (49 percent)
- 2 Bedroom (949 SF): 93 units (31 percent)
- Live-Work Units (varies 609 SF, 636 SF and 949 SF): 9 units (3 percent)

The units would be housed in two main buildings: Building A would be a four-story on grade building primarily along Commerce Street and Building C, along Mission Avenue, which would be two-story townhome style live in units (**Figure 6: Site Plan**). Building A is split by an open east-west walkway area that offers both ground level access and “skybridges” between the split buildings. The building is shaped as an “S” north of the walkway and a “C” south of the walkway. The clubhouse and the courtyard and pool area are situated within a portion of the “S” shaped Building A along Commerce Street to reduce the appearance of massing along Commerce Street.

Amenities and Historic Rehabilitation: The Proposed Project would feature one approximately 11,000 SF swimming pool and courtyard area just east of Commerce Street, a clubhouse near the pool, a dog park to be located on the southeast corner of the project, a second courtyard within the northern portion of the site, and a roof deck. The complex provides 36,770 SF of open space, significantly more than the required 22,500 SF of open space. The open space includes 19,650 SF of common open space and 17,120 SF of private open space.

The clubhouse would be situated within the rehabilitated former Barley Mills Building, an original 1891 structure located along Commerce Street. The Proposed Project’s design intent is to rehabilitate the building’s original south, north, east, and west façades with a reconstruction of the original projecting canopies over a perimeter loading dock at the south and west façades. The removal of later 1930 (non-contributing) additions expanding from the original north and east façades will protect the original Barley Mills Building during Project construction. (**Figure 7: Barley Mills Building Renovation**) constitutes a “historic resource” under local criteria as a Riverside “City Structure of Merit” number 86.

Circulation and Parking: There would be two ungated, 24-foot-wide entrances, one on 5th Street (north side) and one on Mission Inn Avenue (south side). Each entrance would be lined with date palm trees on each side. The complex would provide 388 parking spaces, of which ten would be garage spaces, 301 covered spaces, and 77 would be surface spaces. Of the 388 spaces, 117 would be equipped with charging equipment for electric vehicles.

Off-Site Roadway Improvements:

The Proposed Project would construct the following off-site roadway improvements, which are project design features identified in the Project's Traffic Impact Analysis (Appendix H-1):

Roadway Segments

Mission Inn Avenue

- Construct ultimate half-section width (four-lane divided (two-way turn lane) Arterial roadway), including landscaping and parkway improvements along project boundary abutting Mission Inn Avenue (from Commerce Street to the east project boundary) in conjunction with the development.

5th Street

- Construct ultimate half-section width (two-lane undivided roadway), including landscaping and parkway improvements along project boundary abutting 5th Street (from Commerce Street to the east project boundary) in conjunction with the development.
- Coordinate with the planned 3rd Street Grade Separation project contractor for roadway construction.

Commerce Street

- Construct ultimate half-section width (two-lane undivided roadway), including landscaping and parkway improvements along project boundary abutting Commerce Street (from 5th Street to Mission Inn Avenue) in conjunction with the development.
- Coordinate with the planned 3rd Street Grade Separation project contractor for roadway construction.

Intersections

Commerce Street (NS) at Mission Inn Avenue (EW)

- Install high-visibility pedestrian crosswalk on the east leg of the intersection including an overhead infrastructure with advanced pedestrian warning signs.

Project Driveway (NS) at Mission Inn Avenue (EW)

- Construct the Proposed Project driveway with one inbound lane and one outbound lane.
- Install southbound stop control at site egress.

Project Driveway (NS) at 5th Street (EW)

- Construct the project driveway with one inbound lane and one outbound lane.
- Install northbound stop control at site egress.

Vine Street (NS) and Mission Inn Avenue (EW) – improvement to be at direction of the City.

- Install total of four stop signs equipped with solar powered flashing LEDs at all approaches.
- Upgrade the existing crosswalks to the high visibility crosswalks at all approaches.

Architectural Components and Elevations: The four-story building primarily along Commerce Street is designed primarily at 41.3 feet high where portions of the building are designed as alternating “pop outs” and differing colors of gray and rust which provide a visual illusion of varying rooflines and elevations to reduce massing. Additionally, the strategic portions of the building are designed as 49 feet high, and rust colored which provides stark contrasting visual elements. The two-story live-work units are approximately 21.1 feet high, with a steel gray base color, and alternating dark gray and rust to break visual continuity. Additionally, a variety of materials will be used, including weathered steel flat, weathered steel perforated, stucco, and burnished concrete masonry as homage to the historical uses in the surrounding area. Refer to **Figure 8: Architectural Concepts** and **Figure 9: Concept Architectural Renderings** for the elevational concepts along Commerce Street and Mission Inn Avenue.

Landscaping: The landscaping design is designed to complement the Project Site with a mix of trees and shrubs, dominating areas with shade trees and tall date palms around both sides of the building and within the parking lot, with date palm trees lining the ingress and egress on 5th Street and Mission Inn Avenue (refer to **Figure 10: Landscaping Concept Plan**). Landscaping for the Proposed Project would be designed in accordance with the State mandated Assembly Bill (AB) 1881 Water Efficient Landscape Ordinance and the City of Riverside Municipal Code Chapter 19.570–Water Efficient Landscaping and Irrigation. The Proposed Project provides 15,556 SF of landscaping, whereas 7,742 SF is required. In the parking lot, 28 shade trees will be provided, where 23 are required.

Stormwater Controls: A Project-specific water quality control plan was prepared for the Proposed Project (Appendix F-1). The proposed development will match as close to possible existing drainage paths and minimize usage of inlets. Drainage will occur over impervious surfaces. Walkways within portions of the site will drain to adjacent landscaping. Due to anticipated soil conditions, including collapsible soil, runoff will not be dispersed to adjacent pervious areas. Stormwater from the Project Site will drain into a water quality treatment system using a single “swirl chamber” for pre-treatment prior to detention by a solid walled corrugated metal pipe and infiltration by means of drywells.

Trash Service and Enclosures: The buildings are designed with a trash chute on each floor conveniently located near the elevator lobbies and main building entries and/or centralized within each building. The residents would have equal access to their units, or their parking spaces below and on grade. Trash access is located approximately 325 feet from any front door within the Project Site. The residents deposit the trash in the chutes which are collected into trash bins on the termination floor. Bins would be retrieved on trash pickup day from the trash termination room and brought to a staging area on site determined by the trash hauler.

Hazardous Waste Remediation: The Project Site was part of the former Riverside Scrap Iron and Metal Company (RSIM) where known potential soils contamination occurred within the site and driveways. A Remedial Action Plan (RAP) for the site was originally developed in 2020 on behalf of the previous site owner, RSIM. The RAP was not implemented because the previous owner lacked the financial resources to pay for the remediation. Subsequently, the Applicant purchased the properties that were formerly part of RSIM. As such, the Project Applicant entered into an agreement with the Department of Toxic Substances Control (DTSC) providing regulatory oversight. Based on the presence of PCBs at the Site, United States Environmental Protection Agency (USEPA) is providing supplemental regulatory oversight, specific to PCBs and requirements of the federal Toxic Substances Control Act (TSCA), in coordination with DTSC. In 2024, the DTSC approved a Response Plan by GSI Environmental for the excavation and off-site disposal of approximately 30,000 cubic yards of soil impacted by polychlorinated biphenyls (PCBs); arsenic and lead; post development indoor air sampling and risk evaluation; restrict modification to existing buildings using land use covenant. The building design includes the installation, testing, and operation, maintenance, and monitoring (OM&M) of a vapor

intrusion mitigation system (VIMS) in each of the buildings. The VIMS includes robust building slabs, sub-slab venting system, a composite membrane vapor system, utility penetration seals, and modern heating and ventilation systems to prevent vapor intrusion. As part of the historic building renovation, the existing crawl space will also be passively vented with a sub-slab venting system and improved with a modern heating and ventilation system. The environmental impacts of the excavation and haul off as well as the installation of the VIMS were assessed in an Initial Study prepared by the DTSC in September 2024.

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

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant lots: 211-072-022, -021, -024; 211-071-023, -004, -005. abandoned industrial buildings 211-072-020, 211-071-024, -001 and 002 (historic structure)	Business Office Park (B/OP)	Business and Manufacturing Park (BMP-SP)
North	5 th Street, vacant and abandoned industrial buildings beyond	Business Office Park (B/OP)	Business and Manufacturing Park (BMP-SP)
East	Single-family residential	Low Density Residential (LDR)	Business and Manufacturing Park (BMP-SP)
South	Mission Inn Ave; Mission Loft Apartments beyond	Mission Inn Avenue; Mixed Use-Urban; Mixed Use-Village beyond	Business and Manufacturing Park (BMP-SP)
West	Vacant strip of land adjacent to commuter light rail	Business Office Park (B/OP)	Business and Manufacturing Park (BMP-SP)

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

a. Riverside County Airport Land Use Commission, Compatibility Determination. The site is located within Compatibility Zone E of the March Air Force Base Land Use Compatibility Plan.

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

One or more California Native American tribes traditionally and culturally affiliated with the project area requested AB 52 consultation pursuant to Public Resources Code section 21080.3.1, and the City conducted consultation in good faith. The City's consultation approach includes implementation of the Project's tribal cultural resources mitigation measures, which establish procedures to (1) continue consultation if project design/grade changes occur, (2) prepare an Archaeological Monitoring Plan in consultation with consulting tribes, including protocols for evaluating discoveries and the authority for tribal monitors to stop/redirect work, (3) provide for tribal notification, access, and culturally appropriate treatment/disposition of inadvertent discoveries, and (4) maintain confidentiality for sensitive tribal information such as burial/reburial locations. Additional details regarding consultation, participating tribes, and the adopted measures are provided in Section 13, Tribal Cultural Resources.

14. Other Environmental Reviews Incorporated by Reference in this Review:

- a. General Plan 2025
- b. GP 2025 Final Program Environmental Impact Report (FPEIR).
- c. *Former Riverside Scrap Iron and Metal Property Response Plan Initial Study/Negative Declaration*, prepared by Applied Planning for the Department of Toxic Substances Control, September 19, 2024
- d. The following Technical Reports:
 - Appendix A:** *Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis*, Ganddini Group, April 25, 2025.
 - Appendix B:** *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project*, NOREAS, Inc., December 2024.
 - Appendix C-1:** *Cultural Resources Assessment Report: Barley Mills Building, 3596 Commerce Street & 3051 Mission Inn Avenue, Riverside CA; Site of Riverside Soda Works, 2993 Mission Inn Avenue, Riverside CA*, George Taylor Loudon AIA, Inc., December 30, 2024.
 - Appendix C-2:** *Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project*, City of Riverside, Cogstone, September 2025.
 - Appendix D:** *Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street*, Geotechnical Professionals, Inc., July 28, 2025.
 - Appendix E-1:** *Response Plan: Former Riverside Scrap and Iron Metal Property, 2993 6th Street, Riverside, CA 92507*, GSI Environmental, November 4, 2024.
 - Appendix E-2:** *Airport Land Use Commission (ALUC) Development Review, Director’s Determination*, Riverside County Airport Land Use Commission, April 14, 2023.
 - Appendix F-1:** *Project-Specific Water Quality Management Plan*, KHR Associates, revised December 6, 2024.
 - Appendix F-2:** *Preliminary Hydrology-Hydraulics Study for Iron Lofts Apartments, 3093 Mission Inn Avenue, Riverside, California*, KHR Associates, revised December 6, 2024.
 - Appendix G:** *Noise Existing Conditions Report, Title 7 – Noise Code, and Iron Lofts Multifamily Residential Noise Impact Analysis*, Ganddini Group, Inc., April 25, 2025.
 - Appendix H-1:** *Circulation Element Traffic Study and Traffic Study Appendix, SCAG’s RTP, and Iron Lofts Multifamily Residential Traffic Impact Analysis*, Ganddini Group, Inc., May 30, 2025.
 - Appendix H-2:** *Iron Lofts Multifamily Project Vehicle Miles Traveled (VMT) Screening Assessment*, Ganddini Group, Inc., December 27, 2024.
 - Appendix I:** Project Plans

15. Acronyms

AQMP -	Air Quality Management Plan
CAP	Climate Action Plan
CBC	California Building Code
CEQA -	California Environmental Quality Act
CMP -	Congestion Management Plan
EIR -	Environmental Impact Report
EOP -	Emergency Operations Plan
FEMA -	Federal Emergency Management Agency
FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GIS -	Geographic Information System
GHG -	Greenhouse Gas
GP 2025 -	General Plan 2025
HRA	Health Risk Assessment
IS -	Initial Study
MSHCP -	Western Riverside County Multiple-Species Habitat Conservation Plan
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report
RCALUC -	Riverside County Airport Land Use Commission
RCALUCP -	Riverside County Airport Land Use Compatibility Plan
RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RMC -	Riverside Municipal Code
RPD -	Riverside Police Department
RPU -	Riverside Public Utilities
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCH -	State Clearinghouse
SKR-HCP -	Stephens' Kangaroo Rat - Habitat Conservation Plan
SPRR	Southern Pacific Railroad
SWPPP -	Storm Water Pollution Prevention Plan
TOD	Transit Oriented Development
USGS -	United States Geologic Survey
WQMP -	Water Quality Management Plan

Figure 1: Regional Location

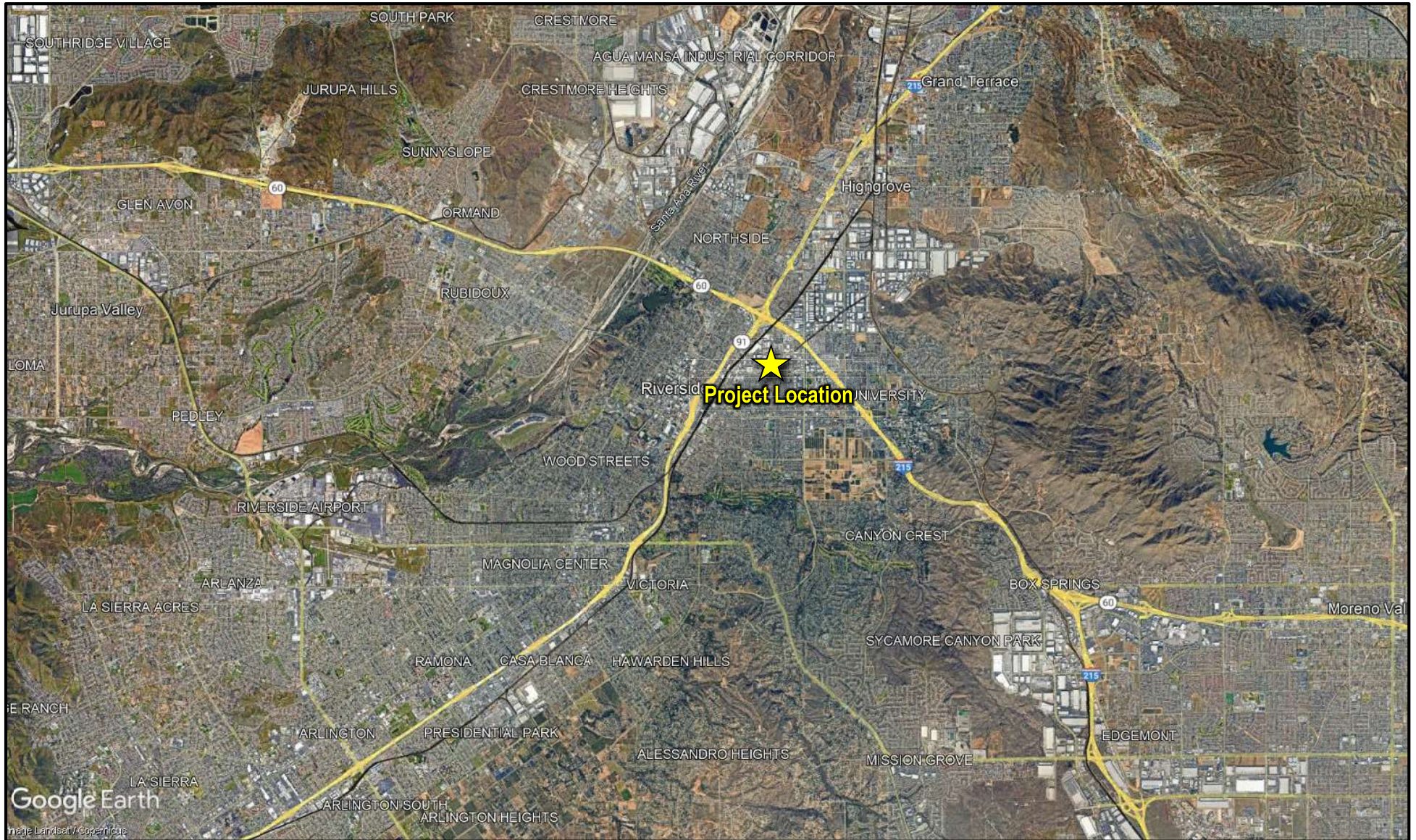


Figure 2: Project Location

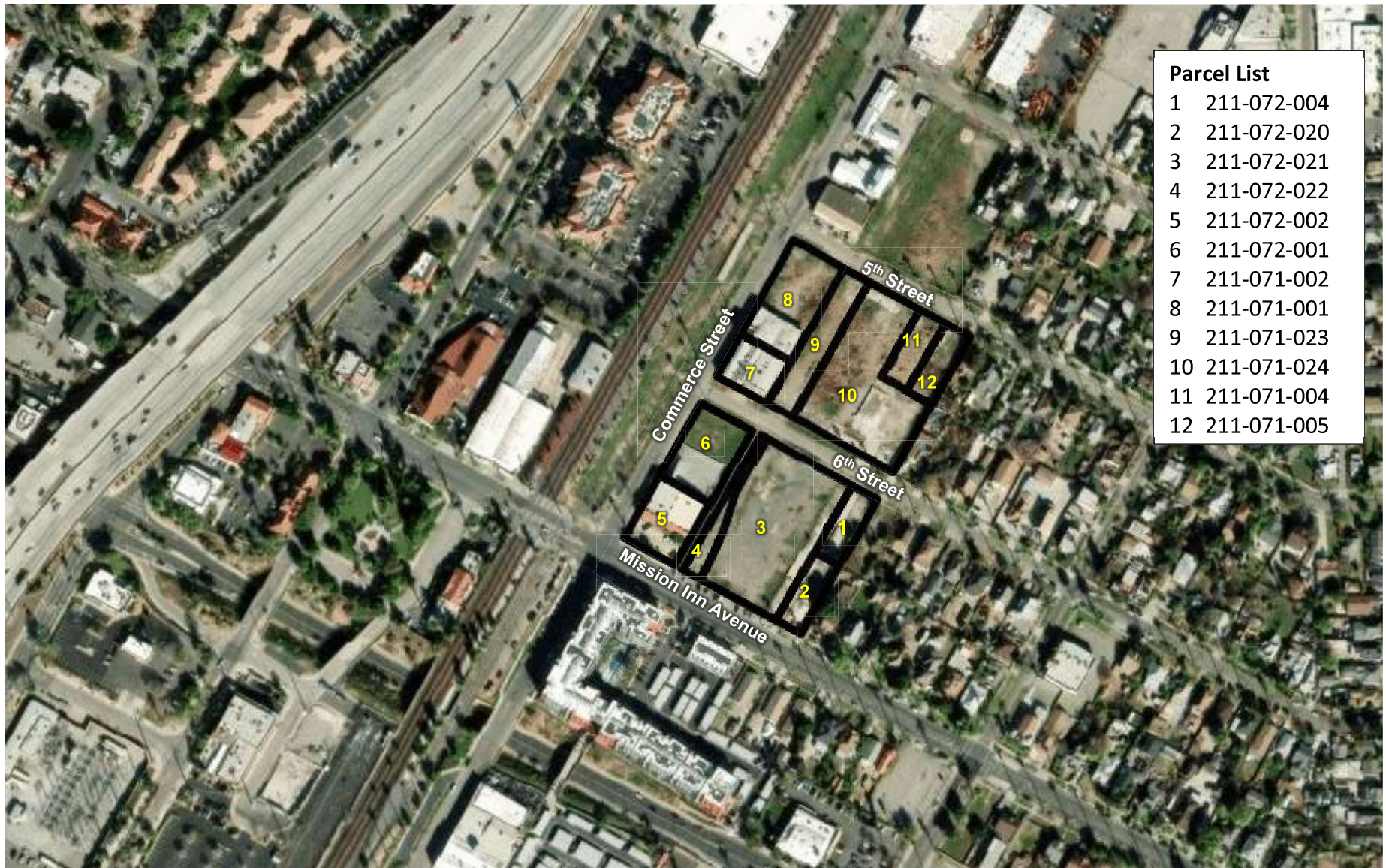


Figure 3: Tentative Tract Map 38624

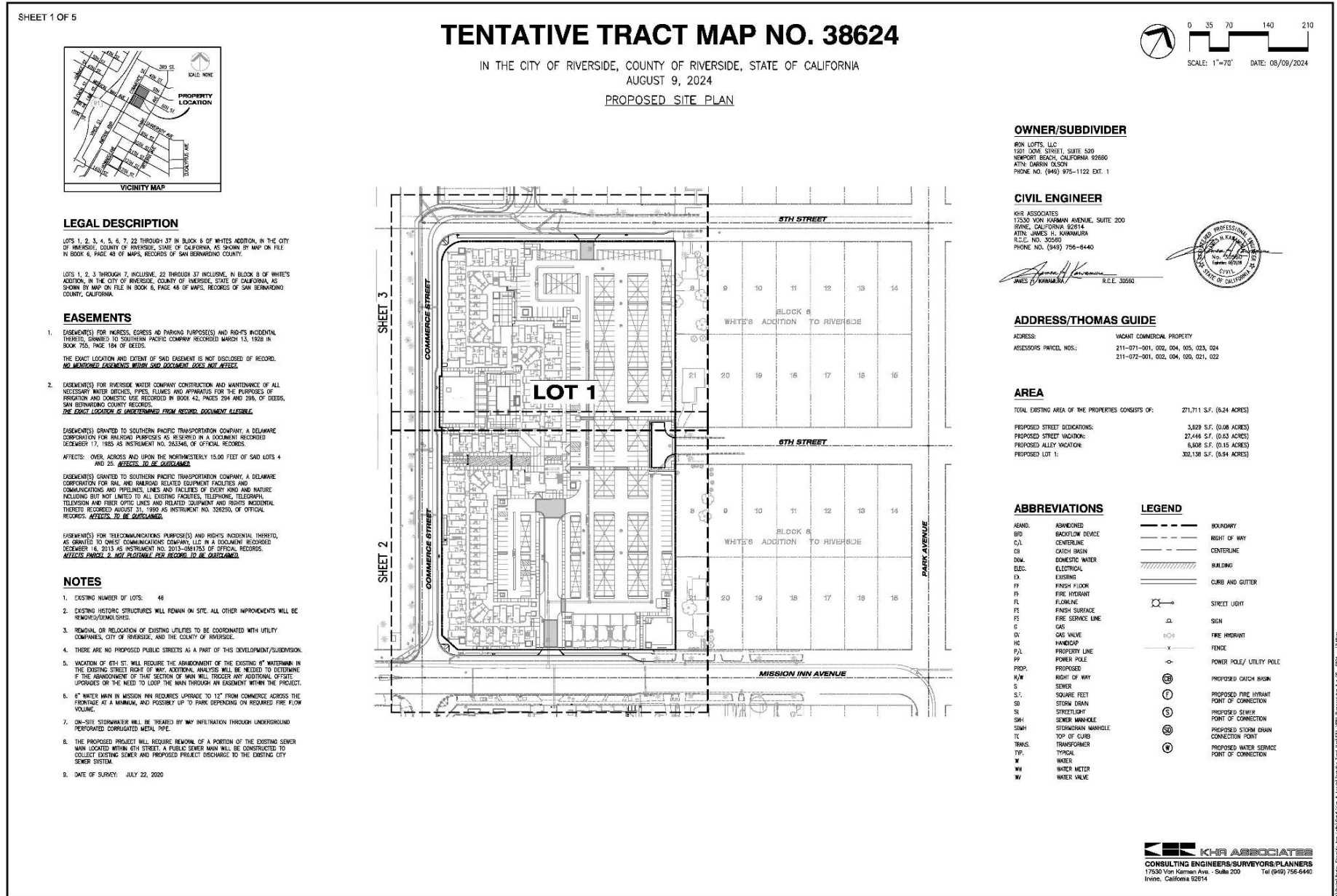


Figure 4: General Plan Amendment

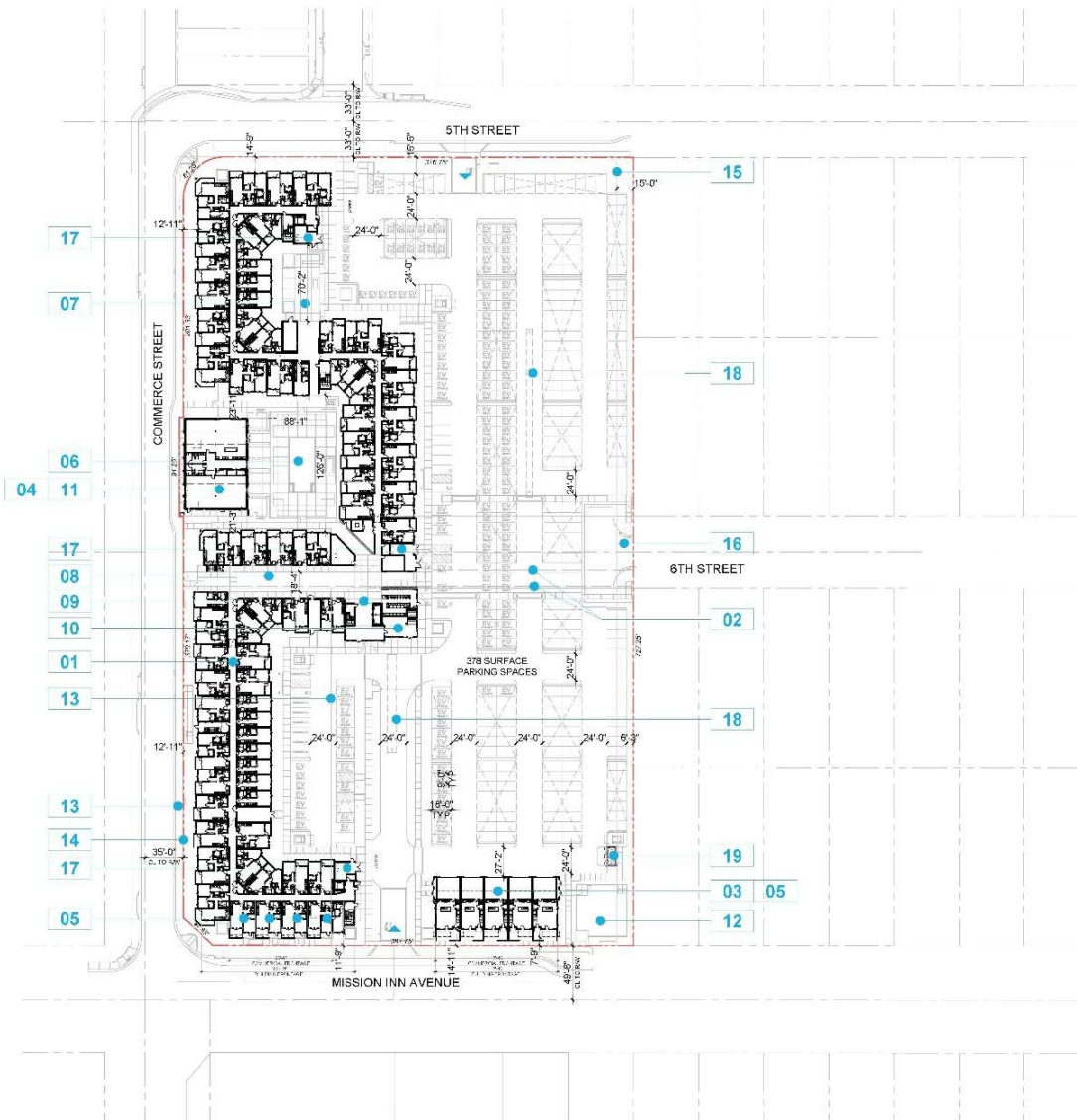


Figure 5: Zone Change



PR-2023-001469 (GPA, RZ, SPA, PPE, TM)

