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La Sierra Alhambra Residential Project

CEQA Guidelines Section 15183 Consistency Checklist

City of Riverside, Riverside County, California

PREPARED FOR:

City of Riverside
3900 Main Street
Riverside, CA 92522
951.826.5800

Contact: Judy Eguez, Senior Planner

PREPARED BY:

FirstCarbon Solutions
967 Kendall Drive, #A-537
San Bernardino, CA 92407
714.508.4100

Contact: Jason Brandman, Project Director
Angela Wolfe, Senior Project Manager

June 18, 2026

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ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ACCA	Air Conditioning Contractors of America
ADT	Average Daily Traffic
AERMOD	American Meteorological Society/EPA Regulatory Model
AICUZ	Air Installations Compatible Use Zones
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
APZ	Airport Protection Zone
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
ASHRAE	American Society of Heating, Refrigerating and Air Conditioning Engineers
AUSD	Alvord Unified School District
BERD	California Built Environment Resource Directory
BGS	below ground surface
BRA	Biological Resources Assessment
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAPSSA	Criteria Area Plant Species Survey Area
CBC	California Building Standards Code
CCS	carbon capture and storage
CDFW	California Department of Fish and Wildlife
CDR	Carbon Dioxide Removal
CEC	California Energy Commission
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System

CNDDB	California Natural Diversity Database
CIP	Capital Improvement Program
CIWMB	California Integrated Waste Management Board
CO	carbon monoxide
CO_2	carbon dioxide
CPHI	California Points of Historical Interest
CPTED	Crime Prevention Through Environmental Design
CRA	Cultural Resources Assessment
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DMA	drainage management area
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
du/acre	dwelling units per acre
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMFAC	Emissions Factors mobile source emission model
EMS	Emergency Medical Services
EMWD	Eastern Municipal Water District
EOC	Emergency Operation Center
EPA	United States Environmental Protection Agency
ESA	Environmentally Sensitive Area
EV	electric vehicle
FAA	Federal Aviation Administration
FCS	FirstCarbon Solutions
FEIR	Final EIR
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FMZ	Fuel Modification Zone
FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	Global Warming Potential
HANS	Habitat Acquisition and Negotiation Strategy
HARP2	Hotspots Analysis and Reporting Program

HFC	hydrofluorocarbon
HOA	Homeowner's Association
HRA	Health Risk Assessment
HVAC	Heating, Ventilating and Conditioning
iDigBio	Integrated Digitized Biocollections
IM	Implementing Measure
in/sec	inches per second
ISO	Insurance Services Office
kWh	kilowatt hours
LDV	light-duty vehicle
L_{eq}	equivalent sound level
LHMP	Local Hazard Mitigation Plan
L_{max}	maximum noise level
LOS	Level of Service
LRA	Local Responsibility Area
LST	localized significance threshold
MARB	March Air Force Base
MBTA	Migratory Bird Treaty Act
MDR	Medium Density Residential
MEIR	Maximally Exposed Individual Receptor
MLD	Most Likely Descendant
MM	Mitigation Measure
MMT	million metric tons
mph	miles per hour
MRZ	Mineral Resource Zone
MSHCP	Multiple Species Habitat Conservation Plan
MT CO_2e	metric tons of carbon dioxide equivalent
MWD	Metropolitan Water District
MWS	modular wetland system
NAGPRA	Native American Graves Protection Repatriation Act
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NFHL	National Flood Hazard Layer
NEPSSA	Narrow Endemic Plant Species Survey Area
NO_X	nitrogen oxides

NPC	Neighborhood Policing Center
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OCP	organochlorine pesticide
OEHHA	California Office of Environmental Health Hazard Assessment
OGV	Ocean-going Vessel
PDF	Project Design Feature
PF	Public Facilities
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
ppm	parts per million
PRD	Planned Residential Development
PQP	Public/Quasi-Public
PV	photovoltaic
REC	Recognized Environmental Condition
RFD	Riverside Fire Department
RHWC	Riverside Highland Water Company
RIVCOM	Riverside County Transportation Model
RNG	renewable natural gas
RPD	Riverside Police Department
RPU	Riverside Public Utilities
RRG	Riverside Restorative Growthprint
RRG-CAP	Riverside Restorative Growthprint Climate Action Plan
RRG-EPAP	Riverside Restorative Growthprint Economic Prosperity Action Plan
RSL	Regional Screening Levels
RTA	Riverside Transit Agency
RTRP	Riverside Transmission Reliability Project
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
RWQCP	Regional Water Quality Control Plant
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearinghouse

SEMS	Standardized Emergency Management System
SIP	Strategic Investment Plan
SKR	Stephens' kangaroo rat
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SMACNA	Sheet Metal and Air Conditioning Contractor's National Association
SOC	Standard Operating Condition
SOI	Sphere of Influence
SO_X	sulfur oxides
SR	State Route
SRA	State Responsibility Area
SRR	Semi Rural Residential
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
UCMP	University of California Museum of Paleontology
UCR	University of California at Riverside
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United State Geological Survey
VDEC	Verified Diesel Emission Control Strategy
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program
WMWD	Western Municipal Water District
WRCOG-CAP	Western Riverside Council of Government's Subregional Climate Action Plan
WSMP	Water Supply Master Plan
WQMP	Water Quality Management Plan
ZEV	Zero-Emission Vehicle

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1 - INTRODUCTION

This Consistency Checklist and attached supporting documents have been prepared to determine whether and to what extent the proposed La Sierra Alhambra Residential Project (proposed project), involves project-specific environmental effects which are peculiar to the project or its site and to evaluate the extent the proposed project is consistent with development density established in the certified Program Environmental Impact Report (Program EIR) for the City of Riverside General Plan 2025 Program, adopted November 2007 (State Clearinghouse [SCH] No. 2004021108), prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], § 21000, *et seq.*). [1]

1.1 - CEQA Assessment

The following Consistency Checklist has been prepared pursuant to CEQA Guidelines Section 15183 (Projects Consistent with a Community Plan or Zoning) to determine whether the proposed project requires additional environmental review.

CEQA Guidelines Section 15183 mandates that projects which are consistent with the development density established by existing zoning, community plan or general plan policies for which an Final EIR was certified (in this case, the Program EIR for the City of Riverside General Plan 2025 Program [Prior FEIR]) shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

1.2 - Summary of Results

As illustrated by the following Consistency Checklist, the proposed project is consistent with the development density established in the Housing Element Update and related zoning and has been found to be in conformance with the analysis and conclusions of the Prior FEIR and is exempt from further environmental review. This determination is based on the following criteria pursuant to CEQA Guidelines Section 15183:

1. There are no new significant effects peculiar to the proposed project or its site that were not analyzed as significant effects in the Prior FEIR;
2. There are no new significant off-site or cumulative impacts that were not analyzed in the Prior FEIR, and
3. There are no previously significant effects which, as a result of substantial new information that was not known when the Prior FEIR was certified, are determined to have a more severe adverse impact than discussed in the Prior FEIR.

[1] City of Riverside. 2007. Recirculated Program Environmental Impact Report. July

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2 - PROJECT DESCRIPTION

2.1 - Project Location and Setting

2.1.1 - Project Location

The approximately 9.88-acre project site is located on the southern corner of La Sierra Avenue and Alhambra Avenue, in the City of Riverside (City), in Riverside County (County), California (Exhibit 1 and Exhibit 2). [2] The project site is identified as Assessor's Parcel Numbers (APNs) 149-052-004, -009, -011, -012, -013, and -014. The project site is currently occupied by several residences and associated structures that would be demolished prior to development. The project site is bounded by La Sierra Avenue, Loma Vista Middle School, and single-family residences to the east; single-family residences and Francisco Place to the south; single-family residences and Alhambra Avenue to the west; and single-family residences and Alhambra Avenue to the north. The La Sierra Hills are approximately 0.23 mile to the west. The project site is located within the *Riverside West* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map, Township 3 South, Range 6 West (Latitude: 33° 56' 26" North; Longitude: 117° 30' 3" West).

2.1.2 - Existing Development and Land Use Activities

The project site currently contains several trees that would be removed prior to development. The project site also contains three existing single-family residences with associated structures and an in-ground swimming pool. [3] The residences and associated structures would be demolished before the development of the proposed project.

2.1.3 - General Plan and Zoning Designations

General Plan Designations

According to the City's General Plan Land Use Map, APNs 149-052-11 and -012 are designated as Semi Rural Residential (SRR); APNs 149-052-004, -009, -013, and -014 are designated as Medium Density Residential (MDR) (Exhibit 3). The City's Zoning Code also allows for increases in density pursuant to the approval of a Planned Residential Development (PRD) Permit, which allows for flexibility and creativity in design of single-family residential developments and for the application of unique development standards that reflect special property conditions. [4]

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[2] This acreage includes 9.51 acres of disturbance area and 0.37 acres to be dedicated to the City of Riverside.

[3] 6204 La Sierra Avenue, 6244 La Sierra Avenue, and 6251 Alhambra Avenue.

[4] City of Riverside. 2024. Code of Ordinances. Chapter 19.780, Planned Residential Development Permits. Website: https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO_ARTIXLAUSDEPEREPR_CH19.780PLREDEPE. Accessed February 9, 2025.

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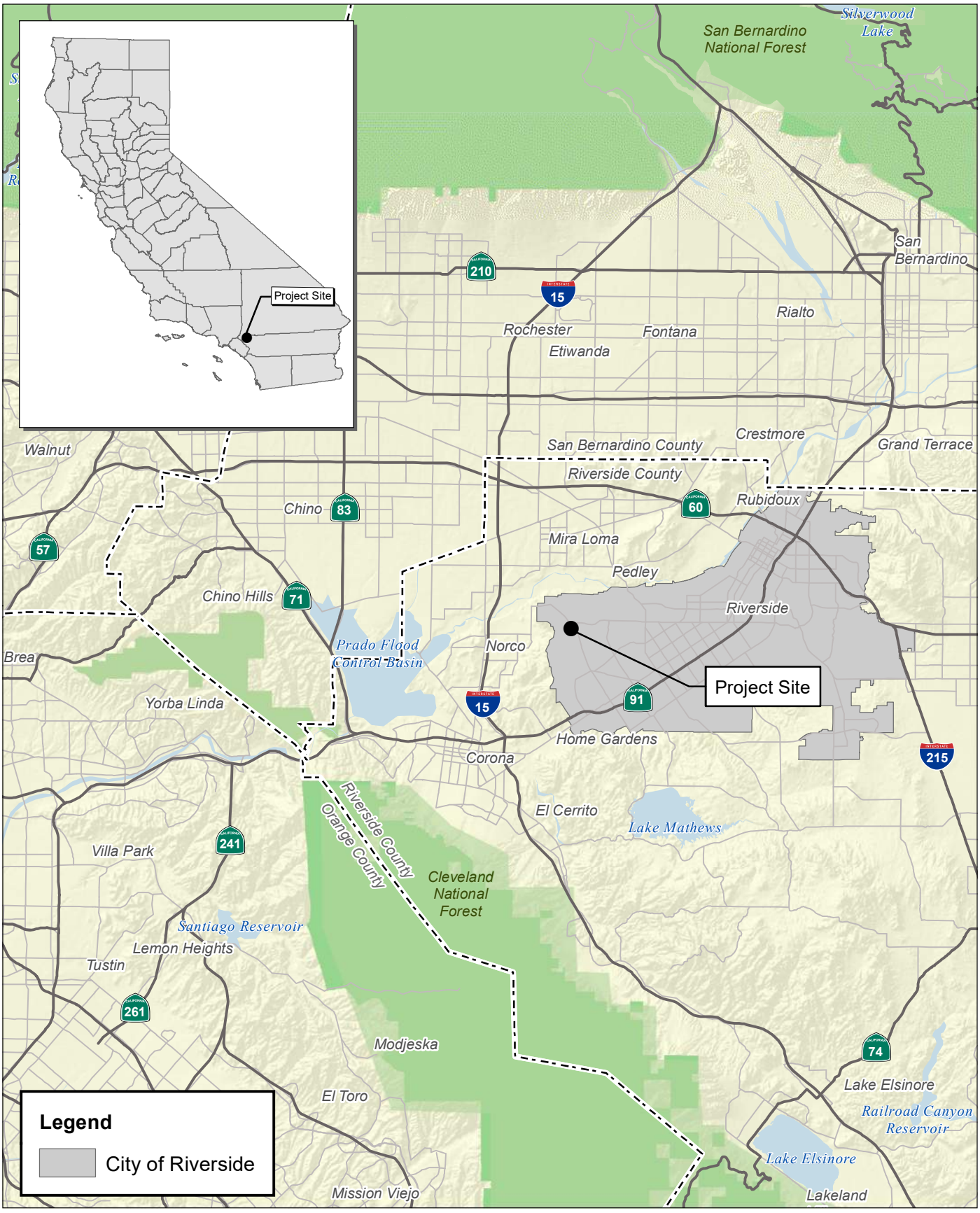

Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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Exhibit 1
Regional Location Map

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Source: Bing Aerial Imagery. Kimley-Horn, 01/10/2025.

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Exhibit 2
Local Vicinity Map

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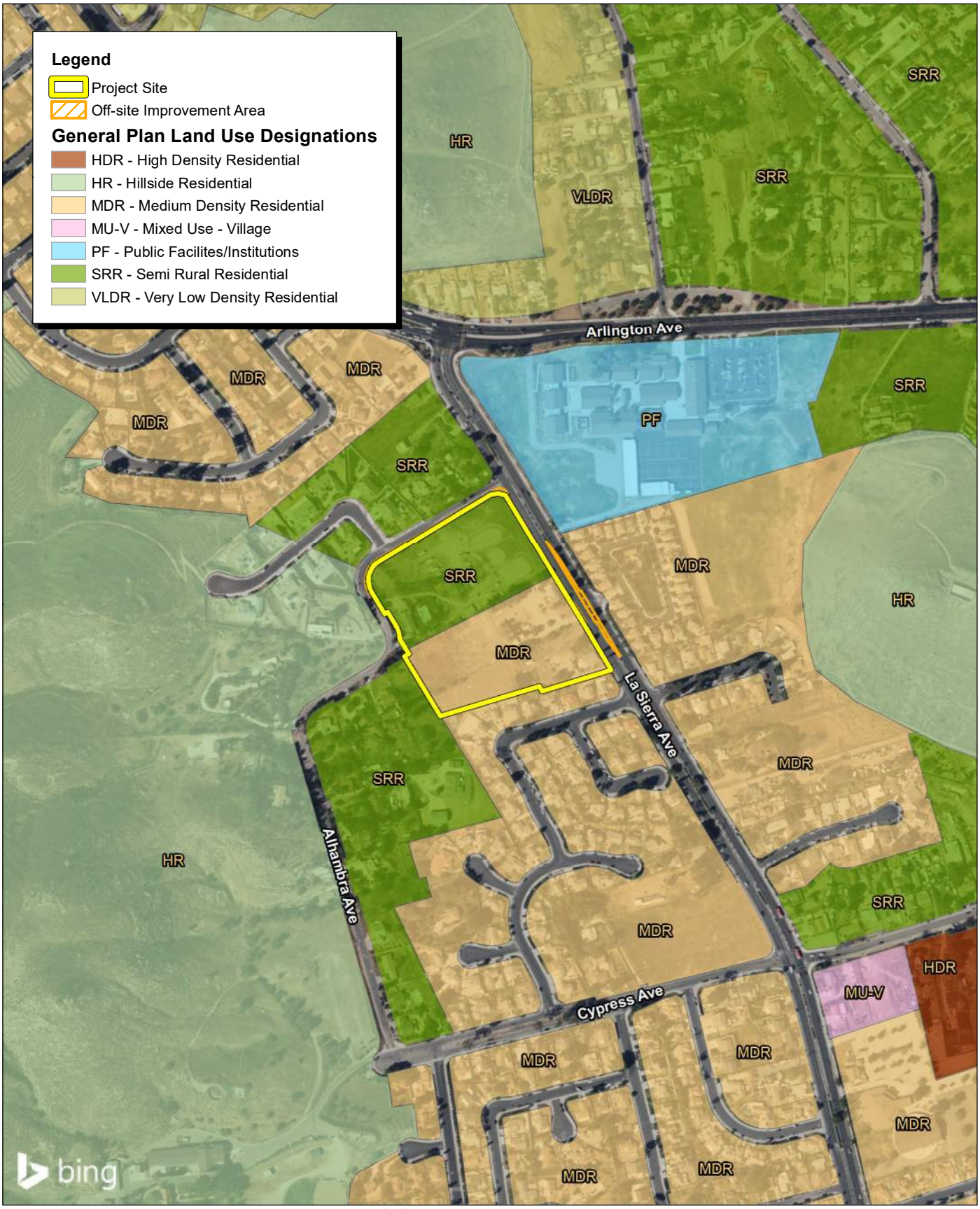

Source: Bing Aerial Imagery. City of Riverside. Kimley-Horn, 01/10/2025.

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Exhibit 3
General Plan Land Use Designations

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The SRR designation is intended for large lot single-family development while allowing enough space for animal keeping as an auxiliary use. The SRR designation supports a maximum density of 2.1 dwelling units per acre (du/acre), with the potential to support 3.3 du/acre with approval of a PRD Permit.[5] The MDR designation is intended for the development of single-family residences, town houses, and row houses. The MDR designation supports a maximum density of 6.2 dwelling units per acre, with the potential to support 8 du/acre with a PRD Permit.[6] The proposed project is not seeking an amendment to the General Plan land use designation of the project site. The proposed project is residential in nature and would therefore be consistent with the permitted uses of the SRR and MDR General Plan land use designations and would also be consistent with the allowed density with the approval of a PRD Permit.

