



**PLANNING COMMISSION HEARING DATE: AUGUST 28, 2025  
AGENDA ITEM NO. 2**

**PROPOSED PROJECT**

Case Numbers	PR-2024-001675	
Request	To consider the Draft Environmental Impact Report and Mitigation Monitoring Program for the future redevelopment of the Riverside Convention Center and Lot 33 (Riverside Alive project).	
Applicant	City of Riverside	
Project Location	Located on the superblock bound by Market Street, Third Street, Orange Street, and Fifth Street.	
APN	213-111-016; 213-111-012; 213-111-015; 213-111-017; 213-111-011; and 213-111-014	
Project Area	10.28 acres	
Ward	1	
Neighborhood	Downtown	
General Plan Designation	Downtown Specific Plan	
Zoning Designation	Downtown Specific Plan – Raincross District	
Specific Plan	Downtown Specific Plan	
Staff Planner	Paige Montojo, Senior Planner 951-826-5773 <a href="mailto:pmontojo@riversideca.gov">pmontojo@riversideca.gov</a>	

**RECOMMENDATIONS**

Staff recommends that the Planning Commission:

1. **RECOMMEND** that the City Council find:

- A. The Draft Environmental Impact Report has been completed in compliance with the California Environmental Quality Act (CEQA);

- B. The project will have a significant effect on the environment; but
  - C. There are no feasible alternatives to the project or mitigation measures that will avoid or substantially lessen the significant environmental effects as identified in the Draft EIR for project-specific significant and unavoidable impacts to air quality and greenhouse gas emissions; and
2. **RECOMMEND CERTIFICATION** of Planning Case PR-2024-001675 (EIR), based on the facts for findings outlined and summarized in the staff report, and subject to the recommended conditions and mitigation measures (Exhibits 1 and 2).

## BACKGROUND

The City of Riverside owns a 108,000-gross-square-foot convention facility ("Riverside Convention Center") and associated surface parking lot ("Lot 33"), comprising a 10.28-acre site in Downtown Riverside. The site is situated on the superblock bound by Market, Third, Orange, and Fifth Streets and comprises six contiguous parcels.

In September 2018, the City issued a Request for Proposals for the redevelopment of Lot 33 and expansion of the Riverside Convention Center. The Project Objectives are to:

- Facilitate the creation of a dynamic employment, hospitality, entertainment, retail and residential district to strengthen Downtown Riverside's status as the region's premier urban downtown;
- Expand the Convention Center to improve the City's ability to attract larger conferences and be more competitive;
- Facilitate larger events that bring in more patrons and be supported by existing and potential future hotels, entertainment, and retail uses;
- Improve the overall economics of downtown through greater transient occupancy tax (TOT) generation, increased sales tax, and job creation;
- Provide quality, multi-family housing in the Downtown core, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) obligation;
- Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions; and
- Place housing near existing employment center downtown to encourage pedestrian connectivity and reduce vehicular usage and associated impacts.

In May of 2019, the City selected the proposal and entered into an Exclusive Negotiating Agreement ("ENA") with a developer for the sale and private redevelopment of Lot 33 and a Public-Private Partnership for the expansion of the Riverside Convention Center known as the Riverside Alive Project.

To accommodate a spectrum of likely future proposals and support the development potential of the project site, the City analyzed a maximum likely development intensity of the uses based on the RFP, and elected to conduct the necessary environmental review pursuant to the California Environmental Quality Act (CEQA). In February of 2024, the City kicked off the environmental analysis efforts. A Draft Environmental Impact Report (DEIR) (Exhibit 1) was prepared to analyze the potential environmental effects of future development and construction of the subject site with a mixed-use hospitality, commercial, entertainment and residential project. This maximum development envelope project description will then cover any less-intense version of the same or similar uses. This approach provides predictability and allows project applicants to proceed under this EIR without the delays and uncertainty that may be associated with the EIR process.

It should be noted that there is no development application for a discrete project under consideration at this time, therefore there are no project plans under consideration. Rather, the

item for consideration today is an environmental analysis of potential development using maximum land use square footages, residential units and hotel rooms, sometimes referred to as a “development envelope.” For the purposes of this report and the EIR, the subject development envelopes will be referred to as “the Project”. Any future development project would require review and approval of the necessary entitlements.