Figure 6: Site Plan



PROJECT SUMMARY

COMMERCE ST AND MISSION INN AVE
RIVERSIDE, CALIFORNIA

ZONING
CURRENT: BMP (BUSINESS MANUFACTURING
AND PARK ZONE)
PROPOSED: MU-U (MIXED-USE URBAN)

AREA
PRE-DEDICATION: 7.03 AC (306,100 SF)
POST-DEDICATION: 6.94 AC (302,131 SF)
TOTAL DWELLING UNITS: 300 DU
DENSITY: 42.7 DU/AC
FAR: 0.95:1 (292,250 SF)

UNIT MIX
STUDIO: 51 UNITS (17%)
1-BED: 147 UNITS (49%)
2-BED: 93 UNITS (31%)
LIVE/WORK: 9 UNITS (3%)
TOTAL: 300 UNITS
AVG. UNIT SIZE: 713 SF

VEHICLE PARKING

RESIDENTIAL REQUIRED: 474 SPACES
(1 SP/STUDIO + 1.5 SP/1-BED + 2 SP/2-BED)

RESIDENTIAL PROVIDED: 388 SPACES
(1.29 SP/DU)

378 SURFACE SPACES
10 GARAGE SPACES (2 SP/TH)

*COVERED: 301 SPACES (1 SP/DU)

CALLOUT LEGEND

- 01 BUILDING A (4-STORY ON GRADE)
- 02 AT&T EASEMENT
- 03 BUILDING C (2-STORY TOWNHOMES)
- 04 BUILDING D (HISTORIC)
- 05 LIVE-WORK UNITS
- 06 COURTYARD A (ACTIVE - POOL)
- 07 COURTYARD B (PASSIVE)
- 08 OPEN AIR BREEZEWAY
- 09 LOBBY
- 10 LEASING
- 11 AMENITIES
- 12 DOG PARK
- 13 EXISTING PROPERTY LINE
- 14 NEW PROPERTY LINE
- 15 PROPOSED SETBACK
- 16 6TH STREET HAMMERHEAD
- 17 IN-BUILDING TRASH ROOM
- 18 STORMWATER TREATMENT TANK & AQUA-SWIRL
- 19 ON-GRADE TRASH ENCLOSURE

COMMERCIAL FRONTAGE

MIXED-USE COMMERCIAL FRONTAGE COMPLIANCE
(PER SECTION 19.120.050)

LOCATION	FRONTAGE LENGTH*	80% LINEAL GROUND FLOOR FRONTAGE REQUIRED	COMMERCIAL FRONTAGE PROPOSED
MISSION INN AVENUE	254.67 FT	203.73 FT	206.59 FT (81.1%)

* EXCLUDING NON-BUILDING SITE AREA (DRIVEWAYS OR PEDESTRIAN ENTRANCES)



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IRON LOFTS
RIVERSIDE, CALIFORNIA # 2020-0844

SCHEMATIC DESIGN
AUGUST 09, 2024



SITE PLAN
PROJECT SUMMARY

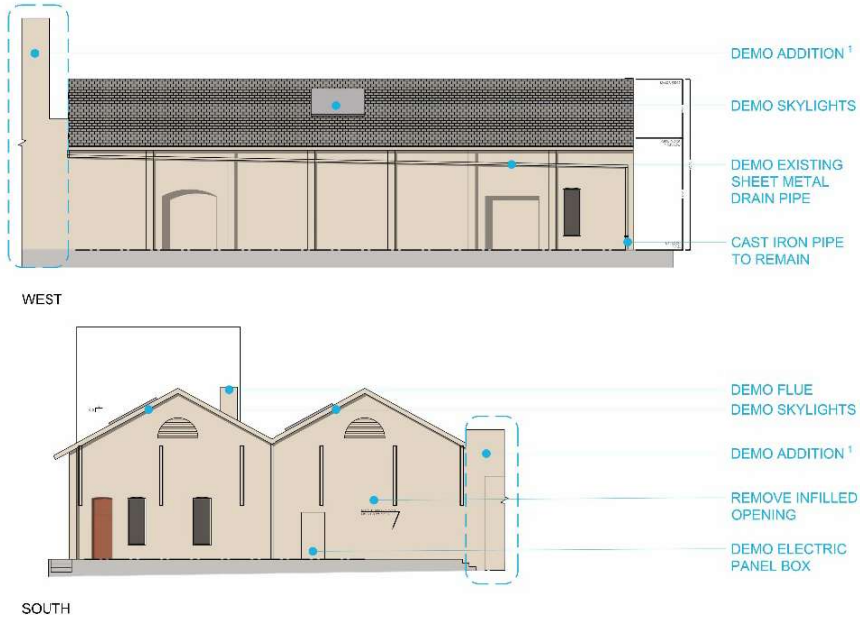
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Figure 7: Barley Mills Building Renovation

NOTE

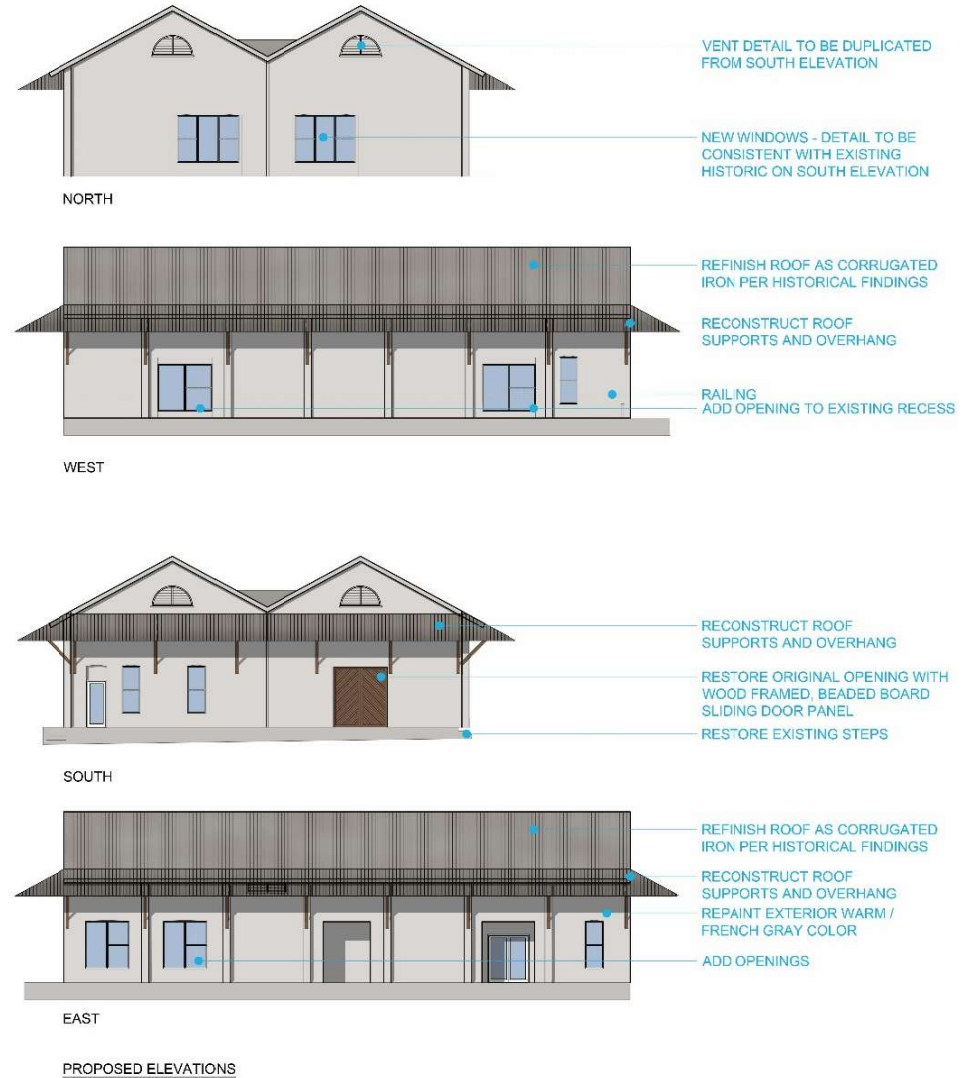
SURVEY DRAWINGS PROVIDED BY OTHERS.

KTGY NOT RESPONSIBLE FOR ACCURACY OF LINEWORK AND/OR DIMENSIONS. ALL GRAPHICS SHOWN ARE FOR REFERENCE PURPOSES ONLY.



NOTES:
 1 - PROTECT ORIGINAL WALL DURING ADJACENT DEMO
 2 - HISTORIC WINDOWS FOUND TO BE 1 OVER 1 DOUBLE HUNG WOOD FRAMED WINDOWS

SURVEY ELEVATIONS WITH DEMO NOTES SHOWN

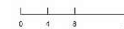


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IRON LOFTS
 RIVERSIDE, CALIFORNIA # 2020-0844

SCHEMATIC DESIGN
 AUGUST 09, 2024



BUILDING ELEVATIONS
 EXISTING HISTORIC BUILDING D - 3596 COMMERCE ST

A2-5

Figure 8: Architectural Elevation Concepts



Figure 9: Concept Architectural Renderings



STREET SCENE FROM MISSION INN AVENUE | BUILDINGS A & C



CORNER OF MISSION INN AVENUE AND COMMERCE STREET | BUILDING A



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IRON LOFTS
RIVERSIDE, CALIFORNIA #2020-0844

SCHEMATIC DESIGN
AUGUST 08, 2024



CONCEPTUAL PERSPECTIVES

A6-0

Figure 10: Landscaping Concept Plan



PALMS AND TREE LEGEND

SYM	NAME	SIZE	SYM	NAME	SIZE
	Trunked California Fan Palm	24' DBH		Agave and/or Yucca	24' Box
	Queen of Sheba Palm	24' Box		Callery White Chinese Hackberry	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box
	Queen of Sheba Palm	24' Box		Queen of Sheba Palm	24' Box

VINES LEGEND

NAME	SIZE / SPACING	WUCOLS	NAME	SIZE / SPACING	WUCOLS
Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low
Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low

SHRUBS AND GROUNDCOVERS LEGEND

SYM	NAME	SIZE / SPACING	WUCOLS	NAME	SIZE / SPACING	WUCOLS
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low

BIOFILTRATION SHRUBS AND G.C.

SYM	NAME	SIZE / SPACING	WUCOLS	NAME	SIZE / SPACING	WUCOLS
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low

SHRUBS

SYM	NAME	SIZE / SPACING	WUCOLS	NAME	SIZE / SPACING	WUCOLS
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low

SHRUBS/G.C. NORTH/EAST EXPOSURE

SYM	NAME	SIZE / SPACING	WUCOLS	NAME	SIZE / SPACING	WUCOLS
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low
	Flowering Vine	5' x 5'	Low	Flowering Vine	5' x 5'	Low

PARKING LOT LANDSCAPING TABULATIONS

REQUIREMENT	PARKING LOT QTY.	REQUIRED	PROVIDED
Planting area (see Appendix A) for parking lot	10,247 SF	10,247 SF	10,247 SF
Planting area (see Appendix A) for parking lot	10,247 SF	10,247 SF	10,247 SF

PROPOSED IMPROVEMENTS

- Project monumentation signage
- Enhanced vehicular covers at entry drive aisle
- Natural grey concrete with retardant finish and sawcut joints at walkways
- Rash enclosure
- Transformer
- Fenced dog park area
- 6" CMU wall at property line
- Decorative wall made from salvaged CMU blocks
- Enhanced pedestrian pavers
- Re-sod planter with accent tree
- Parking lot tree
- Shade tree
- Accent palm tree
- Carport
- 5' H Decorative weathered steel panel wall
- Bench
- Decomposed granite

GENERAL NOTES

- Final Landscape Plans shall accurately show placement of trees, shrubs, and groundcovers.
- Landscape Architect shall verify utility, sewer, storm drain, and other underground utilities prior to construction.
- All proposed landscape areas shall be maintained by owner per City of Riverside requirements.
- No existing trees shall be protected.
- All existing trees shall be protected in place and shall be maintained by owner per City of Riverside requirements.
- All proposed landscape areas shall be maintained by owner per City of Riverside requirements.
- All proposed landscape areas shall be maintained by owner per City of Riverside requirements.
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- All proposed landscape areas shall be maintained by owner per City of Riverside requirements.

TRANSFORMER AND UTILITIES NOTE

Visible transformer and utilities shall be screened by landscape in order to improve the aesthetic value of the project.

PLANTING NOTES

Planting shall be done in accordance with the City of Riverside Planting Manual. All planting areas shall be prepared with appropriate soil amendments, fertilizers, and appropriate mulch. All planting areas shall be watered and maintained by owner per City of Riverside requirements.

IRRIGATION NOTES

An automatic irrigation system shall be installed to provide coverage for all planting areas shown on the plans. Low precipitation equipment shall provide sufficient water for plant growth with minimal evaporation. All irrigation systems shall be installed in accordance with the City of Riverside requirements.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency):

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

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

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

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

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

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

Signature Judy Eguéz
Printed Name & Title Judy Eguéz, Senior Planner

Date 4/14/26
For City of Riverside



ENVIRONMENTAL INITIAL STUDY

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- 7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
1a. Response: (Source: (Source: General Plan 2025 FPEIR; Figure CCM-4 – Master Plan of Roadways; General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways; Table 5.1-A – Scenic and Special Boulevards and Table 5.1-B – Scenic Parkways; General Plan 2025 Figure LU-3-Riverside Park; Citywide Design Guidelines and Sign Guidelines CDGSG)) Less Than Significant Impact. The State CEQA Guidelines do not define “scenic vista” or specify vantage points from which scenic vistas should be observed. Scenic vistas typically refer to public viewpoints offering expansive views of valued landscapes, such as undeveloped hillsides, ridgelines, or open space areas. According to the General Plan 2025 FPEIR (page 5.1-2), while Riverside is urbanized, surrounding hills and ridgelines provide scenic vistas. Notable scenic vistas include La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. General Plan Figure LU-3 identifies scenic vistas within the City, and none are located near the Project Site. <u>Conclusion</u> The Project Site is currently vacant and surrounded by urban development. Implementation of the Proposed Project would not obstruct views of distant natural vistas. The Proposed Project would involve new development, but its site plan and architectural elevations are designed to comply with the Citywide Design Guidelines, which promote high-quality design. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways; General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways; and Citywide Design Guidelines and Sign Guidelines CDGSG) No Impact. Mission Inn Avenue, adjacent to the Project Site, is designated as a Scenic Boulevard in General Plan Figure CCM-4. The Proposed Project would involve installation of a driveway and landscaping improvements along Mission Inn Avenue, including, 24” box size Celtis sinensis along Mission Inn Avenue, Lophestemon confertus (Brisbane box) along Commerce Street, and Magnolia grandiflora 'St Mary' along 5TH ST. Utilities would be placed underground, and existing sidewalks and curbs would be preserved.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Project Site does not contain scenic resources such as trees, rock outcroppings, or historic buildings that would be affected. The Proposed Project would be consistent with the Citywide Design Guidelines and the General Plan's intent for Scenic Boulevards. Additionally, the General Plan FPEIR (page 5.1-4) confirms that no officially designated or eligible State scenic highways traverse the City or its Sphere of Influence. Therefore, no impacts associated with implementation of the Proposed Project would occur.				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
1c. Response: (Source: General Plan 2025; General Plan 2025 FPEIR; Zoning Code; Citywide Design and Sign Guidelines; Seventh Street East Historic District; Citrus Thematic Potential Industrial Historic District; and Riverside Marketplace Specific Plan) Less Than Significant Impact. The Project Site is in an urbanized area. The Proposed Project would be required to implement the General Plan 2025 goals and policies identified as follows and would be subject to a Design Review consistent with established Citywide Design and Sign Guidelines. <i>Policy HP-5.1: The City shall use its design and plot plan review processes to encourage new construction to be compatible in scale and character with cultural resources and historic districts.</i> <i>Policy HP-5.2: The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.</i> The Project Site is in an urbanized area and is subject to the Citywide Design Guidelines and the Riverside Marketplace Specific Plan. The Proposed Project would involve construction of residential buildings designed to reflect the historical character of the area, including materials such as corrugated metal siding, stucco, and concrete block, and a color palette of deep red and gray tones. The Proposed Project would also involve rehabilitation of the historic Barley Mills Building, preserving its original façades, and removing non-contributing additions. The design would be reviewed through the City's Certificate of Appropriateness process to ensure compatibility with the Seventh Street East Historic District and the Citrus Thematic Industrial Historic District.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> Implementation of the Proposed Project would improve the visual quality of the currently vacant and underutilized site. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
1d. Response: (Source: General Plan 2025; General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area; Title 19 – Article VIII – Chapter 19.556 – Lighting; Citywide Design and Sign Guidelines; Seventh Street East Historic District; Citrus Thematic Potential Industrial Historic District; and Riverside Marketplace Specific Plan Less Than Significant Impact. The Proposed Project would involve installation of lighting typical of residential development. Lighting would be like existing conditions in the surrounding area and would not introduce substantial new sources of glare. The Project Site is not located within the Mount Palomar Lighting Area. Lighting design would comply with the Citywide Design Guidelines and Riverside Municipal Code Chapter 19.556 – Lighting. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability; General Plan 2025 – Figure OS-3 - Williamson Act Preserves; General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses) No Impact. The Project Site is in an urbanized area. According to General Plan 2025 Figure OS-2 – Agricultural Suitability, the Project Site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Farmland Mapping and Monitoring Program confirms that no such farmland exists on or near the Project Site. The existing and proposed zoning does not permit agricultural uses. Therefore, no impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves; General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses; and RMC Title 19) No Impact. The Project Site is not subject to any Williamson Act contracts and is not zoned for agricultural use. The Proposed Project would not conflict with existing zoning for agricultural uses or any applicable Williamson Act contracts. Therefore, no impacts associated with implementation of the Proposed Project would occur.				
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
2c. Response: (Source: GIS Map – Forest Data) No Impact. The City of Riverside does not contain forest land as defined in Public Resources Code Section 12220(g), nor does it contain timberland or land zoned for Timberland Production. Therefore, no impacts associated with implementation of the Proposed Project would occur.				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
2d. Response: (Source: GIS Map – Forest Data) No Impact. The Project Site is in a fully urbanized area and does not contain forest land. The Proposed Project would not result in the loss or conversion of forest land. Therefore, no impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
2e. Response: (Source: General Plan – Figure OS-2 – <i>Agricultural Suitability</i>; Figure OS-3 – <i>Williamson Act Preserves</i>; General Plan 2025 FPEIR No Impact. The Project Site is surrounded by urban development and is not located near any farmland or forest land. The Proposed Project would not result in changes to the environment that could indirectly lead to the conversion of farmland or forest land. Therefore, no impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
3a. Response: Source: South Coast Air Quality Management District's 2012 Air Quality Management Plan (AQMP); GP 2025 FPEIR; Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Proposed Project is located within the South Coast Air Basin (SCAB), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which prepares and administers the Air Quality Management Plan (AQMP) for the Basin. The 2022 AQMP, adopted by SCAQMD and approved by the California Air Resources Board (CARB) in 2023, outlines a comprehensive strategy to attain federal and state air quality standards, particularly for ozone and PM2.5, for which the Basin is designated nonattainment. The AQMP's control measures and emission reduction estimates are based on regional growth forecasts developed by the Southern California Association of Governments (SCAG), including land use, population, and employment characteristics derived in consultation with local jurisdictions. Projects that are consistent with SCAG's growth projections and local general plans are considered consistent with the AQMP. The Proposed Project includes a General Plan Amendment to change the land use designation from Business/Office Park (B/OP) to Mixed Use–Urban (MU-U). Although the General Plan 2025 land use assumptions incorporated into the AQMP do not reflect this change, the Proposed Project would not result in a substantial deviation from regional growth forecasts. The General Plan 2025 Program Environmental Impact Report (FPEIR) estimated a total of 127,692 dwelling units at buildout under the "Typical Growth Scenario." The Proposed Project's addition of 300 units represents less than a one percent increase and would not materially alter the City's growth trajectory. The General Plan 2025 includes policies that promote mixed-use, pedestrian-friendly development, reduce vehicle miles traveled, and support air quality improvements over time. The Proposed Project is consistent with these policies and would be subject to applicable AQMP control measures, including SCAQMD Rules 403 (fugitive dust), 445 (wood-burning devices), and 1113 (architectural coatings). To evaluate emissions, the Proposed Project was modeled using CalEEMod v2022.1.1.29, incorporating EMFAC2021 and OFFROAD2017 emission factors. Both construction and operational emissions were found to be below SCAQMD regional and localized significance thresholds. The Proposed Project does not introduce substantial stationary sources and would not increase the frequency or severity of existing air quality violations or delay attainment of air quality standards.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In addition, the Proposed Project supports AQMP goals by promoting infill development, reducing reliance on single-occupancy vehicles, and implementing energy-efficient design features consistent with Title 24 and CALGreen standards. The Project Site is in a Senate Bill 535-designated disadvantaged community and would benefit from AQMP strategies that prioritize emission reductions in overburdened areas. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
3b. Response: (Source: General Plan 2025; FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds; Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Project Site is located within the South Coast Air Basin (SCAB), which is designated nonattainment for ozone, PM10, and PM2.5 under both federal and state standards. The South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for air quality planning and enforcement in the Basin. The applicable standards include the National Ambient Air Quality Standards (NAAQS), California Ambient Air Quality Standards (CAAQS), and regional thresholds established by SCAQMD. To evaluate potential impacts, construction and operational emissions were modeled using CalEEMod v2022.1.1.29, incorporating EMFAC2021 and OFFROAD2017 emission factors. Construction activities include demolition of approximately 24,500 square feet of existing buildings, site preparation, grading of 6.94 acres (with 10,000 cubic yards of export), building construction, paving, and application of architectural coatings. Operational emissions include mobile sources (net new 1,213 daily vehicle trips), energy use, area sources, water, waste, and refrigerants. <u>Construction Emissions</u> To evaluate short-term construction emissions, the air quality analysis presented in Appendix A utilized CalEEMod Version 2022.1.1.29, incorporating project-specific phasing, equipment, and activity assumptions. The modeling accounted for compliance with applicable SCAQMD rules, including Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). SCAQMD Rule 403 requires implementation of best management practices to minimize fugitive dust emissions during construction. These measures include watering active construction areas at least three times daily, applying nontoxic chemical soil stabilizers to inactive areas, covering haul trucks or maintaining a minimum of two feet of freeboard, limiting vehicle speeds on unpaved roads to 15 miles per hour, suspending grading during wind events exceeding 25 miles per hour, and sweeping paved access roads using Rule 1186.1-compliant equipment. These practices were incorporated into the CalEEMod inputs and are considered part of the Proposed Project's design.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
Architectural coatings applied during construction would comply with SCAQMD Rule 1113, which limits the volatile organic compound (VOC) content of paints and solvents. Specifically, building coatings would be restricted to an average of 50 grams per liter or less of VOCs, and traffic coatings would be limited to 100 grams per liter or less. These limits were reflected in the CalEEMod modeling assumptions and are consistent with current regulatory standards.						
Table 1 – Construction-Related Regional Pollutant Emissions						
Activity	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO ₂	PM10	PM2.5
Maximum Daily Emissions ^{1,2}	54.20	31.90	38.50	0.05	9.30	5.26
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No
Notes: Source: CalEEMod Version 2022.1.1.29. (1) On-site demolition, site preparation, and grading PM-10 and PM-2.5 emissions show compliance with SCAQMD Rule 403 for fugitive dust. (2) Construction, painting, and paving phases may overlap.						
The results shown in Table 1 identifies that none of the Proposed Project's construction emissions would exceed regional thresholds. Localized air quality impacts were evaluated using the South Coast Air Quality Management District (SCAQMD) Localized Significance Thresholds (LSTs) methodology. The analysis considered the maximum daily disturbance area of 3.5 acres during site preparation and applied LSTs for a receptor distance of 25 meters, appropriate for the nearest sensitive receptors located approximately 65 to 100 feet from the Project Site.						
Construction emissions were modeled using CalEEMod Version 2022.1.1.29, incorporating equipment and activity assumptions for each phase of construction. The modeling included compliance with SCAQMD Rule 403 (fugitive dust control), which requires best management practices such as watering active areas, limiting vehicle speeds on unpaved roads, and suspending grading during high wind conditions. Emissions from architectural coatings were modeled in accordance with SCAQMD Rule 1113, which limits volatile organic compound (VOC) content.						
Maximum on-site daily emissions during construction were compared to applicable LST thresholds for nitrogen oxides (NOx), carbon monoxide (CO), particulate matter less than 10 microns (PM10), and particulate matter less than 2.5 microns (PM2.5), as shown in Table 2 – Local Construction Emissions and Nearest Receptors .						