Zoning Designations

According to the City of Riverside Zoning Map, the northern portion of the project site (APNs 149-052-11 and -012) is zoned Rural Residential (RR). The southern portion of the project site (APNs 149-052-004, -009, -013, and -014) is zoned Single-Family Residential (R-1-8500) (Exhibit 4). The RR zoning is intended to provide areas for single-family residences on large lots where flexible provisions apply pertaining to the keeping of farm animals such as horses, ponies, mules, cows, goats, sheep, and swine under Future Farmers of America-supervised and 4-H-supervised projects. These zones are established in areas of the City where the keeping of such animals is already prevalent. It is also the intent of the RR zoning to provide opportunities for persons whose lifestyles include the keeping of such animals in areas where such animal-keeping activities minimize impact to other residential properties.[7] The Single-Family Residential (R-1-8500) zoning provides areas for single-family residences with medium to large lot sizes.

The applicant is not proposing a zoning change for the project site and the proposed project would be consistent with the PRD Permit. The proposed project is residential in nature and consists entirely of single-family residential use and would therefore be consistent with the permitted uses of the City of Riverside Zoning Code.

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5 City of Riverside. 2007. Land Use and Urban Design Element. Single-Family Residential Land Use Designations. Semi-Rural Residential (SRR). Website: https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf. Accessed December 30, 2024.

6 City of Riverside. 2007. Land Use and Urban Design Element. Single-Family Residential Land Use Designations. Medium Density Residential (MDR). Website: https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf. Accessed December 30, 2024.

7 City of Riverside. 2024. Code of Ordinances. Chapter 19.100, Residential Zones. Website: https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO_ARTVBAZOREUSDEPR_CH19.100REZORCRRRE1-2AC1300010500850070004000300025002000150OR-. Accessed December 30, 2024.

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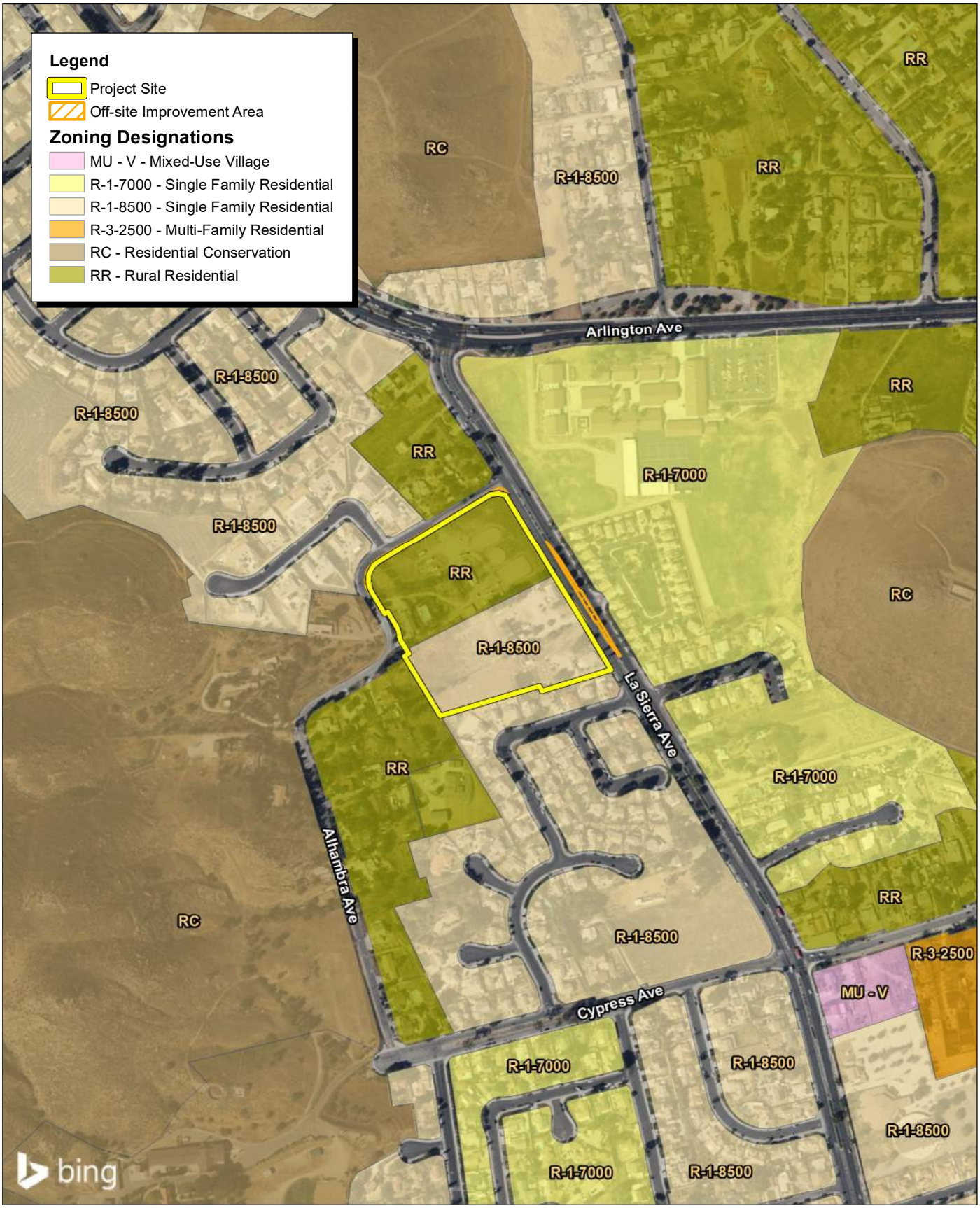

Source: Bing Aerial Imagery. City of Riverside. Kimley-Horn, 01/10/2025.

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Exhibit 4
Zoning Designations

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2.2 - Project Background and Previous Environmental Review

2.2.1 - General Plan

The City Council adopted the 2025 General Plan in 2007. The 2025 General Plan is a strategic, long-range plan guiding growth to 2025. The plan reflects the voices of hundreds of residents who shared their dreams and creative ideas for the future of Riverside. Residents provided input on key land use and social, economic, environmental and cultural issues. The 2025 General Plan provides the direction to create a sustainable, resilient, and livable Riverside. [8]

Riverside's Vision establishes five key themes around which this Plan has been crafted:

1. How We Work: A focus on creating economic development opportunities that provide high-skilled, high-paid employment for all members of the community.
2. How We Play: Creating a comfortable gathering place that enriches the lives of residents and visitors alike.
3. How We Live: Empowering neighborhoods and residents to work together.
4. How We Get Around: A focus on easy access to an efficient, multi-option transportation system that enables them to meet their needs within the community.
5. How We Learn: A focus on achieving quality education at all levels.

2.2.2 - General Plan Environmental Impact Report

The City prepared a Program Environmental Impact Report (Prior FEIR) for the 2025 General Plan and certified the Prior FEIR in November 2007. The Prior FEIR identified significant environmental effects that could result from implementation of the 2025 General Plan, as well as ways the impacts could be reduced to less than significant through implementation of applicable regulations and mitigation measures. The significant environmental impacts the Prior FEIR identified were related to conversion of agricultural resources, air quality, hydrology, noise, population and housing, recreation, transportation and traffic, and utilities. The City adopted a Standard Operating Condition (SOC) for each significant and unavoidable impact prior to approving development related to buildout of the 2025 General Plan. The Prior FEIR's conclusions are summarized in Section 4, Environmental Analysis, of this document.

[8] City of Riverside. 2007. General Plan 2025. November.

2.3 - Project Description

2.3.1 - Development Summary

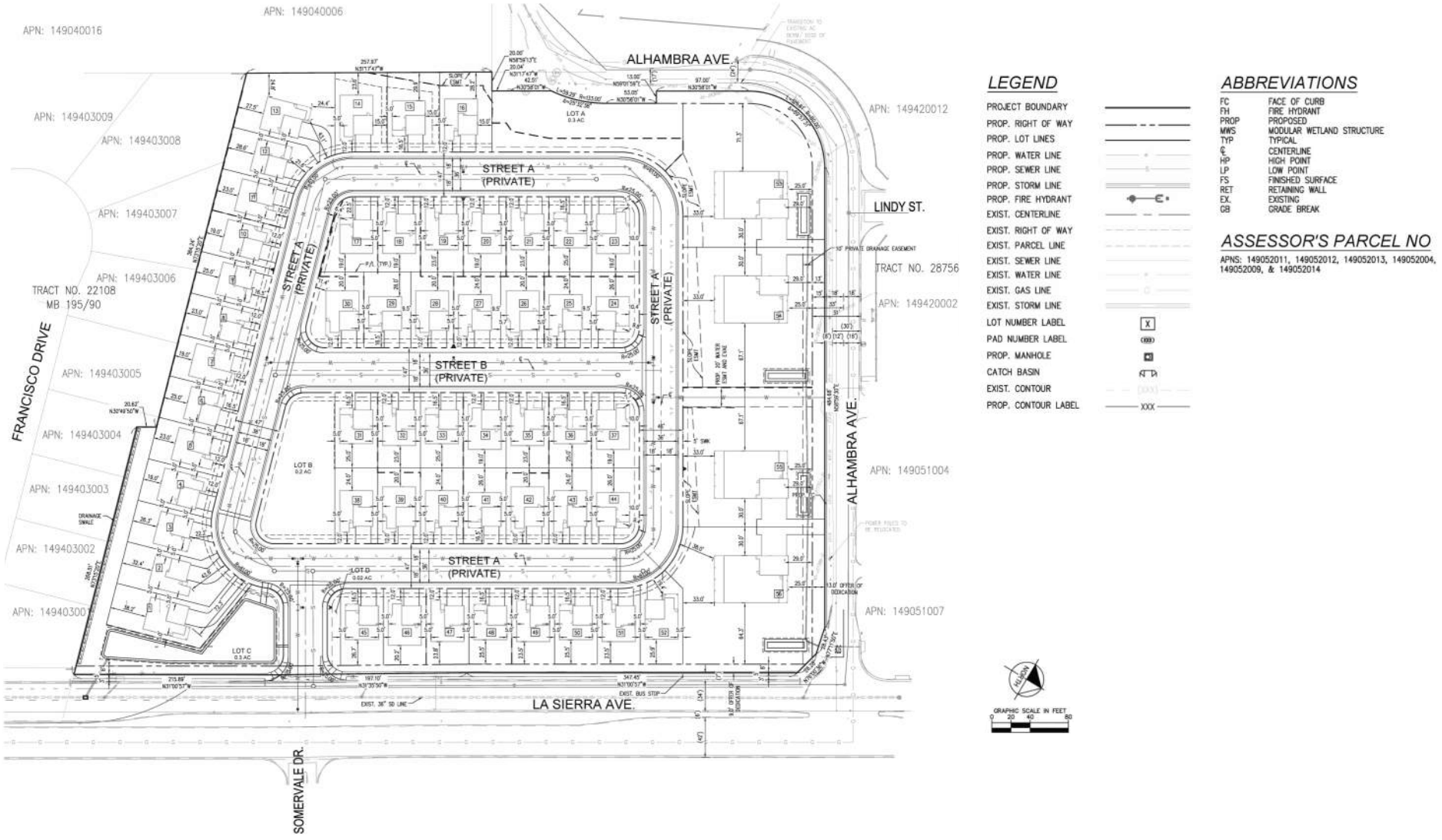
MLC Holdings, LLC (project applicant) proposes to construct 56 single-family residences consisting of 52 2-story residences on 45 feet by 79 feet minimum lots and four single-story residences on estate sized parcels with a minimum of 20,000 square feet in size. The proposed project encompasses approximately 9.88 acres in addition to approximately 0.36 acre of roadway and frontage improvements. Residences would range between approximately 2,000 square feet to 2,500 square feet. The estate sized parcels would be intended to support animal keeping while providing a smooth transition from the existing horse-keeping lots across Alhambra Avenue. The proposed project would include private roadways, common space and amenity areas, landscaping, and pedestrian walkways throughout the site (Exhibit 5).

2.3.2 - Density Bonus

The project applicant proposes to deed restrict 6 percent of the units (equal to three residences) as very low affordable residences. Pursuant to the State Density Bonus Law, based on the provision of 6 percent of the units as affordable to very low income-qualifying households, the proposed project would be allowed a 22.5 percent increase in density. The Density Bonus Law also provides for the granting of concessions and waivers. The proposed project would utilize four waivers:

- Waiver 1: Reduce perimeter setback to 19 feet along the southern property line;
- Waiver 2: Reduce perimeter setback to 20-feet along La Sierra Avenue;
- Waiver 3: Reduce common open space requirement (264 square feet per dwelling unit proposed);
- Waiver 4: Full height (6-foot) fencing allowed in perimeter setback area.

Furthermore, the proposed project would use a PRD Permit to allow flexibility to increase the allowed density from what is proscribed by the General Plan and Zoning and, further, to allow the density to be blended across the site. As shown in the site plan (Exhibit 5) four single-story residences would be located in the northern portion of the site—on the parcel zoned RR—which has the lowest allowed density (3.3 du/acre with a PRD Permit) and reflects estate sized lots. The remaining 52 residences would be arranged around an internal looping street (Street A and B) within the community. This arrangement, along with the utilization of a PRD Permit, the Density Bonus, and the three waivers listed above, would allow for the construction of up to a maximum of 57 residences on-site. As such, the proposed project, which includes a total of 56 residences, would be consistent with the allowed density for the project site as demonstrated in Table 1 and Table 2.



Source: Kimley-Horn and Associates, Inc. 04/23/2026.

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Exhibit 5
Site Plan

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Table 1: Allowed Density Pursuant to the 2025 General Plan and Zoning

General Plan Land Use Designation	Zoning Designation	Allowed General Plan Density without PRD Permit (du/acre)	Zoning Density Allowed without PRD Permit (du/acre)	Zoning Allowed Density with PRD Permit (du/acre)
SRR	RR	2.1	2.1	3.0
MDR	R-1-8500	6.2	5.1	6.3

Notes:
du/acre = dwelling units per acre
MDR = Medium Density Residential
PRD = Planned Residential Development
RR = Rural Residential
SRR = Semi Rural Residential
Source: City of Riverside. Municipal Code. 2024.

Table 2: Total Dwelling Units Allowed Pursuant to 2025 General Plan and Zoning

Assessor's Parcel Number	Acreage	GP Land Use	Zoning	Units Allowed by General Plan without PRD Permit	Units Allowed by General Plan with PRD Permit	Units Allowed by Zoning without PRD Permit	Units Allowed by Zoning with PRD Permit	Total Units Allowed with 22.5% State Density Bonus
149-052-011 and 12	4.89	SRR	RR	10.3	16.13	10.3	14.67	17.97
149-052-013	1.17	MDR	R-1-8500	7.3	9.36	6.0	7.37	9.03
149-052-004	1.68	MDR	R-1-8500	10.4	13.44	8.6	10.58	12.96
149-052-009	0.85	MDR	R-1-8500	5.3	6.81	4.3	5.37	6.58
149-052-014	1.29	MDR	R-1-8500	8.0	10.31	6.6	8.12	9.95
Total				**41**	**56**	**35**	**46**	**57**

Notes:
MDR = Medium Density Residential
PRD = Planned Residential Development
RR = Rural Residential
SRR = Semi Rural Residential
Source: City of Riverside Municipal Code. 2024

2.3.3 - Design and Appearance

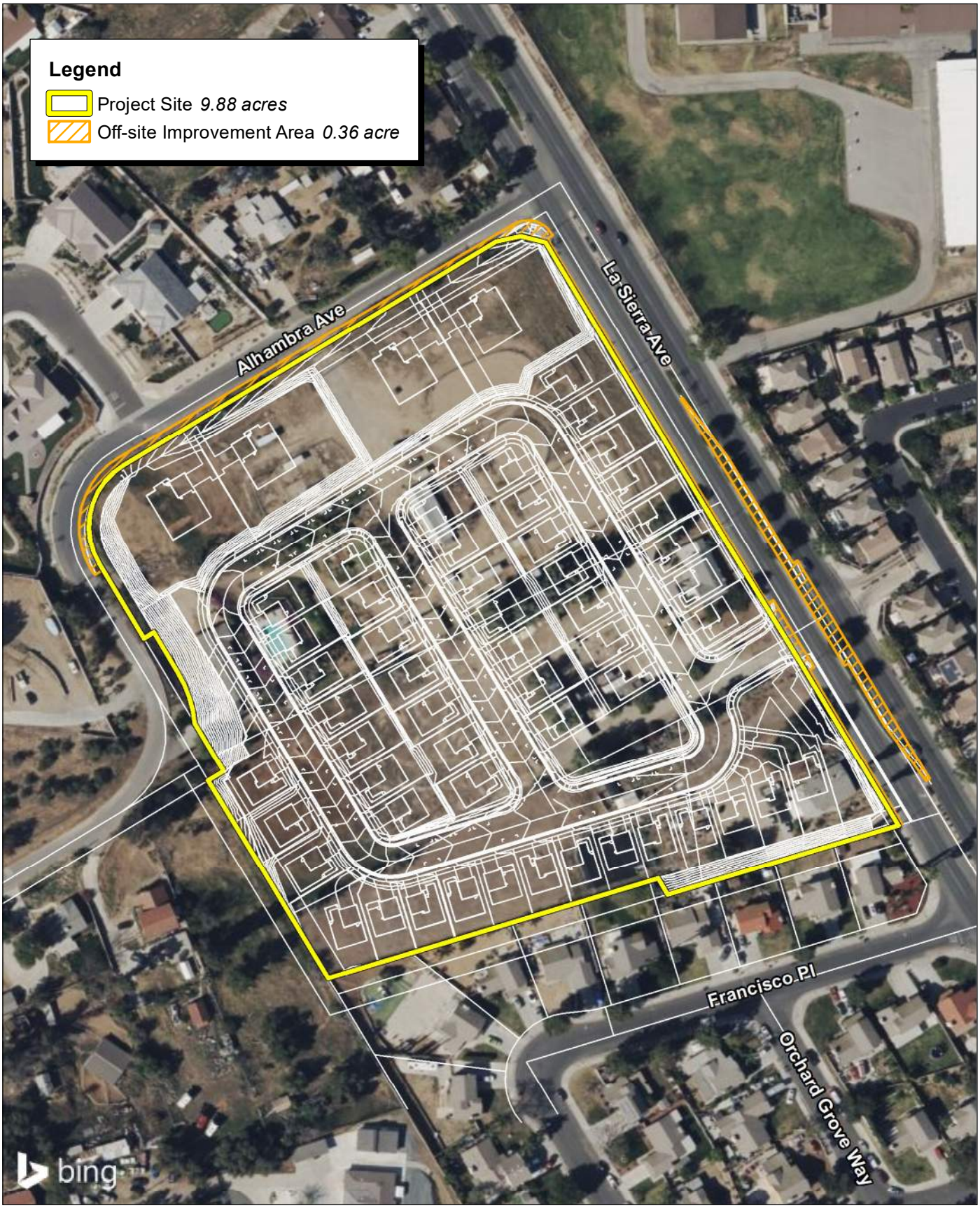
The proposed residences would range in height from 18 feet 6 inches to 26 feet 3 inches and would vary slightly in color and appearance but would be stylistically consistent with existing residences in the area. Residences would include stucco exteriors, vinyl windows with simulated wood shutters, and concrete tile roofs. Spanish, coastal, and Santa Barbara architectural styles would be used.