## PROJECT ASSUMPTIONS

Specific assumptions regarding the potential land use mix, residential density, building intensity, and construction process were made to ensure a complete and comprehensive assessment of all potentially significant environmental impacts. The development envelope includes a combination of residential, office, retail, and hotel uses; an expansion of the existing Riverside Convention Center; and new parking facilities. Table 1 describes the major components analyzed in the EIR.

**TABLE 1 – Maximum Development Envelopes Studied**

Land Use Type		Maximum Units	Maximum Area
<b>Residential</b>	Condominiums	55	
	Multi-Family Residential	113	
<b>Nonresidential</b>	Hotel	376	
	Office		220,000 sf
	Restaurant		12,875 sf
	Grocery Store		20,690 sf
	Fitness Center		28,416 sf
	Parking Facilities		Up to 5 levels
	Convention Center Expansion		189,000 sf

Any development proposal on the site will be required to obtain any necessary entitlements required for that specific development proposal which may include but not be limited to:

- Tentative Parcel Map, lot line adjustment, and/or subdivision map pursuant to Title 18 of the RMC;
- Site plan and design review, pursuant to Chapters 19.710 and 19.770 of the Zoning Code;
- Conditional Use Permit – for buildings exceeding 100-feet in height, pursuant to Chapter 6 of the DSP; and
- Conditional Use Permit – for establishment with alcohol sales, pursuant to Chapter 6 of the DSP.

Proposals that fall within the parameters analyzed in this EIR may require a Consistency Analysis demonstrating consistency with this EIR and/or any supplemental analysis required. Proposals exceeding the parameters may require additional environmental review to comply with CEQA.

## PROJECT ANALYSIS

The Draft EIR analyzed all impact categories and project alternatives, pursuant to section 15161 and 15126.6 of the CEQA Guidelines and City of Riverside Resolution No. 21106. An Initial Study

was prepared which identified which environmental issue areas were unlikely to have potential impacts due to the nature of the project, its location, or other factors. Sections 5.1 – 5.10 of the Draft EIR examine the potential environmental impacts associated with implementation of the Project and focuses on the following issues:

- Aesthetics;
- Air Quality;
- Cultural Resources;
- Energy;
- Greenhouse Gas Emissions;
- Noise;
- Public Services;
- Transportation;
- Tribal Cultural Resources; and
- Utilities and Service Systems.

Technical studies were prepared for various environmental issues including air quality, energy, greenhouse gas emissions, noise, transportation, and cultural resources. These studies establish baseline environmental conditions and assess the projected environmental conditions during project implementation. These technical studies provide quantitative evidence to support any finding of no impact, less than significant impact, or significant impact; and the appropriate mitigation measures necessary to minimize or eliminate any significant environmental impacts.

For each environmental issue, the DEIR discusses applicable local, state, or federal regulations; thresholds of significance and criteria for determining the significance of Project impacts; analysis of the nature and extent to which the Project is expected to change the existing environment; and draft mitigation measures to reduce significant adverse impacts to the extent feasible.

### ***Environmental Effects Found Not to Be Significant***

The Initial Study prepared for the Project (Exhibit 1, Appendix A), and analysis contained in the DEIR concludes that the Project would not result in significant impacts or impacts would be less than significant for the following environmental issues:

- Aesthetics;
- Agriculture and forest resources\*;
- Air quality (odor);
- Biological resources;
- Geology and soils\*;
- Hazards and hazardous materials\*;
- Hydrology/water quality\*;
- Land use planning\*;
- Mineral resources\*;
- Population and housing\*;
- Public Services (schools, parks, other facilities);
- Recreation\*;
- Transportation (hazards, emergency access);
- Utilities and service systems\*;
- Wildfire\*

\* Addressed in the Initial Study, no further analysis required.

CEQA Guidelines state that the DEIR shall focus on all potentially significant effects created by the Project on the environment, and effects eliminated from further analysis in the Initial Study need not be discussed further in the DEIR in accordance with Section 15128 of the CEQA Guidelines.