Table 2 – Local Construction Emissions and Nearest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Demolition	22.20	19.90	1.36	0.91
Site Preparation	31.60	30.20	9.04	5.20
Grading	16.30	17.90	3.49	2.00
Building Construction	10.40	13.00	0.43	0.40
Paving	6.94	9.95	0.30	0.27
Architectural Coating	0.83	1.13	0.02	0.02
SCAQMD Thresholds ^{1,2}	230	1,299	11	6
Exceeds Threshold?	No	No	No	No

Notes:

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for an interpolated 3.5-acre threshold at 25 meters in SRA 23 Metropolitan Riverside County.

The nearest sensitive receptors to the project include the existing single-family residential uses located adjacent to the east, approximately 100 feet (~30 meters) southeast, and approximately 65 feet (~20 meters) northeast and the multi-family residential uses located approximately 100 feet (~30 meters) south of the Project Site; therefore, the 25 meter threshold was used. Note: The project would disturb up to a maximum of 3.5 acres a day during site preparation (see Table 7). (2) The 3.5-acre threshold was interpolated based on the 2-acre and 5-acre thresholds.

All modeled emissions were below the applicable LST thresholds. The analysis also considered potential health risks from diesel particulate matter (DPM) associated with construction equipment. Due to the short-term nature of construction (approximately 24 months), compliance with CARB idling limits, and use of newer equipment, the Project would not result in long-term exposure or exceed cancer or non-cancer risk thresholds. No significant localized impacts are anticipated, and no additional mitigation measures are required beyond standard dust control practices.

Based on the modeling results and regulatory compliance measures incorporated into the Proposed Project, construction-related emissions would not exceed SCAQMD regional or localized significance thresholds for any criteria pollutant. The Project would comply with applicable air quality standards and would not contribute to an existing or projected violation. Therefore, potential impacts associated with construction emissions would be less than significant, and no mitigation would be required.

Operational Emissions

Long-term operational emissions associated with the Proposed Project were evaluated using CalEEMod Version 2022.1.1.29, based on an anticipated opening year of 2027. The analysis included emissions from mobile sources (vehicle trips), area sources (consumer products, landscaping equipment, architectural coatings), energy use (electricity and natural gas), water and wastewater, solid waste, and refrigerants.

Trip generation rates were derived from the Iron Lofts Traffic Impact Analysis and adjusted to account for removal of existing uses. The net new trip rate was 4.043 trips per dwelling unit per day, resulting in approximately 1,213 daily vehicle trips. Emission factors were based on EMFAC2021 for mobile sources and OFFROAD2017 for off-road equipment.

As shown in **Table 3 – Regional Operational Pollutant Emissions**, all modeled emissions were below applicable thresholds. The Proposed Project does not include stationary sources or attract heavy-duty truck traffic that would warrant localized significance threshold (LST) analysis for operational emissions. Additionally, no intersections in the vicinity of the Project Site exceed 100,000 vehicles per day; therefore, carbon monoxide (CO) “hot spot” modeling was not required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
Table 3 – Regional Operational Pollutant Emissions						
Activity	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO2	PM10	PM2.5
Maximum Daily Emissions	13.20	10.10	59.70	0.14	9.76	2.86
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Notes: Source: CalEEMod Version 2022.1.1.29; the higher of either summer or winter emissions.						
Conclusion						
Based on the modeling results and regulatory assumptions incorporated into the Proposed Project, operational emissions would not exceed SCAQMD regional thresholds for any criteria pollutant. The Project would not result in localized exceedances, contribute to carbon monoxide “hot spots,” or introduce stationary sources requiring further analysis. Therefore, potential impacts associated with operational emissions would be less than significant, and no mitigation would be required.						
c. Expose sensitive receptors to substantial pollutant concentrations?			☐	☐	☒	☐
3c. Response: (Source: General Plan 2025; FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds; South Coast Air Quality Management District’s 2016 Air Quality Management Plan, CalEEMod; Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025)						
Less Than Significant Impact.						
The Proposed Project is located within the South Coast Air Basin (SCAB), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Sensitive receptors in the vicinity include single-family residences located approximately 65 feet northeast and 100 feet southeast of the Project Site, as well as multi-family residences located approximately 100 feet south. These receptors meet the SCAQMD definition of sensitive land uses, which include locations where individuals may remain for extended periods, such as homes, hospitals, and convalescent facilities.						
Construction Emissions						
Short-term construction emissions were modeled using CalEEMod Version 2022.1.1.29, incorporating EMFAC2021 and OFFROAD2017 emission factors. The analysis assumed a maximum daily disturbance area of 3.5 acres during site preparation and applied SCAQMD Localized Significance Thresholds (LSTs) for a receptor distance of 25 meters. All modeled emissions of NOx, CO, PM10, and PM2.5 were below applicable LST thresholds. Construction activities would comply with SCAQMD Rule 403 (fugitive dust control), which requires best management practices such as watering active areas, limiting vehicle speeds on unpaved roads, and suspending grading during high wind conditions.						
Operational Emissions						
Long-term operational emissions were also evaluated using CalEEMod and found to be below SCAQMD regional thresholds. The Proposed Project does not include stationary sources or attract heavy-duty truck traffic that would						