2.3.4 - Off-site Roadway and Frontage Improvements

The proposed project would include approximately 0.36 acre of roadway and frontage improvements (Exhibit 6).

Off-site design features include the following:

- Alhambra Avenue improvements–The proposed project would widen Alhambra Avenue adjacent to the estate lots to its full paved width section.
- Installation of red curb–The proposed project would coordinate with the City of Riverside Traffic Division to implement red curb parking restrictions along the inside of the horizontal curve of Alhambra Avenue approaching the first proposed residential home along, with advance curve ahead warning signage and centerline striping.
- Riverside Transit Association (RTA) Coordination–The proposed project would install bus stop amenities for the existing bus stop located along the project frontage through consultation with the RTA.
- La Sierra and Driveway 1–The proposed project would construct Driveway 1 on La Sierra Avenue with stop controls for the eastbound traffic (proposed project egress) in order to facilitate site access.
- Installation of a solar speed feedback sign for the northbound traffic of La Sierra Avenue.



Source: Bing Aerial Imagery. Kimley-Horn, 01/10/2025.

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Exhibit 6
Off-site Roadway and Frontage Improvements

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2.3.5 - City Street Dedication

The proposed project would also include 0.37 acre of street dedication to the City, consisting of the following:

- La Sierra Avenue improvements–The proposed project would include a 9-foot-wide offer of dedication along the La Sierra Avenue frontage with new sidewalk and landscape strip. The existing curb line will remain as is, with old driveway cuts being replaced.
- Alhambra Avenue improvements–No concrete sidewalk or parkway will be installed, but rather a decomposed granite trail to match the rural residential aesthetic across the street. The improvements include a 13-foot-wide offer of dedication along Alhambra on the north side of the project boundary to accommodate the decomposed granite trail along with road widening and curb and gutter improvements.

2.3.6 - Access and Circulation

Vehicular Circulation

The proposed project would include a 36-foot-wide private street (Private Street A) which would provide access to the driveways of the 52 proposed 2-story units. The remaining four single-story estate lots would be accessed directly from Alhambra Avenue via private driveways. Access to Private Street A would be from a 36-foot-wide entryway on La Sierra Avenue. A second private street (Private Street B) would be located within the site to provide additional internal access to residences. Emergency access would be available from the main entryway on La Sierra Avenue, and adequate fire truck turning space would be provided at the entrance and on the private street.

Pedestrian Access

A 5-foot-wide sidewalk is proposed on either side of Private Street A and Private Street B, starting at the entrance to the site along La Sierra Avenue. Residents of the single-story estate parcels would be able to access their residences directly from Alhambra Avenue.

Emergency Vehicle Access

The proposed project would include 20-foot-wide Emergency Vehicle Access (EVA) lane originating from Alhambra Avenue onto Street A between single-story estate parcels Lots 54 and 55.

2.3.7 - Parking

Each of the 56 units would include a 2-car garage, as well as a private driveway with a 2-car capacity. The proposed project would also include 69 parallel parking spaces along private streets, which would result in 293 total parking spaces within the site.

2.3.8 - Open Space, Landscaping, and Amenities

The proposed project would include approximately 12,858 square feet of on-site park amenity areas including picnic tables, a children's play area, dog park, fitness nodes, a bocce ball court, and a putting green. The proposed project would also include 2,900 square feet of common areas and 21,171 square feet of slope plantings. Trees and shrubs would be planted throughout the site and along public parkways and medians. On-site open space would total 36,929 square feet, and off-site landscaping within the median would total 25,274 square feet. Landscaping details are included on Exhibit 7 and Exhibit 8.

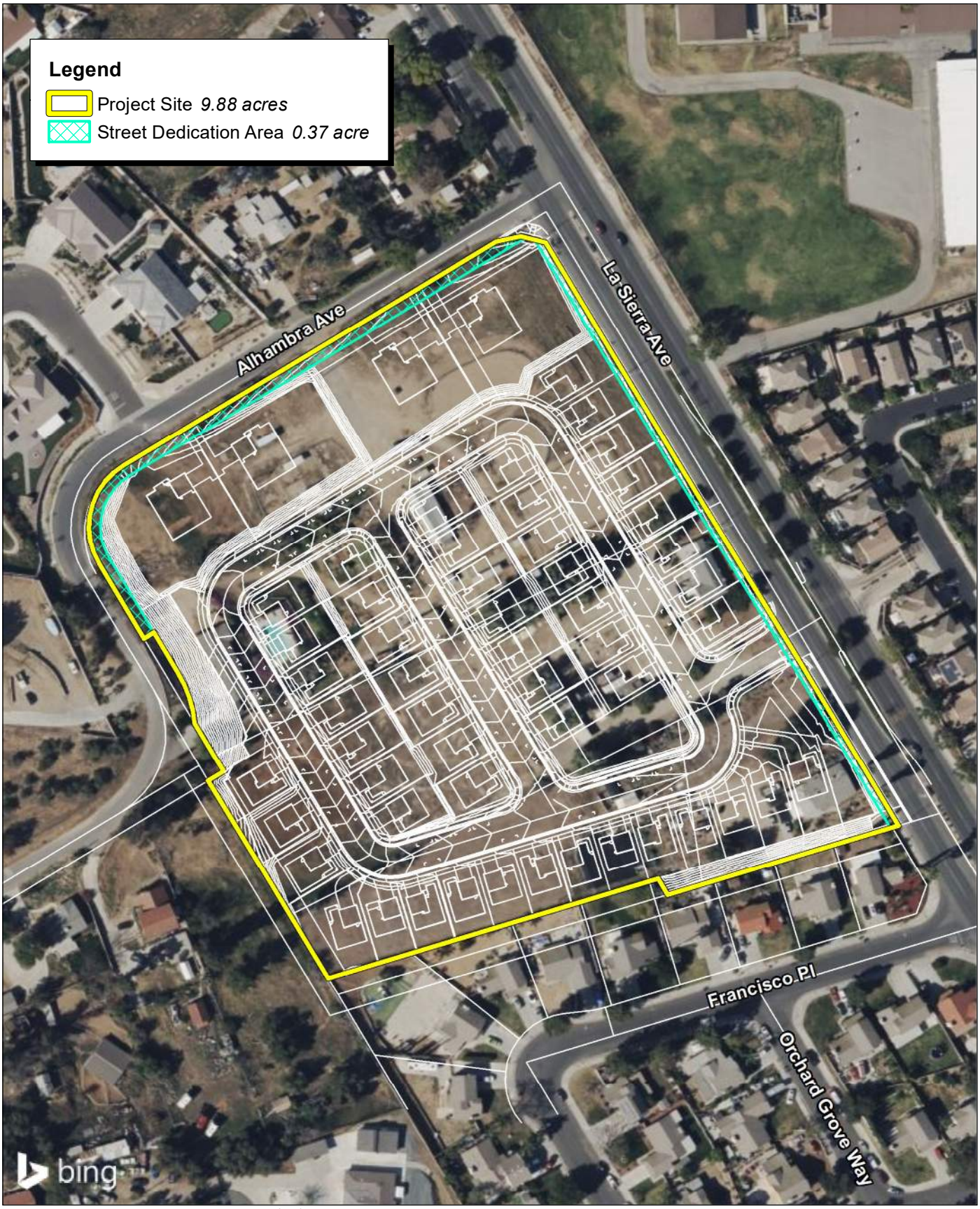
2.3.9 - Utilities

The proposed project would include installation of water, sewer, and water quality infrastructure. The estate parcels would be serviced by existing water, sewer, and electric infrastructure on Alhambra Avenue. The new proposed water and sewer lines would service the remaining units and would connect to infrastructure on La Sierra Avenue and Alhambra Avenue. Four bioretention basins are proposed on-site, one within each of the four estate lots. Stormwater treatment and a modular wetland system (MWS) is proposed at the southeast corner of the site near Lot 1. A drainage swale would be located at the southeastern corner of the site directly behind Lots 1 through 5. The proposed project would be entirely serviced by electricity; no natural gas service is proposed.

The proposed project would be served by the following utility providers: [9]

- Water: Riverside Public Utilities
- Wastewater: Riverside Public Works
- Storm Drainage: Riverside Public Works
- Electricity: Riverside Public Utilities

[9] Natural gas is not proposed as part of the project.



Source: Bing Aerial Imagery. Kimley-Horn, 01/10/2025.

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150 75 0 150
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Exhibit 7
City Street Dedication

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CITY OF RIVERSIDE
LA SIERRA ALHAMBRA RESIDENTIAL PROJECT
CONSISTENCY CHECKLIST

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LEGEND

1. Street Tree
2. Entry Monumentation Wall with Potential Project Signage
3. Street Light
4. Project Entry Enhanced Paving
5. Property Line
6. Picnic Table with Umbrella
7. Shade Structure / Picnic Area
8. Bocce Ball Court
9. Pedestrian Concrete Walk
10. Mailbox - Cluster Unit
11. Fitness Nodes
12. Frontage Tree
13. Water Quality Basin
14. Children's Play Area
15. Focal Accent Tree
16. Vertical Evergreen Screen Tree
17. Entry Pilasters
18. Park Trees
19. Open Space Slope Tree
20. Fire Hydrant
21. Open Natural Turf Play Area
22. Typical Front Yard Planting
23. Interior Open Space
24. Site Distance Triangle
25. BBQ Counter
26. Maintenance Access Double Gates
27. Project EVA

PLANT SCHEDULE

SYMBOL	BOTANICAL / COMMON NAME		CONT	W.U.COLS	SPACING
	ACCENT TREE (MULTI-TRUNK)				
	PARKINSONIA X DESERT MUSEUM / PALO VERDE		24" BOX	VL	AS SHOWN
	VITEX AGNUS-CASTUS / CHASTE TREE		24" BOX	L	AS SHOWN
	ARBUTUS UNEDO / STRAWBERRY TREE		24" BOX	L	AS SHOWN
	LA SIERRA AVENUE (STANDARD)				
	GEIJERA PARVIFLORA / AUSTRALIAN WILLOW		24" BOX	L	AS SHOWN
	LAGERSTROEMIA INDICA / CRAPE MYRTLE		24" BOX	L	AS SHOWN
	ZELKOVA SERRATA / JAPANESE ZELKOVA		24" BOX	M	AS SHOWN
	PARKINSONIA X DESERT MUSEUM / PALO VERDE	CITY APPROVED	24" BOX	VL	AS SHOWN
	CERCIS OCCIDENTALIS 'FOREST PANSY' / FOREST PANSY REDBUD		24" BOX	M	25' O.C.
	ALHAMBRA AVENUE (STANDARD)				
	GEIJERA PARVIFLORA / AUSTRALIAN WILLOW		24" BOX	L	AS SHOWN
	LAGERSTROEMIA INDICA / CRAPE MYRTLE		24" BOX	L	AS SHOWN
	PISTACIA CHINENSIS / CHINESE PISTACHE	CITY APPROVED	24" BOX	M	AS SHOWN
	PARKINSONIA X DESERT MUSEUM / PALO VERDE		24" BOX	VL	AS SHOWN
	PISTACIA ATLANTICA 'RED PUSH' / RED PUSH PISTACHE		24" BOX	M	25' O.C.
	PARK TREE (STANDARD)				
	ARBUTUS MARINA / MARINA STRAWBERRY TREE		24" BOX	L	AS SHOWN
	HANDROANTHUS HEPTAPHYLLUS / PINK TRUMPET TREE		24" BOX	M	AS SHOWN
	LAGERSTROEMIA INDICA / CRAPE MYRTLE		24" BOX	L	AS SHOWN
	CASSIA LEPTOPHYLLA / GOLD MEDALLION TREE		24" BOX	M	AS SHOWN
	CERCIS OCCIDENTALIS / WESTERN REDBUD		24" BOX	L	AS SHOWN
	PROSOPIS CHILENSIS / CHILEAN MESQUITE		24" BOX	L	AS SHOWN
	ULMUS PARVIFOLIA / LACEBARK ELM		24" BOX	M	AS SHOWN
	SCREEN TREE (STANDARD)				
	LOPHOSTEMON CONFERTUS / BRISBANE BOX		24" BOX	M	AS SHOWN
	PINUS ELDARICA / MONDELL PINE		24" BOX	VL	AS SHOWN
	PODOCARPUS GRACILIOR / AFRICAN FERN PINE		24" BOX	M	AS SHOWN
	UMBELLULARIA CALIFORNICA / CALIFORNIA BAY LAUREL		24" BOX	L	AS SHOWN
	STENOCARPUS SINUATUS / QUEENSLAND FIRE WHEEL TREE		24" BOX	M	AS SHOWN
	WATER QUALITY BASIN TREE (STANDARD)				
	PLATANUS RACEMOSA 'ROBERTS' / ROBERTS CALIFORNIA SYCAMORE		24" BOX	M	AS SHOWN
	UMBELLULARIA CALIFORNICA / BAY LAUREL		24" BOX	M	AS SHOWN

SHRUBS				
	MYRTUS COMMUNIS / TRUE MYRTLE	SG	L	5 FT
	LIGUSTRUM JAPONICUM 'TEXANUM' / JAPANESE PRIVET	SG	M	4 FT
	LEUCOPHYLLUM FRUTESCENS / TEXAS SAGE	SG	L	4 FT
	SALVIA SPP.	SG	VL/L	3 FT
	SPHAERALCEA AMBIGUA / DESERT MALLOW	SG	L	3 FT
	PITTOSPORUM TOBIRA 'WHEELERS DWARF' / MOCK ORANGE	SG	M	4 FT
	OLEA EUROPAEA 'LITTLE OLLIE' / LITTLE OLLIE OLIVE	SG	L	4 FT
	COLEONEMA PULCHELLUM 'SUNSET GOLD' / BREATH OF HEAVEN	SG	M	4 FT
	TEUCRIUM CHAMAEDRYS / GERMANDER	SG	L	2 FT
	DIANELLA SPP. / FLAX LILY	SG	L/M	2 FT
	DIETES SPP. / FORTNIGHT LILY	SG	L	3 FT
GRASSES				
	CAREX TUMULICOLA / BERKELEY SEDGE	SG	L	2 FT
	MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS	SG	L	3 FT
	MUHLENBERGIA LINDHEIMERI / LINDHEIMER MUHLY	SG	L	4 FT
	LIRIOPE SPP. / LILYTURF	SG	M	2 FT
	MUHLENBERGIA DUBIA / PINE MUHLY	SG	L	3 FT
	BOUTELOUA GRACILIS 'BLONDE AMBITION' / BLUE GRAMA	SG	L	2 FT
VINES				
	FICUS PUMILA / CREEPING FIG	SG	M	3 FT
	CLYTOSTOMA CALLISTEGIOIDES / VIOLET TRUMPET VINE	SG	M	3 FT
	TRACHOLESPERMUM JASMINOIDES / STAR JASMINE	SG	M	3 FT
	THUNBERGIA ALATA / BLACK-EYED SUSAN VINE	SG	M	3 FT
GROUNDCOVER				
	WESTRINGIA FRUTICOSA 'MORNING LIGHT' / ROSEMARY	SG	L	4 FT
	SANTOLINA CHAMAECYPARISSUS 'NANA' / LAVENDER COTTON	SG	L	3 FT
	CARISSA MACROCARPA 'GREEN CARPET' / NATAL PLUM	SG	L	4 FT
	LIRIOPE SPP. / LILYTURF	SG	M	2 FT
	TEUCRIUM COSSONII / MAJORCAN GERMANDER	SG	L	3 FT
	GAZANIA SPP. / GAZANIA	SG	L	1/2 FT
	CEPHALOPHYLLUM 'RED SPIKE' / ICE PLANT	SG	L	2 FT
	CEANOTHUS T. HORIZONTALIS 'CARMEL CREEPER' / CEANOTHUS	SG	L	4 FT
	ROSMARINUS OFFICINALIS PROSTRATUS / CREEPING ROSEMARY	SG	VL	3 FT

WATER QUALITY BASIN BOTTOM				
	CALAMAGROSTIS KARL FOERSTER / FEATHER REED GRASS	SG	M	2 FT
	CAREX PANSA / MEADOW SEDGE	SG	M	<2 FT
	CAREX TUMULICOLA / FOOTHILL SEDGE	SG	L	1.5 FT
	IRIS DOUGLASIANA / DOUGLAS IRIS	SG	M	4 FT
	JUNCUS PATENS / CALIFORNIA GRAY RUSH	SG	L	2 FT
	LEYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE GIANT WILD RYE	SG	L	4 FT
	ROSA CALIFORNICA / CALIFORNIA WILD ROSE	SG	L	7 FT
	SPOROBOLUS AIROIDES / ALKALI SACATON	SG	L	2 FT
WATER QUALITY BASIN SLOPE				
	ACHILLEA MILLEFOLIUM / COMMON YARROW	SG	L	1.5 FT
	BOUTELOUA GRACILIS / BLUE GRAMA GRASS	SG	L	1 FT
	FESTUCA CALIFORNICA / CALIFORNIA FESCUE	SG	L	2 FT
	MELICA IMPERFECTA / CALIFORMIA MELIC	SG	M	1.5 FT
	MIMULUS AURANTIACUS / STICKY MONKEY FLOWER	SG	VL	2 FT
	MUHLENBERGIA RIGENS / DEER GRASS	SG	M	4 FT

LANDSCAPE NOTES

The selection of plant material is based on climatic, aesthetic, and maintenance considerations. All planting areas shall be prepared with appropriate soil amendments, fertilizers and appropriate supplements based upon a soils report from an agricultural suitability soil sample taken from the site. All shrubs beds shall be mulched to a 3" depth to help conserve water, lower soil temperature, and reduce weed growth. The shrubs shall be allowed to grow in their natural forms. All landscape improvements shall follow the guidelines set forth by the City of Riverside Municipal Code.