### **Less Than Significant Impacts with Mitigation**

The DEIR found that there would be significant impacts to Biology, Tribal and Cultural Resources, Noise, and Public Services without mitigation. Mitigation measures are actions taken to reduce or eliminate the significant environmental impacts of a project. The final Mitigation Monitoring and Reporting Program (MMRP) will be included in the Final EIR to track implementation of all mitigation measures. The MMRP ensures that mitigation measures define the action and procedure necessary for compliance; identify the responsible party; and identify required timing for compliance. As the Lead Agency, the City of Riverside is responsible for ensuring full compliance, including all monitoring and reporting activities. A summary of all mitigation measures is included under Exhibit 2 of this staff report.

The DEIR recommends 14 mitigation measures to reduce environmental impacts to less than significant for Biology, Tribal and Cultural Resources, Noise and Public Services. The DEIR discusses the extent to which the Project may affect the environment without mitigation and demonstrates how mitigation measures lessen said effects. All mitigation measures are detailed in Section 1.7 of the DEIR, and are summarized in Table 2.

**Table 2 – Mitigation Measures Summary**

<b>Environmental Issue</b>	<b>Mitigation Measures Summary</b>
Biology	Require a nesting bird survey prior to the removal of any trees or vegetation during nesting/breeding season.
Tribal and Cultural Resources	Measures to ensure appropriate Tribal engagement; archaeological and tribal monitoring; and treatment and disposition of tribal, cultural, or paleontological resources if discovered.
Noise	Ensure mechanical equipment, interior noise attenuation levels for residential and non-residential buildings, and exterior noise attenuation levels are consistent with Riverside Municipal Code Chapter 16.08.
Public Services	Confer with the Riverside Fire Department to determine if physical improvements, increased personnel, or other types of expansion are necessary at nearby fire stations to adequately serve the project. Funds will be allocated <i>from</i> the Project <i>Developer</i> as part of determined Development Impact Fees or in a standalone Cost Contribution Agreement.

### **Significant and Unavoidable Impacts**

The following environmental impacts are significant and unavoidable, and require a Statement of Overriding Considerations to be adopted by the City Council.

#### **Air Quality**

The Air Quality/Greenhouse Gas Analysis (Exhibit B of the DEIR) evaluated whether the expected emissions generated as a result of construction and operation of the Project would cause exceedances of the South Coast Air Quality Management District's (SCAQMD) significance thresholds for air quality in the Project area. As recommended by SCAQMD, the California Emissions Estimator Model (CalEEMod) was used to quantify Project-related criteria pollutant emissions in pounds per day (lb/day). CalEEMod estimates mobile source emissions using data

from the Project's Traffic Impact Analysis; area source emissions using default factors and land use assumptions; and energy source emissions utilizing Title 24 energy conservation standards.

Based on the analysis contained in Section 5.2 of the DEIR, construction emissions associated with the Project would not exceed SCAQMD regional thresholds for construction and no mitigation is required. However, unmitigated daily operational emissions of the project would exceed SCAQMD daily thresholds for volatile organic compounds (VOC), nitrous oxides (NO<sub>x</sub>), and carbon monoxide (CO). The DEIR identified mobile sources (e.g., vehicles and equipment) as the primary generator of operational emissions, followed by area sources and energy sources. The DEIR recommends mitigation measures MM AQ-1 through MM AQ 9 to potentially reduce the project's operations emissions by:

- Notifying prospective tenants or occupants about alternative transportation modes to reduce residential and non-residential commute trips;
- Providing designated carpool/vanpool parking, electric vehicle charging, and non-residential bicycle parking in desirable locations on the project site;
- Installation of broadband infrastructure or other communication technologies in the office use to encourage telecommuting and working from home;
- Encouraging unbundled parking costs from the property costs, allowing those who wish to purchase parking spaces to do so at an additional cost to encourage decreased vehicle ownership;
- Installation of Energy Star-rated appliances, or other equivalent technology; and
- Installation of all necessary infrastructure to allow solar photovoltaic systems on the Project site with an electrical generation capacity to accommodate the Project's energy needs.