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
warrant LST analysis for operational emissions. Therefore, no substantial pollutant concentrations are anticipated during operation. <u>Health Risk Assessment</u> A Health Risk Assessment (HRA) was conducted to evaluate exposure to diesel particulate matter (DPM) from nearby freeway (SR-91) and rail sources. Using AERMOD dispersion modeling and OEHHA methodology, the maximum cumulative cancer risk over a 30.25-year exposure scenario was 5.28 in one million, well below the CEQA threshold of 10 in one million. The non-cancer hazard index was 0.0014, below the threshold of 1.0. These results indicate that the Proposed Project would not expose future residents to substantial health risks from toxic air contaminants. <u>2025 General Plan FPEIR Mitigation Measures</u> The Proposed Project would implement all applicable air quality mitigation measures identified in the 2025 General Plan FPEIR. These measures are incorporated into the Proposed Project through standard conditions of approval and regulatory compliance requirements. The following mitigation measures apply: MM AIR 1: Implement fugitive dust control measures consistent with SCAQMD Rule 403, including watering active sites, applying soil stabilizers, covering haul trucks, limiting vehicle speeds on unpaved roads, suspending grading during high winds, replanting disturbed areas, and sweeping streets with compliant equipment. MM AIR 2: Ensure all architectural coatings used during construction and operation comply with SCAQMD Rule 1113, limiting VOC content to 50 g/L for building coatings and 100 g/L for traffic coatings. MM AIR 3: Use asphalt materials that comply with SCAQMD Rule 1108, which limits VOC content in paving materials. MM AIR 4: Limit diesel equipment idling to five minutes or less in accordance with CARB Air Toxics Control Measures and use newer, cleaner equipment per CARB's In-Use Off-Road Diesel Vehicle Regulation. MM AIR 5: If asbestos is encountered during demolition, comply with SCAQMD Rule 1403, including notification, removal, and disposal procedures. MM AIR 6: Minimize odor impacts through proper equipment operation, material handling, and disposal practices consistent with SCAQMD Rule 402. MM AIR 7: Sweep on-site and off-site streets during construction to reduce particulate matter, using sweepers compliant with SCAQMD Rule 1186.1. These measures are integrated into the Project's design and construction protocols and were reflected in the emissions modeling presented in Appendix A. <u>Conclusion</u> The Proposed Project does not exceed applicable SCAQMD thresholds and remains consistent with the General Plan 2025. Cumulative impacts related to criteria pollutants were previously evaluated as part of the buildout scenario analyzed in the General Plan 2025 Program Environmental Impact Report (FPEIR). No significant new impacts would occur beyond those previously disclosed, and a Statement of Overriding Considerations was adopted for those impacts. Based on the modeling results and health risk assessment presented in Appendix A, the				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, potential impacts would be less than significant, and no mitigation would be required beyond compliance with existing regulatory standards and adopted General Plan mitigation measures.				
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐
3d. Response: (Source: Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Proposed Project would not result in the creation of objectionable odors affecting a substantial number of people. Odor impacts are evaluated based on the potential to create a nuisance under South Coast Air Quality Management District (SCAQMD) Rule 402, which prohibits emissions that cause injury, detriment, nuisance, or annoyance to a considerable number of people or the public. <u>Construction Activities</u> Construction activities may generate temporary odors from diesel exhaust, asphalt paving, and volatile organic compounds (VOCs) associated with coatings and solvents. These emissions would be short-term, intermittent, and localized. The Air Quality, GHG, and Energy Impact Analysis prepared for the Proposed Project confirms that: - Odor emissions would be minimized through compliance with SCAQMD Rules 402 and 1113 (architectural coating), and implementation of best management practices (BMPs), including equipment maintenance and use of low-VOC materials. - Odors from materials such as asphalt would dissipate rapidly upon drying or curing. - Diesel exhaust and VOCs would disperse quickly and are not expected to reach objectionable levels at the nearest sensitive receptors, which are located approximately 65 to 100 feet from the Project Site. Due to the temporary and intermittent nature of construction-related odor emissions and compliance with applicable regulations, construction-source odor impacts would be less than significant. <u>Operational Activities</u> The Proposed Project does not include land uses typically associated with persistent or noxious odors, such as industrial operations, food processing, or waste treatment. Potential odor sources during operation would be limited to trash storage areas and occasional diesel delivery truck emissions. The Air Quality Report determined that: - Operational activities would comply with SCAQMD Rule 402. - The distance to the nearest sensitive receptors and the residential nature of the Proposed Project would prevent odor concentrations from reaching nuisance levels. - No odor complaints are associated with the Project Site, and no odor control technologies are required. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
4a. Response: <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP); Figure OS-7 – MSHCP Cores and Linkages; Figure OS-8 – MSHCP Cell Areas; General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans; Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas; Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area; Figure 5.4-7 – MSHCP Criteria Area Species Survey Area; Figure 5.4-8 – MSHCP Burrowing Owl Survey Area; and Appendix B: Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc., December 2024)</i> Less Than Significant Impact. The Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. The Project Site disturbance footprint, which includes a buffer consists of 7.03 acres of developed and anthropogenically disturbed land, and is surrounded by residential, commercial, and industrial development. Field surveys conducted in 2023 and 2024 confirmed that the Project Site does not support suitable habitat for special-status species, including nesting birds, raptors, or bat roosts. No special-status plants or wildlife species were observed during the surveys, and no remnant raptor nests or bat guano were detected. The Project Site is not located within any Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Subunit, Criteria Cell, Cell Group, Public/Quasi-Public Land, Core, Linkage, or Conserved Land. It is also not within any MSHCP-designated survey area for burrowing owl, narrow endemic or criteria area plant species, amphibians, mammals, or the Delhi Sands flower-loving fly. The site is mapped as “Urban” in the MSHCP vegetation layer and is characterized by Arlington fine sandy loam, a well-drained, non-hydric soil type that does not support vernal pools, wetlands, or riparian/riverine habitats. No riparian or riverine features, vernal pools, or other aquatic resources were identified on the Project Site. Consequently, the Project would not impact species associated with these habitats, including fairy shrimp or riparian birds such as the least Bell’s vireo or southwestern willow flycatcher. The Project Site also lacks the floral diversity, nesting substrates, and landscape connectivity necessary to support Crotch’s bumblebee or other special-status invertebrates. Based on the absence of suitable habitat, the lack of special-status species observations, and the Project Site’s location outside of MSHCP conservation areas and survey zones, the Proposed Project would not result in direct or indirect impacts to special-status species.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
4b. Response: <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP); Figure OS-7 – MSHCP Cores and Linkages; Figure OS-8 – MSHCP Cell Areas; General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans; Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas; Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area; Figure 5.4-7 – MSHCP Criteria Area Species Survey Area; Figure 5.4-8 – MSHCP Burrowing Owl Survey Area; MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools; and Appendix B: Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc., December 2024)</i> Less Than Significant Impact. The Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. The Project Site is entirely composed of developed and disturbed land and is mapped as “Urban” in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) vegetation layer. Field surveys conducted in 2023 and 2024 confirmed that the site does not support riparian, riverine, or wetland resources. The Project Site is underlain by Arlington fine sandy loam, a well-drained, non-hydric soil type that does not support the hydrological conditions necessary for riparian or wetland habitat. No hydrophytic vegetation, surface water flow, or topographic depressions were observed during field surveys. Additionally, the site is not located within or adjacent to any mapped streambeds, floodplains, or designated sensitive natural communities. The U.S. Fish and Wildlife Service National Wetland Inventory, EPA WATERS GeoViewer, and FEMA flood zone maps do not identify any riparian or wetland features on or near the Project Site. The absence of these features was further confirmed through in-field observations and review of aerial imagery and hydrologic data. Because the Project Site does not contain any riparian habitat or other sensitive natural communities, the Proposed Project would not result in direct or indirect impacts to such resources. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer); Appendix B: Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc., December 2024) Less Than Significant Impact. The Proposed Project would not have a substantial adverse effect on federally protected wetlands. Field surveys conducted in 2023 and 2024 confirmed that the Project Site does not contain any wetlands, vernal pools, or other aquatic features subject to regulation under Section 404 of the Clean Water Act. The Project Site is underlain by Arlington fine sandy loam, a well-drained, non-hydric soil type that does not support the hydrological conditions necessary for wetland formation. No topographic depressions, ponding, or hydrophytic vegetation were observed during field surveys. The U.S. Fish and Wildlife Service National Wetland Inventory, EPA WATERS GeoViewer, and other hydrologic data sources do not identify any wetlands or jurisdictional waters on or adjacent to the Project Site. Additionally, the site lacks connectivity to traditional navigable waters or other jurisdictional features. The absence of wetland indicators, hydrologic connectivity, and suitable soil conditions confirms that the Proposed Project would not result in direct or indirect impacts to federally protected wetlands through removal, filling, hydrological interruption, or other means. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
4d. Response: (Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage); Appendix B: Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc., December 2024) Less Than Significant Impact. The Proposed Project would not interfere with the movement of native resident or migratory wildlife species, nor would it impede the use of wildlife corridors or nursery sites. The Project Site is located within a fully urbanized area of the City of Riverside and is surrounded by existing residential, commercial, and industrial development.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The site is composed entirely of developed and disturbed land and does not contain natural habitat features that would support wildlife movement or serve as a functional corridor. Field surveys conducted in 2023 and 2024 did not identify any wildlife nursery sites or evidence of wildlife movement through the Project Site. No remnant raptor nests, bat roosts, or other indicators of breeding or nesting activity were observed. The site is not located within or adjacent to any designated wildlife corridors, linkages, or conserved lands identified in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project Site's isolation from natural open space areas, combined with its lack of suitable habitat and physical barriers such as roads and development, limits its potential to function as a movement corridor or nursery site for wildlife. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
4e. Response: (Source: MSHCP; Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees; City of Riverside Urban Forest Tree Policy Manual; Appendix B: Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc., December 2024) Less Than Significant Impact. The Proposed Project would not conflict with any local policies or ordinances protecting biological resources. The Project Site is located within the City of Riverside and consists entirely of developed and disturbed land. Field surveys conducted in 2023 and 2024 confirmed that the site does not support sensitive vegetation communities or mature native trees subject to preservation under local regulations. The City of Riverside's Urban Forestry Policy Manual (Revised February 2024) provides guidelines for the protection, maintenance, and removal of trees within the public right-of-way and on City-owned property. The Manual includes specific requirements for construction projects, such as tree protection during sidewalk and curb renovations, root pruning protocols, and public notification procedures for tree removals. The Proposed Project does not propose removal of any City-owned trees and would comply with all applicable provisions of the Manual. In accordance with Riverside Municipal Code (RMC) Section 16.40.040, the Project would be subject to the Tree Planting and Maintenance Fee, which supports the City's Urban Forestry Program and funds the planting and long-term care of street trees throughout the community. Additionally, the Project is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area and is subject to the Local Development Mitigation Fee (LDMF), as required under RMC Section 16.72.040. This fee contributes to the acquisition and management of habitat for the conservation of 146 covered species. The Project is also subject to the Threatened and Endangered Species Fees, which support compliance with state and federal Endangered Species Acts.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The Proposed Project would comply with all applicable local and regional biological resource protection policies, including fee programs and tree preservation standards. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐
4f. Response: (Source: MSHCP; General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP); Stephens’ Kangaroo Rat Habitat Conservation Plan; Appendix B: Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc., December 2024) Less Than Significant Impact. The Project Site is located within the Cities of Riverside and Norco Area Plan but lies outside any designated MSHCP Subunit, Criteria Cell, Cell Group, Public/Quasi-Public Land, Core, Linkage, or Conserved Land. The site is also not located within any MSHCP-designated survey area for burrowing owl, narrow endemic or criteria area plant species, amphibians, mammals, or the Delhi Sands flower-loving fly. Field surveys conducted in 2023 and 2024 confirmed the absence of special-status species, riparian or riverine resources, vernal pools, and other sensitive biological features. The Proposed Project would be subject to the following MSHCP-related fees and compliance measures: • MSHCP Local Development Mitigation Fee (LDMF): As required by the City of Riverside and the Western Riverside County Regional Conservation Authority (RCA), the Project would pay the LDMF at the time of building permit issuance. This fee supports the acquisition, management, and monitoring of habitat lands to meet the conservation goals of the MSHCP. • Threatened and Endangered Species Fees: In addition to the LDMF, the Project would be subject to the City’s Threatened and Endangered Species Fees, which contribute to regional compliance with the federal and state Endangered Species Acts. These fees are collected pursuant to Riverside Municipal Code (RMC) Section 16.72.040. • MSHCP Best Management Practices (BMPs): The Project would implement applicable BMPs identified in Volume I, Appendix C of the MSHCP. These include erosion control, minimization of disturbance, and proper staging and storage of materials to avoid indirect impacts to off-site resources. The Project does not include any off-site improvements or fuel modification zones that would extend into MSHCP-designated areas. All construction activities would occur within the 7.03-acre permanent disturbance footprint, which is composed entirely of developed and disturbed land.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Based on the Project's location, biological conditions, and compliance with applicable MSHCP requirements and fee programs, the Proposed Project is consistent with the goals and objectives of the MSHCP and would not conflict with any other adopted habitat conservation plan. <u>Conclusion</u> Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☐	☒	☐
5a. Response: (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D; Title 20 of the Riverside Municipal Code; Appendix C-1: Cultural Resources Assessment Report: Barley Mills Building, 3596 Commerce Street & 3051 Mission Inn Avenue, Riverside CA; Site of Riverside Soda Works, 2993 Mission Inn Avenue, Riverside CA, George Taylor Loudon AIA, Inc., December 30, 2024; Appendix C-2: Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project, City of Riverside, Cogstone, September 2025) Less Than Significant Impact. The Proposed Project involves rehabilitation of a historical resource as defined under Section 15064.5 (a) of the CEQA Guidelines. The original 1891 Barley Mills Building located at 3596 Commerce Street is designated as City Structure of Merit #86 in the locally designated Seventh Street East Historic District as defined in Title 20 of the Riverside Municipal Code. The Riverside Soda Works building at 2993 Mission Inn Avenue, listed as City Structure of Merit #412, was destroyed in a windstorm in November 2023 and is no longer extant. <u>Significance and Integrity</u> The Barley Mills Building is considered a historic resource under CEQA due to its local designation and its contribution to Riverside's cultural heritage. While the building is not listed in the National Register of Historic Places or the California Register of Historical Resources, it retains sufficient integrity to qualify as a local cultural resource. The building exhibits integrity of location, design, materials, and association, despite alterations and additions made over time. Constructed in 1891, the Barley Mills Building is a one-story Industrial Vernacular structure historically associated with Riverside's citrus and grain industries and is recognized for its association with Riverside's early agricultural and industrial development. The building historically served as a feed mill, grain and milling facility, and citrus packing house, reflecting the city's agrarian economy and its connection to the railroad infrastructure that supported commercial distribution. It retains several character-defining features, including: • Unreinforced brick masonry walls • Segmental arched window and door openings • Raised concrete loading docks • Historic canopy framing elements • Original wood trim and ventilation louvers The building has undergone alterations, including non-original concrete additions constructed in 1930, which are proposed for removal. These additions are not part of the building's period of significance, and their removal is consistent with the Secretary of the Interior's Standards for Rehabilitation.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The Proposed Project includes adaptive reuse of the original 1891 structure as a recreation facility. Rehabilitation activities include: • Reconstruction of the original roof overhang based on historic photographs • Replacement of non-historic roof cladding with historically appropriate corrugated iron • Installation of new windows and doors in existing openings, using Douglas Fir to match original materials • Preservation of freight door openings, with recommendations to rehabilitate and retain original sliding doors and hardware • Removal of non-original skylights, which are not proposed for rehabilitation. A Certificate of Appropriateness request is included as part of this project application and will be reviewed by the City's Cultural Heritage Board pursuant to Title 20 of the Riverside Municipal Code. Under CEQA Guidelines §15064.5(b), a substantial adverse change in the significance of a historical resource occurs when physical demolition, destruction, relocation, or alteration materially impairs the resource's significance. The Proposed Project includes the adaptive reuse and rehabilitation of the Barley Mills Building in accordance with the Secretary of the Interior's Standards for Rehabilitation and Preservation Brief 14. The Proposed Project would retain and rehabilitate the building's historic façades and architectural features, and would differentiate new construction through setbacks, material changes, and visual separation. The design approach ensures that the historical character of the Barley Mills Building is preserved and enhanced. Portions of the Project Site are located within the Seventh Street East (Residential) Historic District (District), and the District itself is a historic resource. The Proposed Project therefore evaluates whether new construction and site improvements would cause a substantial adverse change in the significance of the District (State CEQA Guidelines, § 15064.5(b)(1)) by materially impairing the physical characteristics that convey the District's historical significance. As documented in the Historic Resources Assessment prepared by George Taylor Loudon AIA, Inc. (March 2025), the Proposed Project site area within the District does not contain extant historic residential structures and includes areas that are presently vacant/barren. Accordingly, the Proposed Project would not demolish or physically alter contributing District buildings, nor would it remove character-defining features that convey the District's significance. In addition, the Proposed Project's massing, height transitions, and edge treatments are specifically designed to maintain compatibility with the District and to avoid adverse effects on the District's historic setting and character. The project incorporates a stepped transition from the taller (four-story) portions of the development to lower-scale (two-story) building forms toward the eastern edge adjacent to the residential neighborhood, reducing apparent bulk and providing a more compatible interface with the District. The project also employs an articulation methodology that breaks down façade massing into smaller-scale components intended to reference the scale and rhythm of nearby historic single-family residences, thereby avoiding monolithic appearance and supporting compatibility with the District's scale. Consistent with this compatibility approach, the Proposed Project includes referential and compatible exterior materials, colors, textures, and finishes (e.g., concrete/stucco and metal panel elements) derived from surrounding historic and historically industrial/commercial context, while remaining clearly contemporary. Further, the Proposed Project includes physical buffering and screening elements at the District interface that minimize potential effects on the District's immediate surroundings. A required "green" canopy covering the				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
parking area—together with existing and additional landscape buffering along the eastern property line—reduces the potential for visual and setting-related impacts at the District edge and indicates that direct physical impacts to the adjacent residential historic district would be limited. With these design features (step-down massing, façade articulation, compatible material palette, and landscaped buffering), the Proposed Project would not materially impair the District’s ability to convey its historical significance and therefore would not result in a substantial adverse change in the significance of the Seventh Street East (Residential) Historic District under CEQA. For context, although the Barley Mills Building is associated with the overall project and is addressed in Appendix C-1, it is situated outside the District’s period of significance and is identified as a non-contributor to the District; therefore, changes to the Barley Mills Building would not materially impair the District’s significance. <u>Project Design Features</u> The following design features are incorporated into the project to ensure preservation and enhancement of the Barley Mills Building. All rehabilitation work shall comply with the Secretary of the Interior’s Standards for Rehabilitation and shall be reviewed by a qualified historical architect. PDF-CUL-1: Details of separation, often described by the NPS as a “hyphen,” between new construction and the rehabilitated existing conditions of the Barley Mills Building’s existing façades and new interior spaces. This approach serves to identify a strong differentiation between proposed new construction and the historical 1891 structure design. PDF-CUL-2: Retain and rehabilitate per SoIS the East, South, West and North façades, including the canopy reconstruction and hardscape paving areas. The original rail spur tracks located along Commerce Street at the west façade of the Barley Mills Building are subject to a new city engineering roadway project that will alter the nearby historical street condition. PDF-CUL-3: Retain and rehabilitate per SoIS the north and east façades, given the original 1891 exterior walls will be protected to remain in place during the controlled removal of the adjacent non-significant 1930’s concrete structure construction expansion. PDF-CUL-4: Retain and photodocument the remaining façade lettering hand painted signage elements at the southwest corner façade. PDF-CUL-5: Maintain the arrangement of the raised concrete loading dock structure along the south and west façades and install period-appropriate steel pipe guard rails and handrails. PDF-CUL-6: Retain, reconstruct, and rehabilitate the Barley Mills Building’s original window and door elements, including wood casing, apron and base trim, ventilation louvers, roof drain leaders, and cast-iron pipe drains.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
PDF-CUL-7: Create a memorial marker for the lost Soda Works structure with interpretive text and images recorded in site surveys and research, repurposing the salvaged cast concrete block units and some heavy timber framing members for use in a fenced dog park for these Iron Lofts residents. The above recommendations are reflected in the design of the proposed Project. The Project's incorporation of the above-referenced features will serve as a project benefit to the existing 1891 Barley Mills Building design for an adaptive reuse program of an Iron Loft Community space, including the overall site context and proposed MFR. <u>Conclusion</u> The Proposed Project would not result in a substantial adverse change in the significance of a historical resource. The Barley Mills Building is a designated City of Riverside Structure of Merit and qualifies as a historic resource under CEQA. The Proposed Project includes the rehabilitation and adaptive reuse of the building in accordance with the Secretary of the Interior's Standards for Rehabilitation and incorporates design features that retain and enhance its character-defining elements. The Proposed Project would not materially impair the building's historical significance or its eligibility as a local cultural resource. Potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☒	☐	☐
5b. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity; Appendix C-2: Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project, City of Riverside, Cogstone, September 2025) Less Than Significant Impact with Mitigation. A pedestrian survey of the Project Area conducted by Cogstone archaeologists in May and June 2021 did not identify any prehistoric-aged archaeological resources. No previously recorded archaeological sites are present within the Project Area, and the Sacred Lands File search returned negative results. Based on this, the Project Area is assessed to have low sensitivity for buried intact prehistoric-aged deposits. However, remnants of railroad rail and historic-aged heating coils were observed during the survey. While these features were determined to be not significant due to a lack of integrity, their presence—along with evidence from Sanborn Fire Insurance Company maps and USDA historic aerial photographs—indicates a moderate to high potential for buried historic-aged resources, such as basements or trash pits. The top one foot of sediment is considered disturbed due to prior use of the site as a recycling facility. Excavation below this depth may encounter intact historic-aged archaeological resources. As described in the Project Description, Section 9, Hazards and Hazardous Materials, and Appendix E-1, a Revised Remedial Action Plan (RAP) was prepared for the site in January 2020 and submitted to the California Department of Toxic Substances Control (DTSC). The RAP proposed excavation and off-site disposal of impacted soils but was				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
not implemented due to a change in ownership. The Project Applicant will implement the RAP as part of site development (Appendix E-1). In support of the approved RAP and associated remediation, George Taylor Loudon AIA, Inc. completed a cultural resources assessment in 2024 to comply with Section 106 of the National Historic Preservation Act. The Section 106 assessment identified one historic-era built environment resource within the Project Area—the Barley Mills Building, which is designated by the City of Riverside as a local Structure of Merit. The assessment concluded that remedial actions would protect the Barley Mills Building in place and would not affect the building. The assessment also found no other historical resources within the Project Area and determined that the remedial actions would not affect known off-site historical resources. The Section 106 assessment includes an inadvertent discovery protocol for ground-disturbing remediation activities. The protocol requires work to halt in the vicinity of any discovery until a qualified cultural resources and/or paleontological professional evaluates the find, with notification and involvement of appropriate Native American tribal representatives if materials may be associated with Native American patrimony. If a discovery is determined to be significant, treatment would prioritize avoidance and preservation in place where feasible, with data recovery or other appropriate measures implemented as directed by the City. The protocol also establishes procedures for unanticipated discovery of human remains, including notification of the Riverside County Coroner and coordination with the Native American Heritage Commission (NAHC) if remains are determined to be Native American. Pursuant to State law, a standard condition of approval would address the unanticipated discovery of human remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)). Through adherence to state law and implementation of MM-CUL-1 through MM-CUL-4, potential impacts to archeological resources associated with the Proposed Project would be reduced to a less than significant level. <u>Mitigation Measures</u> MM-CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities. MM-CUL-2: Archaeological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a. Project grading and development scheduling; b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists; c. The protocols and stipulations that the Applicant, tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; d. Treatment and final disposition of any cultural resources, sacred sites, and human remains if discovered on the project site; and e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
MM-CUL-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes MM-CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report. <u>Conclusion</u> Potential impacts associated with implementation of the Proposed Project would be less than significant with adherence to state law and incorporation of mitigation measures MM-CUL-1 through MM-CUL-4.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
5c. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity); Appendix C-3: Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project, City of Riverside, Cogstone, September 2025) Less Than Significant with Mitigation. No known cemeteries or burial sites are present within the Project Area. The pedestrian survey conducted by Cogstone in May and June 2021 did not identify any human remains or burial features. However, the Project Area has a moderate to high sensitivity for buried historic-aged resources, including the potential for unanticipated discoveries of human remains, due to its long history of industrial and residential use prior to modern demolition and sanitation standards. In the unlikely event that human remains are encountered during Project construction, the Project Applicant shall comply with California Health and Safety Code Sections 7050.5 and 7052, which require that all ground-disturbing activities cease within the vicinity of the find and that the Riverside County Coroner’s Office be notified within 24 hours. No further disturbance shall occur until the Coroner has decided regarding the nature of the remains. If the Coroner determines that the remains are Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours, pursuant to Public Resources Code Section 5097.98. The NAHC will designate a Most Likely Descendant (MLD), who may recommend appropriate treatment or disposition of the remains and associated grave goods. Work shall not resume in the vicinity of the find until all requirements of the Health and Safety Code and Public Resources Code have been met. <u>Conclusion</u> Potential impacts associated with implementation of the Proposed Project would be less than significant with adherence to state law regarding unanticipated discoveries of human remains and incorporation of mitigation measures MM-CUL-1 through MM-CUL-4.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
6a. Response: (Source Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Proposed Project involves demolition of existing structures and construction of a new 300-unit multi-family residential development on a 6.94-acre site. Construction activities will require temporary energy use for grading, excavation, and building operations, including fuel for equipment and vehicles. Operational energy demand will include electricity and natural gas for residential units, lighting, HVAC systems, and common areas. Electricity would be provided by Riverside Public Utilities (RPU), a consumer-owned water and electric utility established in 1895. According to the 2022 RPU Power Mix, 45.4 percent of the utility's energy portfolio is derived from renewable sources, including: • Geothermal: 33.4% • Solar: 10.5% • Wind: 1.5% • Biomass and eligible hydroelectric: 0% Other sources include: • Coal: 19.4% • Natural Gas: 4.5% • Nuclear: 4.7% • Large hydroelectric: 1.2% • Unspecified sources: 24.8% Natural gas would be provided by Southern California Gas (SoCalGas). The CPUC regulates SoCalGas and other utilities serving California, ensuring safe and reliable delivery of natural gas to residential and commercial customers. Construction energy demand is estimated at 120,307 kWh of electricity and 57,813 gallons of diesel fuel over the 24-month construction period. Construction worker fuel consumption is estimated at 58,697 gallons, construction vendor fuel consumption of 17,515 gallons, and construction hauling fuel consumption at 5,082 gallons. Operational energy demand is estimated at 1,839,149 kWh of electricity and 3,888,231 kBtu of natural gas annually. These levels are consistent with similar residential developments and do not require new energy infrastructure. The Proposed Project would also generate additional vehicle trips, resulting in consumption of gasoline and diesel fuel. These fuels are commercially available and would be accessed by residents and visitors via existing commercial outlets. Based on CalEEMod modeling, the project is expected to generate				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
approximately 214,378 gallons of transportation fuel consumption annually, which is negligible compared to statewide consumption. The Project would comply with the California Building Standards Code (Title 24), including the 2022 Energy Code and CALGreen, which mandate energy-efficient design and construction practices. These standards include: • High-efficiency HVAC systems • Solar-ready infrastructure and battery storage • Electric-ready wiring for future conversion from gas • LED lighting and daylighting controls • Low-flow water fixtures • Enhanced insulation and ventilation standards The Project does not conflict with any state or local plans for renewable energy or energy efficiency, including the Riverside General Plan Energy Element, RRG Climate Action Plan, and State Energy Strategy. No features of the Project would result in wasteful or inefficient energy use. <u>Conclusion</u> Compliance with applicable energy efficiency standards will ensure that energy consumption is not wasteful or inefficient. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
6b. Response: (Source: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Proposed Project is in a developed urban area with access provided by existing public roadways. No intermodal transportation facilities are planned for the Project vicinity, and the Project would not interfere with or obstruct any transportation plans or projects proposed under the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). The Southern California Association of Governments (SCAG) has not identified intermodal facilities in the Project area. The Project would comply with the California Green Building Standards Code (CALGreen) and Title 24 of the California Code of Regulations, which require energy-efficient buildings and appliances. The Project would also participate in energy efficiency programs administered by Riverside Public Utilities (RPU) and Southern California Gas Company (SoCalGas). With respect to Assembly Bill 1493 (Pavley regulations), individual development projects do not directly comply with or conflict with these regulations, which apply to vehicle manufacturers and regulatory agencies. However, vehicles associated with the Proposed Project would be required to comply with applicable federal and state fuel efficiency standards.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The Proposed Project would comply with the State’s Renewable Energy Portfolio Standards through adherence to CALGreen requirements, which mandate reductions in water consumption, building commissioning to improve system efficiencies, diversion of construction waste from landfills, and installation of low pollutant-emitting finish materials. The Proposed Project consists of residential uses and would not interfere with future energy development or conservation strategies implemented by utility providers or regulatory agencies. No features of the Proposed Project would conflict with or obstruct any adopted plan for renewable energy or energy efficiency. <u>Conclusion</u> Compliance with applicable energy efficiency regulations and participation in utility programs will ensure the Project does not conflict with or obstruct renewable energy or energy efficiency plans. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
7i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR; Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025) No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no active faults are known to cross or project through the Project Site. The geotechnical investigation confirmed the absence of fault traces or fault-related features within the site boundaries. Therefore, the potential for ground rupture due to faults is considered negligible. <u>Conclusion</u> There would be no potential impacts associated with implementation of the Proposed Project.				
ii. Strong seismic ground shaking?	☐	☐	☒	☐
7ii. Response: (Source: General Plan 2025 FPEIR, Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025) Less Than Significant. The Project Site is in a seismically active region of Southern California and may be subject to strong ground shaking from nearby faults, particularly the San Jacinto Fault, located approximately 7 miles away. The geotechnical report estimates a peak ground acceleration (PGA) of 0.60g for a magnitude 6.9 earthquake, based on USGS data and ASCE 7-16 criteria. The Proposed Project would be designed in accordance with the 2022 California Building Code (CBC), using Site Class D parameters, which require structural measures to mitigate seismic hazards.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Proposed Project would be designed to meet current seismic safety standards, including CBC seismic design criteria. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
7iii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential; Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025) Less Than Significant Impact. The Project Site is in an area having low potential for soil liquefaction per the GP 2025 Liquefaction Zones Map – Figure PS-2. The geotechnical investigation found that groundwater was not encountered to a depth of 50 feet, and prior studies indicate groundwater is deeper than 100 feet. The subsurface soils are stiff to dense and not prone to liquefaction under seismic loading. <u>Conclusion</u> Due to deep groundwater and low liquefaction susceptibility, the potential for seismic-related ground failure is minimal. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
iv. Landslides?	☐	☐	☐	☒
7iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope; Title 18 – Subdivision Code; Title 17 – Grading Code; Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025) No Impact. The Project Site is flat, with a gentle slope from east to west and no adjacent steep slopes or hillsides and is not located in a landslide hazard zone. No evidence of slope instability was observed during the geotechnical investigation. <u>Conclusion</u> No impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
7b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code; Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025) Less Than Significant Impact. Construction activities associated with the Proposed Project, including grading, excavation, and site preparation, have the potential to disturb surface soils and result in erosion or loss of topsoil. These impacts may occur during storm events or through wind dispersion if soils are left exposed without stabilization. To address these risks, the Proposed Project is subject to multiple layers of regulatory oversight and mandatory compliance measures: <u>State and Federal Requirements</u> The Applicant must comply with the National Pollutant Discharge Elimination System (NPDES) regulations, which require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will include site-specific best management practices (BMPs) to control erosion, sedimentation, and pollutant discharge during construction. <u>Local Ordinances</u> The City of Riverside’s Grading Code (Title 17) and Erosion Control Standards (Title 18) require all development projects to implement measures that minimize soil erosion. These include: • Stabilization of disturbed soils • Use of perimeter controls such as silt fencing and fiber rolls • Scheduling of grading activities to avoid wet seasons • Installation of sediment basins or traps where appropriate <u>Post-Construction Stabilization</u> Upon completion of construction, the site will be stabilized through paving, landscaping, and permanent drainage improvements. These features will prevent long-term erosion and protect topsoil from displacement. <u>Conclusion</u> Compliance with State and Federal regulations, including NPDES and SWPPP requirements, as well as local ordinances under Titles 17 and 18, will ensure that soil erosion and loss of topsoil are minimized. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site	☐	☒	☐	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
landslide, lateral spreading, subsidence, liquefaction, or collapse?				
7c. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025) Less Than Significant Impact with Mitigation Incorporated. The geotechnical investigation identified several geologic conditions that could affect soil stability if not properly addressed. These include undocumented fill, compressible natural soils, potential for seismic ground subsidence, and localized collapse potential. The following summarizes the findings and recommendations: <u>Undocumented Fill and Compressible Soils</u> Subsurface exploration revealed undocumented fill materials within the upper 5 to 5.5 feet of the site, consisting of sandy silts, silty sands, and sandy clays. These materials lack documentation of placement or compaction and may be associated with prior industrial use, including underground storage tanks. Natural soils beneath the fill were found to be loose to medium dense (granular) and stiff to hard (fine-grained), with low to moderate compressibility. To mitigate instability, the geotechnical report recommends: • Removal and replacement of undocumented fill and disturbed soils with engineered fill compacted to at least 90–95% of maximum dry density (ASTM D1557). • Over excavation to depths of 5 feet below existing grade or 3 feet below the bottom of post-tensioned slabs, whichever is deeper. • Extension of removals laterally at least 5 feet beyond building footprints or the depth of removal, whichever is greater. <u>Seismic Ground Subsidence</u> The Project Site is in a seismically active region and may experience strong ground shaking. Although liquefaction potential is low due to deep groundwater, seismic ground subsidence could occur due to densification of loose to medium dense sandy soils. The geotechnical report estimates total subsidence of up to ¾ inch, with differential settlement of up to ¾ inch over a 40-foot span. <u>Collapse Potential</u> Hydro consolidation testing indicated low collapse potential (0.1–0.2%) in sandy silts. However, similar soils in nearby developments have exhibited moderate collapse potential. To reduce the risk of collapse: • Landscaping requiring significant irrigation should be avoided within 10 feet of buildings. • Stormwater infiltration systems should be located at least 30 feet from building foundations and 10 feet from drilled pier foundations.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Mitigation Measures</u> MM-GEO-1: Prior issuance of a building permit, undocumented fill and compressible soils shall be removed and replaced with engineered fill compacted to geotechnical specifications. MM-GEO-2: Prior to issuance of a grading permit, the Applicant shall demonstrate that a qualified geotechnical engineer will be on site to observe and test all grading, subgrade preparation, and fill placement to verify compliance with compaction and moisture standards. MM-GEO-3: Prior to issuance of a grading permit, the plans shall demonstrate that stormwater infiltration systems shall be located a minimum of 30 feet from building foundations and 10 feet from drilled pier foundations to reduce the risk of settlement. MM-GEO-4: Prior to issuance of a grading permit, the plans shall demonstrate that landscaping adjacent to buildings shall be designed to minimize irrigation and infiltration. Where irrigation is necessary, impermeable liners shall be installed beneath planting areas within 10 feet of structures. <u>Conclusion</u> With implementation of remedial grading, foundation design recommendations, and mitigation measures, the Project would not be located on unstable soils or geologic units. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, with mitigation incorporated.				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
7d. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential Appendix D: Geotechnical Investigation: Proposed Residential Development – Iron Lofts, NEC Mission Inn Avenue and Commerce Street, Geotechnical Professionals, Inc., July 28, 2025, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code) Less Than Significant Impact with Mitigation. Expansive soils are characterized by their potential to undergo significant volume changes (shrink and swell) in response to changes in moisture content. These movements can damage foundations, slabs, and other structural elements if not properly mitigated. The geotechnical investigation included laboratory testing and field observations to evaluate the expansion potential of near-surface soils. The findings are summarized below:				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Soil Characteristics</u> The near-surface soils at the Project Site consist primarily of sandy silts, silty sands, and sandy clays. Laboratory testing determined that these soils exhibit low expansion potential, with an Expansion Index (EI) of less than 20. Hydro consolidation testing showed minimal collapse potential (0.1–0.2%), further confirming the stability of the soil profile under moisture changes. <u>Foundation Design Recommendations</u> To address any residual risk associated with expansive soils, the geotechnical report recommends the following: <u>Post-Tensioned Slab Foundations</u> The proposed apartment and townhome buildings will be supported on post-tensioned slab foundations placed over engineered fill. These slabs are designed to resist differential movement and are appropriate for sites with low to moderate expansion potential. <u>Engineered Fill</u> All fill placed beneath foundations and slabs will be compacted to at least 90–95% of maximum dry density (ASTM D1557) and will consist of non-expansive granular material with an EI < 20. <u>Moisture Control Measures</u> A vapor/moisture retarder (e.g., 15-mil Stego Wrap) will be installed beneath slabs that support moisture-sensitive flooring. This will reduce the potential for moisture migration into the slab and subgrade. <u>Landscaping and Irrigation Controls</u> To prevent moisture infiltration near foundations, landscaping requiring significant irrigation will be avoided within 10 feet of buildings. Where irrigation is necessary, impermeable liners may be installed beneath planting areas. <u>Conclusion</u> The Project Site contains soils with low expansion potential. With implementation of foundation design recommendations and moisture control measures, expansive soils would not pose a substantial risk to life or property. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant with implementation of MM-GEO-1 through MM-GEO-4.				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
7e. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types) No Impact. The Project Site is in the urbanized area of the City of Riverside and will be served by the municipal sewer system. No septic tanks or alternative wastewater disposal systems are proposed as part of the development.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The geotechnical investigation did not identify any site constraints that would affect the installation or operation of sewer infrastructure. Groundwater was not encountered to a depth of 50 feet, and the subsurface soils are suitable for trenching and utility installation. Utility trench backfill will be compacted in accordance with geotechnical recommendations to ensure long-term stability and performance of underground infrastructure. <u>Conclusion</u> The Proposed Project would connect to the municipal sewer system and does not propose the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts associated with the implementation of the Proposed Project would occur.				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
7f. Response: (Source: General Plan 2025 Policy HP-1.3), Appendix C-2: Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project, City of Riverside, Cogstone, September 2025) Less than Significant With Mitigated Incorporated. The Project Site is mostly developed and has been previously disturbed, which reduces the likelihood of encountering unique paleontological resources. However, due to the depth of planned excavation and the presence of sensitive Pleistocene-aged sediments, there remains a potential for fossil discovery. Paleontological resources are considered historical resources under CEQA Guidelines Section 15064.5(a)(3)(D), and their damage or destruction could result in a significant impact. The Project Site area is identified in the General Plan EIR as having an unknown potential for paleontological resources. The Project area is mostly developed, and the Project Site has been previously disturbed, therefore, discovery of any unique paleontological resource is considered highly unlikely. Activities including construction-related and earth-disturbing actions could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are historical resources, as defined in CEQA Guidelines Section 15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact. The Project Area is mapped entirely as middle to late Pleistocene old alluvial fan deposits (unit 3), which are known to vary in paleontological sensitivity based on depth. According to the paleontological sensitivity analysis included in the cultural resources assessment prepared by Cogstone in September 2025 (Appendix C-2), and consistent with the Riverside County General Plan, these sediments are assigned: • Low sensitivity (PFYC 2) for impacts occurring less than four feet below the original ground surface. • Moderate sensitivity (PFYC 3) for impacts greater than four feet deep. Although no fossil localities have been recorded directly within the Project Site, similar Pleistocene-aged sediments in the surrounding region have yielded scientifically significant vertebrate fossils, including remains of mammoth, horse, sabertoothed cat, mastodon, bison, and camel. These findings underscore the potential for fossil discovery during deeper excavation activities. The Proposed Project includes grading to depths of approximately 15 feet and utility trenching to depths of up to 20 feet, which exceeds the threshold for moderate paleontological sensitivity. While drilling and pile driving are				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
considered to have low potential for fossil recovery due to the lack of stratigraphic control, excavation activities pose a greater risk of encountering paleontological resources. <u>Mitigation Measures</u> To ensure that potential impacts to paleontological resources are reduced to a level that is less than significant and to comply with General Plan Policy HP-1.3, including relevant federal regulations such as the Native American Graves Protection and Repatriation Act, the following mitigation measures shall be implemented: MM-GEO-5: Prior to issuance of a grading permit, the Applicant shall provide documentation of training completion of a Paleontological Worker Environmental Awareness Program (WEAP). This training, administered by a qualified paleontologist, will educate construction personnel on the types of paleontological resources that may be encountered. MM-GEO-6: Prior to issuance of a grading permit, the Applicant shall retain a qualified paleontologist to monitor all excavation activities that extend deeper than four feet into native sediments. The paleontologist shall have the authority to temporarily halt or redirect construction if paleontological resources are encountered. MM-GEO-7: Ongoing during grading, if paleontological resources are exposed during excavation, ground-disturbing activities in the vicinity within a 25-foot radius shall be redirected. A qualified paleontological resources specialist shall evaluate the find. If deemed significant, appropriate measures such as avoidance, recovery, evaluation, and curation shall be implemented in accordance with the standards of the City of Riverside and the Society of Vertebrate Paleontology. <u>Conclusion</u> Potential impacts associated with implementation of the Proposed Project would be less than significant with incorporation of MM-GEO-5 through MM-GEO-7.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
8a. Response: (Source: Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Air Quality and Greenhouse Gas (AQ/GHG) Analysis included in Appendix A evaluated the Proposed Project's greenhouse gas (GHG) emissions associated with both construction and operational activities. The analysis determined that the Proposed Project would generate an estimated 2,851.57 metric tons per year of carbon dioxide equivalents (MTCO₂e). This total includes construction-related emissions amortized over a 30-year project life, consistent with guidance from the South Coast Air Quality Management District (SCAQMD). The total annual GHG emissions are below the SCAQMD's recommended screening threshold of 3,000 MTCO₂e per year for non-industrial land uses. Emissions were modeled using CalEEMod Version 2022.1.1.29 and included contributions from mobile sources, energy use, water consumption, waste generation, area sources, and refrigerants. The Proposed Project incorporates standard design features and regulatory compliance measures that reduce GHG emissions, including: • Compliance with Title 24 Building Energy Efficiency Standards; • Implementation of CALGreen Code requirements; • Elimination of wood-burning devices in accordance with SCAQMD Rule 445; • Efficient site planning and trip generation adjustments to reflect removal of existing uses. The Proposed Project's GHG emissions do not exceed the applicable threshold and do not result in a cumulatively considerable contribution to global climate change. <u>Conclusion</u> The Proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8b. Response: (Source: Appendix A: Iron Lofts Multifamily Residential Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis, Ganddini Group, April 25, 2025) Less Than Significant Impact. The Proposed Project has been evaluated for consistency with applicable plans, policies, and regulations adopted for the purpose of reducing greenhouse gas (GHG) emissions. While the potential exists for any development project to conflict with such plans, the analysis presented in Appendix A demonstrates that the Proposed Project would not result in such a conflict. The South Coast Air Quality Management District (SCAQMD) has established a tiered approach to evaluating GHG impacts under CEQA. The Tier 3 screening threshold, which is based on the goals of Executive Order S-3-05, sets a benchmark of 3,000 metric tons of CO₂ equivalents (MTCO_{2e}) per year for non-industrial land uses. Executive Order S-3-05, issued in 2005, established the following statewide GHG reduction targets: • By 2010: Reduce GHG emissions to 2000 levels • By 2020: Reduce GHG emissions to 1990 levels • By 2050: Reduce GHG emissions to 80 percent below 1990 levels. In 2006, the California State Legislature adopted Assembly Bill (AB) 32, the California Global Warming Solutions Act, which requires the California Air Resources Board (CARB) to implement rules and regulations to achieve 1990-level emissions by 2020. These regulations were phased in beginning in 2012. Subsequently, Senate Bill (SB) 32 established a further reduction target of 40 percent below 1990 levels by 2030. The City of Riverside has adopted the Riverside Restorative Growthprint Climate Action Plan (RRG-CAP) and Economic Prosperity Action Plan, which include policies and measures to support the goals of AB 32 and other statewide climate initiatives. The City also enforces the California Building Code (Title 24), which incorporates CALGreen standards requiring new development to reduce energy and water consumption and minimize solid waste generation. The Proposed Project would comply with these local and state requirements through the following: • Implementation of Title 24 Building Energy Efficiency Standards • Compliance with CALGreen Code provisions • Elimination of wood-burning devices in accordance with SCAQMD Rule 445 • Adherence to City of Riverside General Plan policies related to sustainability and climate action • Conformance with CARB's Climate Change Scoping Plan measures The AQ/GHG Analysis (Appendix A) determined that the Proposed Project would generate 2,851.57 MTCO_{2e} per year, which is below the SCAQMD's screening threshold. This level of emissions demonstrates consistency with the reduction goals of Executive Order S-3-05, AB 32, SB 32, and the RRG-CAP. Additionally, the Project would be subject to future regulatory requirements as they are adopted and implemented by the State.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Based on the analysis and regulatory context described above, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. <u>Conclusion</u> The Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
9a. Response: <i>(Source: General Plan 2025 Public Safety Element; GP 2025 FPEIR; California Health and Safety Code; Title 49 of the Code of Federal Regulations; California Building Code; Riverside Fire Department EOP; 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP; 2004 Part 1, OEM’s Strategic Plan; and Appendix E-1: Response Plan: Former Riverside Scrap and Iron Metal Property, 2993 6th Street, Riverside, CA 92507, GSI Environmental, November 4, 2024)</i> Less Than Significant Impact. The Proposed Project would involve the development of two multifamily residential buildings, including one four-story on-grade building and one two-story townhome building located along the western portion of the Project Site. The Project Site has been the subject of multiple subsurface investigations, which identified the presence of hazardous substances in shallow soils. Constituents of concern (COCs) include polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and metals (primarily lead and arsenic) at concentrations exceeding residential screening levels and/or regional background concentrations. In addition, volatile organic compounds (VOCs) have been detected in soil vapor at concentrations above residential screening thresholds. These contaminants are present within the top one foot of soil, with isolated detections at depths of 2.5 to 5 feet. A Revised Remedial Action Plan (RAP) was prepared for the Site in January 2020 by the previous property owner and submitted to the California Department of Toxic Substances Control (DTSC). The RAP proposed excavation and off-site disposal of impacted soils but was not implemented due to a change in ownership. The current Project Applicant has committed to completing the RAP as part of site development (Appendix E-1). Approximately 20,000 cubic yards of impacted soil are expected to be removed. Based on an average truck capacity of 13 cubic yards, this would result in approximately 1,500 one-way truck trips, or 43 truckloads per day over a 35-day period. A similar volume of clean fill soil may be imported for grading. A portion of the excavated material may be classified as Resource Conservation and Recovery Act (RCRA) hazardous waste, requiring specialized handling and disposal. The remaining material may be classified as California hazardous waste or non-hazardous waste, depending on contaminant concentrations. During construction, hazardous materials such as fuels, oils, solvents, and adhesives would be used and transported in limited quantities typical of residential development. These materials would be managed in accordance with applicable federal, state, and local regulations, including the California Health and Safety Code, Title 49 of the Code of Federal Regulations, and the California Building Code. Oversight would be provided by the appropriate regulatory agencies, including DTSC and the City of Riverside Fire Department.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
During operation, the residential use of the site would involve the storage and use of small quantities of household hazardous materials, such as cleaning products, pesticides, and electronic waste. These materials would be stored and used in accordance with applicable regulations and would not pose a significant hazard to the public or the environment. The Proposed Project would comply with the City’s Emergency Operations Plan (EOP), the General Plan 2025 Public Safety Element, and the Local Hazard Mitigation Plan (LHMP). The Response Plan prepared for the Project Site (Appendix E-1) outlines procedures for safe handling, transport, and disposal of hazardous materials during remediation and construction. <u>Conclusion</u> The Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
9b. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1; Appendix E-1: Response Plan: Former Riverside Scrap and Iron Metal Property, 2993 6th Street, Riverside, CA 92507, GSI Environmental, November 4, 2024.) Less Than Significant. The Proposed Project involves the development of a 300-unit multifamily residential complex. Construction and operation would involve the use of materials commonly associated with residential development, including fuels, lubricants, paints, adhesives, and cleaning products. These materials are considered hazardous but would be used in limited quantities and managed in accordance with applicable local, state, and federal regulations, including the California Health and Safety Code, Title 49 of the Code of Federal Regulations, and the California Building Code. The Project Site is not listed on the Cortese List or other regulatory databases identifying hazardous materials contamination. No industrial uses are proposed, and the Proposed Project does not include activities that would involve the routine transport, storage, or disposal of large quantities of hazardous or acutely hazardous materials. The nature of proposed residential use, combined with the regulatory framework governing hazardous materials handling, significantly reduces the likelihood of upset or accidental release of hazardous substances into the environment. No reasonably foreseeable conditions have been identified that would result in a significant environmental impact related to hazardous materials. The Proposed Project would also comply with the City of Riverside’s Emergency Operations Plan (EOP), the General Plan 2025 Public Safety Element, and the Local Hazard Mitigation Plan (LHMP). Additionally, the Response Plan				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
prepared for the Site (Appendix E-1) outlines procedures for safe handling, transport, and disposal of hazardous materials during construction and operation. <u>Conclusion</u> The Proposed Project would not create significant environmental impacts due to a reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
9c. Response: <i>(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Google Earth)</i> No Impact. The Proposed Project is not located within one-quarter mile of an existing or proposed school site. The nearest school is Longfellow Elementary School, located at 3610 Eucalyptus Avenue in the City of Riverside, approximately 0.5 miles east of the Project Site. Given the distance between the Project Site and the nearest school, the Proposed Project would not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. Materials associated with construction and residential uses such as fuels, paints, and cleaning products—would be used in limited quantities and managed in accordance with applicable local, state, and federal regulations. The Project would not pose a risk to nearby educational facilities and would not result in hazardous emissions or activities in proximity to schools. Therefore, no impact would occur. <u>Conclusion</u> The Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impact associated with implementation of the Proposed Project would occur.				