IRRIGATION NOTES

An automatic irrigation system shall be installed to provide 100% coverage for all planting areas shown on the plan. The water supply for this site is a potable water connection and a dedicated irrigation meter will be provided. Low volume equipment shall provide sufficient water for plant growth with no water loss due to water controllers, and other necessary irrigation equipment. An point source system shall be adequately filtered and regulated per manufacturers recommended design parameters. All irrigation improvements shall follow the guidelines set forth by the City of Riverside Municipal Code.

Source: Kimley-Horn and Associates, Inc., 04/23/2026.

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Exhibit 8
Conceptual Landscape Plan

49400042 • 04/2026 | 8_landscape_plan.cdr

CITY OF RIVERSIDE
LA SIERRA ALHAMBRA RESIDENTIAL PROJECT
CONSISTENCY CHECKLIST

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2.3.10 - Project Design Features

The proposed project would implement the following Project Design Feature (PDF) as part of the proposed project.

PDF AIR-1 All off-road equipment equal to or greater than 50 horsepower shall meet either United States Environmental Protection Agency (EPA) or California Air Resources Board (ARB) Tier 3 standards with Level 3 Verified Diesel Emission Control Strategy (VDEC) filters or meet Tier 4 standards (automatically achieves the required reductions without VDECs). The project applicant shall maintain a construction management plan that includes a list of equipment used during construction and the engine ratings. Off-road equipment descriptions and information included in the construction management plan shall include but not be limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, and engine serial number.

2.3.11 - Phasing and Construction

Construction of the proposed project would begin approximately 8 months to 1 year following entitlement approval. It is anticipated that construction would start in 2026 and that the proposed project would become operational in 2028. Construction activities would consist of a single phase, including the following activities: (1) demolition of the existing paved surfaces and structures, clearing, and site preparation (1 month); (2) site development, including grading, utility installation, and roadway construction (9 months); (3) construction and landscaping installation (18 months). The proposed grading generally follows the existing topography with cuts and fills on the order of 1 to 5 feet to reach pad grades and provide proper site drainage.

2.4 - Discretionary Approvals

The City of Riverside has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Section 15183 Checklist. In order to implement the proposed project, the following permits and/or approval would need to be granted:

- Planned Residential Development Permit
- Tentative Tract Map
- Design Review

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3 - CEQA GUIDELINES SECTION 15183: PROJECTS CONSISTENT WITH A COMMUNITY PLAN OR ZONING

CEQA Guidelines Section 15183 mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an FEIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

Proposed Project Qualifies for No Further Environmental Review under CEQA Guidelines Section 15183

The statutory exemption in CEQA Guidelines Section 15183 applies to the project since it meets all of the following conditions as described below.

(d)(1)(B) The project is consistent with a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development.

According to the City of Riverside Zoning Map, the project site is zoned Rural Residential (RR) and Single-Family Residential (R-1-8500). The RR zoning is intended to provide areas for single-family residences on large lots where flexible provisions apply pertaining to the keeping of farm animals such as horses, ponies, mules, cows, goats, sheep, and swine under Future Farmers of America-supervised and 4-H-supervised projects. These zones are established in those areas of the City where the keeping of such animals is already prevalent. It is also the intent of the RR zoning to provide opportunities for persons whose lifestyles include the keeping of such animals in areas where such animal-keeping activities minimize impact to other residential properties. [10] The Single-Family Residential (R-1-8500) provides areas for single-family residences with medium to large lot sizes.

The applicant is not proposing a zoning change for the project site. The proposed project consists entirely of single-family residential uses that would be consistent with the permitted uses and

[10] City of Riverside. Code of Ordinances. Chapter 19.100, Residential Zones. Website: https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO_ARTVBAZOREUSDEPR_CH19.100REZORCRRRE1-2AC1300010500850070004000300025002000150OR-. Accessed December 30, 2024.

densities allowed by the RR and R-1-8500 zone districts with the approval of the PRD Permit and application of Density Bonus Law. Therefore, the proposed project is consistent with the allowed density of the City's Zoning Code for the project site.

(d)(1)(C) The project is consistent with the Riverside 2025 General Plan.

The project site is designated as SRR and MDR by the City of Riverside 2025 General Plan. The SRR designation is intended for large lot single-family development while allowing enough space for animal keeping as an auxiliary use. The SRR designation supports a maximum density of 2.1 du/acre, with the potential to support 3.3 du/acre with approval of a PRD Permit.[11] The MDR designation is intended for the development of single-family residences, town houses, and row houses. The MDR designation supports a maximum density of 6.2 du/acre, with the potential to support 8 du/acre with approval of a PRD Permit.[12]

The proposed project is not proposing an amendment to the General Plan land use designation of the project site. The project applicant proposes to deed restrict 6 percent of the units (three units) as very low affordable residences. Pursuant to the Density Bonus Law, with the provision of 6 percent of the units as affordable to very-low income families, the proposed project would be allowed a 22.5 percent increase in density. With the application of Density Bonus Law as well as the approval of a PRD Permit, the 56 proposed single-family residences would be consistent with the allowed density of the SRR and MDR designations. As such, the proposed project would be consistent with the uses contemplated for the project site in the 2025 General Plan.

(d)(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

The City of Riverside prepared a Program Environmental Impact Report (State Clearinghouse Number 2004021108) for the 2025 General Plan and certified the Prior FEIR in November 2007.

[11] City of Riverside. 2007. Land Use and Urban Design Element. Single-Family Residential Land Use Designations. Semi-Rural Residential (SRR). Website: https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf. Accessed December 30, 2024.

[12] City of Riverside. 2007. Land Use and Urban Design Element. Single-Family Residential Land Use Designations. Medium Density Residential (MDR). Website: https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf. Accessed December 30, 2024.

4 - ENVIRONMENTAL CHECKLIST

CEQA Guidelines Section 15183(b) states that:

(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

(1) Are peculiar to the project or the parcel on which the project would be located;

(2) Were not analyzed as significant effects in a Prior FEIR on the zoning action, general plan, or community plan, with which the project is consistent;

(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the Prior FEIR prepared for the general plan, community plan or zoning action; or

(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the Prior FEIR was certified, are determined to have a more severe adverse impact than discussed in the Prior FEIR.

The following pages of this document contain an Environmental Checklist that examines the project's potential environmental effects within the parameters outlined at CEQA Guidelines Section 15183(b). The Prior FEIR used for the evaluation of potential environmental effects is the Program EIR for the City of Riverside 2025 General Plan Program certified by the City of Riverside in November 2007, including all impact determinations and significance thresholds utilized therein.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.1 Aesthetics *Except as provided in Public Resources Code Section 21099, would the project:*					
a) Have a substantial adverse effect on a scenic vista?	Less than significant impact	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	Less than significant impact	No	No	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact with mitigation incorporated	No	No	No	No

a) Scenic Vista

Would the project: Have a substantial adverse effect on a scenic vista?

Summary of Prior FEIR

General Plan

The Prior FEIR indicated that the City of Riverside is characterized by natural landforms that encircle it and create a natural division of land uses. The northwest portion of the City is the floodplain of the Santa Ana River. To the east, southeast, and west, the uplands and low mountains include the Box Springs Mountain, Alessandro Heights, Arlington Mountain, and the La Sierra/Norco Hills.

Scattered throughout the City are a variety of prominent natural features: Mount Rubidoux, Pachappa Hill, Sycamore Canyon, Hawarden Hills, distinctive arroyos, and isolated hills. There are significant water features in Lake Evens and Mockingbird Reservoir. There are also six major areas within the City that serve as open space: the Santa Ana River Corridor, Box Springs Mountain Regional Park, Sycamore Canyon Wilderness Park, Fairmount Park, Mt. Rubidoux Park, and California Citrus State Historic Park.

The City is committed to preserving its natural resources and open spaces and believes that individual interests must be balanced against the general public interest. The City's General Plan policies aim at balancing development interests with broader community preservation objectives. Through compliance and implementation General Plan policies, Subdivision Code, and Citywide Design and Sign Guidelines, impacts related to scenic vistas were considered to be less than significant.

Proposed Project Analysis and Conclusion

The closest scenic vista to the project site is La Sierra Hills, approximately 1,500 feet in elevation and located immediately west, approximately 0.11 mile away. The hills contain hiking trails and provide a natural background to views in the area. The existing site has no walls or barriers and the three existing single-story residences do not impede the view of the hills from publicly accessible locations.

Existing single- and 2-story residential development surrounds the site to the north, south, east, and west; Loma Vista Middle School is located across La Sierra Avenue to the northeast. The proposed single- and 2-story residences would be consistent with the existing residential development that surrounds the site. Furthermore, the proposed project would comply with applicable guidelines of the General Plan, Subdivision Code, City Zoning Code, and Citywide Design and Sign Guidelines under the Density Bonus Law. The proposed project would undergo design review to ensure that it is designed with materials, colors, and design features that would enhance and be compatible with the surrounding development. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) State Scenic Highways

Would the project: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

Summary of Prior FEIR

An integral part of the General Plan is to protect and enhance the visual character of Riverside. There are no designated scenic highways within the City that could potentially be impacted. However, there are nine City-designated scenic parkways that enhance the visual character of the planning area and protect scenic resources. These include La Sierra Ave, Overlook Parkway, Canyon Crest Drive, Arlington Avenue, Victoria Avenue, Magnolia Avenue/Market Street, University Avenue, Van Buren Boulevard, and Riverwalk Parkway. The General Plan includes a variety of policies that aim to limit aesthetic impacts and impacts on visual resources. With implementation of General Plan policies, the City Tree Policy Manual, designation of parkways, and adherence to the Zoning Code, Subdivision Code, and Citywide Design and Sign Guidelines, scenic resources would be protected and enhanced throughout the City. Therefore, any potential adverse impacts from General Plan buildout to scenic resources will be less than significant, and any potential aesthetic impacts are anticipated to be beneficial as a result of implementation of the General Plan.

Proposed Project Analysis and Conclusion

There are no officially designated scenic highways within the City. The closest eligible route is in the area where State Route (SR) 15 and SR-91 meet, approximately 4.78 miles southwest of the site. [13] As described above, the proposed project would be required to comply with applicable General Plan policies, Subdivision Code, City Zoning Code, and Citywide Design and Sign Guidelines in accordance with Density Bonus Law to protect scenic resources. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[13] California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed January 16, 2025

c) Visual Character

Would the project: **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?**

Summary of Prior FEIR

As described previously, there are nine City-designated scenic parkways that enhance the visual character of the planning area and protect scenic resources. These include La Sierra Avenue, Overlook Parkway, Canyon Crest Drive, Arlington Avenue, Victoria Avenue, Magnolia Avenue/Market Street, University Avenue, Van Buren Boulevard, and Riverwalk Parkway. The General Plan sets forth goals and policies to preserve and improve existing visual resources of the City and its Sphere of Influence (SOI). The City's long-standing history is reflected in its historic buildings, parkways, local landmarks, and diverse topography. The General Plan preserves and enhances these qualities. Future development would be required to implement General Plan's goals and policies, Zoning Code, and Subdivision Code and would be subject to design review consistent with established Citywide Design and Sign Guidelines. Adherence to these requirements would ensure that visual quality is improved citywide. Therefore, impacts were considered to be less than significant.

Proposed Project Analysis and Conclusion

The project site currently contains three existing single-family residences and associated structures. Existing landscaping consists of open sparsely vegetated fields; several trees dot the open spaces.

The proposed project would not demolish any historic buildings, parkways, landmarks or distinctive landscaping features as described in the General Plan. Although the proposed project would introduce new residential uses that have the potential to alter the visual character of the site, the proposed project would be consistent with the visual character of surrounding residential neighborhoods and would include open space and landscaped areas throughout the site including frontage improvements along La Sierra Avenue. Furthermore, a dedication along Alhambra would be provided to accommodate a decomposed granite trail. The proposed project would improve the visual character of the site and surroundings. Furthermore, as described previously, the proposed project would be required to comply with applicable General Plan policies, Subdivision Code, City Zoning Code, and Citywide Design and Sign Guidelines in accordance with the Density Bonus Law. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Light or Glare

Would the project: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Summary of Prior FEIR

The Prior FEIR indicated that the Mount Palomar Nighttime Lighting Policy Area covers the southeastern portion of the planning area. This policy area represents a radius of 45 miles from the observatory and restricts nighttime lighting hours, types, and techniques. This places a portion of the City and the SOI within Zone B of County Ordinance 655, which requires the use of low-pressure sodium fixtures, limits hours of use, prohibits certain types of lights, and requires hooded fixtures. The majority of the City located within Zone B is south of Mariposa Avenue.

General Plan land use designations located within this portion of Zone B that would not generate significant light and glare include Agriculture, Agriculture/Rural Residential, Hillside Residential, Very Low Density Residential, Public Facilities, Open Space/Natural Resources, Kangaroo Rat Habitat, and Commercial. The portion of the Planning Area located within Zone B and north of Mariposa Avenue includes both existing and planned uses, which are General Plan, designated as Very Low Density Residential, Low Density Residential, MDR, Commercial, Public Facilities, and Public Parks.

New sources of light that would contribute to light and glare and affect the nighttime sky include streetlights, park lighting, commercial parking lots, and residential/other outdoor security lighting. These light sources will contribute to light and glare and affect the nighttime sky. Implementation of Mitigation Measure (MM) AES 1 was required to reduce this impact to less than significant. Additionally, General Plan Policy OS 2.5 was created to review the feasibility of creating a nighttime sky ordinance to reduce light pollution further. Additionally, the City requires the use of luminaires that limit the amount of light distribution for streetlights. Furthermore, the Zoning Code requires that lighting shall be shielded to avoid spillage on surrounding properties, and the Subdivision Code requires approval of streetlights by the Public Utilities Director. Finally, all new developments would be required to comply with the Citywide Design and Sign Guidelines to ensure that illumination is adequate, not overly bright, and is shielded to confine spread within site boundaries. Implementation of MM AES 1, the above streetlight requirements, and adherence to the Zoning Code, Subdivision Code, and Citywide Design and Sign Guidelines would reduce impacts related to light and glare to a less than significant level.

Proposed Project Analysis and Conclusion

The proposed project would create additional sources of light and glare beyond existing conditions through additional indoor and outdoor lighting for 56 new houses, additional street lighting, and new traffic at the project site.

To minimize light and glare impacts, the proposed project would be required to comply with applicable light and glare standards in the Municipal Code and California Energy Code. As described above, the proposed project would also be subject to the Zoning Code, Subdivision Code, and Citywide Design

and Sign Guidelines review prior to project approval. Furthermore, the proposed project would adhere to MM AES 1, which requires shielding devices or other light pollution limiting characteristics on new sources of light to reduce spillover. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

FEIR Mitigation Measures

MM AES 1 To further reduce impacts related to light pollution, the City shall require at the time of issuance of building permits all development which introduces light sources, or modifications to existing light sources, to have shielding devices or other light pollution limiting characteristics such as hoods or lumen restrictions.

Conclusion

With regards to Aesthetics, Light, and Glare, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. MM AES-1 from the Prior FEIR would be required and would reduce potential impacts to below a level of significance consistent with the analysis in the Prior FEIR.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.2 Agriculture and Forestry 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 forest carbon measurement methodology provided in 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 nonagricultural use?	Significant and unavoidable impact	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	Significant and unavoidable impact	No	No	No	No
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned	No significant impact identified	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
Timberland Production (as defined by Government Code Section 51104(g))?					
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No significant impact identified	No	No	No	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	Significant and unavoidable impact	No	No	No	No

a) Conversion of Important Farmland

Would the project: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

Summary of Prior FEIR

According to the Prior FEIR, the City and its SOI contain approximately 3,401 acres of Prime Farmland, 2,716 acres of Farmland of Statewide Importance, 4,976 acres of Unique Farmland, 5,814 acres of Farmland of Local Importance, and 7,275 acres of Grazing Land. The Prior FEIR highlights 14 areas that total approximately 535.45 acres that would be converted to different zoning that would prevent farming and 11 areas totaling approximately 612.33 acres that would be converted to land use designations that do not permit agriculture.