While these recommended mitigation measures may reduce the operational VOC, NO<sub>x</sub>, and CO emissions qualitatively, it is reasonable to assume that the amount of criteria pollutant reductions resulting from their implementation would not reduce Project emissions below the threshold of significance.

#### *Greenhouse Gas (GHG) Emissions*

The GHG Assessment (Exhibit B of the DEIR) evaluates whether the expected GHG emissions generated due to construction and operation of the Project would exceed the SCAQMD draft significance thresholds. The analysis uses CalEEMod to estimate area source, energy-related, mobile source, solid waste, water-related, and refrigerant emissions, measured in metric tons per year of carbon dioxide equivalent (MTCO<sub>2</sub>E/year). The GHG analysis found that the total GHG emissions from the Project would result in 23,455.2 MTCO<sub>2</sub>E/year, exceeding the SCAQMD draft threshold is 3,000 MTCO<sub>2</sub>E/year. The analysis also found that approximately 73% of project emissions were attributed to mobile sources.

As with Air Quality there are limited, if any, feasible mitigation measures that can be applied to the Project to substantially reduce mobile source GHG emissions. While mitigation measures MM AQ-1 through MM AQ-9 reduce mobile source emissions qualitatively, it is reasonable to assume that the amount of GHG reductions resulting from their implementation would not reduce Project emissions below the threshold of significance.

It should be noted that projects of this scope and size, with office and commercial components, typically incur similar mobile source impacts to Air Quality and GHG Emissions. To ensure all potentially significant impacts were identified, Air Quality and GHG were studied conservatively and did not factor in anticipated internal trip reduction between the Project's residential and nonresidential uses (approximately 10%). Further, mobile source emissions are regulated at the state and federal level and do not account for future regulations such as the Advanced Clean



Cars II program, which, if reinstated in the future, would require all sales of light-duty vehicles to be zero-emission by 2035.

### Alternatives

The CEQA Guidelines require the DEIR to describe a range of reasonable alternatives to the project that would feasibly attain the basic project objectives (listed under the Background section of this report) but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.

The EIR identified and analyzed three Project Alternatives in comparison to the potential environmental effects associated with the proposed Project:

- Alternative 1: No Project, Status Quo
- Alternative 2: 30% Reduced residential density and non-residential square footage
- Alternative 3: Convention Center expansion with hotel and residential uses only (no office or retail).

The DEIR evaluates each alternative based on its presumed environmental impacts compared to the project, its relationship to the project objectives, and its feasibility. Based on this evaluation the DEIR must identify an Environmentally Superior Alternative which meets the project objectives and reduces significant impacts to less than significant or no impact. Table 3 compares the alternatives' ability to reduce significant and unavoidable impacts to Air Quality and GHG, and ability to meet project objectives and environmental superiority.

**Table 3 – Alternatives Summary**

<b>Issue</b>	<b>Alternative 1: No Project/Status Quo</b>	<b>Alternative 2: 30% Reduced Project Density/Intensity</b>	<b>Alternative 3: Convention Center Expansion with Hotel and Residential Uses Only</b>
<b>Less or more significant impacts on Air Quality</b>	<b>Less</b> – no new long-term emissions would result from increased traffic or building energy use	<b>Similar</b> – A 30% reduction in pollutant emissions would still result in VOC emissions exceeding the SCAQMD daily threshold	<b>Less</b> – Long-term air quality impacts from mobile sources would be reduced by 52% and would be less than the SCAQMD threshold
<b>Less or more significant impacts on GHG Emissions</b>	<b>Less</b> - no new long-term emissions would result from increased traffic or building energy use	<b>Similar</b> - A 30% reduction in GHG emissions would still result in an exceedance of the draft SCAQMD daily threshold	<b>Similar</b> – The resulting 52% reduction in would still result in GHG emissions that exceed the standard.
<b>Meets Most of the Project Objectives</b>	<b>No</b> – 0 out of 7 objectives met	<b>Yes</b> , but to a lesser degree (7 of 7 objectives met)	<b>Yes</b> , but to a lesser degree (6 of 7 objectives met)