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
9d. Response: (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites; Appendix E-1: Response Plan: Former Riverside Scrap and Iron Metal Property, 2993 6th Street, Riverside, CA 92507, GSI Environmental, November 4, 2024) No Impact. Government Code Section 65962.5, commonly referred to as the Cortese List, identifies sites that are known to contain hazardous materials or are subject to cleanup actions due to contamination. The list is compiled by various state agencies, including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and the Department of Resources Recycling and Recovery (CalRecycle). A review of hazardous materials databases and regulatory sources—including the General Plan 2025 Figure PS-5 (Hazardous Waste Sites), GP 2025 FPEIR Tables 5.7-A through 5.7-C, and the DTSC EnviroStor Database—confirms that the Project Site is not listed on the Cortese List or any other regulatory database identifying hazardous materials contamination. The Response Plan prepared for the Site (Appendix E-1) further supports this conclusion, indicating that while shallow soil contamination exists and will be remediated prior to development, the Site is not subject to any formal listing under Government Code Section 65962.5. Based on this review, the Proposed Project would not be located on a site included on a hazardous materials list and would not create significant hazard to the public or the environment. <u>Conclusion</u> The Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impact would occur.				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
9e. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005), and Appendix E-2: Airport Land Use Commission (ALUC) Development Review, Director’s Determination, Riverside County Airport Land Use Commission, April 14, 2023) Less Than Significant Impact. The Project Site is located within Compatibility Zone E of the March Air Reserve Base/Inland Port Airport Influence Area (AIA), as designated by the Riverside County Airport Land Use Compatibility Plan (RCALUCP). Zone E permits residential development and does not impose restrictions on residential density or non-residential intensity.				

Pursuant to the Countywide Policies section of the RCALUCP, neither density nor intensity is limited within Zone E.

The Project Site lies within the March AIA, therefore, the Proposed Project is subject to review by the Riverside County Airport Land Use Commission (ALUC). In April 2023, the ALUC determined that the Proposed Project is consistent with the March 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to conditions that will be incorporated into the City's Conditions of Approval.

The Project Site is located approximately 20,000 feet from the runways at both Riverside Municipal Airport and March Air Reserve Base/Inland Port Airport, and approximately 12,000 feet from the northeasterly end of Runway 6-24 at Flabob Airport. Based on Federal Aviation Administration (FAA) obstruction evaluation criteria, review is required for any structure exceeding 1,006.8 feet above mean sea level (AMSL) in elevation. The Project Site has an existing elevation of approximately 885 feet AMSL, and the tallest proposed structure would reach a maximum elevation of 940.17 feet AMSL. Therefore, FAA review for obstruction due to height is not required.

The Proposed Project would not interfere with aircraft operations or result in a safety hazard to people residing or working in the area. The Project is consistent with applicable airport land use compatibility policies and does not include features that would pose a risk to aviation safety.

Conclusion

The Proposed Project is located within an airport land use plan area but has been determined to be consistent with applicable compatibility policies and does not exceed FAA obstruction thresholds. Therefore, potential impacts related to aviation safety associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?



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

Less Than Significant Impact.

The City of Riverside has adopted a comprehensive Emergency Operations Plan (EOP), prepared by the Emergency Management Office. The EOP outlines procedures for coordinated emergency response and is supported by the City's Fire Department, which promotes multi-jurisdictional cooperation through activation of the Standardized Emergency Management System (SEMS). In addition, the City's General Plan includes policies that support implementation of emergency planning and response strategies.

The Proposed Project would be served by existing public streets, including Mission Inn Avenue, Commerce Street, and 5th Street, all of which are fully improved and designed to meet the specifications of the City's Public Works and Fire Departments. These roadways provide adequate access for emergency vehicles and are not proposed to be permanently altered in a manner that would interfere with emergency response or evacuation routes.

The Proposed Project includes improvements to portions of Mission Inn Avenue, 5th Street, and Commerce Street to enhance pedestrian safety and traffic circulation. While temporary lane closures may occur during construction, traffic control measures would be implemented in accordance with City standards. These measures require that emergency access be always maintained. All construction activities would comply with applicable City Fire Code provisions and conditions of approval to ensure that emergency access and evacuation routes remain unobstructed.

The Proposed Project would not result in physical barriers or changes to the circulation network that would impair emergency response or evacuation. The improvements proposed would enhance safety and mobility in the area and would be coordinated with City departments to ensure compliance with emergency planning requirements.

Conclusion

The Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.

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



9g. Response: *(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFHSZ 2010, City of Riverside’s EOP, 2002 http://intranet/Portal/uploads/Riv_City_EOP_complete.pdf, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan)*

No Impact.

The Project Site is located within a fully urbanized area of the City of Riverside and is surrounded by existing development. The Project Site is not located within or adjacent to any designated wildland areas and is not mapped within a Very High Fire Hazard Severity Zone (VHFHSZ), as identified by the California Department of Forestry and Fire Protection (CAL FIRE).

The Proposed Project involves residential development on a previously disturbed site and does not include uses or features that would increase the risk of wildland fire exposure. No interface with wildland vegetation exists, and the Project Site would be served by existing infrastructure, including fire protection services provided by the City of Riverside Fire Department.

Given the Proposed Project’s location, existing conditions, and absence of wildland fire hazards, no impact related to wildland fire risk would occur.

Conclusion

The Project Site is not located within or adjacent to wildlands or a Very High Fire Hazard Severity Zone. Therefore, no impact associated with implementation of the Proposed Project would occur.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
10a. Response: (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; Appendix F-1: Project-Specific Water Quality Management Plan, KHR Associates, revised December 6, 2024) Less Than Significant Impact. The Proposed Project construction would occur over 6.94 acres, which would be managed by a Stormwater Pollution Prevention Plan (SWPPP) prepared pursuant to the statewide General Construction Permit (NPDES General Permit No. CAS000002, Waste Discharge Requirements, Order No. 2009-0009-DWQ, adopted September 2, 2009 and effective as of July 2, 2010) issued by the State Water Resources Control Board (SWRCB). With the SWPPP, the Proposed Project would incorporate appropriate Best Management Practices (BMPs) to minimize potential runoff and erosion during construction. The Proposed Project would implement a comprehensive suite of stormwater management measures designed to prevent violations of water quality standards and waste discharge requirements. The Project is located within the Santa Ana Watershed, and stormwater runoff would discharge to the Santa Ana River, Reach 3, which is listed on the EPA 303(d) list for impairments including copper, lead, and indicator bacteria. A Project-Specific Water Quality Management Plan (WQMP) was prepared in compliance with Regional Board Order No. R8-2010-0033 and the City of Riverside Water Quality Ordinance (Municipal Code Section 14.12.315). The WQMP identifies Drainage Management Areas (DMAs) and incorporates Low Impact Development (LID) Best Management Practices (BMPs) for all DMAs. Stormwater would be pre-treated using Aqua-Swirl® hydrodynamic separators, detained in solid-walled corrugated metal pipes (CMPs), and infiltrated via drywells. These systems are designed to capture and treat the Design Capture Volume (DCV) within 48 hours, consistent with regulatory requirements. Infiltration rates were confirmed through geotechnical testing, and setbacks from building foundations were incorporated to mitigate risks associated with collapsible soils. The WQMP includes source control BMPs such as marked storm drain inlets, plumbed interior drains, pest-resistant landscaping, and restrictions on vehicle maintenance and hazardous material handling. Operational BMPs include regular inspections, maintenance logs, and educational materials for site personnel. <u>Conclusion</u> The Proposed Project would not violate water quality standards or waste discharge requirements and would not degrade surface or groundwater quality. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
10b. Response: <i>(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan; Appendix F-1: Project-Specific Water Quality Management Plan, KHR Associates, revised December 6, 2024)</i> Less Than Significant. The Project Site is located within the Riverside South Water Supply Basin, which is part of the Santa Ana Watershed and tributary to the Santa Ana River, Reach 3. Potable water service would be provided by Riverside Public Utilities (RPU), which supplies domestic water for the City of Riverside. Approximately 97 percent of RPU’s water supply is sourced from local groundwater basins, including Bunker Hill, Riverside North and South, and the Gage Exchange. The Bunker Hill Basin is adjudicated, and its safe yield and export rights are well defined. The Proposed Project includes a General Plan Amendment (GPA) and zone change that would redesignate approximately 6.94 acres from Business Manufacturing Park (BMP-SP) to Mixed Use-Urban (MU-U). As a result, the Project’s water demand was not considered in the General Plan 2025 Final Program Environmental Impact Report (FPEIR). However, the Proposed Project would comply with the CalGreen Building Code, which was adopted after the FPEIR was prepared. CalGreen requires a 20 percent reduction in indoor water use, which would result in lower water demand than what was evaluated in the FPEIR, even if the GPA were not proposed. In addition, the Proposed Project would implement water-efficient landscaping consistent with the Citywide Water Efficient Landscaping and Irrigation Design Guidelines, which encourage the use of stormwater infiltration measures such as infiltration beds, swales, basins, and permeable paving. These features would allow runoff to infiltrate the soil and percolate into the subsurface, thereby supporting groundwater recharge. The Preliminary WQMP prepared for the Proposed Project confirms that infiltration is feasible across all Drainage Management Areas (DMAs). The Proposed Project would utilize drywells and corrugated metal pipe (CMP) detention systems to infiltrate the Design Capture Volume (DCV) within the required drawdown time of 48 hours. Infiltration rates measured during geotechnical testing ranged from 0.7 to 6.8 inches per hour at depths of 12 feet and 1.3 to 1.6 inches per hour at depths of 40–50 feet. Groundwater was not encountered to depths of 61 feet, and historical data indicates groundwater levels exceed 100 feet below grade. The Proposed Project would not extract groundwater, and its design would enhance recharge through infiltration. The land use changes proposed are minor in the context of the overall General Plan buildout, and the Proposed Project would not interfere with sustainable groundwater management.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Proposed Project would not decrease groundwater supplies or interfere with groundwater recharge. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	☐	☐	☒	☐
10 (i) Response: (Source: Preliminary grading plan, Project Specific Water Quality Management Plan, prepared by KHR Associates, Revised December 6, 2023 (Appendix F-1) and Preliminary Hydrology-Hydraulics Study For Iron Lofts Apartments, 3093 Mission Inn Avenue, Riverside, California, prepared by KHR Associates, revised December 6, 2024 [Appendix F-2]) Less Than Significant Impact. The Proposed Project would not alter the course of any stream or river. The Project Site is in a fully urbanized area and does not contain natural water courses. Existing drainage patterns would be preserved to the extent feasible, and the Project would incorporate Low Impact Development (LID) features and Best Management Practices (BMPs) to manage stormwater runoff and minimize erosion. The Preliminary Water Quality Management Plan (WQMP) identifies Drainage Management Areas (DMAs) and includes a combination of source control, treatment control, and infiltration BMPs. These measures include Aqua-Swirl® hydrodynamic separators, drywells, and corrugated metal pipe (CMP) detention systems designed to capture and treat the Design Capture Volume (DCV) within 48 hours. These systems are intended to prevent erosion and siltation by controlling flow rates and removing sediment prior to infiltration. During construction, erosion control measures would be implemented in accordance with the City's grading permit requirements and the Construction Plan Checklist included in the WQMP. These measures would prevent sediment discharge from the Project Site and ensure compliance with applicable water quality standards. <u>Conclusion</u> The Proposed Project would not result in substantial erosion or siltation on- or off-site. Therefore, potential impacts would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	☐	☐	☒	☐
10 (ii) Response: (Source: Preliminary grading plan, Project Specific Water Quality Management Plan, prepared by KHR Associates, Revised December 6, 2023 (Appendix F-1) and Preliminary Hydrology-Hydraulics Study For Iron Lofts Apartments, 3093 Mission Inn Avenue, Riverside, California, prepared by KHR Associates, revised December 6, 2024 [Appendix F-2]) Less Than Significant Impact. The Proposed Project would increase impervious surface area due to the construction of buildings, hardscape, and parking areas. However, the Proposed Project has been designed to manage post-development runoff through a combination of Low Impact Development (LID) features and Best Management Practices (BMPs), as detailed in the Preliminary Water Quality Management Plan (WQMP). Currently, stormwater runoff from the Project Site flows to adjacent streets without treatment and is collected by existing curb and gutter systems connected to the municipal storm drain network. Underdeveloped conditions, the Proposed Project would alter the drainage pattern by capturing and treating runoff on-site prior to discharge. This change would not result in increased flooding either on-site or off-site. Runoff would be detained and infiltrated using engineered systems, including Aqua-Swirl® hydrodynamic separators, drywells, and corrugated metal pipe (CMP) detention structures. These systems are designed to attenuate the Design Capture Volume (DCV) within 48 hours, consistent with regulatory requirements. The WQMP confirms that the Proposed Project qualifies for Hydrologic Condition of Concern (HCOC) Exemption, indicating that post-development runoff would not significantly differ from pre-development conditions in terms of volume or flow rate. According to Figure PS-4 of the General Plan 2025, the Project Site is not located within a designated flood hazard area. The proposed drainage improvements would reduce the potential for uncontrolled runoff and enhance stormwater management through on-site capture and infiltration. <u>Conclusion</u> The Proposed Project would not increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, impacts would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
10 (iii) Response: (Source: Preliminary grading plan, Project Specific Water Quality Management Plan, prepared by KHR Associates, Revised December 6, 2023 (Appendix F-1) and Preliminary Hydrology-Hydraulics Study For Iron Lofts Apartments, 3093 Mission Inn Avenue, Riverside, California, prepared by KHR Associates, revised December 6, 2024 [Appendix F-2]) Less Than Significant Impact. The Proposed Project would result in the development of a multifamily residential complex on a site greater than one acre in size and is subject to coverage under the State Water Resources Control Board’s General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit) and must prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). In addition, the City of Riverside regulates stormwater quality through its Municipal Separate Storm Sewer System (MS4) Permit, which requires the preparation of a Water Quality Management Plan (WQMP) for new development. The WQMP prepared for the Proposed Project includes a detailed description of the on-site stormwater drainage system, which would be installed concurrently with site construction. This system is designed to capture, treat, and infiltrate stormwater runoff generated by the Proposed Project, and is adequately sized to accommodate the volume of runoff expected under post-development conditions. The Project Site is expected to generate typical urban pollutants, including sediment/turbidity, nutrients, trash and debris, oxygen-demanding substances, bacteria and viruses, oil and grease, and pesticides. These pollutants would be addressed through a combination of site design measures, source control BMPs, and treatment control BMPs as specified in the WQMP. Treatment systems include Aqua-Swirl® hydrodynamic separators, drywells, and detention structures, which are designed to capture and treat the Design Capture Volume (DCV) within 48 hours. The Proposed Project would not discharge untreated runoff to the municipal storm drain system and would not exceed the capacity of existing or planned infrastructure. The integration of permanent BMPs and compliance with applicable water quality regulations ensures that the Proposed Project would not contribute substantial additional sources of polluted runoff. <u>Conclusion</u> The Proposed Project would not create or contribute runoff water that exceeds the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Impede or redirect flood flows?	☐	☐	☐	☒
10 (iv) Response: (Source: Preliminary grading plan, Project Specific Water Quality Management Plan, prepared by KHR Associates, Revised December 6, 2023 (Appendix F-1) and Preliminary Hydrology-Hydraulics Study For Iron Lofts Apartments, 3093 Mission Inn Avenue, Riverside, California, prepared by KHR Associates, revised December 6, 2024 [Appendix F-2]) No Impact. The Proposed Project would not impede or redirect flood flows. The Project Site is in a fully urbanized area and is not within a designated floodplain. According to Figure PS-4 of the General Plan 2025, the Site is not located in a flood hazard area. Stormwater runoff from the existing site currently flows to adjacent streets and is collected by curb and gutter systems connected to the municipal storm drain network. Underdeveloped conditions, the Project would alter the drainage pattern by capturing and treating runoff on-site through a system of Low Impact Development (LID) features and Best Management Practices (BMPs), as outlined in the Preliminary Water Quality Management Plan (WQMP). The proposed stormwater infrastructure would be installed concurrently with site development and is designed to manage the Design Capture Volume (DCV) without obstructing or redirecting natural or engineered flood pathways. The Project would not introduce barriers or grading features that would interfere with flood flows. <u>Conclusion</u> The Proposed Project would not impede or redirect flood flows. Therefore, no impact would occur.				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
10d. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality) No Impact. The Project Site is not located within a designated flood hazard zone. According to Figure 5.8-2 of the General Plan 2025 Final Program Environmental Impact Report (FPEIR) and Figure PS-4 of the General Plan 2025, the Project Site is not within or near a 100-year floodplain and is not located in a dam inundation area. Therefore, the Project would not be subject to flooding or dam failure that could result in the release of pollutants. Tsunamis are large wave events typically associated with seismic activity in coastal regions. The City of Riverside is located inland and is not subject to tsunami risk. Similarly, seiches—standing waves in enclosed water bodies—are not a concern for the Project Site, as there are no large lakes or reservoirs in the immediate vicinity that could generate such conditions. The Project Site would not be exposed to inundation from floods, tsunami, or seiche events, and would not result in the release of pollutants due to such hazards.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Proposed Project is not located in a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants due to inundation. Therefore, no impact would occur.				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
10e. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality) Less Than Significant. The Project Site is located within the Santa Ana River Watershed, in the far eastern portion of the San Bernardino–Riverside Basin Area South, which was adjudicated in 1992 and is managed by the Riverside Basin Area Watermaster. Groundwater in this region is collected and supplied to the Project Site by Riverside Public Utilities (RPU) in coordination with the Western Municipal Water District (WMWD). RPU’s water supply planning is guided by its Urban Water Management Plan, most recently updated in 2020. The Sustainable Groundwater Management Act (SGMA), enacted in 2014, requires that medium- and high-priority groundwater basins be managed by Groundwater Sustainability Agencies (GSAs). The adjudicated status of the Riverside Basin Area South and its management by a Watermaster satisfies SGMA requirements for sustainable groundwater oversight. As discussed in Section 10b, the Proposed Project would not have a significant impact on groundwater quantity or quality. The Project would include physical alterations to the site such as grading, tree removal, and paving, but these activities would not conflict with water quality standards or waste discharge requirements. The Project would be subject to coverage under the State General Permit for Construction Activities, administered by the Santa Ana Regional Water Quality Control Board (RWQCB), and would be required to implement a final approved Water Quality Management Plan (WQMP) prior to grading. The WQMP is consistent with the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) and includes site design, source control, and treatment control measures to manage stormwater runoff and protect water quality. The Project does not include features or activities that would obstruct or conflict with the implementation of a water quality control plan or sustainable groundwater management plan. <u>Conclusion</u> The Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, potential impacts would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING: Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
11a. Response: (Source: General Plan 2025 Land Use and Urban Design Element, Project Site plan City of Riverside GIS/CADME map layers) No Impact. The Proposed Project is an infill development served by existing public streets and infrastructure. It would not involve subdivision of land or creation of new streets that could alter the surrounding development pattern or affect an established community. <u>Conclusion</u> No impacts associated with implementation of the Proposed Project would occur.				
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
11b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Riverside Marketplace Specific Plan, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines) Less Than Significant Impact. The Proposed Project would involve a General Plan Amendment to change the land use designation of the Project Site from Business and Manufacturing Park (BMP) to Mixed Use-Urban (MU-U), a Specific Plan Amendment to revise the SubArea designation from Central Marketplace and Marketplace Business Park to Mixed Use Marketplace, and adoption of the Mixed Use-Urban land use standards and uses from Title 19 into the Marketplace Specific Plan. The Proposed Project would also include a zone change to rezone 6.94 acres from Business Office Park (B/OP) with specific plan and cultural resources overlays to MU-U Mixed Use-Urban. Additionally, the Proposed Project would require a Certificate of Appropriateness for development of a multi-family residential project partially located within the Seventh Street East Historic District and partially within the boundaries of the Citrus Thematic Industrial Potential Historic District. The Project Site is adjacent to existing residential uses and would continue the established development pattern in the Project Area. The building heights would alternate between four stories and two stories along Mission Inn Avenue to maintain compatibility with surrounding residential development. The Proposed Project would provide 388 parking spaces, which is fewer than the City’s standard requirement of 474 spaces. However, Assembly Bill 2097 eliminates minimum automobile parking requirements for most new developments located within one-half mile of a major transit stop.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> Potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
12a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources) No Impact. The Project Site is located within a Mineral Resource Zone (MRZ-3), which is defined as an area where available geologic information indicates that mineral deposits may exist, but the significance of the deposit is undetermined. Given the Project Site's size and its location within a developed urban area, it is unlikely that surface mining or mineral recovery operations could feasibly occur. <u>Conclusion</u> No impacts associated with implementation of the Proposed Project would occur.				
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
12b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources) No Impact. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) determined that no areas within the City or its Sphere of Influence contain locally important mineral resource recovery sites. The GP 2025 FPEIR also concluded that implementation of the General Plan would not significantly preclude the ability to extract state-designated mineral resources. <u>Conclusion</u> No impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
13a. Response: <i>(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, and Noise Existing Conditions Report, Title 7 – Noise Code, and Iron Lofts Multifamily Residential Noise Impact Analysis, prepared by Ganddini Group, Inc, April 25, 2025 [Appendix G])</i> Less Than Significant With Mitigation Incorporated. A noise impact analysis was prepared for the Proposed Project by Ganddini Group, Inc. (April 25, 2025), included as Appendix G. The analysis evaluated potential noise impacts from both construction and operational activities in relation to standards established in the City of Riverside General Plan and Municipal Code (Title 7 – Noise Code), as well as applicable federal and state guidelines. <u>Construction Noise</u> Construction activities would occur during the hours permitted by the City of Riverside Municipal Code Section 7.35.020(G), which exempts construction noise between 7:00 AM and 7:00 PM on weekdays and 8:00 AM to 5:00 PM on Saturdays. The City does not establish numeric thresholds for construction noise; therefore, the Federal Transit Administration (FTA) thresholds were used. The FTA daytime threshold is 80 dBA Leq for residential uses and 85 dBA Leq for commercial uses. Modeled construction noise levels at the nearest sensitive receptors are forecast to range from 61.5 to 75.2 dBA Leq, which would not exceed the applicable FTA thresholds. Construction would not occur during nighttime hours (10:00 PM to 7:00 AM) and therefore would not exceed nighttime thresholds. Potential impacts would be less significant, and no mitigation would be required. <u>Best Management Practices (BMPs)</u> To further reduce construction noise, the following BMPs shall be incorporated into project plans and contract specifications: 1. All equipment, whether fixed or mobile, shall be equipped with properly operating and maintained mufflers, consistent with manufacturer standards.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. All stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the Project Site. 3. All equipment shall be shut off and not left to idle when not in use. 4. Equipment staging shall be in areas that create the greatest distance between construction-related noise and vibration sources and existing sensitive receptors. 5. Portable stationary noise sources shall be directed away and shielded from existing residences in the vicinity of the Project Site. Shielding may include one-inch plywood or sound blankets that block the line of sight between equipment and residences, without holes or cracks. 6. No amplified music and/or voice shall be allowed on the Project Site. 7. Haul truck deliveries shall not occur outside of the exempt construction hours defined in Municipal Code Section 7.35.020(G). <u>Operational Noise</u> Transportation-related noise levels at the proposed residential buildings are expected to range between 61 and 72 dBA CNEL. Per the City’s Noise/Land Use Compatibility Criteria, residential uses are considered “normally acceptable” up to 65 dBA CNEL and “conditionally acceptable” up to 75 dBA CNEL. To ensure interior noise levels remain below the 45 dBA CNEL standard, Mitigation Measure NOI-1 would be implemented. MM-NOI-1: To ensure interior noise levels in habitable rooms comply with applicable standards, the Project Applicant shall incorporate exterior building-envelope sound insulation into final building plans. Specifically, windows and exterior glazed doors serving dwelling units shall be constructed to achieve, at a minimum, the Sound Transmission Class (STC) ratings identified in Table NOI-1 (below) for the corresponding building façades/locations shown by the representative receptor points on the project’s transportation noise contour figure (Noise Impact Analysis - Figure 6). Where no enhanced STC rating is specified for a given façade/location, standard windows and glazed doors that meet California Building Code requirements shall be sufficient. Prior to issuance of building permits, the Applicant shall demonstrate plan compliance by including window/door schedule notes (or acoustical cut sheets) showing the specified STC ratings for each applicable façade and floor level. <u>Conclusion</u> With implementation of Mitigation Measure NOI-1 and incorporation of BMPs, the Proposed Project would not expose people to noise levels more than applicable standards. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant with mitigation.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Table NOI-1. Required STC Ratings by Building Location (Representative Receptors) <i>Representative receptor locations correspond to the building/façade locations shown on Figure 6 (Transportation Noise Levels) and Table 13 (Required STC for Windows and Glass Doors) and Figure 6 (Receptor Locations).</i>					
Representative receptor (building location per Figure 6)	Floor level	Exterior Noise Level	Required minimum STC (windows & exterior glazed doors)		
Receptor 1	1	73	31		
	2	74	32		
	3	74	32		
	4	75	33		
Receptor 2	1	67	25		
	2	69	27		
Receptor 3	1	79	37		
	2	79	37		
	3	80	38		
	4	81	39		
Receptor 4	1	78	36		
	2	79	37		
	3	80	38		
	4	80	38		
Receptor 5	1	78	36		
Receptor 6	1	78	36		
	2	79	37		
	3	79	37		
	4	80	38		
Receptor 7	1	74	32		
	2	74	32		
	3	75	33		
	4	76	34		
Receptor 8	1	56	14		
	2	56	14		
	3	56	14		
	4	57	15		
Receptor 9	1	68	26		
	2	69	27		
	3	71	29		
	4	74	32		