The City has identified several policies within its General Plan that encourage, but do not require, protection of the premature conversion of agricultural lands. Because the implementation of the General Plan would change land use designations and zoning in a way that does not provide for the preservation of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and because General Plan policies do not require preservation of designated Farmland, the Prior FEIR

concluded that impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use would be significant and unavoidable.

Proposed Project Analysis and Conclusion

According to the California Department of Conservation, the project site is designated as Urban and Built Up Land and is not adjacent to or in proximity to any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural uses, and there would be no impacts in this regard. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Agricultural Zoning and Williamson Act Contracts

Would the project: Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

Summary of Prior FEIR

The Prior FEIR determined that there are two Williamson Act Contract preserve areas within the city limits: one parcel within Hunter Business Park along the City border near the northeast part of the City at the intersection of Columbia Avenue and Michigan Avenue, and four parcels south of SR-91 and west of the intersection of Overlook Parkway and Washington Street. As of 2025, the parcel on Columbia and Michigan is no longer encumbered by a Williamson Act Contract. There are also several active Williamson Act preserve areas within the City's SOI, including El Sobrante No. 1, El Sobrante No. 2, El Sobrante No. 3, El Sobrante No. 14, Highgrove No. 1, Woodcrest No. 3, Woodcrest No. 4, Woodcrest No. 5, and Woodcrest No. 7.

The Prior FEIR determined that the implementation of the General Plan would not affect those Williamson Act Contracts, and any future cancellations by property owners as part of future development proposals would be required to evaluate potential impacts pursuant to CEQA. The only non-conforming contracted land within the city limits was non-conforming under the 1994 General Plan, and therefore, the Prior FEIR concluded that the implementation of the General Plan would not create any new conflict with the existing Williamson Act Contract. Therefore, the Prior FEIR concluded that impacts related to Williamson Act Contract conflicts would be less than significant.

However, the Prior FEIR highlights 14 areas that total approximately 535.45 acres that would be converted to different zoning that would prevent farming and 11 areas totaling approximately 612.33 acres that would be converted to land use designations that do not permit agriculture. Therefore, the Prior FEIR concluded that potential impacts to existing zoning for agricultural uses would be significant and unavoidable.

Proposed Project Analysis and Conclusion

According to Figure OS-3–Williamson Act Preserves of the General Plan, the project site is not located within a Williamson Act Preserve and Contracted Land Area or a Williamson Act Preserve area.[14] Therefore, there would be no impacts related to Williamson Act Contracts. The northern portion of the project site is zoned SRR, which allows for lower residential density and animal keeping. This zone would not be changed, and the proposed residences on large lots would still allow for animal keeping. The southern single-family residences are in areas zoned MDR, and agricultural uses are not currently permitted in these areas. Therefore, impacts related to existing agricultural zoning would be less than significant, and there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Forest Zoning

Would the project: Conflict with existing zoning for forest land or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to the potential to conflict with existing zoning for forest land or timberland. However, the City and its SOI do support woodlands and forests composed of coast live oak woodlands, dense Engelmann oak woodlands, oak woodlands, peninsular juniper woodland, and scrub vegetation.[15] Any future development projects under the implementation of the General Plan that would conflict with existing zoning for forest land or timberland would be required to complete an environmental analysis pursuant to CEQA and reduce impacts to less than significant by implementing all feasible mitigation measures.

Proposed Project Analysis and Conclusion

The project site is zoned SRR and MDR and is not zoned for forest land or timberland. The proposed project would have no impacts related to conflict with existing zoning for forest land or timberland. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[14] City of Riverside. 2007. Riverside General Plan 2025. Figure OS-3—Williamson Act Preserves. Revised November 2012.

[15] City of Riverside. 2007. Riverside General Plan 2025. Open Space and Conservation Element. Revised November 2012.

d) Conversion of Forest Land

Would the project: Result in the loss of forest land or conversion of forest land to non-forest use?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to the loss of forest land or the conversion of forest land to non-forest use. However, the City and its SOI does support woodlands and forests composed of coast live oak woodlands, dense Engelmann oak woodlands, oak woodlands, peninsular juniper woodland, and scrub vegetation.[16] Future development projects under the implementation of the General Plan would be required to conduct an environmental analysis pursuant to CEQA and implement all feasible mitigation measures to reduce impacts to less than significant.

Proposed Project Analysis and Conclusion

The project site does not have designated forest land. Therefore, the proposed project would have no impacts on the loss of forest land or conversion of forest land to non-forest use. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Pressures to Convert Farmland or Forest Land

Would the project: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?

Summary of Prior FEIR

The Prior FEIR determined that the implementation of the General Plan would indirectly influence the conversion of Farmland by facilitating development, increasing densities, and constructing roads and infrastructure in proximity to operating agricultural areas. Development adjacent to agricultural areas could cause issues for agriculture, including dust generation, vandalism, soil compaction, and crop theft. Likewise, locating agricultural uses near residential uses could result in indirect economic impacts to farming operations due to noise or odor complaints. Since the City's Zoning and General Plan designations allow for agriculture to be located in residential areas, and since the majority of the Planning Area is built out, the Prior FEIR determined that future development could indirectly contribute to increased pressure to convert existing agricultural uses to nonagricultural uses, to convert land under Williamson Act Contracts, or to discourage agriculture uses altogether. The Prior FEIR notes that the General Plan has policies, tools, measures, and propositions that work to protect and encourage agriculture, but the increase of development within the City under the General Plan would be expected to contribute to direct and indirect conversion of agricultural resources to nonagricultural uses. Therefore, the Prior FEIR concluded that impacts would be significant and unavoidable.

[16] Ibid.

Proposed Project Analysis and Conclusion

The northern portion of the project site is zoned for SRR, which allows for a lower residential density and animal keeping. This zone would not be changed, and the planned residential areas would still allow for animal keeping. The proposed project would create a smooth transition and buffer from the existing horse-keeping plot across the street to the north to the proposed single-family homes. The southern single-family residences are in areas zoned MDR, which do not currently permit agricultural uses. The transition effect of the estate lots would help minimize potential impacts of conflict from agricultural to residential land use. Additionally, the project site is currently designated as Urban and Built Up Land by the DOC and does not contain Prime, Unique or Statewide Importance Farmland. Lastly, the project site does not contain forest land or timberland. The proposed project would have a less than significant impact related to the conversion of Farmland to nonagricultural use or the loss of forest land. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Agriculture and Forestry Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.3 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?	Significant and unavoidable impact	No	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	Significant and unavoidable impact	No	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and unavoidable impact	No	No	No	No
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	Less than significant impact	No	No	No	No

The analysis in this section is based, in part, on project-specific air quality modeling completed by FirstCarbon Solutions (FCS) using the California Emission Estimator Model (CalEEMod) Version 2022.1, the American Meteorological Society/United States Environmental Protection Agency (EPA) Regulatory Model (AERMOD) (Version 23132), and the California Air Resources Board (ARB) Hotspots Analysis and Reporting Program Version 2 (HARP2) (22188 dated April 28, 2022). The modeling output files and supporting information are included in Appendix A.

a) Air Quality Plan Conflict

Would the project: Conflict with or obstruct implementation of the applicable air quality plan?

Summary of Prior FEIR

The Prior FEIR indicated that the impacts associated with both long- and short-term air emissions, including criteria pollutants and global warming gases, are significant, unavoidable and cumulatively considerable assuming a worst-case growth scenario. There are no feasible mitigation measures or project alternatives to reduce this impact to a less than significant level. Because growth under the development contemplated under the Prior FEIR were found not to be consistent with Southern California Association of Government's (SCAG's) projections, the Prior FEIR concluded that such development would not be consistent with the 2003 Air Quality Management Plan (AQMP). As such, the Prior FEIR concluded that impacts would be significant and unavoidable.

Proposed Project Analysis and Conclusion

A potentially significant impact would occur if the proposed project would conflict with or obstruct implementation of the applicable air quality plan beyond what was evaluated or disclosed in the Prior FEIR. CEQA Guidelines Section 15183(b). An impact is not specific to the proposed project if it has been previously addressed as a significant effect in the Prior EIR.

The proposed project is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is responsible for preparing air quality attainment plans to be transmitted to the ARB and the EPA for incorporation into the State Implementation Plan. The SCAQMD has designated this area as extreme nonattainment for ozone and serious nonattainment for particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). [17] To evaluate whether a project conflicts with or obstructs implementation of the applicable air quality plan (in this case the 2022 AQMP for South Coast Air Basin), the SCAQMD CEQA Air Quality Handbook states that there are two key indicators. These indicators are identified by the criteria discussed below.

- **Indicator:** Whether the proposed project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- **Indicator:** According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook, the purpose of the General Plan consistency findings is to determine whether a proposed project is inconsistent with the growth assumptions incorporated into the air quality plan and, thus, whether it would interfere with the region's ability to comply with federal and California air quality standards.

[17] South Coast Air Quality Management District (SCAQMD). Air Quality Management Plan. Website: http://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan. Accessed January 5, 2025.

Considering the recommended criteria in the SCAQMD's 1993 Handbook, this analysis uses the following criteria to address this potential impact:

- **Criterion 1:** Proposed project's contribution to air quality violations; and
- **Criterion 2:** Compliance with applicable emission control measures in the AQMPs.

Criterion 1: Project's Contribution to Air Quality Violations

According to the SCAQMD, the proposed project is consistent with the AQMP if the proposed project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. [18]

If a project's emissions do not exceed the SCAQMD regional thresholds for volatile organic compound (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter less than 10 microns in diameter (PM_{10}), or $PM_{2.5}$, it follows that the project's emissions would not exceed the allowable limit for each project in order for the region to attain and maintain ambient air quality standards, which is the primary goal of air quality plans. As shown in Impact 4.3(b), the proposed project would not exceed the SCAQMD's regional thresholds of significance during either construction or operation. Therefore, the proposed project would be consistent with the AQMP under this criterion.

Criterion 2: Control Measures

The AQMP contains several control measures which are enforceable requirements through the adoption of rules and regulations. The proposed project would comply with all applicable SCAQMD rules and regulations. Because of the nature of the proposed project, which includes earthmoving activity during construction, SCAQMD Rule 403 applies. Rule 403 requires that fugitive dust be controlled with Best Available Control Measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Compliance with this rule is achieved through the application of standard Best Management Practices (BMPs). These BMPs include application of water or chemical stabilizers to disturbed soils; covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. The Prior EIR identified and evaluated this impact, and MM Air 2 from the Prior FEIR requires the implementation of best available dust control measures during activities capable of generating fugitive dust, consistent with the requirements of SCAQMD Rule 403. The proposed project's compliance with all applicable SCAQMD rules and regulations would result in consistency with the applicable AQMP control measures.

[18] South Coast Air Quality Management District (SCAQMD). 1993. CEQA Handbook. Available at SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765.

Summary

In summary, the proposed project would not result in a regional exceedance of criteria air pollutants and would comply with all applicable SCAQMD rules and regulations with incorporation of MM Air 2 from the Prior FEIR. As such, the proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. Furthermore, the proposed project would not interfere with the region's ability to comply with federal and California air quality standards. Therefore, this impact would be less than significant. As such, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Air Quality Standard, Criteria Pollutants

Would the project: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Summary of Prior FEIR

The Prior FEIR indicated that future development facilitated by the General Plan would result in short-term construction-related criteria pollutant emissions that have the potential to have an adverse effect on air quality. MM Air 1 through MM Air 5 were identified in the Prior FEIR to require individual development projects to employ construction approaches that minimize pollutant emissions. Although MM Air 1 through MM Air 5 would reduce construction emissions from individual projects and MM Air 1 requires that future development projects facilitated by the General Plan be analyzed for their short-term impacts, the Prior FEIR found that some projects may not meet SCAQMD standards. Therefore, the Prior FEIR concluded that impacts related to short-term (construction) air emissions are considered significant under all development scenarios.

The Prior FEIR found that future development facilitated by the General Plan could violate long-term ambient air quality standards, contribute substantially to an existing or projected air quality violation, and expose sensitive receptors to substantial pollutant concentrations. MM Air 1 through MM Air 7, MM Air 11, and MM Air 12 were identified to reduce these impacts.

The Prior FEIR demonstrated that the operational (long-term) emissions at buildout of the City of Riverside's General Plan were above the SCAQMD thresholds and were found to have a significant impact on air quality in the Planning Area. Thus, the evaluation of buildout generated emissions in relation to the thresholds of significance provided in the Prior FEIR demonstrated that impacts to air quality from General Plan implementation are considered significant and unavoidable, even with mitigation incorporated.

The Prior FEIR determined that implementation of the maximum densities within the General Plan would result in exceedances of all the SCAQMD's daily thresholds of significance for all criteria

pollutants. As such, the Prior FEIR concluded that impacts would be considered significant and unavoidable.

The Prior FEIR indicated that future development facilitated by the General Plan would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal or State ambient air quality standard and a cumulatively considerable increase in greenhouse gas (GHG) emissions. MM Air 8 through MM Air 10 were identified to reduce this impact.

In conclusion, impacts associated with both long- and short-term air emissions, including criteria pollutants and global warming gases, were found to be significant, unavoidable and cumulatively considerable.

Proposed Project Analysis and Conclusion

This impact is related to the cumulative effect of a project's criteria pollutant emissions. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants results from past and present development within the air basin, and this regional impact is a cumulative impact. Therefore, new development projects (such as the proposed project) within the South Coast Air Basin would contribute to this impact on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited but cumulatively considerable when evaluated in combination with past, present, and future development projects.

Potential regional impacts could result in exceedances of State or federal standards for NO_X, particulate matter (PM_{10} and $PM_{2.5}$), or CO. NO_X emissions are of concern because of potential health impacts from exposure to NO_X emissions during both construction and operation and as a precursor in the formation of airborne ozone. PM_{10} and $PM_{2.5}$ are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion and resulting health effects.

VOC emissions are also important because of their participation in the formation of ground level ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and that can cause substantial damage to vegetation and other materials. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to CEQA Guidelines Section 15064(h)(4), the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the proposed project's incremental effects would be cumulatively considerable. Rather,

the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in regional emissions that exceed the SCAQMD regional thresholds of significance for construction and operations on a project level. Projects that generate emissions below the SCAQMD significance thresholds would be considered consistent with regional air quality planning efforts and would not generate cumulatively considerable emissions.

The proposed project's regional construction and operational emissions are evaluated separately below. Construction and operational emissions from the proposed project were estimated using CalEEMod Version 2022.1. The complete CalEEMod output files are included as part of Appendix A.

Construction Emissions

Construction emissions are described as short-term or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the proposed project would result in the temporary generation of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions from construction activities such as site preparation, grading, building construction (home construction), architectural coating, and paving. Fugitive dust emissions are primarily associated with earth disturbance and grading activities and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site. Construction-related NO_X emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. VOC emissions are mainly generated by exhaust emissions from construction vehicles, off-gas emissions associated with architectural coatings, and asphalt paving.

For the purpose of this analysis, construction of the proposed project was estimated to begin in January 2026 and conclude in February 2028 and was modeled based on an applicant-provided preliminary schedule; see Appendix A. Note that construction emissions would likely decrease if the construction schedule were deferred to later years because of improvements in technology and more stringent regulatory requirements. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as the CEQA Guidelines require.

The calculations of pollutant emissions from the construction equipment account for the type of equipment, horsepower, and load factors of the equipment, and the duration of equipment use. Table 3 presents the proposed project's maximum daily construction emissions during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction. The PM_{10} and $PM_{2.5}$ emissions reflect the combined exhaust and fugitive dust emissions after incorporation of MM Air 2 from the Prior FEIR, which requires the implementation of best available dust control measures outlined in SCAQMD Rule 403. Complete CalEEMod output files are included as part of Appendix A.

Table 3: Unmitigated Construction—Maximum Daily Regional Emissions by Year

Construction Year	Regional Pollutant Emissions (pounds per day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily from Project Construction (2026)	3.21	29.31	29.78	0.07	9.16	5.14
Maximum Daily from Project Construction (2027)	0.56	4.91	9.09	0.01	0.49	0.23
Maximum Daily from Project Construction (2028)	41.16	4.75	8.92	0.01	0.54	0.23
Maximum Daily Construction Emissions						
Maximum Daily Emissions[1]	**41.16**	**29.31**	**29.78**	**0.07**	**9.16**	**5.14**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compound
[1] Assumes overlap of construction activities based on schedule presented in Appendix A.
The PM_{10} and $PM_{2.5}$ emissions reflect the combined exhaust and mitigated fugitive dust emissions in accordance with SCAQMD Rule 403 and incorporated into the proposed project assumptions through MM Air 2 from the Prior FEIR.
Source of Emissions: Appendix A.

As shown above in Table 3, the proposed project's construction emissions (with the incorporation of MM Air 2 from the Prior FEIR) would not exceed the applicable significance threshold for any of the pollutants.

Operational Emissions

Long-term operational emissions would be generated, resulting from daily operations at the proposed townhomes. Operational emissions for residential land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Mobile source emissions are those associated with automobiles that would travel to and from the project site. Assumptions used to estimate mobile source emissions that would be generated by the proposed project were consistent with those presented in the project-specific traffic analysis. The proposed project would generate 514

average daily weekday trips.[19] Area-source emissions are those associated with natural gas combustion for space and water heating, landscape maintenance activities, and periodic architectural coatings. Energy-source emissions are those associated with electricity consumption and are more pertinent for GHG emissions than air quality pollutants. Table 4 presents the proposed project's estimated maximum daily operational emissions.