<b>Environmental Superiority</b>	<b>Yes, however</b> in accordance with CEQA guidelines, the identification of another environmentally superior alternative is required if the No Project alternative is selected as the superior alternative	<b>No</b>	<b>Yes</b>
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The comparative analysis of the three alternatives found that Alternative 3 is the Environmentally Superior Alternative because it would result in a reduction of Air Quality emissions below the SCAQMD threshold and would meet most of the Project objectives. However, Alternative 3 would still result GHG emissions exceeding the SCAQMD threshold. Further, while this alternative meets most project objectives, they are met to a lesser degree. Without a retail component Alternative 3 would generate less sales tax revenue and employment opportunities, would not provide supporting retail to expanded entertainment uses, and would not contribute to a dynamic downtown center. Because of its inability to reduce GHG emissions below the threshold and its failure to fulfill project objectives, Alternative 3 is not recommended.

### ***Comparison of Development Envelope and Applicable Development Standards***

The site is located within the Raincross District of the Downtown Specific Plan and is zoned Downtown Specific Plan – Raincross District, with a General Plan Land Use Designation of Downtown Specific Plan. To fully assess the project's maximum density and intensity, the potential project layout is presumed under Exhibit 3, with six potential buildings:

- Building A - Multifamily residential and retail
- Building B - Hotel, fitness, grocery
- Building C – Hotel, condominiums
- Building D – Office
- Building E – Convention Center Expansion
- Building F – Existing Convention Center

The potential development of the Riverside Alive project is aligned with the Downtown Specific Plan, General Plan and the Zoning Code and would not require any amendments to the DSP, General Plan or Zoning designations.

The Downtown Specific Plan permits buildings up to 100 feet in height and allows buildings to exceed the maximum height with a conditional use permit. Buildings A, B, and C were studied at a height of 95 feet, while building D was studied at a height of 155 feet, requiring a conditional use permit for a potential future project that maximizes the development envelope. The total project density was studied at 16 dwelling units per acre, well below the maximum density of 60 dwelling unit per acre allowed by the Specific Plan. The total project FAR was studied at 2.25 for all buildings and uses, below the maximum FAR of 3.5 allowed by the Specific Plan. Table 4 summarizes the assessed development envelope's compliance with the Downtown Specific Plan.



**Table 4 – Development Envelope Compliance with DSP**

Building	Height	DSP Height Standard	Uses	DSP Permitted Uses	Density or FAR	DSP Density/ FAR Standard
A	95 ft	Complies	Multifamily Apartment	Permitted	11 du/ac	Complies
			Retail	Permitted	0.01	Complies
B	95 ft	Complies	Extended Stay Hotel	Conditionally permitted	0.30	Complies
			Fitness	Conditionally Permitted		
			Grocery	Permitted		
C	95 ft	Complies	Full-service Hotel	Conditionally Permitted	0.39	Complies
			Retail	Permitted		
			Branded Residential (Condos)	Permitted	5 du/ac	Complies
D	155 ft	Conditionally Permitted	Office	Permitted	0.49	Complies
Total Project Density Studied					16 Du/ac	Complies
Total Project FAR Studied					2.25	Complies

1. Buildings E and F (Convention Center Expansion and Existing Convention Center, respectively) are public property and exempt from Title 19 per Riverside Municipal Code Section 19.040.110.

## PUBLIC NOTICE, COMMUNITY MEETINGS, AND COMMENTS

On October 9, 2024, the Initial Study (IS) and Notice of Preparation (NOP) for the DEIR were distributed to the State Clearinghouse, responsible agencies, and other interested parties. On October 23, 2024, staff held a virtual scoping meeting to inform the community that an Environmental Impact Report (EIR) was being prepared for the proposed project, solicit input on the Scope of the EIR, provide information on the CEQA/EIR process, share an overview of the proposed project, and inform the community of all future opportunities for input.

In accordance with AB 52, the City notified nine Native American tribes of the preparation of the DEIR. The Soboba Band of Luiseño Indians, Pechanga Band of Luiseño Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians were the four tribes to request consultation. This City worked in partnership with the four consulting tribes to fully assess any potential impacts the project may have on Tribal and Cultural Resources, and the draft language

found in mitigation measures MM CR-1 through MM CR-9. All tribes concurred with the proposed mitigation measures and concluded consultation by July 2, 2025.