STC Requirements by Floor and Receptor (Windows & Glazed Doors)

Floor	R1	R2	R3	R4	R5	R6	R7	R8	R9
1	31	25	37	36	36	36	32	14	26
2	32	27	37	37	—	37	32	14	27
3	32	—	38	38	—	37	33	14	29
4	33	—	39	38	—	38	34	15	32

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
13b. Response: <i>(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, and Noise Existing Conditions Report, Title 7 – Noise Code, and Iron Lofts Multifamily Residential Noise Impact Analysis, prepared by Ganddini Group, Inc, April 25, 2025 [Appendix G])</i> Less Than Significant With Mitigation. Groundborne vibration impacts associated with the Proposed Project were evaluated in the Iron Lofts Multifamily Residential Noise Impact Analysis (Ganddini Group, Inc., April 25, 2025), included as Appendix G. The analysis considered construction-related vibration, operational vibration, and rail-related vibration in relation to thresholds established by the Federal Transit Administration (FTA). <u>Construction Vibration</u> Construction activities are the most common source of groundborne vibration that could affect occupants of nearby buildings. Sensitive receptors near the Project Site include residential structures located as close as 15 feet to the east and commercial buildings approximately 55 feet to the northwest. The FTA threshold for architectural damage to non-engineered timber and masonry buildings is 0.2 inches per second (PPV). Modeled vibration levels indicate that this threshold could be exceeded at residential structures along 5th and 6th Streets if vibratory rollers or similar equipment are operated within 26 feet of these buildings. Additionally, the FTA annoyance threshold of 80 VdB could be exceeded within 74 feet of residential structures during daytime construction activities. However, this potential impact would be temporary during construction during daytime hours. Implementation of MM-NOI-2 would avoid potential damage and minimize annoyance. <u>Operational Vibration</u> Post-construction operations would primarily involve passenger vehicles and trucks traveling on paved surfaces. Loaded trucks typically generate a PPV of 0.076 inches per second at 25 feet, which is lower than construction equipment such as vibratory rollers (0.210 inches per second at 25 feet). Therefore, operational vibration levels would not exceed those modeled for construction and would be less than significant. <u>Rail-Related Vibration</u> The Project Site is located approximately 170 feet southeast of the BNSF rail line. Groundborne vibration from freight rail pass-bys is expected to reach up to 53 VdB at the nearest proposed building, which is below the FTA thresholds for damage or annoyance. No mitigation is required for rail-related vibration.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
MM-NOI-2: Prior to issuance of grading permits, the applicant shall include a note on grading and construction plans prohibiting the use of vibratory rollers, large bulldozers, or pile drivers within 26 feet of residential structures surrounding the Project Site. The City of Riverside shall verify compliance through review of grading plans and specifications prior to permit issuance. <u>Conclusion</u> With implementation of MM-NOI-2, the Proposed Project would not expose people to excessive groundborne vibration levels. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant with mitigation.				
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
13c. Response: <i>(Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards)</i> No Impact. The Project Site is in Airport Compatibility Zone E of the March Air Reserve Base/Inland Port Airport Influence Area. However, the Project Site is not located within the 60 dBA CNEL noise contour or any other airport noise contour areas as depicted on Exhibit MA-4 of the Riverside County Airport Land Use Compatibility Plan (RCALUCP). Additionally, the Project Site is located approximately 2.29 miles southeast of Flabob Airport and approximately 4.4 miles northeast of Riverside Municipal Airport. Per the RCALUCP Policy Document Maps FL-3 and RI-3, the Project Site is well outside the 55 dBA CNEL noise contours for both airports. <u>Conclusion</u> The Proposed Project would not expose people residing or working in the Project Area to excessive noise levels associated with airport operations. Therefore, no impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
14a. Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections–2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG’s RCP and RTP) Less Than Significant Impact. The Proposed Project would involve the construction of a 300-unit multifamily residential complex, which may directly induce population growth through the addition of new housing units and may indirectly induce growth through associated infrastructure improvements. According to the City of Riverside General Plan 2025, the projected population by the year 2025 is 346,867. Based on the 2010 U.S. Census, the average household size in Riverside was 3.18 persons per household. Using a conservative, worst-case scenario assuming full occupancy of all 300 units at 3.18 persons per unit, the Proposed Project could result in a population increase of approximately 954 residents. This represents approximately 0.002 percent of the City’s projected population by the Southern California Association of Governments (SCAG) for the year 2040. Alternatively, assuming a more realistic occupancy scenario of two persons per unit for the 51 studio units, 147 one-bedroom units, and 9 work-live units (207 units total), and 3.18 persons per unit for the remaining 93 two-bedroom units, the Proposed Project may generate approximately 709 residents. It is unknown whether these units would be occupied by new residents moving into the City or by existing residents seeking alternative housing options due to location, affordability, or generational shifts (e.g., younger adults moving out of family homes or extended families forming separate households). Although the Proposed Project includes a General Plan Amendment, Specific Plan Amendment, and zone change to redesignate approximately 6.94 acres from Business and Manufacturing Park (BMP) to Mixed Use-Urban (MU-U) within the Riverside Marketplace Specific Plan, the increase of 300 dwelling units represents less than one percent of the total 127,692 dwelling units projected at build-out under the General Plan 2025 “Typical Growth Scenario.” The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) evaluated population growth impacts under this scenario. The Proposed Project does not exceed or alter the assumptions used in the GP 2025 FPEIR and does not result in new or more severe impacts than those previously disclosed.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Proposed Project would not induce substantial population growth beyond what was previously evaluated in the GP 2025 FPEIR. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant.				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14b. Response: (Source: CADME Land Use 2003 Layer, Google imaging etc.) No Impact The Proposed Project would involve the construction of a 300-unit multifamily residential complex on a 6.94-acre site currently designated as Business and Manufacturing Park (BMP-SP) and zoned Business Office Park (B/OP) with specific plan and cultural resources overlays. The site is partially developed with commercial and industrial buildings and is not currently used for residential purposes. The Project Site does not contain any existing housing units, nor is it occupied by residents. Therefore, implementation of the Proposed Project would not result in the displacement of existing housing or people. No demolition or removal of residential structures would occur, and no residents would be relocated because of the Proposed Project. Although the Proposed Project includes a General Plan Amendment, Specific Plan Amendment, and zone change to allow residential development, these changes would not displace existing housing or residents. Instead, the Proposed Project would increase the City's housing supply by adding 300 new units, which may help meet regional housing needs and reduce pressure on existing housing stock. <u>Conclusion</u> The Proposed Project would not displace existing housing or people. Therefore, no impacts associated with implementation of the Proposed Project would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
15a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1) Less Than Significant Impact. The Proposed Project would involve the development of a 300-unit multifamily residential complex within the City of Riverside. The Project Site is located within an urbanized area that is currently served by the Riverside Fire Department (RFD), which provides fire protection, emergency medical services, and hazardous materials response throughout the City and its Sphere of Influence. Adequate fire protection services are available from Fire Station 1, located at 3420 Mission Inn Avenue, approximately 0.5 miles west of the Project Site. The proximity of this facility ensures timely emergency response capabilities for the Proposed Project. The Proposed Project would incrementally increase demand for fire protection services due to the addition of new residential units and associated population growth. However, the Project would be subject to standard development review procedures, including compliance with applicable fire codes, emergency access requirements, and fire suppression infrastructure standards. The Proposed Project would also be required to implement General Plan 2025 policies related to public safety and emergency services. In addition, Ordinance 5984, adopted in 1991, requires new development to pay fire impact fees, which may be used for the acquisition of land and construction of new fire facilities. These fees help ensure that fire protection services remain adequate as the City grows. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) evaluated citywide growth and concluded that implementation of the General Plan would not result in significant impacts to fire protection services with adherence to existing regulations and policies. The Proposed Project does not exceed or alter the assumptions used in the GP 2025 FPEIR and does not result in new or more severe impacts than those previously disclosed.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Proposed Project would not result in the need for new or physically altered fire protection facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				
b. Police protection?	☐	☐	☒	☐
15b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers) Less Than Significant. The Proposed Project would involve the development of a 300-unit multifamily residential complex within the City of Riverside. The Project Site is located within an urbanized area currently served by the City of Riverside Police Department (RPD), which provides law enforcement services throughout the City and its Sphere of Influence. Police protection services for the Project Site are provided by the Neighborhood Policing Center located at 4102 Orange Street, approximately 1.5 miles west of the site. RPD has implemented a decentralized Neighborhood Policing Center model to provide more equitable and responsive services across the City. This model allows officers to be more embedded in the communities they serve, improving response times and community engagement. The Proposed Project would incrementally increase demand for police services due to the addition of new residential units and associated population growth. However, the Project Site is in an area already served by existing police facilities and patrol operations. The Project would be subject to standard development review procedures, including site plan review to ensure adequate lighting, visibility, and access for emergency response. The Project would also be required to comply with applicable safety and security design standards, including those outlined in the City’s General Plan 2025 and Municipal Code. RPD does not use a formula for calculating the number of officers per capita. Instead, staffing levels are managed to ensure proper supervision and coverage across all shifts, as outlined in the RPD Policy Manual. Additionally, new developments in the City are required to pay public safety impact fees, which may be used to support police staffing, equipment, and facilities. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) concluded that existing General Plan policies, the payment of impact fees, and the fact that development itself is often a natural deterrent to crime, would reduce the potential for impacts. Compliance with existing codes and standards, and implementation of Police Department practices, would ensure that impacts remain less than significant. <u>Conclusion</u> The Proposed Project would not result in the need for new or physically altered police protection facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Schools?	☐	☐	☒	☐
15c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-3 – AUSD Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Student Generation for RUSD and AUSD By Education Level, and Figure 5.13-4 – Other School District Boundaries) Less Than Significant. The Proposed Project would involve the development of a 300-unit multifamily residential complex, which may incrementally increase demand for public school services due to the potential addition of school-aged children residing in the new units. The Project Site is located within the boundaries of the Riverside Unified School District (RUSD). The closest schools serving the area include: • Longfellow Elementary School, located at 3610 Eucalyptus Avenue, approximately 0.5 miles east of the Project Site. • University Heights Middle School, located at 1155 Massachusetts Avenue, approximately 2 miles east of the Project Site. • Riverside Polytechnic High School, located at 5450 Victoria Avenue, approximately 3 miles south of the Project Site. Of the 300 proposed units, 93 are two-bedroom units, which are more likely to accommodate families with school-aged children. While the Proposed Project may result in an increase in student enrollment, the scale of the increase is not expected to exceed the capacity of existing schools or result in the need for new or expanded school facilities. The Riverside Unified School District has established procedures for evaluating and accommodating student enrollment growth, including long-range facilities planning and the collection of school impact fees from new residential development. These fees are authorized under California Education Code Section 17620 and are used to fund the construction and expansion of school facilities to maintain adequate service levels. Although the Proposed Project may generate new students, the increase is not expected to exceed the capacity of existing schools or result in the need for new or physically expanded school facilities. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) evaluated citywide growth and concluded that implementation of the General Plan would not result in significant impacts to school services with adherence to existing policies and fee programs. <u>Conclusion</u> The Proposed Project would not result in the need for new or physically altered school facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Parks?	☐	☐	☒	☐
15d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative) Less Than Significant. The Proposed Project would involve the development of a 300-unit multifamily residential complex and includes on-site recreational amenities such as a clubhouse, swimming pool, and dog park. These features are intended to serve future residents and reduce reliance on nearby public parks for daily recreational needs. The Project Site is in proximity to several existing public parks, including: • North Park located approximately 500 feet west of the Project Site. This is a 1.23-acre neighborhood park that provides passive recreational space. • Lincoln Park is located approximately 0.6 miles south of the Project Site. This is a 3.26-acre community park with amenities including lighted basketball courts, horseshoe courts, a community center, playground, and picnic facilities. With the addition of 300 dwelling units, the Proposed Project may incrementally increase the use of nearby public parks. However, the City of Riverside has established mechanisms to ensure that park facilities remain adequate as development occurs. Specifically, Chapter 16.60 (Local Park Development Fees) of the City’s Municipal Code enables the acquisition, development, and improvement of neighborhood and community parks to provide both passive and active recreational opportunities. Per Section 16.60.020 (Determinations) of the Municipal Code, the imposition of a Local Park Development Fee is necessary to fund the acquisition and/or development of new parks and the expansion and/or improvement (including rehabilitation) of existing parks to provide adequate neighborhood and community parks benefiting the development upon which the fee is imposed. The Proposed Project does not dedicate park space to the City and is therefore required to pay the applicable park development fee. The Proposed Project would also be required to comply with General Plan 2025 policies, existing codes and standards, and Park, Recreation and Community Services Department practices. <u>Conclusion</u> The Proposed Project would not result in the need for new or physically altered park facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Other public facilities?	☐	☐	☒	☐
15e. Response: (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards) Less Than Significant Impact. The Proposed Project would involve the development of a 300-unit multifamily residential complex, which may incrementally increase demand for other public facilities such as libraries, community centers, and administrative services provided by the City of Riverside. The City of Riverside operates a network of public facilities that serve residents citywide, including the Main Library located at 3900 Mission Inn Avenue, approximately 0.6 miles west of the Project Site. Additional facilities include the Riverside Metropolitan Museum, community centers, and City Hall, all of which are located within reasonable proximity to the Project Site and are accessible via existing transportation infrastructure. While the Proposed Project may result in a modest increase in demand for these services due to population growth, the increase would not be substantial relative to the City’s overall service capacity. The Proposed Project would be subject to development impact fees, which contribute to the maintenance and expansion of public facilities as needed to support growth. These fees are collected pursuant to the City’s adopted fee schedule and capital improvement planning process. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) evaluated citywide growth and concluded that implementation of the General Plan would not result in significant impacts on other public facilities with adherence to existing policies and fee programs. The Proposed Project does not exceed or alter the assumptions used in the GP 2025 FPEIR and does not result in new or more severe impacts than those previously disclosed. <u>Conclusion</u> The Proposed Project would not result in the need for new or physically altered public facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
16a. Response: <i>(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)</i> Less Than Significant Impact. The Proposed Project would involve the development of a 300-unit multifamily residential complex, which may incrementally increase the use of existing parks and recreational facilities in the City of Riverside due to the addition of new residents. The Project Site is located within an urbanized area served by the City’s existing park system, which includes neighborhood parks, community parks, and regional recreational facilities. The nearest public park is North Park, located approximately 361 feet southwest of the Project Site. Additional recreational amenities are available within a short distance, including Fairmount Park, White Park, and the Mount Rubidoux Trail. The City of Riverside General Plan 2025 includes policies to ensure adequate parkland and recreational services are provided as the City grows. New residential development is subject to Quimby Act parkland dedication requirements and park development impact fees, which help fund the acquisition, improvement, and maintenance of public recreational facilities. Although the Proposed Project may result in increased use of nearby parks, the incremental demand would not exceed the capacity of existing facilities or result in physical deterioration. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) concluded that implementation of the General Plan would not result in significant impacts to recreational facilities with adherence to existing policies and fee programs. <u>Conclusion</u> The Proposed Project would not result in the physical deterioration of existing parks or recreational facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐
16b. Response: (Source: Project Description, Submittal Materials) Less Than Significant Impact. The Proposed Project would involve the development of a 300-unit multifamily residential complex, which may incrementally increase demand for recreational facilities due to the addition of new residents. However, the Proposed Project does not include the construction or expansion of public recreational facilities, nor would it require such facilities to be built to offset its impacts. The Proposed Project includes on-site recreational amenities for residents, including a clubhouse, swimming pool, and dog park. These features are designed to serve the recreational needs of future residents and reduce reliance on public facilities. The Project Site is located within an urbanized area already served by existing recreational infrastructure, including North Park, located approximately 361 feet southwest of the site. The City of Riverside maintains a comprehensive park and recreation system that serves the community through neighborhood parks, community centers, trails, and open space areas. The Proposed Project would be subject to park development impact fees and Quimby Act requirements, which contribute to the funding of new or improved recreational facilities as needed to support population growth. These mechanisms ensure that the City can maintain adequate recreational services without requiring individual projects to construct new public facilities. The General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR) evaluated citywide growth and concluded that implementation of the General Plan would not result in significant impacts to recreational facilities with adherence to existing policies and fee programs. The Proposed Project does not exceed or alter the assumptions used in the GP 2025 FPEIR and does not result in new or more severe impacts than those previously disclosed. <u>Conclusion</u> The Proposed Project would not result in the construction or expansion of public recreational facilities. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION Would the project result in:				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
17a. Response: <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15-K – Freeway Analysis Proposed General Plan, and Circulation Element Traffic Study and Traffic Study Appendix, SCAG’s RTP, and Iron Lofts Multifamily Residential Traffic Impact Analysis, prepared by Ganddini Group, Inc, May 30, 2025 [Appendix H-1])</i> Less Than Significant Impact. The Proposed Project involves removal of existing buildings and construction of 295 mid-rise multifamily dwelling units and five low-rise multifamily dwelling units within a residential complex. Vehicular access would be provided via two driveways, one on 5th Street and one on Mission Inn Avenue. The Proposed Project requires a General Plan Amendment and Zoning Amendment to rezone the site from Business & Manufacturing Park Zone (BMP) to Mixed-use Urban (MU-U), and a Specific Plan Amendment to expand the mixed-use Marketplace Sub-area within the Riverside Marketplace Specific Plan. The plan also includes a street vacation of 6th Street from Commerce Street to the east side of the Project Site. A Traffic Impact Analysis (TIA) was prepared by Ganddini Group, Inc. (Appendix H-1), which evaluated 13 intersections and three roadway segments. The Proposed Project is forecast to generate approximately 1,213 net new daily trips, including 90 AM peak hour trips and 72 PM peak hour trips. The General Plan 2025 identifies policies for the circulation system, including transit, roadway, bicycle, and pedestrian. Applicable policies include: • Policy CCM-2.3: Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis. • Policy CCM-2.4: Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles. • Policy CCM-2.9: Design all street improvement projects in a comprehensive fashion to include consideration of street trees, pedestrian walkways, bicycle lanes, equestrian pathways, signing, lighting, noise, and air quality wherever any of these factors are applicable.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Roadway and Intersection Operations</u> Level of Service (LOS) is a qualitative measure describing the efficiency of traffic flow, expressed on a scale from A (free flow) to F (highly congested conditions). The City of Riverside General Plan 2025 establishes a policy goal to maintain LOS D or better on arterial streets wherever possible, with LOS E acceptable on a case-by-case basis. A higher standard of LOS C is expected for Local and Collector streets. The Traffic Impact Analysis evaluated 13 intersections and three roadway segments in the Project vicinity. All study intersections and roadway segments currently operate at acceptable Levels of Service (LOS D or better). The TIA evaluated conditions for: • Existing • Existing Plus Project • Opening Year (2026) Without and With Project • Buildout Year (2045) Without and With Project • With and Without the planned Commerce Street realignment (3rd Street Grade Separation Project) All intersections would continue to operate at LOS D or better under all scenarios, except for Vine Street and Mission Inn Avenue, which is forecast to operate at LOS E during the PM peak hour in 2045. To address this, the Proposed Project would implement off-site improvements described below. The roadway segment capacity analysis for all scenarios conditions demonstrates that the study roadway segments would continue to operate within acceptable Levels of Service (D or better). The Proposed Project would also contribute to the City of Riverside Development Impact Fee and the Western Riverside Council of Governments Transportation Uniform Mitigation Fee (TUMF), which funds arterial street improvements, traffic signals, and emergency services. Their purpose is to minimize, to the greatest extent practicable, the impact of new development on the City's public services and infrastructure. <u>Pedestrian Facilities</u> Sidewalks currently exist along Mission Inn Avenue but are absent along Commerce Street and 5th Street. The Proposed Project would install sidewalks along all frontages, consistent with General Plan policies. <u>Transit Facilities</u> The Riverside Transit Agency (RTA) provides both local and regional transit services throughout the region, operating 38 fixed routes, five CommuterLink routes, and Dial-A-Ride services with a fleet of 231 vehicles. Route 10 runs along Mission Inn Avenue, with the nearest bus stop located at the southeast corner of Mission Inn Avenue and Park Avenue, adjacent to the Project Site. In addition, the Metrolink train station is located southwest of Mission Inn Avenue between Vine Street and Commerce Street, within one-half mile of the Project Site. A pedestrian bridge over the train tracks provides access between the southbound track adjacent to Vine Street and the northbound track adjacent to Commerce Street, facilitating regional connectivity for future residents.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Bicycle Facilities</u> The City’s Master Plan of Trails and Bikeways identify proposed bike lanes on Lime Street and existing sharrows on Mission Inn Avenue and Vine Street. The Proposed Project would not interfere with these facilities and would include on-site bicycle parking to encourage alternative transportation. If the Proposed Project is completed prior to the construction of the 3rd Street Grade Separation project roadway improvements, the following bike lanes would be included in the pavement marking improvements plan (Off-Site Improvements): <i>Commerce Street (between 3rd Street and Mission Inn Avenue)</i> • Install Type III bike lane sharrows on pavement markings. <i>5th Street (between Commerce Street and Park Avenue)</i> • Install Type III bike lane sharrows on pavement markings. <i>4th Street (between Commerce Street and Park Avenue)</i> • Install Type III bike lane sharrows on pavement markings. <u>Designated Truck Routes</u> Trucks over 6,000 pounds are prohibited on Fourth, Fifth, and Sixth Streets per City Code Sections 10.56.010 and 10.56.020. The Proposed Project would not conflict with these restrictions. <u>Railroad Crossing</u> Mission Inn Avenue includes a railroad crossing west of Commerce Street with limited vehicle storage. To prevent queue spillback, the Proposed Project would install “KEEP CLEAR” pavement markings at the intersection of Commerce Street and Mission Inn Avenue for westbound lanes on Mission Inn Avenue (Off-Site Improvement). <u>Site Access and Circulation</u> This section evaluates the project site access and on-site circulation. Vehicular access to the Project Site would be via two driveways: one on 5th Street and one on Mission Inn Avenue. This analysis assumes the following improvements would be constructed as part of the Proposed Project to provide site access. Roadway Segments <i>Mission Inn Avenue</i> • Construct ultimate half-section width (four-lane divided (two-way turn lane) Arterial roadway), including landscaping and parkway improvements along project boundary abutting Mission Inn Avenue (from Commerce Street to the east project boundary) in conjunction with the development.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>5th Street</i> - Construct ultimate half-section width (two-lane undivided roadway), including landscaping and parkway improvements along project boundary abutting 5th Street (from Commerce Street to the east project boundary) in conjunction with the development. - Coordinate with the planned 3rd Street Grade Separation project contractor for roadway construction. <i>Commerce Street</i> - Construct ultimate half-section width (two-lane undivided roadway), including landscaping and parkway improvements along project boundary abutting Commerce Street (from 5th Street to Mission Inn Avenue) in conjunction with the development. - Coordinate with the planned 3rd Street Grade Separation project contractor for roadway construction. <i>Intersections</i> <i>Commerce Street (NS) at Mission Inn Avenue (EW)</i> - Install high-visibility pedestrian crosswalk on the east leg of the intersection including an overhead infrastructure with advanced pedestrian warning signs. <i>Project Driveway (NS) at Mission Inn Avenue (EW)</i> - Construct the project driveway with one inbound lane and one outbound lane. - Install southbound stop control at site egress. <i>Project Driveway (NS) at 5th Street (EW)</i> - Construct the project driveway with one inbound lane and one outbound lane. - Install northbound stop control at site egress. This analysis also assumes the project shall comply with the following conditions as part of the City of Riverside standard development review process to ensure adequate geometric design and emergency access: - Site-adjacent roadways shall be constructed or repaired at their ultimate half-section width, including landscaping and parkway improvements in conjunction with development, or as otherwise required by the City of Riverside. - All on-site and off-site roadway design, signing/striping, and traffic control improvements relating to the proposed project shall be submitted to the City for review and constructed following applicable State/Federal engineering standards to the satisfaction of the City of Riverside. - The final grading, landscaping, and street improvement plans shall demonstrate that applicable sight distance requirements are met. - Final project plans shall demonstrate adequate emergency vehicle access and circulation to the satisfaction of the City of Riverside Public Works and Fire Departments. - A construction worksite traffic control plan shall comply with applicable engineering standards outlined in the California Manual of Uniform Traffic Control Devices and shall be submitted to the City for review and approval before the issuance of a grading permit or start of construction. The plan shall				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
identify any roadway, sidewalk, bike route, or bus stop closures and detours as well as haul routes and hours of operation. All construction-related trips shall be restricted to off-peak hours to the extent possible. - The final placement of the ADA compliant crosswalk ramp at the northwest corner of Mission Inn Avenue and Commerce Street will require coordination with California Public Utility Commission (CPUC) and Burlington Northern Santa Fe (BNSF) railroad due to the proximity to the railroad tracks. The placement of ADA crosswalk ramp on the northwest corner is shown as a feature of the Commerce Street improvements included in the 3rd Street Grade Separation project. <u>Off-Site Improvements</u> The Project Proponent would install the following improvement to ensure westbound queues at the rail crossing on Mission Inn Avenue do not block turning or north-south through movements at Commerce Street for all scenarios: <i>Commerce Street (NS) at Mission Inn Avenue (EW)</i> - Install "KEEP CLEAR" markings in the intersection for westbound lanes on Mission Inn Avenue. <i>Vine Street and Mission Inn Avenue</i> The Project Proponent would implement the following City-directed improvements to address the LOS E forecast during the PM peak hour in 2045 at Vine Street and Mission Inn Avenue. - Install total of four stop signs equipped with solar powered flashing LEDs at all approaches. - Upgrade the existing crosswalks to the high visibility crosswalks at all approaches. In the event that this project's completion proceeds the construction of the 3rd Street Grade Separation project roadway improvements, roadway concept plans for the following pavement marking improvements are shown in Appendix K for the Traffic Impact Analysis. <i>Commerce Street (between 3rd Street and Mission Inn Avenue)</i> - Install Type III bike lane sharrow pavement markings <i>5th Street (between Commerce Street and Park Avenue)</i> - Install Type III bike lane sharrow pavement markings <i>4th Street (between Commerce Street and Park Avenue)</i> - Install Type III bike lane sharrow pavement markings <u>Conclusion</u> The Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, transportation impacts would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
17b. Response: <i>(Source: City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (LOS, July 2020 ["City TIA Guidelines"], Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California, December 2018) ["OPR Technical Advisory"] Iron Lofts Multifamily Project Vehicle Miles Traveled VMT Screening Assessment, prepared by Ganddini Group, Inc, December 27, 2024 [Appendix H-2])</i> Less Than Significant Impact. CEQA Guidelines Section 15064.3 provides that transportation impacts are, in general, best measured by evaluating a project's vehicle miles traveled (VMT), rather than automobile delay or Level of Service (LOS), which is no longer considered an environmental impact under CEQA. VMT quantifies the amount and distance of automobile travel attributable to a project or region. The City of Riverside has adopted Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (July 2020), which are consistent with the Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018). The City of Riverside Traffic Impact Analysis Guidelines identify screening criteria for certain types of development that are associated with reduced vehicle miles traveled (VMT). Projects that meet any one of the following criteria may be presumed to result in a less than significant VMT impact, provided no substantial evidence indicates otherwise: • Projects located within a Transit Priority Area (TPA) • Projects located within a low VMT area • Project Type Screening • Mixed-Use Projects • Redevelopment Projects The Proposed Project is forecast to generate approximately 1,213 net new daily trips, including 90 AM peak hour trips and 72 PM peak hour trips. A VMT screening assessment was conducted in accordance with the City's adopted guidelines and determined that the Proposed Project satisfies two of the City's established VMT screening criteria: location within a Transit Priority Area (TPA) and location within a low VMT area. <u>Transit Priority Area (TPA) Screening</u> The Project Site is located within a TPA, defined as within one-half mile of a major transit stop or high-quality transit corridor. According to the WRCOG VMT Screening Tool, the Project qualifies for TPA screening. The City's guidelines note that this screening criterion may not apply if the project has a floor area ratio (FAR) less than 0.75, is inconsistent with the Sustainable Communities Strategy, or proposes fewer moderate- or high-income units than the number of affordable units being replaced. The Proposed Project has a FAR greater than 0.75 and does not conflict with these conditions. Therefore, the Project meets the TPA screening criterion.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Low VMT Area Screening</u> The WRCOG VMT Screening Tool also identifies the Project Site, located within Traffic Analysis Zone (TAZ) 2102, as a low VMT area. The baseline VMT per resident for this TAZ is 7.9, which is below the City's baseline threshold of 12.3 VMT per resident. This indicates that the Project is in an area where travel behavior results in fewer and shorter vehicle trips. The Project does not propose land uses that would alter the built environment in a way that would increase trip rates or trip lengths. Therefore, the Project satisfies the low VMT area screening criterion. <u>Conclusion</u> The Proposed Project meets multiple VMT screening criteria established by the City of Riverside and supported by WRCOG's regional travel demand model. Based on this analysis, the Proposed Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, VMT impacts would be less than significant, and no mitigation would be required.				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
17c. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas) No Impact. The Proposed Project would not result in a change in air traffic patterns, nor would it increase air traffic levels or alter the location of existing flight paths. The Project Site is not located within an airport influence area, as identified in General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas. The Project does not propose structures of a height or use that would interfere with navigable airspace or aviation operations. <u>Conclusion</u> The Proposed Project would not result in a change in air traffic patterns or introduce substantial safety risks. Therefore, no impact would occur.				
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
17d. Response: (Source: Project Site Plans, Lane Striping and Signing Plans and Iron Lofts Multifamily Residential Traffic Impact Analysis, prepared by Ganddini Group, Inc, May 30, 2025 [Appendix H-1]) Less Than Significant Impact. The Proposed Project would not introduce design features or incompatible uses that would result in a substantial increase in transportation-related hazards. Vehicular access to the Project Site would be provided via two driveways—one on 5th Street and one on Mission Inn Avenue. These driveways are designed with one				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