Table 4: Maximum Daily Operational Regional Pollutants

Operational Activity	Regional Pollutant Emissions (pounds per day)[1]					
	VOC	NO_X	CO	SO_X	PM_{10} (Total)	$PM_{2.5}$ (Total)
Area	3.18	< 0.01	3.18	< 0.01	< 0.01	< 0.01
Energy	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Mobile (Automobiles)	1.94	1.71	15.14	0.04	3.57	0.92
Overall Maximum Daily[1]	**5.12**	**1.71**	**18.32**	**0.04**	**3.57**	**0.92**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds
[1] Emissions shown represent the maximum daily emissions from summer and winter seasons for each operational emission source and pollutant. Therefore, total daily operational emissions represent the maximum daily emissions that could occur throughout the year.
Source of Table: Appendix A.

As shown in Table 4, the proposed project's regional daily operational emissions would not exceed any of the SCAQMD thresholds of significance.

Summary

In summary, the proposed project would not result in a regional exceedance of criteria air pollutants and would comply with all applicable SCAQMD rules and regulations with incorporation of MM Air 2 from the Prior FEIR. As such, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment. Therefore, there are no

[19] Urban Crossroads. La Sierra Residential Focused Traffic Analysis, City of Riverside. February 5, 2025.

environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Sensitive Receptors

Would the project: Expose sensitive receptors to substantial pollutant concentrations?

Summary of Prior FEIR

The Prior FEIR concluded that development consistent with the Genal Plan could expose sensitive receptors to substantial pollutant concentrations. The Prior FEIR found that future development facilitated by the General Plan could violate long-term ambient air quality standards, contribute substantially to an existing or projected air quality violation, and expose sensitive receptors to substantial pollutant concentrations. MM Air 1 through MM Air 7, MM Air 11, and MM Air 12 were identified to reduce these impacts. Furthermore, the Prior FEIR found that, even with regular assessment of air quality in relation to sensitive receptors from new development projects and transportation improvements and adherence to policies such as AQ-2.5, [20] impacts related to exposing sensitive receptors to substantial pollutant concentrations are expected to be significant and unavoidable.

Proposed Project Analysis and Conclusion

This impact evaluates the potential for the proposed project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. Sensitive receptors are defined as those individuals who are sensitive to air pollution, including children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities. [21] Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as nitrogen dioxide [NO_2] and CO), commercial and/or industrial facilities would be considered sensitive receptors.

To result in a less than significant impact, the following criteria must be true:

- **Criterion 1:** Localized significance threshold (LST) assessment: emissions and air quality impacts during project construction or operation must be below the applicable LSTs to screen out of needing to provide a more detailed air quality analysis. If the proposed project exceeds any applicable LST when the mass rate lookup tables are used as a screening analysis, then project-specific air quality modeling may be performed to determine significance.

[20] Policy AQ-2.5: Consult with the California Air Resources Board to identify ways that it may assist the City (e.g., providing funding, sponsoring programs) with its goal to reduce air pollution by reducing emissions from mobile sources.

[21] South Coast Air Quality Management District (SCAQMD). 2003, Revised 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf. Accessed February 4, 2025.

- **Criterion 2:** A CO hotspot assessment must demonstrate that the proposed project would not result in the development of a CO hotspot that would result in an exceedance of the CO ambient air quality standards.
- **Criterion 3:** Toxic air contaminant (TAC) analysis must demonstrate that TAC emissions from construction and operations of the proposed project would not result in significant health risk impacts to nearby sensitive receptors.

Criterion 1: Localized Significance Threshold Analysis—Criteria Pollutants

The localized construction and operational analyses use thresholds (i.e., LSTs) that represent maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard. [22] If the proposed project's construction or operational emissions are under those thresholds, it follows that the proposed project would not cause or contribute to an exceedance of the standard and would not expose sensitive receptors to substantial pollutant concentrations.

Localized Construction Analysis

The LST Methodology only applies to on-site emissions and states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only on-site emissions were compared with the applicable LSTs.

Utilizing the construction equipment list and associated acreages per 8-hour day provided in the SCAQMD Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, the appropriate thresholds were selected based on the maximum number of acres disturbed in a day. To ensure a conservative analysis, the proposed project emissions have been compared to the 2 acre per day LST. A complete list of construction equipment, as well as the calculation sheet to determine the maximum area disturbed are included in Appendix A.

Table 5 presents the proposed project's maximum daily on-site emissions compared with the applicable LSTs. The closest sensitive receptor is a single-family residence within approximately 15 feet south of the project site (approximately 4.57 meters). [23] Receptors 25 meters or less use the 25-meter LSTs as this is the appropriate threshold to use when receptors are within 25 meters of the project boundary. The project site is bounded by La Sierra Avenue to the east, with Loma Vista Middle School 264 feet (80.5 meters) northeast and single-family residences 158 feet (48.2 meters) directly to the east; single-family residences 106 feet (32.3 meters) to the west; and single-family residences 106 feet (32.3 meters) to the north with Alhambra Avenue, which borders all the north and half the west side of the project site. The La Sierra Hills are approximately 1,214 feet (370.0 meters) to the west. There are additional single-family residences within 0.25 mile (1,320 feet or 402.3 meters) in all

[22] South Coast Air Quality Management District (SCAQMD). 2003, Revised 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf. Accessed February 4, 2025.

[23] Ibid.

directions of the project site but no other types of sensitive receptors other than Loma Vista Middle School.

The LSTs for the project site were obtained from the LST Methodology for a 2-acre project site located in Source Receptor Area 23–Metropolitan Riverside County, with sensitive receptors within 25 meters. As noted in Table 5, emission estimates account for implementation of SCAQMD Rule 403 (incorporated into the proposed project through MM Air 2 from the Prior FEIR), and the construction vehicle trip lengths were adjusted to 0.5 mile to represent localized emissions.

Table 5: Construction Localized Significance Screening Analysis

Activity	On-site Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily from Project Construction (2026)	29.20	29.00	8.92	5.08
Maximum Daily from Project Construction (2027)	4.72	7.93	0.18	0.16
Maximum Daily from Project Construction (2027)	4.51	7.97	0.16	0.14
Maximum Daily On-site Construction Emissions[1]	**29.20**	**29.00**	**8.92**	**5.08**
Construction Localized Significance Threshold (Source Receptor Area 23, 2 acres disturbed, 25 meters)	**170**	**883**	**7**	**1**
Exceed Screening Threshold?	**No**	**No**	**Yes**	**Yes**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
$PM_{2.5}$ = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers
SCAQMD = South Coast Air Quality Management District
[1] Assumes overlap of construction activities based on construction schedule shown in Appendix A.
The PM_{10} and $PM_{2.5}$ emissions reflect the combined exhaust and mitigated fugitive dust emissions in accordance with SCAQMD Rule 403 and incorporated into the proposed project assumptions through MM Air 2 from the Prior FEIR.
Source of emissions: Appendix A.
Source of thresholds: South Coast Air Quality Management District (SCAQMD) Mass Rate Localized Significance Threshold (LST) Lookup Table for Source Receptor Area 23, 2 acres disturbed, within nearest sensitive receptor within 25 meters from the project site.

As shown in Table 5, the proposed project's maximum daily on-site emissions would not exceed the applicable SCAQMD LSTs for NO_X or CO. However, the proposed project's maximum daily on-site emissions would exceed the applicable SCAQMD LSTs for PM_{10} or $PM_{2.5}$. As previously discussed, the LSTs are screening criteria developed by the SCAQMD to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in a potentially significant air quality impact. If a project exceeds an applicable LST, then the SCAQMD recommends that project-specific air quality modeling be performed to determine localized impacts. To determine

localized impacts related to construction-generated PM (including both PM_{10} and $PM_{2.5}$), a project-specific construction Health Risk Assessment (HRA) was performed. As detailed within the HRA addressed in Criterion 3 below, localized impacts from the proposed project's generation of particulate matter during construction would be reduced after incorporation of mitigation. Specifically, the proposed project would be required to comply with MM Air 2 from the Prior FEIR to reduce fugitive dust emissions (consistent with SCAQMD Rule 403) and PDF AIR-1 to reduce exhaust emissions of PM_{10} and $PM_{2.5}$. As described in more detail below, incorporation of PDF AIR-1 is consistent with requirements under MM Air 1 and MM Air 13 from the Prior FEIR. Implementation of MM Air 2 from the Prior FEIR and PDF AIR-1 would ensure that the project-generated emissions of PM_{10} and $PM_{2.5}$ would be controlled during the construction period (see Table 8). Accordingly, with adherence to standard conditions and incorporation of mitigation, the proposed project's on-site construction-related criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. The proposed project's impact would be considered less than significant after incorporation of mitigation and, therefore, would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Localized Operational Analysis

Similar to the construction LST analysis above, the applicable operational LSTs were obtained for a project located in Source Receptor Area 23 with the nearest sensitive receptor being within 25 meters. Long-term operations would occur for the proposed project on the approximately 9.88-acre project site, and LSTs were obtained for a 5-acre site (the largest option).

As described above, the LST Methodology recommends that only on-site emissions are evaluated using LSTs. Because most of the proposed project's mobile source emissions would occur on the local and regional roadway network away from the project site, a trip length of 0.5 mile was used in the modeling input assumptions to account for on-site emissions and from mobile sources. On-site area-, energy-, and mobile source emissions were included in this analysis. Table 6 presents the proposed project's maximum daily on-site emissions compared with the appropriate LSTs.

Table 6: Operational Localized Screening Significance Analysis

Emissions Source	Pounds per Day			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Area	0.03	3.18	< 0.01	< 0.01
Energy	< 0.01	< 0.01	< 0.01	< 0.01
Mobile (Automobiles)	0.48	3.34	0.19	0.05
Maximum Daily On-site Operational Emissions	**0.51**	**6.52**	**0.19**	**0.05**
Localized Significance Thresholds (Source Receptor Area 23, 5-acre site, 25 meters)	**270**	**1,577**	**4**	**2**

Emissions Source	Pounds per Day			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Exceeds Screening Threshold?	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
The highest daily emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ were in the summer season.
Source of Emissions: Appendix A.
Source of thresholds: SCAQMD Mass Rate Lookup Tables for a 5-acre site in Source Receptor Area 23 for sensitive receptors located within 25 meters of the project site.

As shown in Table 6, the proposed project's maximum daily on-site operational emissions would not exceed any applicable SCAQMD LSTs. Therefore, the proposed project's operational activities would not cause or contribute substantially to an existing or future ambient air quality standard violation. Accordingly, the proposed project's operational criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. The Prior FEIR indicated that future development facilitated by the General Plan could violate long-term ambient air quality standards, contribute substantially to an existing or projected air quality violation, and expose sensitive receptors to substantial pollutant concentrations and would, therefore, result in a significant and unavoidable impact. As the proposed project's operational criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations, the proposed project's impact would be less than significant and would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Criterion 2: Carbon Monoxide Hotspot Analysis

A CO hotspot represents a condition wherein high concentrations of CO may be produced by motor vehicles accessing a congested traffic intersection under heavy traffic volume conditions. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Accordingly, vehicle emissions standards have become increasingly more stringent to help remedy this impact.

The CO hotspot analysis contained in the SCAQMD 1992 CO Plan is used to determine potential CO hotspot impacts from the proposed project because, by using the 1992 CO Plan as a worst-case scenario, the proposed project can measure CO impacts against intersections that experienced significantly more vehicle traffic than adjacent to the proposed project. The 1992 CO Plan is used as a worst-case scenario because it included a CO hot spot analysis for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was that at Wilshire Boulevard

and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. Subsequently, the CO Plan determined that no CO hotspot would occur even with 100,000 vehicles per day at this one intersection.

According to the transportation analysis prepared by Urban Crossroads, [24] the peak-hour trips for the proposed project site: land use operations are 38 AM peak-hour trips, 38 midday peak-hour trips and 51 PM peak-hour trips. The proposed project was estimated to generate 514 trips per day. The existing trips on La Sierra Avenue were documented to be 12,800 average daily trips. Therefore, total daily vehicle trips, combined with existing trips, would not result in traffic volumes exceeding 100,000 vehicles per day at any of the intersections evaluated near the project site. [25] Additionally, project-generated trips would be distributed throughout the day and would not impact local roadways at one time, further reducing the potential impacts to CO. As a result, none of the intersections near the proposed project site would have peak-hour traffic volumes exceeding those at the intersections analyzed in the 1992 CO Plan. Additionally, the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited, such as a tunnel or overpass. Furthermore, there are no factors unique to the local meteorology to conclude that this intersection would yield higher CO concentrations if modeled in detail. Therefore, the operational CO impact would be less than significant.

Criterion 3: Project-specific Operational Toxic Air Pollutants

An assessment was made of the potential health impacts on surrounding sensitive receptors resulting from TAC emissions during construction.

The SCAQMD has defined health risk significance thresholds. These thresholds are represented as a cancer risk to the public and a non-cancer hazard from exposures to TACs. Cancer risk represents the probability (in terms of risk per million individuals) that an individual would contract cancer resulting from exposure to TACs continuously over a period of several years. The principal TAC emission analyzed in this assessment was diesel particulate matter (DPM) from operation of off-road equipment and diesel-powered delivery and worker vehicles during construction. DPM has been identified by the ARB as a carcinogenic substance. For purposes of this analysis, DPM is represented as exhaust emissions of PM_{10}. The California Office of Environmental Health Hazard Assessment (OEHHA) has developed guidance for estimating cancer risks that considers the increased sensitivity of infants and adults to TAC emissions, different breathing rates, and time spent at home. This guidance was applied in estimating cancer risks from the construction and operation of the proposed project. To assess impacts to off-site sensitive receptors, the American Meteorological Society/EPA Regulatory Model (AERMOD) air dispersion model was used to estimate the concentrations from PM_{10} and $PM_{2.5}$ exhaust at nearby sensitive receptors within 1,000 feet of the project site. The Hotspots Analysis and Reporting Program (HARP2) software was used to identify the cancer risks associated with DPM generated during construction activities.

[24] Urban Crossroads. La Sierra Residential Focused Traffic Analysis, City of Riverside. December 31, 2025.

[25] Ibid.

Toxic Air Contaminant Construction Analysis

Major sources of DPM during construction include off-road construction equipment and heavy-duty delivery truck activities. The results of the HRA prepared for project construction for cancer risk and long-term chronic cancer risk are summarized below. Detailed parameters, a description of methodology, and complete calculations are contained in Appendix A.

The estimated health and hazard impacts at the Maximally Exposed Individual Receptor (MEIR) from the proposed project's construction emissions, prior to incorporation of mitigation, are provided in Table 7.

Table 7: Estimated Health Risks and Hazards During Project Construction (Unmitigated)

Scenario	Cancer Risk (risk per million)	Chronic Non-Cancer HI
Maximally Exposed Individual Receptor[1]	10.48	0.006
Significance Threshold	**10**	**1**
Exceeds Individual Source Threshold?	**Yes**	**No**

Notes:
HI = hazard index
1 The location of the construction Maximally Exposed Individual Receptor (MEIR) was determined to be an existing single-family residence within approximately 126 feet east of the project boundary, at 33°56'31.4"N 117°29'58.5"W.
Source: Appendix A.

As noted in Table 7, above, the proposed project's construction emissions would exceed the cancer risk significance threshold without the use of cleaner than average construction equipment. Accordingly, mitigation is required to reduce potentially significant impacts.

Compliance with MM Air 2 from the Prior FEIR would ensure that the proposed project would implement fugitive dust control practices, which do not have a bearing on exhaust emissions. MM Air 1 from the Prior FEIR stipulates that proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available emissions model and ensures individual development projects would mitigate for potential adverse impacts resulting from construction activities. Additionally, MM Air 13 from the Prior FEIR require projects to mitigate, to the extent feasible, anticipated emissions which exceed AQMP Guidelines.

To reduce potential health risk from proposed project development, PDF AIR-1 is recommended, which would require the use of either or any combination of the following: (1) Equipment meeting Tier 4 standards for all construction equipment equal to or greater than 50 horsepower or (2) Tier 3 engines with Level 3 Verified Diesel Emission Control Strategy (VDEC) filters for all construction equipment equal to or greater than 50 horsepower. PDF AIR-1 aligns with requirements under MM Air 1 and MM Air 13 from the Prior FEIR.

As noted in Table 8, below, the proposed project's construction emissions would not exceed any applicable SCAQMD significance threshold for health risk impacts after incorporation of PDF AIR-1. Therefore, project construction would not result in significant health impacts to nearby sensitive receptors after incorporation of mitigation.

Table 8: Estimated Health Risks and Hazards During Project Construction (Mitigated)

Scenario	Cancer Risk (risk per million)	Chronic Non-cancer HI
Mitigated Construction–Tier 4 Interim Scenario		
Maximally Exposed Individual Receptor[1]	2.67	0.001
Mitigated Construction–Tier 3 with Level 3 Filters Scenario		
Maximally Exposed Individual Receptor[1]	2.87	0.002
Mitigated Construction–Highest Health Risk Impacts in Either Mitigated Scenario		
Maximally Exposed Individual Receptor[1]	2.87	0.002
Significance Threshold	**10**	**1**
Exceeds Individual Source Threshold?	**No**	**No**

Notes:
HI = hazard index
[1] The location of the construction Maximally Exposed Individual Receptor (MEIR) was determined to be an existing single-family residence within approximately 126 feet east of the project boundary, at 33°56'31.4"N 117°29'58.5"W.
Source: Appendix A.