Pursuant to Section 15087 of the CEQA Guidelines, the DEIR was circulated for a 45-day public review and comment period from May 23, 2025, through July 7, 2025. A Notice of Availability was mailed to various Federal, State, regional, and local government agencies and other interested parties, including the agencies/interest groups that commented on the Notice of Preparation. The Notice of Availability was also published in the *Press-Enterprise*.

During the 45-day comment period, staff received the following four comment letters (Exhibit 4):

1. **From Lozeau Drury LLP on behalf of Supporters Alliance for Environmental Responsibility (SAFER).** The letter requests that Lozeau Drury LLP be notified of any and all actions, or hearings related to activities, approvals, licensed or certified by the City. It should be noted that Lozeau Drury LLP are included on the City's distribution list for this Project and received both the Notice of Preparation and Notice of Availability of the DEIR. As requested, the City will continue to mail Lozeau Drury LLP of any actions or hearings related to activities or approvals related to the project.
2. **From Riverside Transit Agency.** The comment recommends the incorporation of pedestrian walkways throughout the project site to provide a safe path for people to connect to public transportation. Section 3.4.4 -*Pedestrian Circulation and Site Access* of the DEIR state the Project would provide several pedestrian pathways to facilitate walkable connections within and around the project site. Additionally, the development of any future project must comply with the City of Riverside's Complete Streets Ordinance.
3. **From Lozeau Drury LLP comment on the DEIR on behalf of SAFER.** The letter expresses concern that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. The letter requests that a revised draft environmental impact report (RDEIR) be recirculated. An RDEIR prior to certification is required when significant new information is added to the after public notice is given of the availability of the DEIR. The comment provides no evidence, significant or otherwise, that identifies any significant new environmental issues or impacts that were not already addressed in the DEIR. Therefore, no analysis or revisions are required.
4. **From California Department of Transportation (CalTrans), District 8.** The letter states that Caltrans reviewed the Project's Vehicle Miles Traveled (VMT) analysis and concurs with the determination that VMT impacts are less than significant. The letter requests a ramp merge and diverge analysis for the State Route 60 (SR-60)/Main Street and State Route 91 (SR-91)/Mission Avenue. According to Section 5.8 of the DEIR, the Project's daily traffic volumes are expected to be minimal compared to existing daily traffic volumes. Further, the project does not propose improvements along or near either the SR-91 or the SR-60. Finally, since the implementation of Senate Bill (SB) 743, transportation analyses utilize VMT rather than Level of Service (LOS).

The letter requests the inclusion of queueing analysis calculations within the report. It is unclear what type of queueing analysis is requested. The project is not proposing any improvements within Caltrans' jurisdiction, and as noted above the Project's daily traffic volumes are not anticipated to impact the existing roadway network. Therefore a queueing analysis is not warranted.

Lastly, the letter requests that the development provide connectivity for pedestrians and bicyclists traveling to and from the downtown core. As mentioned above, the

development of any future project must comply with the City of Riverside's Complete Streets Ordinance.

A Notice of Public Hearing was mailed to property owners within 300 feet of the project site in connection with the Notice of Hearing. As of the writing of this report, no responses have been received. A final response to the four comment letters received will be included in the Final EIR (FEIR) to be prepared and made available for the City Council's consideration.

## APPEAL INFORMATION

Actions by the City Planning Commission, including any environmental finding, may be appealed to the City Council within ten calendar days after the decision. Appeal filing and processing information may be obtained from the Planning Division Public Information Section, 3rd Floor, City Hall.

## EXHIBITS LIST

### 1. Draft Environmental Impact Report – City's Website

Draft EIR – Also on File at:

- City's Community & Economic Development Department, 3900 Main Street, Riverside, CA 92522;
- Riverside Public Library Main Branch, 3911 University Avenue, Riverside, CA 92501; and
- Riverside Public Library Marcy Branch, 6927 Magnolia Avenue, Riverside, CA 92506.

### 2. Mitigation Measures Summary

### 3. Development Envelope and Building diagram

### 4. Public Review Period Comment Letters

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