inbound lane and one outbound lane and would be subject to stop control at site egress points. The Project would also construct ultimate half-section improvements along Mission Inn Avenue, 5th Street, and Commerce Street, including landscaping and parkway improvements consistent with City standards. The Traffic Impact Analysis (Appendix H-1) includes a site access and queuing analysis, which confirms that forecasted vehicle queues at the project driveways would operate within available storage lengths during peak hours. The final grading, landscaping, and street improvement plans would be reviewed by the City to ensure compliance with applicable sight distance requirements and emergency access standards. All on-site and off-site roadway design, signing, striping, and traffic control improvements would be constructed in accordance with applicable State and Federal engineering standards and subject to City approval. The Project does not propose any incompatible land uses such as agricultural or industrial operations that would conflict with surrounding urban development. No sharp curves, blind corners, or other roadway geometries that would increase safety risks are proposed. A construction worksite traffic control plan would be required prior to grading or construction activities to ensure safe circulation during the construction phase. <u>Conclusion</u> The Proposed Project would not increase hazards due to design features or incompatible uses. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
e. Result in inadequate emergency access?	☐	☐	☒	☐
17e. Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code and Iron Lofts Multifamily Residential Traffic Impact Analysis, prepared by Ganddini Group, Inc, May 30, 2025 [Appendix H-1]) Less Than Significant Impact. The Proposed Project would not result in inadequate emergency access. Vehicular access to the Project Site would be provided via two driveways—one on 5th Street and one on Mission Inn Avenue. These driveways are designed to accommodate emergency vehicles and would be constructed with one inbound lane and one outbound lane, subject to stop control at site egress points. The Traffic Impact Analysis (Appendix H-1) includes a site access and queuing analysis, which confirms that forecasted vehicle queues at the project driveways would operate within available storage lengths during peak hours. Final project plans would be reviewed by the City of Riverside Public Works and Fire Departments to ensure compliance with emergency access and circulation requirements. The final grading, landscaping, and street improvement plans would also demonstrate that applicable sight distance standards are met. All on-site and off-site roadway improvements would be constructed in accordance with applicable State and Federal engineering standards and subject to City approval. A construction worksite traffic control plan would be required prior to grading or construction activities. The plan would identify haul routes, detours, and any temporary closures of roadways, sidewalks, bike routes, or bus stops, and would ensure that emergency access is maintained throughout the construction phase.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> The Proposed Project would not result in inadequate emergency access. Therefore, potential impacts would be less than significant, and no mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				:
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
18a. Response: (<i>Source: AB52 Consultation; Appendix C-2: Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project, City of Riverside, Cogstone, September 2025</i>) Less Than Significant Impact with Mitigation Incorporated. Cogstone prepared a Cultural and Paleontological Resources Assessment for the Proposed Project (Appendix C-2) that addressed the ethnographic and archaeology of the Native American occupation in the City of Riverside. <u>Environmental Setting</u> The Project Area currently consists of empty lots, hardscaped surface streets, and several buildings and structures, including at least one structure described as historic in age. The Cultural Resources Report notes the Project Site's recent use as a recycling facility and describes assorted shredded modern refuse on the ground surface at varying densities, with low weed covering some portions where the site is not landscaped. These existing surface conditions reflect substantial prior ground disturbance and reduced visibility in places. The Project Area is located within the traditional use area of the Cahuilla and near the traditional use area of the Tongva (Gabrielino). As boundaries between groups shifted in history and prehistory, ethnographic information on both tribes is presented below. <u>Cahuilla</u> The Cahuilla occupied the San Gorgonio Pass (referred to as the Pass Cahuilla), San Jacinto and Santa Rosa Mountains (Mountain Cahuilla), and the Coachella Valley, the northern end of Imperial Valley (Desert Cahuilla). To the northwest, their territory extended to near the Santa Ana River. The Cahuilla are linked to other Takic language family groups such as the Serrano and Luiseño and share many aspects of culture and religion with those tribes. Although various bands spoke the Cahuilla language, each person's primary identity was linked to clan lineage and moiety, rather than tribal affiliation. The two moieties of the Cahuilla were Istam (coyote) and Tuktum				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(wild cat). Affiliation was inherited from the father's moiety and members of one moiety had to marry into the other group. Each clan was an independent, politically autonomous land-holding unit (Bean and Saubel 1972; Bean 1978; Strong 1929). In addition to lineage residence areas and clan territory owned in common with other clan members, each lineage had ownership rights to various food collecting and hunting areas. Individuals also "owned" specific areas rich in plant resources, as well as hunting grounds, rock quarry locations, and sacred spots used only by shamans, healers, and ritual practitioners. Cahuilla clans varied in size from several family groups to those composed of several thousand people. Clans were situated so that each lineage or community was located near a reliable water source and in proximity to significant food resources. Within each community, house structures were spatially placed at some distance from each other. Often a community would spread over a mile or two in distance with each nuclear and extended family having homes and associated structures for food storage and shaded workplaces (ramadas) for tool manufacture and food processing. Each community also contained a house clan leader. In more recent times, a ceremonial house (kishumnawat) was placed within each community, and most major religious ceremonies of the clan were held there. In addition, house and ceremonial structures, storage granaries, sweat houses, and song houses (for recreational music) were present. Usually, an area within one to three miles contains the bulk of materials needed for daily subsistence, although territories of a given clan might be larger, and longer distances were traveled to get precious exotic resources, usually found in the higher elevations of the surrounding mountains. While most daily secular and religious activities took place within the community, there were locations at some distance from the community where people camped for extended periods to harvest acorns or piñon nuts. Throughout the area, there were sacred places used primarily for rituals, intergroup or inter-clan meetings, caches for sacred materials, and locations for use by shamans or medicine men. Hilly, rocky areas, cave sites, or walled cave sites were used for temporary camping, storage of foods, fasting by shamans, and as hunting blinds. Between the mid-1500s and the 1800s, the Cahuilla were variously contacted by Spanish explorers, then Mexican ranchers, and later American settlers. By the mid-1800s, the Cahuilla were fully exposed to new peoples with new cultural ways, opportunities, and constraints. In the 1860s, several epidemics devastated the Cahuilla population and the increasing contact with Europeans continued to have a major impact on their traditional lifeway. Survivors of decimated Cahuilla clans joined villages that were able to maintain their ceremonial, cultural, and economic institutions (Bean 1978). <u>Gabrielino (Tongva)</u> The name Gabrielino is Spanish in origin and was used in reference to the Native Americans associated with the Mission San Gabriel. It is unknown what these people called themselves before the Spanish arrived, but today they call themselves Tongva, meaning "people of the earth." The Tongva speak a language that is part of the Takic language family and at the time of Spanish contact, their territory encompassed a vast area stretching from Topanga Canyon in the northwest, to the base of Mount				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wilson in the north, to San Bernardino in the east, Aliso Creek in the southeast and the Southern Channel Islands, in all an area of more than 2,500 square miles (Bean and Smith 1978; McCawley 1996). At European contact, the tribe consisted of more than 5,000 people living in various settlements throughout the area. Some of the villages could be quite large, housing up to 150 people. The Tongva are considered to have been one of the wealthiest tribes and to have influenced tribes they traded with (Kroeber 1925:621). Houses were domed and circular structures thatched with tule or similar materials (Bean and Smith 1978:542). The best-known artifacts were made of steatite and were highly prized. Many common everyday items were decorated with inlaid shell or carvings reflecting an elaborately developed artisanship (Bean and Smith 1978:542). The main food zones utilized were marine, woodland, and grassland (Bean and Smith 1978). Plant foods were, by far, the greatest part of the traditional diet at contact. Acorns were the most important single food source. Villages were located near water sources necessary for the leaching of acorns, which was a daily occurrence. Grass seeds were the next most abundant plant food used along with chia. Seeds were parched, ground, and cooked as mush in various combinations according to taste and availability. Greens and fruits were eaten raw or cooked or sometimes dried for storage. Bulbs, roots, and tubers were dug in the spring and summer and usually eaten fresh. Mushrooms and tree fungus were prized as delicacies. Various teas were made from flowers, fruits, stems, and roots for medicinal cures as well as beverages (Bean and Smith 1978:538-540). The principal game animals were deer, rabbit, jackrabbit, woodrat, mice, ground squirrels, antelope, quail, dove, ducks, and other birds. Most predators were avoided as food, as were tree squirrels and most reptiles. Trout and other fish were caught in the streams, while salmon were available when they ran in the larger creeks. Marine foods were extensively utilized. Sea mammals, fish, and crustaceans were hunted and gathered from both the shoreline and the open ocean, using reed and dugout canoes. Shellfish were the most common resource, including abalone, turban, mussels, clams, scallops, bubble shells, and others (Bean and Smith 1978:538-540). <u>Sacred Lands File Search and Native American Scoping</u> Cogstone requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on May 12, 2021. The NAHC responded on May 25, 2021, that the results of the search were negative. The City of Riverside is conducting consultations to meet the requirements of Assembly Bill 52 (AB 52). <u>Regulatory Framework</u> CEQA provides that a project that may cause a substantial adverse change in the significance of a tribal cultural resource (TCR) may have a significant effect on the environment. A tribal cultural resource includes resources that are listed or eligible for listing in the California Register of Historical Resources or local registers, and resources a lead agency chooses to treat as a TCR in its discretion. CEQA also requires consultation with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Thresholds of Significance</u> Implementation of the Proposed Project would result in a significant impact related to tribal cultural resources if it would cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074. <u>AB52 Consultation</u> The City of Riverside initiated AB 52 consultation for the Iron Lofts project by issuing formal notice to tribes that have requested notification for projects within the City, and three tribes requested consultation. The Gabrieleno Band of Mission Indians requested consultation and consulted in writing; the City provided the Tribe the final cultural resources mitigation measures (MM-CUL-1 through MM-CUL-4 and the standard condition addressing discovery of human remains) and, with no further comments received, the City closed consultation as of April 1, 2026. The Pechanga Band of Indians requested consultation; the City conducted consultation meetings and follow-up communications focused on tribal cultural resources protections, and the City closed consultation after completing good-faith efforts to address tribal input. The Agua Caliente Band of Cahuilla Indians requested consultation; the City met with the Tribe, addressed questions regarding ground disturbance and proposed protections, and consultation was concluded. Other noticed tribes did not request AB 52 consultation within the statutory timeframe. <u>Impact Analysis</u> Available records searches and field investigations indicate a low likelihood that construction would encounter intact, buried prehistoric deposits or known tribal cultural resources within the Project Area. A California Historical Resources Information System (CHRIS) records search for the Project Area and a 0.25-mile radius confirms that no prior cultural resources studies have been completed for the Project Area and no cultural resources have been previously recorded within it. A Native American Heritage Commission (NAHC) Sacred Lands File search returned negative results. Intensive pedestrian surveys of the Project Area identified no prehistoric archaeological resources and no tribal cultural resources; the only materials observed consisted of isolated, non-significant railroad-related remnants and historic-era heating coils. Collectively, these results support a conclusion that the Project Area has low sensitivity for previously unrecorded tribal cultural resources. Construction activities would involve demolition and ground disturbance and could result in the inadvertent discovery of previously unknown cultural materials, including resources that could meet the definition of a tribal cultural resource. The Project incorporates the City's adopted cultural resources mitigation measures (MM-CUL-1 through MM-CUL-4) that require continued coordination with consulting tribes if project design/grade changes occur, preparation of an Archaeological Monitoring Plan in consultation with consulting tribes (including protocols for discovery evaluation, treatment, and disposition), notification and tribal access procedures for discoveries, and construction-worker cultural sensitivity training. In addition, the Project incorporates a standard condition of approval addressing the discovery of human remains, which supplements the cultural resources mitigation measures and provides a clear legal compliance pathway if remains (or remains that may be human) are encountered during grading or earthmoving. The condition requires immediate work stoppage within the specified buffer area, notification of the Riverside				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
County Coroner and the City, and, if remains are determined to be Native American, coordination with the NAHC and implementation of the Most Likely Descendant (MLD) process consistent with applicable state law. The condition also includes confidentiality provisions for the locations of Native American burials and reburials. This standard condition is incorporated by reference as part of the Project's cultural resources protections described in the Cultural Resources section. With implementation of the adopted cultural resources mitigation measures and the standard condition of approval for discovery of human remains, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Impacts would be less than significant with mitigation incorporated. <u>Conclusion</u> With completion of AB 52 consultation and implementation of MM-CUL-1 through MM-CUL-4, together with the standard condition of approval addressing the discovery of human remains, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant with incorporation of mitigation.				
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
18b. Response: (Source: AB52 Consultation; Appendix C-2: Cultural and Paleontological Resources Assessment for the Iron Lofts Multi-Family Residential Project, City of Riverside, Cogstone, September 2025) Less Than Significant Impact with Mitigation Incorporated. As discussed in 18a, record searches, the NAHC Sacred Lands File search, and field surveys did not identify tribal cultural resources within the Project Area, and AB 52 consultation was completed for the Project. In the event previously unknown resources are encountered during ground disturbance, the Project's cultural resources measures (MM-CUL-1 through MM-CUL-4), including the Archaeological Monitoring Plan developed in consultation with consulting tribes, notification/tribal access procedures, treatment and disposition protocols, and cultural sensitivity training—together with the standard condition of approval for discovery of human remains—provide a framework to identify, evaluate, and protect any tribal cultural resources that may be determined significant. Accordingly, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource under 18b.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> With completion of AB 52 consultation and implementation of MM-CUL-1 through MM-CUL-4, together with the standard condition of approval addressing the discovery of human remains, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, potential impacts associated with implementation of the Proposed Project would be less than significant with incorporation of mitigation.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
19a. Response: <i>(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, FPEIR Table 5.16 Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR.)</i> Less Than Significant Impact. The Proposed Project would involve the development of 300 multifamily residential units within an urbanized area of the City of Riverside that is already served by existing utility infrastructure. Water and wastewater service would be provided by Riverside Public Utilities (RPU). The Project Site is located within the service boundaries of RPU (electric and water), the City of Riverside Public Works Department (wastewater and stormwater), and Southern California Gas Company (natural gas). Telecommunications services are available from multiple providers. Although the Proposed Project includes a General Plan Amendment, Specific Plan Amendment, and change of zone to allow residential development, it is consistent with the Typical Growth Scenario evaluated in the General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR). The FPEIR determined that future water and wastewater demand under this growth scenario would be adequately served by existing and planned facilities (see Tables 5.16-E through 5.16-K of the GP 2025 FPEIR). Therefore, the Proposed Project would not require the construction of new or expanded water or wastewater treatment facilities. Implementation of the Proposed Project would require construction of an on-site stormwater drainage system to convey flows to the existing public storm drain system. In accordance with the City’s Subdivision Code (Title 18, Section 18.48.020), the Project would be subject to drainage impact fees. These fees are transferred to a drainage facilities fund maintained by the Riverside County Flood Control and Water Conservation District and are required as a condition of approval or waiver for filing a final map or parcel map. This requirement is consistent with California Government Code Section 66483, which authorizes the collection of fees for the construction of drainage facilities. Utility improvements would be limited to standard service connections and minor extensions necessary to serve the proposed residential development. No off-site utility relocations or expansions are required. All				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
utility infrastructure improvements would be constructed in accordance with applicable engineering standards and subject to City review and approval. <u>Conclusion</u> The Proposed Project would not require the relocation or construction of new or expanded utility infrastructure that would result in significant environmental effects. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
19b. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, RPU Master Plan, 2020 Urban Water Management Plan, prepared July 2021 Less Than Significant Impact. Water service to the Proposed Project would be provided by Riverside Public Utilities (RPU), which maintains a diversified water supply portfolio and long-range planning strategies to ensure reliability during normal, dry, and multiple dry years. The Proposed Project includes a General Plan Amendment, Specific Plan Amendment, and change of zone to allow development of 300 multifamily residential units. However, the Proposed Project is consistent with the Typical Growth Scenario evaluated in the General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR), which concluded that adequate water supplies would be available to serve projected growth under normal and drought conditions (see Tables 5.16-E through 5.16-K of the GP 2025 FPEIR). The City’s 2020 Urban Water Management Plan (UWMP), prepared in July 2021, developed water demand projections using 2020 Census data, SCAG population growth forecasts, and updates to the City’s General Plan. The UWMP evaluates water supply reliability under normal year, single dry year, and multiple dry year scenarios. These estimates assume that 100 percent of RPU’s groundwater and recycled water supplies would remain available during dry years, while imported water availability is adjusted based on reliability assessments provided by Western Municipal Water District (WMWD). For all planning scenarios, the UWMP concludes that available water supplies exceed projected demand (UWMP, pp. III, 7-5, 7-6). Although the GP 2025 FPEIR found that water demand within RPU’s service area could exceed supply under a “worst-case” scenario of maximum population growth, WMWD is projected to have 123,784 acre-feet annually available for sale to agencies such as RPU (see Table 5.16-I of the GP 2025 FPEIR). Therefore, even under high-growth conditions, water supply may be available to meet demand. The Proposed Project’s population and dwelling units fall within the scope of growth assumptions evaluated in the General Plan and GP 2025 FPEIR. Pursuant to SB X7-7, RPU calculated its baseline water use over a 10-				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to 15-year period and determined the average base daily per-capita water use to be 266 gallons per capita per day (gpcd) (UWMP, pp. 5-1 – 5-2). Based on an estimated residential population of 709 persons, the Proposed Project would generate a water demand of approximately 211 acre-feet per year (AFY). This represents less than a 1 percent increase over projected demand levels of 114,923 AFY for 2025 and 129,693 AFY for 2045. Additionally, the Proposed Project would be required to comply with water efficiency measures in accordance with the most recent CalGreen Code standards, including low-flow fixtures and drought-tolerant landscaping. These measures would further reduce water demand and ensure efficient use of available resources. <u>Conclusion</u> The Proposed Project would be served by a reliable water provider with sufficient supplies to meet demand during normal, dry, and multiple dry years. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
19c. Response: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Wastewater Integrated Master Plan and Certified EIR, and City of Riverside Sewer Lift Station and Force Main Guidelines, September 2012) Less Than Significant Impact. Wastewater service to the Proposed Project would be provided by Riverside Public Utilities (RPU). The Project Site is located within RPU's service area and would connect to existing wastewater infrastructure within adjacent public rights-of-way. Wastewater generated at the Project Site would be treated at the Riverside Regional Water Quality Control Plant (RRWQCP), which currently treats approximately 28 million gallons per day (mgd) of annual average flow (AAF) and has a hydraulic capacity of approximately 46 mgd AAF. The RRWQCP is projected to accommodate daily effluent flows of approximately 39 mgd through the year 2037. Based on the City's sewer calculation guidelines, the Proposed Project is anticipated to generate approximately 0.04 mgd of wastewater (709 persons × 65 gallons per capita per day = 46,085 gallons/day). While the Proposed Project would contribute additional flows to the system, this increase represents a small fraction of the available treatment capacity. Therefore, the wastewater treatment provider has adequate capacity to serve the Proposed Project's projected demand in addition to existing commitments. The Proposed Project includes a General Plan Amendment, Specific Plan Amendment, and change of zone to allow development of 300 multifamily residential units. However, the Proposed Project is consistent with the Typical Growth Scenario evaluated in the General Plan 2025 Program Environmental Impact Report (GP 2025				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
FPEIR), which concluded that wastewater generation associated with anticipated development could be adequately accommodated by existing and planned treatment facilities (see Tables 5.16-F through 5.16-K of the GP 2025 FPEIR). All wastewater infrastructure improvements would be constructed in accordance with applicable engineering standards and subject to City review and approval. The Proposed Project would not result in a determination by RPU or the Regional Water Quality Control Board that inadequate capacity exists to serve the Project in addition to existing commitments. <u>Conclusion</u> The Proposed Project would not result in a determination of inadequate wastewater treatment capacity. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
19d. Response: (Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area) Less Than Significant Impact. Solid waste generated by the Proposed Project would be collected and disposed of in accordance with City of Riverside waste management protocols. Assuming an average generation rate of approximately 7 pounds per unit per day, the 300-unit residential development is estimated to generate approximately 2,100 pounds of solid waste per day, or 1.05 tons per day. This volume represents less than one-tenth of one percent of the maximum daily capacity of regional landfills that serve the City, including El Sobrante Landfill, Badlands Landfill, and Lamb Canyon Landfill. The Proposed Project is consistent with the Typical Buildout Scenario evaluated in the General Plan 2025 Program Environmental Impact Report (GP 2025 FPEIR), which concluded that future landfill capacity would be adequate to accommodate projected growth (see Tables 5.16-A and 5.16-M of the GP 2025 FPEIR). The Project would not exceed the capacity of local infrastructure or conflict with applicable solid waste reduction goals. Solid waste disposal services would be provided by the City or its contracted hauler, and the Proposed Project would be required to comply with applicable State and local regulations, including those related to recycling and diversion of construction and operational waste. Compliance with the California Integrated Waste Management Act and CalGreen Code standards would ensure that the Project contributes to statewide waste reduction targets. <u>Conclusion</u> The Proposed Project would not generate solid waste more than landfill capacity or conflict with applicable				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
waste reduction goals. Therefore, potential impacts would be less than significant, and no mitigation would be required.				
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒
19e. Response: (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study) No Impact. The Proposed Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste management and reduction. Under the California Integrated Waste Management Act (Public Resources Code), local jurisdictions are required to divert at least 50 percent of all solid waste generated. The City of Riverside currently achieves a diversion rate of approximately 60 percent, exceeding the State's minimum requirement. In addition, the California Green Building Code requires all developments to divert at least 50 percent of non-hazardous construction and demolition debris, and 100 percent of excavated soil and land clearing debris for non-residential projects. The Proposed Project would be subject to these requirements and would be required to implement waste diversion measures during both construction and operation. The Proposed Project must also comply with the City's waste disposal and recycling requirements, which are designed to support statewide waste reduction goals and ensure proper handling of solid waste. Compliance with these standards would ensure that the Proposed Project does not conflict with any applicable solid waste regulations. <u>Conclusion</u> The Proposed Project would comply with all applicable solid waste management and reduction regulations. Therefore, no impact would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
20a. Response: (Source: Public Resources Code (PRC) Sections 4125-4128, California Fire Code (CFC, Title 24, California Code of Regulations, Part 9, and General Plan 2021 Public Safety Element) No Impact. The Project Site is not located within a State Responsibility Area or an area classified as a Very High Fire Hazard Severity Zone (FHSZ). The nearest FHSZ is the Box Springs Mountains, located approximately 2.7 miles east of the Project Site (CAL FIRE, 2023a). According to the City of Riverside General Plan Safety Element, there are no formally designated evacuation routes within the City. However, the Safety Element includes programs and action items that support the identification and planning of evacuation routes in coordination with CAL FIRE and other local and regional agencies. The Proposed Project would include roadway improvements to Mission Inn Avenue, Commerce Street, and Fifth Street. In accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), any activity that encroaches into a public right-of-way must be safeguarded through the installation of safety devices to ensure that construction activities do not interfere with emergency access or evacuation. Compliance with Section 503 would be verified by the City's Building and Safety Division during the construction permitting process, including plan check and issuance of grading, and building permits. During operations, the Proposed Project would comply with applicable Municipal Code standards, which require design and construction specifications that ensure adequate emergency access and public safety. Roadway improvements would be constructed to meet emergency response requirements and would not obstruct or conflict with any emergency response or evacuation planning efforts. <u>Conclusion</u> The Proposed Project would not impair implementation of or interfere with an adopted emergency response or evacuation plan. Therefore, no impact would occur.				
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
20b. Response: (Source: CAL FIRE FHSZ Viewer, 2025) No Impact.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The Project Site is not located within a Fire Hazard Severity Zone (FHSZ), as identified by the most recent CAL FIRE FHSZ Viewer (CAL FIRE, 2025). The nearest designated FHSZ areas are classified as Moderate and located within Local Responsibility Areas approximately 2 miles east of the Project Site near the Box Springs Mountains, and approximately 2 miles west near Lake Evans. The nearest Very High FHSZ is also located approximately 2 miles east of the Project Site, associated with the Box Springs Mountains. This area is designated as a Local Responsibility Area, with an adjacent Very High FHSZ within a State Responsibility Area in the same general vicinity. The predominant wind direction in the Project area is from the west and north (NOAA, 2025). As such, a wildfire originating in the foothills east of the Project Site would be unlikely to be carried across the site under typical prevailing wind conditions. The Project Site is located within an urbanized area and does not contain or border wildland vegetation that would contribute to wildfire risk. <u>Conclusion</u> The Proposed Project would not expose occupants to pollutant concentrations from wildfire or contribute to the uncontrolled spread of wildfire. Therefore, no impact would occur.				
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
20c. Response: (Source: CAL FIRE FHSZ Viewer, 2025) No Impact. The Project Site is not located within a State Responsibility Area or an area classified as a Very High Fire Hazard Severity Zone (FHSZ), as identified by CAL FIRE (2025). The Project is located within an urbanized area served by existing infrastructure, and no fuel breaks, emergency water sources, or other fire-related infrastructure improvements are proposed or required. The Proposed Project would include roadway improvements to Mission Inn Avenue, Commerce Street, and Fifth Street, as well as utility connections to existing systems. These improvements would not exacerbate fire risk or result in temporary or ongoing environmental impacts beyond those typically associated with urban infill development. All infrastructure would be constructed in accordance with applicable engineering and safety standards and subject to City review and approval. <u>Conclusion</u> The Proposed Project would not require the installation or maintenance of infrastructure that would exacerbate fire risk or result in environmental impacts. Therefore, no impact would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
20d. Response: (Source: CAL FIRE FHSZ Viewer, 2025) No Impact. The Project Site is not located within a State Responsibility Area or an area classified as a Very High Fire Hazard Severity Zone (FHSZ). Post-fire slope instability typically occurs when wildfire removes vegetation from steep slopes, reducing infiltration and increasing the potential for soil erosion and slope failure during subsequent rainfall events. No significant slopes are present on-site or in the immediate vicinity of the Project Site. The surrounding area is flat and urbanized, and the Project would not alter topography in a manner that would increase susceptibility to landslides or flooding. The Proposed Project would not result in drainage changes that would expose people or structures to downstream flooding or post-fire slope instability. Standard stormwater management improvements would be implemented in accordance with City requirements to ensure proper runoff control. <u>Conclusion</u> The Proposed Project would not expose people or structures to risks associated with post-fire slope instability, flooding, or landslides. Therefore, no impact would occur.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
21a. Response: <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, Iron Lofts Project, NOREAS, Inc, December 2024, FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code; Cultural Resources Assessment Report: Barley Mills Building, 3596 Commerce Street & 3051 Mission Inn Avenue, Riverside CA Site of Riverside Soda Works, 2993 Mission Inn Avenue; Riverside CA, prepared by George Taylor Loudon AIA, Inc, December 30, 2024 [Appendix C-1], and Appendix C-2 – Cultural and Archaeological Report.)</i> Less Than Significant with Mitigation. The Project Site is located within an urbanized area of the City of Riverside and does not support habitat for sensitive fish or wildlife species. As discussed in the Biological Resources Section, the site is not within or adjacent to designated conservation areas, and the project is consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Therefore, potential impacts to biological resources would be less than significant. The site is located within an area of moderate to high sensitivity for cultural and paleontological resources, as identified in the General Plan 2025 Program Environmental Impact Report (FPEIR). Ground-disturbing activities have the potential to uncover buried archaeological materials or paleontological resources associated with significant periods of California history or prehistory. To ensure that impacts to these resources are reduced to a less than significant level, MM-CUL-1 through MM-CUL-4 and MM-GEO-5 through MM-GEO-7 would be implemented.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>Conclusion</u> With implementation of these mitigation measures, the project would not eliminate important examples of California history or prehistory, and impacts would be reduced to a level that is less than significant. No additional mitigation would be required.				
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
21b. Response: (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program) Less Than Significant with Mitigation. Cumulative impacts refer to two or more individual effects that, when considered together, are considerable or compound other environmental effects. The CEQA Guidelines define a cumulative impact as one that results from the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable future projects. The Realm Iron Lofts project is located within a fully urbanized area of the City of Riverside and is consistent with the General Plan 2025 land use designations and zoning. As analyzed throughout this Initial Study, the project would not result in significant impacts in any environmental category when considered individually. Where potentially significant impacts were identified—specifically in the areas of cultural resources and paleontological resources—mitigation measures have been incorporated to reduce those impacts to a less than significant level. <u>Conclusion</u> With implementation of mitigation measures, the Proposed Project would not result in cumulatively considerable impacts, and impacts would be reduced to a level that is less than significant. No additional mitigation would be required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
21c. Response: (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program) Less Than Significant Impact with Mitigation. Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology and water quality, noise, population and housing, public facilities, hazards and hazardous materials, recreation, and transportation/traffic sections of this Initial Study. Among these, project impacts related to noise were identified as potentially significant. However, with implementation of mitigation measures MM-NOI-1 and MM-NOI-2, noise impacts would be reduced to a level that is less than significant. With implementation of these mitigation measures, the project would not cause substantial adverse effects, directly or indirectly, to human beings, and impacts would be reduced to a level that is less than significant. No additional mitigation would be required.				