Criterion 3: Project-specific Operational Toxic Air Pollutants

The proposed project is a residential project and would not have stationary sources or on-site sources of TACs during operation. Traffic generated by the residential project would consist of mostly light-duty gasoline-powered vehicles, which are not a significant source of TAC and air pollutant emissions. Thus, the proposed project would not generate a significant amount of DPM or other TAC emissions during operation and would not result in significant health impacts to nearby sensitive receptors during operation.

Cumulative Toxic Air Contaminant Analysis

As previously discussed, projects that exceed project-specific significance thresholds are considered cumulatively considerable by the SCAQMD. Conversely, projects that do not exceed project-specific thresholds are generally not considered cumulatively significant. As discussed in Criteria 1 through 3 above, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Since the proposed project would not exceed project-specific thresholds it would not be considered to result in cumulatively significant impacts.

The Proposed Project as a Receptor

The proposed project would locate new sensitive receptors (residents) that could be subject to existing sources of TACs at the project site. However, as demonstrated above, the proposed project would comply with all existing regulations and would not exacerbate environmental hazards or conditions that already exist. Accordingly, no further analysis is required. The California Supreme Court concluded in *California Building Industry Association v. BAAQMD* that CEQA generally does not require an analysis of the impact of existing environmental conditions on a project's future users or residents.

Summary

In summary, the Prior EIR found impacts would be significant and unavoidable; however, the proposed project would not expose sensitive receptors to substantial pollutant concentrations after incorporation of MM Air 2 from the Prior FEIR and PDF AIR-1, consistent with MM Air 1 and MM Air 13 from the Prior FEIR. The proposed project's impacts would be considered less than significant after mitigation. Therefore, there are no significant environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Odors

Would the project: Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?

Summary of Prior FEIR

The Prior FEIR concluded compliance with applicable regulations in the General Plan and applicable SCAQMD rules and regulations would minimize odor emissions from adversely affecting a substantial number of people within the City and impacts would be less than significant. Specifically, General Plan Policy AQ-2.11 promotes the use of the Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities in determining which land uses are compatible with each other. Additionally, future industrial and commercial uses established pursuant to the General Plan that could generate objectionable odors within the planning area will be subject to SCAQMD Rule 402 governing odor emissions. Any objectionable odor may be reported to the SCAQMD, which was assumed in the Prior FEIR to result in resolution of complaints through investigation and issuances of Notices to Comply/Notices of Violations. Therefore, implementation of the proposed General Plan was concluded to not result in development that would cause objectionable odors affecting a substantial number of people. The Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

The SCAQMD does not provide a suggested screening distance for a variety of odor-generating land uses and operations. However, the San Joaquin Valley Air Pollution Control District does have a screening distance for odor sources. These screening distances by type of odor generator are listed below in Table 9.

Table 9: Screening Levels for Potential Odor Sources

Odor Generator	Screening Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Source: San Joaquin Valley Air Pollution Control District (Valley Air District). 2015. Guidance for Assessing and Mitigating Air Quality Impacts. March 19. Website: https://valleyair.org/transportation/GAMAQI.pdf. Accessed February 4, 2025.	

Construction-related Odors

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of DPM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site. The proposed project would utilize typical construction techniques and the odors would be typical of most construction sites for a typical residential subdivision. As such, the proposed project would not cause odors that adversely affect a substantial number of people during the construction period; potential impacts during construction would be less than significant.

Operational-related Odors

The proposed project includes the construction and development of a new residential infill community consisting of a total of up to 56 for-sale single-family residences and associated amenities,

landscaping, paving, and off-site improvements. Operations of the proposed project could lead to odors from associated vehicle exhaust and outdoor cooking. However, such odors generated by project operation would be small in quantity and duration and would not pose an objectionable odor impact to nearby receptors. Land uses that are typically identified as sources of objectionable odors include landfills, transfer stations, sewage treatment plants, composting facilities, feedlots, coffee roasters, asphalt batch plants, and rendering plants. The proposed residential project would not produce any offensive odor emitting end uses such as coffee roasting, composting, feed lots, refining, sewage treatment, or solid waste management and would not be considered an odor generator as identified in Table 9.

Summary

The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people from construction or operations. Therefore, approval of the proposed project would not result in any significant effects relating to other emissions (such as odors), and impacts would be less than significant. As such, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

An environmental impact report is required to describe feasible mitigation measures, which could minimize significant adverse impacts (CEQA Guidelines § 15126.4). The following mitigation measures were identified in the Prior EIR to reduce potentially significant adverse impacts to air quality resources and would be applicable or relevant to the proposed project. MM Air 1, MM 7, and MM 13 are satisfied by the project-specific air quality analysis contained in this document, including Section 4.3 and Appendix A.

MM Air 1 To mitigate for potential adverse impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other methods sanctioned by the SCAQMD. The analysis of construction-related air quality impacts shall be included in the development project's CEQA analysis, including recommended mitigation measures. Proposed mitigation measures may include extending the construction period as feasible in order to ensure air quality thresholds are not exceeded. The analysis shall address pollution levels near sensitive receptors and require mitigation to reduce emissions.

MM Air 2 To mitigate for potential adverse impacts resulting from construction activities, development projects must abide by the SCAQMD's Rule 403 concerning Best Management Practices for construction sites in order to reduce emissions during the construction phase. Measures may include:

- Development of a construction traffic management program that includes, but is not limited to, rerouting construction-related traffic off congested streets, consolidating truck deliveries, and providing temporary dedicated turn lanes for movement of construction traffic to and from site;
- Sweep streets at the end of the day if visible soil material is carried onto adjacent paved public roads;
- Wash off trucks and other equipment leaving the site;
- Replace ground cover in disturbed areas immediately after construction;
- Keep disturbed/loose soil moist at all times;
- Suspend all grading activities when wind speeds exceed 25 miles per hour;
- Enforce a 15 mile per hour speed limit on unpaved portions of the construction site.

MM Air 4 To reduce diesel emissions associated with construction, construction contractors shall provide temporary electricity to the site to eliminate the need for diesel-powered electric generators, or provide evidence that electrical hook ups at construction sites are not cost effective or feasible.

MM Air 7 As part of the CEQA process, the City shall require proposed development projects with potential operational air quality impacts to identify and mitigate those impacts. To ensure proper characterization and mitigation of those impacts, regional impacts shall be analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation. Mitigation should reduce identified impacts to the maximum extent feasible using, among others, measures identified in the Air Quality Element Policies of the General Plan and the most recent Air Quality Management Plan as well as mitigation from the most recent CEQA Air Quality Handbook available at the SCAQMD. Example topics include, but are not limited to, energy conservation, reduction of vehicle miles traveled, overall trip reduction, and reduction of particulate matter.

MM Air 8 To reduce GHG emissions through reduced energy consumption and the procurement of lower-emission resources, Riverside Public Utilities (RPU) shall join the California Climate Action Registry (www.climateregistry.org) and comply with GHG regulations developed by the California Air Resources Board (ARB) and the California Energy Commission (CEC) pursuant to AB 32. RPU shall perform yearly GHG inventories according to the Power/Utility Protocol to identify and implement conservation measures and resource procurement practices that will reduce its GHG emissions.

MM Air 9 To reduce GHG emissions, the City's Environmental Relations Manager, working in conjunction with RPU shall develop, enhance, and/or implement programs to reduce energy consumption. Some examples of programs may be, but are not limited to:

- Replacing incandescent light bulbs with compact fluorescent lamps;
- Participating in the Energy Star Programs;
- Promotion of the use of energy-efficient equipment and vehicles;
- Promotion of commercial and residential solar energy rebate programs; and
- Performance based, commercial/ industrial energy efficiency rebate program.

MM Air 10 The City will implement an incentive based program, Green Builder Program, by the end of 2008 to reduce GHG emissions through the energy consumption of proposed new development. A Riverside Green Builder home must meet five criteria:

- Energy Efficiency–built to exceed California Title 24 energy efficiency standards by 15%;
- Water Conservation–conserving 20,000 gallons of water per home per year;
- Waste Reduction–at least 50% of construction waste diverted from landfills;
- Wood Conservation–wood must be from a certified sustainable source and engineered wood products must be used; and
- Indoor Air Quality–Heating, Ventilating and Air Conditioning (HVAC) designed by a licensed engineer to Air Conditioning Contractors of America (ACCA) manual J, S and D or equivalent Sheet Metal and Air Conditioning Contractor's National Association (SMACNA) or American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) standards.

MM Air 11 For all new residential projects located within 1,000-feet of any freeway full disclosure shall be provided on all rental, lease and sale documents to future tenants and/or buyers of a potential increased cancer risk due to the proximity of the freeway.

MM Air 13 Policy AQ-3.4: Require projects to mitigate, to the extent feasible, anticipated emissions which exceed AQMP Guidelines.

Project Design Features

Implement PDF AIR-1.

Conclusion

With regard to Air Quality, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. MM Air 1, MM Air 2, MM Air 4, MM Air 7 through MM Air 11, and MM Air 13 from the Prior FEIR and PDF AIR-1 would be required and would reduce potential impacts to below a level of significance, which results in an impact that is less severe than the significant and unavoidable impact identified in the Prior FEIR.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.4 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 Wildlife or United States Fish and Wildlife Service?	Less than significant impact	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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 wildlife nursery sites?	Less than significant impact	No	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No

The analysis in this section is based, in part, on Biological Resources Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis (BRA MSHCP) prepared by FCS for the La Sierra Alhambra Residential Project. The BRA MSHCP can be found in Appendix B.

a) Special-status Species

Would the project: 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 Wildlife or United States Fish and Wildlife Service?

Summary of Prior FEIR

The Prior FEIR determined that implementation of the General Plan 2025 would not result in significant direct impacts to existing biological resources; however, the adoption of the General Plan could lead to potential impacts from future development. Implementation of future projects could result in direct impacts such as loss of sensitive plant species and wildlife habitats from construction activities, indirect impacts such as increased urbanization effects, including noise, lighting, human activity, and introduction of domestic animals, or other issues including habitat fragmentation, increased impervious surfaces, and urban runoff containing chemicals like pesticides and fertilizers. Each project will require a case-by-case environmental impact analysis as they are proposed. The Prior FEIR indicates that implementation of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) at the project-specific level will help mitigate both direct and indirect impacts from future developments with payment of mitigation fees and adherence to MSHCP requirements to ensure full compliance with CEQA, the National Environmental Policy Act (NEPA), the federal Endangered Species Act, and the California Endangered Species Act (CESA) for covered species and habitats. Any future projects will be required to comply with existing federal, State, and local regulations. Through compliance with the MSHCP, which covers 146 species, and MM Bio 1 from the Prior FEIR, which addresses impacts to species that are not covered under the MSHCP, impacts from adoption and implementation of the City of Riverside General Plan were considered less than significant.

Proposed Project Analysis and Conclusion

The project site is residential in nature and is surrounded by urban development and does not occur within the MSHCP Burrowing Owl Survey Area Narrow Endemic Plant Species Survey Area (NEPSSA), Criteria Area Plant Species Survey Area (CAPSSA), Mammal Survey Area, and/or Amphibian Survey Area. Since the project site is a maintained residential property, it does not contain any suitable habitat for any special-status plant or wildlife 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 Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). However, existing trees on-site may serve as marginally suitable habitat for nesting birds, including potential special-status avian species. Construction of the proposed project could potentially impact nesting birds if ground-disturbing or vegetation-removing construction activities are initiated or conducted on and adjacent to the project site during the avian breeding season (February 1 through September 15). Potential impacts to nesting special-status birds that could result from construction and operation of the proposed project include destruction of eggs or occupied nests, mortality of young, and abandonment of nests with eggs or young birds prior to fledging. Detailed analysis can be seen in

Appendix B. No other provisions of the MSHCP are applicable to the proposed project with respect to impacts to special-status species. Consistent with the requirements of the Prior EIR, the proposed project would comply with the Migratory Bird Treaty Act (MBTA) and Fish and Game Code through pre-construction nesting bird surveys conducted no more than 7 days prior to the start of ground disturbance and avoidance of active avian nests if found during the surveys. Implementation of the MBTA and the Fish and Game Code would ensure impacts related to nesting birds remain at a less than significant level. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Riparian Habitat and Sensitive Natural Communities

Would the project: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?

Summary of Prior FEIR

The Prior FEIR determined that implementation of the General Plan 2025 would not result in significant direct impacts to riparian or other sensitive natural communities; however, potential impacts could arise indirectly or from future development. Lands within the General Plan area include riparian habitats such as Arundo/Riparian Forest, Cismontane Alkali Marsh, Marsh, Riparian Forest, Riparian Scrub, Southern Cottonwood/Willow Riparian, Southern Willow Scrub, and areas adjacent to open water. Implementation of future projects could result in direct impacts such as loss of sensitive plants and communities due to construction activities, alteration in the natural landscape with the placement of impermeable surfaces, increase in urban runoff containing chemicals (e.g., herbicides, fungicides, pesticides, fertilizers) used for landscaping and turf maintenance, and increased habitat fragmentation. Through the implementation of the MSHCP at the project-specific level, future projects must conduct habitat assessments to determine the presence, extent, and quality of riparian habitats. MSHCP Section 6.1.2 outlines the requirements and protection of riparian/riverine areas and vernal pools within the plan area. Compliance with MSHCP requirements and other regulations would reduce impacts to a less than significant level.

Proposed Project Analysis and Conclusion

The project site is a maintained residential property that is surrounded by urban development that only contains ruderal/bare and developed areas. The project site does not have any riparian habitat, nor does it have any sensitive natural communities as defined by the California Natural Diversity Database (CNDDB). Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Federally Protected Wetlands

Would the project: 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?

Summary of Prior FEIR

The Prior FEIR determined that future development under the General Plan, including private projects, roads, or public facilities, could affect protected wetlands and riparian areas in habitats like Riparian Forests, Marshes, and Willow Scrub. Should future development occur within wetland areas, federal and State laws (e.g., United States Army Corps of Engineers [USACE] Section 404, California Wetlands Conservation Policy) and compliance with applicable MSHCP policies developed to ensure "no net loss" of wetlands, would apply to the project. Accordingly, strict adherence to the identified State and federal laws and regulations, MSHCP, and the “no net wetland loss” policy currently in place would ensure that implementation of the General Plan would have a less than significant impact on jurisdictional waters and wetlands.

Proposed Project Analysis and Conclusion

The project site does not contain any State or federally protected wetlands. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Fish or Wildlife Movement

Would the project: 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 wildlife nursery sites?

Summary of Prior FEIR

The Prior FEIR determined that all projects under the General Plan must comply with the Western Riverside County MSHCP to address potential impacts to wildlife corridors or nursery sites. Additionally, as required by MSHCP Section 10, impacts to migratory species would be protected pursuant to the MBTA. The Prior FEIR noted that the City would work with the Western Riverside County Regional Conservation Authority (RCA) to acquire the following wildlife corridors: between Sycamore Canyon Park and Box Springs Mountain Reserve, between Box Springs Mountain Reserve and the Santa Ana River via Springbrook Wash, and between the Santa Ana River and La Sierra/Norco Hills. The General Plan includes several policies (Policy OS-6.4, Policy OS-6.1, Policy OS-7.3 and Policy LU-5.6) to collectively aim to preserve and enhance wildlife movement by establishing corridors, protecting migration areas, expanding open spaces like the Santa Ana River, and facilitating crossings such as Alessandro Arroyo. Therefore, through implementation of the General Plan policies discussed above (Policy OS-6.4 and Policy OS-6.1) as well as those policies which generally preserve open space (Policy OS-7.3 and Policy LU-5.6), impacts would be reduced

to less than significant. Additionally, the Prior EIR specifically concluded that "any future project would be required to comply with existing federal, State and local regulations." (Certified General Plan 2025 EIR, p. 5.4-54.) The list existing regulations identified in the Prior EIR includes the MBTA.

Proposed Project Analysis and Conclusion

The project site does not function as a wildlife corridor nor is it identified as an existing or proposed MSHCP Core or Linkage. The established wildlife corridors within the project vicinity, in proximity to the project site, are listed below:

- Sycamore Canyon Park–Located approximately 14 miles east of the project site.
- Box Springs Mountain Reserve–Located approximately 20 miles east of the project site.
- Santa Ana River via Springbrook Wash–Located approximately 22 miles northeast of the project site.
- La Sierra/Norco Hills–Located approximately 0.5 mile west of the project site.

The project site and adjacent lands, including La Sierra/Norco Hills, support vegetation communities, land cover types, trees, and other habitat features that provide nesting habitat for avian species covered under the MBTA and the Fish and Game Code, including common native species. As discussed above, construction of the proposed project could potentially impact migratory nesting birds if ground-disturbing or vegetation-removing construction activities are initiated or conducted on and adjacent to the project site during the avian breeding season (February 1 through September 15). Potential impacts to nesting migratory birds and nursery sites that could result from construction and operation of the proposed project include destruction of eggs or occupied nests, mortality of young, and abandonment of nests with eggs or young birds prior to fledging. Consistent with the requirements of the Prior EIR, the proposed project would comply with the MBTA and Fish and Game Code. Compliance with existing regulations would be ensured through pre-construction nesting bird surveys conducted no more than 7 days prior to the start of ground disturbance and avoidance of active avian nests if found during the surveys. This would ensure that impacts related to nesting birds remain less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Conflict with Local Policies or Ordinances

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

Summary of Prior FEIR

The Prior FEIR determined that implementation of the General Plan would be subject to all applicable federal, State, and local regulations protecting biological resources, including payment of mitigation fees under Riverside County Ordinance No. 810.2 (MSHCP fees) and No. 663.10 (Stephens' kangaroo rat [SKR] fees) and adherence to the City of Riverside Tree Policy Manual for tree planting

in City right-of-way, would ensure that future development would not conflict with biological resource protections. As such, impacts would be less than significant.