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

**Iron Lofts Mixed-Use Residential Development
Mitigation Monitoring and Reporting Program**

Terms and Definitions:

1. **Property Owner/Developer** – Owner or developer of Iron Lofts Mixed-Use Residential Development.
2. **Environmental Equivalent/Timing** – Any mitigation measure and timing thereof, subject to the approval of the City, which will have the same or superior result and will have the same or superior effect on the environment. The Planning Department, in conjunction with any appropriate agencies or City departments, shall determine the adequacy of any proposed "environmental equivalent/timing" and, if determined necessary, may refer said determination to the City Council. Any costs associated with information required in order to make a determination of environmental equivalency/timing shall be done by the property owner/developer. Staff time for reviews will be charged on a time and materials basis at the rate in the City's adopted Fee Schedule.
3. **Implementation Timing** – This is the point where a mitigation measure must be monitored for compliance. In the case where multiple action items are indicated, it is the first point where compliance associated with the mitigation measure must be monitored. Once the initial action item has been complied with, no additional monitoring pursuant to the Mitigation Monitoring Plan will occur, as routine City practices and procedures will ensure that the intent of the measure has been complied with. For example, if the timing is "to be shown on approved building plans" subsequent to issuance of the building permit consistent with the approved plans will be final building and zoning inspections pursuant to the building permit to ensure compliance.
4. **Responsibility Monitoring Party** – Shall mean that compliance with the subject mitigation measure(s) shall be reviewed and determined adequate by all departments listed for each mitigation measure. Outside public agency review is limited to those public agencies specified in the Mitigation Monitoring Plan which have permit authority in conjunction with the mitigation measure.
5. **Ongoing Mitigation Measures** – The mitigation measures that are designated to occur on an ongoing basis as part of this Mitigation Monitoring Plan will be monitored in the form of an annual letter from the property owner/developer in January of each year demonstrating how compliance with the subject measure(s) has been achieved. When compliance with a measure has been demonstrated for a period of one year, monitoring of the measure will be deemed to be satisfied and no further monitoring will occur. For measures that are to be monitored "Ongoing During Construction", the annual letter will review those measures only while construction is occurring; monitoring will be discontinued after construction is complete. A final annual letter will be provided at the close of construction.
6. **Building Permit** – For purposes of this Mitigation Monitoring Plan, a building permit shall be defined as any permit issued for construction of a new building or structural expansion or modification of any existing building but shall not include any permits required for interior tenant improvements or minor additions to an existing structure or building.

**Iron Lofts Mixed-Use Residential Development
Mitigation Monitoring and Reporting Program**

Impact Category	Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/Reporting Method
Cultural Resources	MM-CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	Prior to grading permit issuance	City of Riverside Community & Economic Development Department (Planning Division)	Verify through review of revised plans and consultation documentation, if applicable.
Cultural Resources	MM-CUL-2: Archaeological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a. Project grading and development scheduling; b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect	At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place	City of Riverside Community & Economic Development Department (Planning Division)	Verify through approval of monitoring plan and monitoring agreements prior to grading permit.

**Iron Lofts Mixed-Use Residential Development
Mitigation Monitoring and Reporting Program**

Impact Category	Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/Reporting Method
	grading activities in coordination with all project archaeologists; c. The protocols and stipulations that the Applicant, tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; d. Treatment and final disposition of any cultural resources, sacred sites, and human remains if discovered on the project site; and e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.			
Cultural Resources	MM-CUL-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and 3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions	Within 24 hours of discovery (notification); within 60 days of completion of grading (Phase IV Monitoring Report)	City of Riverside Community & Economic Development Department (Planning Division)	Verify through receipt of notification evidence and Phase IV Monitoring Report.

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Mitigation Monitoring and Reporting Program**

Impact Category	Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/Reporting Method
	to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes			
Cultural Resources	MM-CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are	Pre-grading meeting (prior to ground disturbance in sensitive areas)	City of Riverside Community & Economic Development Department (Planning Division)	Verify through training sign-in sheet included in Phase IV Monitoring Report.

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Mitigation Monitoring and Reporting Program**

Impact Category	Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/Reporting Method
	discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.			
Geology and Soils	MM-GEO-1: Prior issuance of a building permit, undocumented fill and compressible soils shall be removed and replaced with engineered fill compacted to geotechnical specifications.	Prior issuance of a building permit	City of Riverside Community & Economic Development Department (Planning Division)	Verify through plan check / geotechnical compliance documentation.
Geology and Soils	MM-GEO-2: Prior to issuance of a grading permit, the Applicant shall demonstrate that a qualified geotechnical engineer will be on site to observe and test all grading, subgrade preparation, and fill placement to verify compliance with compaction and moisture standards.	Prior to issuance of a grading permit	City of Riverside Community & Economic Development Department (Planning Division)	Verify through grading plan review / geotechnical commitment.
Geology and Soils	MM-GEO-3: Prior to issuance of a grading permit, the plans shall demonstrate that stormwater infiltration systems shall be located a minimum of 30 feet from building foundations and 10 feet from drilled pier foundations to reduce the risk of settlement.	Prior to issuance of a grading permit	City of Riverside Community & Economic Development Department (Planning Division)	Verify through grading plan review.
Geology and Soils	MM-GEO-4: Prior to issuance of a grading permit, the plans shall demonstrate that landscaping adjacent to buildings shall be designed to minimize irrigation and infiltration. Where irrigation is necessary, impermeable liners shall be installed beneath planting areas within 10 feet of structures.	Prior to issuance of a grading permit	City of Riverside Community & Economic Development Department (Planning Division)	Verify through grading/landscape plan review.
Geology and Soils	MM-GEO-5: Prior to issuance of a grading permit, the Applicant shall provide documentation of training completion of a Paleontological Worker Environmental Awareness Program (WEAP). This training, administered by a qualified paleontologist, will educate construction personnel on the types of paleontological resources that may be encountered.	Prior to issuance of a grading permit	City of Riverside Community & Economic Development Department (Planning Division)	Verify through receipt of WEAP documentation.
Geology and Soils	MM-GEO-6: Prior to issuance of a grading permit, the Applicant shall retain a qualified paleontologist to monitor all excavation activities that extend deeper than four feet into native sediments. The paleontologist shall have the authority to temporarily halt or redirect construction if paleontological resources are encountered.	Prior to issuance of a grading permit	City of Riverside Community & Economic Development Department (Planning Division)	Verify through retention documentation and monitoring plan.

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Mitigation Monitoring and Reporting Program**

Impact Category	Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/Reporting Method
Geology and Soils	MM-GEO-7: Ongoing during grading, if paleontological resources are exposed during excavation, ground-disturbing activities in the vicinity within a 25-foot radius shall be redirected. A qualified paleontological resources specialist shall evaluate the find. If deemed significant, appropriate measures such as avoidance, recovery, evaluation, and curation shall be implemented in accordance with the standards of the City of Riverside and the Society of Vertebrate Paleontology.	Ongoing during grading	City of Riverside Community & Economic Development Department (Planning Division)	Verify through monitoring documentation / standard City procedures.
Noise	MM NOI-1: To ensure interior noise levels in habitable rooms comply with applicable standards, the Project Applicant shall incorporate exterior building-envelope sound insulation into final building plans. Specifically, windows and exterior glazed doors serving dwelling units shall be constructed to achieve, at a minimum, the Sound Transmission Class (STC) ratings identified in Table NOI-1 (below) for the corresponding building façades/locations shown by the representative receptor points on the project's transportation noise contour figure (Noise Impact Analysis - Figure 6). Where no enhanced STC rating is specified for a given façade/location, standard windows and glazed doors that meet California Building Code requirements shall be sufficient. Prior to issuance of building permits, the Applicant shall demonstrate plan compliance by including window/door schedule notes (or acoustical cut sheets) showing the specified STC ratings for each applicable façade and floor level.	Prior to issuance of building permits	City of Riverside Community & Economic Development Department (Planning Division)	Verify through building plan check and window/door schedule notes.
Noise	MM NOI-2: Prior to issuance of grading permits, the applicant shall include a note on grading and construction plans prohibiting the use of vibratory rollers, large bulldozers, or pile drivers within 26 feet of residential structures surrounding the Project Site. The City of Riverside shall verify compliance through review of grading plans and specifications prior to permit issuance.	Prior to issuance of grading permits	City of Riverside Community & Economic Development Department (Planning Division)	Verify through review of grading plans and specifications prior to permit issuance.

Iron Lofts Mixed-Use Residential Development Mitigation Monitoring and Reporting Program

Table NOI-1. Required STC Ratings by Building Location (Representative Receptors)

Representative receptor locations correspond to the building/façade locations shown on Figure 6 (Transportation Noise Levels) and Table 13 (Required STC for Windows and Glass Doors) and Figure 6 (Receptor Locations).

Representative receptor (building location per Figure 6)	Floor level	Exterior Noise Level	Required minimum STC (windows & exterior glazed doors)
Receptor 1	1	73	31
	2	74	32
	3	74	32
	4	75	33
Receptor 2	1	67	25
	2	69	27
Receptor 3	1	79	37
	2	79	37
	3	80	38
	4	81	39
Receptor 4	1	78	36
	2	79	37
	3	80	38
	4	80	38
Receptor 5	1	78	36
Receptor 6	1	78	36
	2	79	37
	3	79	37
	4	80	38
Receptor 7	1	74	32
	2	74	32
	3	75	33
	4	76	34
Receptor 8	1	56	14
	2	56	14
	3	56	14
	4	57	15
Receptor 9	1	68	26
	2	69	27
	3	71	29
	4	74	32

**Iron Lofts Mixed-Use Residential Development
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STC Requirements by Floor and Receptor (Windows & Glazed Doors)

Floor	R1	R2	R3	R4	R5	R6	R7	R8	R9
1	31	25	37	36	36	36	32	14	26
2	32	27	37	37	—	37	32	14	27
3	32	—	38	38	—	37	33	14	29
4	33	—	39	38	—	38	34	15	32