Proposed Project Analysis and Conclusion

The City does not have a tree preservation ordinance for trees on private land. In addition, the proposed project would be required to pay MSHCP mitigation fees and in doing so would not conflict with Riverside County Ordinance No. 810.2 or Ordinance No. 663.10. Any future applicant is required to pay the SKR mitigation fee and in doing so will not conflict with Ordinance 663.10. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

f) Habitat Conservation Plan/Natural Community Conservation Plan

Would the project: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?

Summary of Prior FEIR

The General Plan aligns with the MSHCP and the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP), ensuring compliance with habitat conservation goals through designated land uses, mitigation strategies, and specific processes such as Habitat Acquisition and Negotiation Strategy (HANS) and Joint Project Review. Development projects will require assessments for riparian areas, vernal pools, narrow endemic plant species, and wildlife habitats, with mitigation measures addressing potential impacts. Additionally, wildland urban interface (WUI) guidelines (Section 6.1.4 of the MSHCP) will minimize indirect effects from proximity to conservation areas. Compliance with federal, State, and local regulations, including permits for sensitive habitats, ensures that the General Plan's implementation results in less than significant impacts.

Proposed Project Analysis and Conclusion

The proposed project would be subject to all applicable federal, State, and local General Plan policies and regulations related to the protection of biological resources. Development within the City would be required to comply with Ordinance 810.2, MSHCP fees, and Ordinance 633.10, SKR HCP fees. Additionally, the General Plan includes policies to ensure future development would not conflict with any local policies or ordinances protecting biological resources. Through compliance with the City's General Plan policies, the proposed project will not conflict with local provisions.

Additionally, the proposed project would plant trees along Alhambra Avenue and La Sierra Avenue, within the City's right-of-way. The proposed project would follow the Tree Policy Manual's guidelines for the planting, pruning, preservation, and removal of all trees in City right-of-way. Through compliance with the City's Tree Policy Manual, the proposed project would not conflict with local provisions.

The proposed project would be consistent with the biological requirements of the MSHCP; specifically pertaining to the proposed project's relationship to reserve assembly, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures).

The project site does not contain any MSHCP Section 6.1.2 Riparian/Riverine resources, including riparian habitat, jurisdictional waters, riparian birds, or vernal pools, nor is the project site located within any Conservation Area or Public/Quasi-Public (PQP) Conserved Lands and would be consistent with guidelines pertaining to Urban/Wildlife Interface. The project site is not in or adjacent to a Conservation Area or PQP Conserved Land and is not located within an existing or proposed MSHCP Core or Linkage. Because of its location outside of any Criteria Cells or Cell Groups, the proposed project is not subject to Reserve Assembly Analysis requirements under the MSHCP.

The project site is not located within any of the MSHCP survey areas for burrowing owl, amphibian, mammal, NEPSSA, CAPSSA, or Delhi Sands flower-loving fly and no suitable habitat is present in the project site for these species. The proposed project is therefore not subject to these survey requirements under the MSHCP. Through compliance with the applicable requirements, under Section 6.1.4 and Section 6.3.2, the proposed project will not conflict with the provisions of the MSHCP. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

FEIR Mitigation Measures

An environmental impact report is required to describe feasible mitigation measures, which could minimize significant adverse impacts (CEQA Guidelines § 15126.4). The following mitigation measures were identified in the Prior EIR to reduce potentially significant adverse impacts to biological resources and would be applicable or relevant to the proposed project. MM Bio 1 has been satisfied by the project-specific BRA MSHCP included as Appendix B.

MM Bio 1 Potential direct and indirect impacts to Federal Species of Concern, California Species of Special Concern, California Species Animals or plants on lists one through four of the California Native Plant Society (CNPS) Inventory and not covered under the MSHCP are considered potentially significant without mitigation. To reduce potential significant impacts to these sensitive species, habitat assessment shall be prepared by a qualified biologist for projects located on undeveloped sites. The report shall be submitted to the City Planning Division prior to issuance of grading permits.

- If the findings of the habitat assessment show no sensitive species or suitable habitat occur on-site, and then no additional surveys or mitigation measures are required.
- If the potential for sensitive species exist or suitable habitat exists on-site, focused surveys or mitigation, if identified in the habitat assessment, shall be completed.

Focused surveys conducted in the appropriate season for each species, as identified in the habitat assessment report, shall be conducted to determine presence/absence status.

- If no sensitive species are identified through focused surveys, then no additional surveys or mitigation measures are required.
- If sensitive species are found on-site and are not avoided by project design, then additional mitigation measures as recommended by a qualified biologist and approved by the City of Riverside shall be implemented.

Conclusion

With regards to Biological Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.5 Cultural and Tribal Cultural Resources *Would the project:*					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact with mitigation incorporated	No	No	No	No
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than significant impact with mitigation incorporated	No	No	No	No
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:					
d) 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	Less than significant impact with mitigation incorporated	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
e) 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Less than significant impact with mitigation incorporated	No	No	No	No

The analysis in this section is based, in part, on Phase I Cultural Resource Assessment (Phase I CRA) prepared by FCS for the La Sierra Alhambra Residential Project. The confidential Phase I CRA can be requested by qualified personnel upon request. found in Appendix C.

Eastern Information Center

On January 23, 2024, a records search was conducted at the Eastern Information Center (EIC) located at University of California, Riverside, for the project site and a 1-mile radius beyond the project boundaries. The current inventories of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historical Landmarks (CHL) list, the California Points of Historical Interest (CPHI) list, and the California Built Environment Resource Directory (BERD) for Riverside County were also reviewed to determine the existence of previously documented local historic resources. The results of the records search indicate that there are no known cultural resources located within the project site or within a 1-mile search radius of the project boundaries. In addition, 12 area-specific survey reports on file with the EIC, none of which address the project site entirely, indicating that the project site has not been previously surveyed for cultural resources.

Native American Heritage Commission

On January 17, 2024, a records search request was sent to the Native American Heritage Commission (NAHC) in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response was received on February 12, 2024, indicating that the SLF search produced positive results for Native American cultural resources within the project site. The NAHC included a list of 45 Tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential Tribal Cultural Resources (TCRs) that may be affected by implementation of the proposed project are addressed, a letter containing project information and requesting additional information was sent to each Tribal representative on September 27, 2024. Two responses were received from Tribal representatives. A response was received on September 30, 2024, from the Gabrieleño Tongva Indians of California indicating that the project site is sensitive for TCRs and that they defer to the San Gabriel Band of Mission Indians for next steps. The second response was received on October 3, 2024, from the Fort Yuma Quechan Indians stating that they do not wish to comment on the proposed project and they defer to more local Tribes on this matter. No additional responses have been received to date.

Pedestrian Survey

On February 16, 2024, and October 7, 2024, FCS Archaeologist/Field Supervisor Natalie Adame conducted a built environment survey for unrecorded cultural resources at the project site. The project site is approximately 10.1 acres; is associated to APNs 149-052-004, 149-052-009, 149-052-011, 149-052-012, 149-052-013, and 149-052-014; and is located southwest of La Sierra Avenue and southwest/east of Alhambra Avenue. The project site is relatively flat along La Sierra Avenue and on partially hilly terrain along Alhambra Avenue.

The survey covered the subject property where possible, beginning in the northeast portion of the project boundary. However, access to the private property was not possible and the survey was limited to the pedestrian right-of-way. The eastern side of the project site runs northeast and southwest on a busy highway (La Sierra Avenue). Surrounding profile shots that captured the eastern, northern, and southern faces of the residential property were taken from La Sierra and Alhambra Avenue. A true profile picture of the western face of the property could not be taken due to it being on private property. Additionally, the pedestrian survey identified three homesteads that may be more than 45 years in age, which have not been evaluated for historic significance. The areas that were not previously accessible were surveyed on October 7, 2024, and no archaeological resources or additional historic resources were found during the survey.

Survey conditions were documented using digital photographs and field notes. During the survey, Ms. Adame examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, toolmaking debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). The area of the project site could not be closely examined for pre-contact or historic materiality. No historic or pre-contact cultural

resources or raw materials commonly used to manufacture tools (e.g., obsidian, Franciscan chert) were observed within the project site.

Historic Resources Assessment: 6204 La Sierra Avenue, 6244 La Sierra Avenue, and 6251 Alhambra Avenue

The historic significance of the site was evaluated on the California Department of Parks and Recreation (DPR) Series 523 Forms. All three properties (6204 La Sierra Avenue, 6244 La Sierra Avenue, and 6251 Alhambra Avenue) located at the project site are over 45 years old and were evaluated for historic significance, and all three properties did not meet any of the criteria for historic and/or architectural significance required for listing on the CRHR or NRHP. Additionally, the three properties do not possess sufficient artistic merit or historical association to meet any local standard for historical importance for listing on the City of Riverside Historical Inventory. No analysis of integrity is required where the property fails to meet all four criteria, and the residential building should not be considered a significant historical resource under CEQA.

a) Historical Resources

Would the project: Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Summary of Prior FEIR

The Prior FEIR indicated that the City of Riverside has a variety of historic resources, including federal, State, and local resources. As of 2004, through an inventory of the City, the City had recorded 110 City Landmarks, more than 1,000 Structures of Merit, 10 Historic Districts, 20 NRHP properties, and four Neighborhood Conservation Areas. These structures meet the definition of historical resources under Section 15064.5(a) of the CEQA Guidelines.

While the 2025 General Plan does not propose any changes to any identified resources, future City development would occur in areas that may contain significant cultural resources. Also, redevelopment to enable a different or more intensive use of a site could impact cultural resources. Additionally, infrastructure or other public works improvements could result in damage to or demolition of other cultural resources. Although the City has programs and policies to protect and minimize adverse impacts to historical structures and features, the potential remains for significant impacts to these resources to occur as a result of development.

The City of Riverside developed a historic preservation program, which is among the most active in the State of California. The program includes an ongoing process to survey, record and designate historic resources, an award-winning historic resources inventory database, historic district design guidelines, educational programs, and a historic preservation plan. The State Office of Historic Preservation has also designated Riverside as a Certified Local Government. This distinction ensures that the City's preservation program meets all State and federal standards. The 2025 General Plan also contains Historic Preservation Policies HP-1.1, HP-1.2, HP-4.3, LU-30.4, PS-11.1, and PS-11.2,

in addition to MM Cultural 5, which would further reduce the already less than significant impacts to maintain an active and systematic program to survey cultural resources citywide, as described below.

Historic Preservation Element

Policy HP-1.1 The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.

Policy HP-1.2 The City shall assume its direct responsibility for historic preservation by protecting and maintaining its publicly owned cultural resources. Such resources may include, but are not limited to, buildings, monuments, landscapes, and right-of-way improvements, such as retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs and gutters.

Policy HP-1.3 The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Policy HP-4.3 The City shall work with the appropriate Tribe to identify and address, in a culturally appropriate manner, cultural resources and Tribal sacred sites through the development review process.

Land Use Element

Policy LU-4.6 Ensure protection of prehistoric resources through consultations with the Native American Tribe(s) identified by the Native American Heritage Commission pursuant to Government Code Section 65352.3 and as required by the California Environmental Quality Act.

Policy LU-30.4 Promote the placement of relocated historic structures on infill lots in neighborhoods within a designated historic district.

Public Safety Element

Policy PS-11.1 Protect resources listed in the Historical Resources Inventory from premature or inadvertent demolition and encourage retrofitting of these resources to protect them from damage caused by a disaster episode.

Policy PS-11.2 Take reasonable steps to prevent the loss of historic buildings without endangering public safety or contributing to additional property damage.

Alteration to any known resource would require a Certificate of Appropriateness application, which is then reviewed pursuant to adopted City procedures to determine whether the proposed change would have a significant adverse environmental effect as defined by CEQA. As such, the Prior FEIR determined that with the continued use of existing federal, State, and local regulations, and

compliance with the 2025 General Plan policies and mitigation, impacts to historic resources would be less than significant.

Proposed Project Analysis and Conclusion

Results from the EIC indicate that no historic resources have been recorded within the project site or the 1-mile search radius. The pedestrian survey identified three residential properties, 6204 La Sierra Avenue, 6244 La Sierra Avenue, and 6251 Alhambra Avenue, over 45 years in age within the project boundaries. The three residential properties were evaluated and recorded on the appropriate DPR forms and failed to meet any of the criteria for historic and/or architectural significance required for listing on the CRHR or NRHP. Additionally, the three properties do not possess sufficient artistic merit or historical association to meet any local standard for historical importance for listing on the City of Riverside Historical Inventory. The Phase I CRA prepared for this project analyzed potential impacts to potential historical resources, and it was determined that the proposed project adheres to the City of Riverside historic preservation program.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Archaeological Resources

Would the project: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Summary of Prior FEIR

The Prior FEIR indicated that based on what is known of the histories of local Native American groups and previously recorded archaeological sites, significant archaeological resources are known to exist within the planning area of the 2025 General Plan. Construction projects within undeveloped portions of the planning area would promote a substantial increase in population, residential and nonresidential structures, and associated infrastructure. Thus, implementation of the 2025 General Plan could cause disturbance on vacant lands that may cause the destruction of known significant archaeological resources, as defined in the CEQA Guidelines, Section 15064.5. Significant prehistoric and historical archaeological resources must be considered in the City's project planning and development process as noted in Title 20 of the Riverside Municipal Code.

The Prior FEIR determined that with implementation of the 2025 General Plan Policy HP-1.3, HP-4.3 and LU-4.6 and MM Cultural 1 through MM Cultural 4, which contain considerations for surveying and preserving archaeological resources, impacts to archaeological resources as result of development consistent with the General Plan would be less than significant with mitigation. Additionally, while already less than significant with implementation of the above measures, the Prior EIR found that application of MM Cultural 6 would further reduce the less than significant impacts.

Proposed Project Analysis and Conclusion

Results from the EIC indicate that no archaeological resources have been recorded within the project boundaries or the 1-mile search radius. Additionally, the pedestrian survey failed to identify any archaeological resources. While there are no known archaeological resources within the project site, it is possible that project-related earthmoving and construction activities could unearth previously undiscovered archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Damage or destruction of these resources would be a potentially significant impact. Nevertheless, the Phase I CRA analysis for archaeological resources determined that the proposed project adheres to the 2025 General Plan Policies HP-1.3, HP-4.3 and LU-4.6 and MM Cultural 1, 2, 3, and 4, and COA CUL-1.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Human Remains

Would the project: Disturb any human remains, including those interred outside of dedicated cemeteries?

Summary of Prior FEIR

The Prior FEIR indicated that numerous archaeological studies within the 2025 General Plan's planning area had revealed the presence of Native American human remains. Although most have been associated with former residential village locations, isolated burials and cremations have also been found in many locations. If the City proposes to construct projects in currently undeveloped areas of the planning area, disturbance on vacant lands could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of dedicated cemeteries. Consistent with State laws protecting these remains, sites containing human remains must be identified and treated in a sensitive manner. In the event that Native American human remains are inadvertently discovered during the City's project-related construction activities, there would be unavoidable significant adverse impacts to Native American resources; however, implementation of the 2025 General Plan Policies HP-1.3, HP-4.3 and LU-4.6 and MM Cultural 1, MM Cultural 2, MM Cultural 3, and MM Cultural 4 would reduce impacts to other types of archaeological resources to a level of less than significant.

Proposed Project Analysis and Conclusion

Results from the EIC failed to identify any human remains and/or cemeteries. While it is highly unlikely that the presence of human remains exists within or near the project site, there is always the possibility that subsurface construction activities associated with the proposed project, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. While there are no known human remains within the project site,

implementation of the 2025 General Plan Policies HP-1.3, HP-4.3 and LU-4.6 and MM Cultural 1, 2, 3, and 4, would ensure that all impacts associated with any previously unknown human remains remain less than significant.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Listed or Eligible 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 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)?

Summary of Prior FEIR

The Prior FEIR did not identify any significant impacts related to TCRs defined as 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. TCRs were not required to be evaluated separately from Cultural Resources by CEQA Guidelines at the time of the preparation of the Prior FEIR.

However, the Prior FEIR implemented Policies HP-1.3, HP-4.3 and LU-4.6 and MM Cultural 1, 2, 3, and 4, which contain special considerations for unknown TCRs and strategies for preservation.

Proposed Project Analysis and Conclusion

The records search conducted at the EIC, which included a search of the CRHR, failed to identify pre-contact resources within the project boundaries or the 1-mile search radius of the project site. Furthermore, the NAHC SLF search results were positive for TCRs within the project boundaries. As described above, as part of the Phase I CRA, FCS received two responses from Tribal representatives. A response was received on September 30, 2024, from the Gabrieleño Tongva Indians of California indicating that the project site is sensitive for TCRs and that they defer to the San Gabriel Band of Mission Indians for next steps. The second response was received on October 3, 2024, from the Fort Yuma Quechan Indians, stating that they do not wish to comment on the proposed project and they defer to more local Tribes on this matter. Should any undiscovered TCRs be encountered during project construction, implementation of adopted Prior FEIR Policies HP-1.3, HP-4.3 and LU-4.6 and MM 1, 2, 3, and 4, and COA CUL-1would be required.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Lead Agency Determined 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 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?**

Summary of Prior FEIR

The Prior FEIR did not address any significant impact related to TCRs, as 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 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. The Prior FEIR conducted Traditional Tribal Cultural Places Consultation with relevant Native American Tribes and concluded that all TCRs present in the planning area were accounted for in the 2025 General Plan. Any development which may adversely affect any known TCRs would be required to provide a Certificate of Appropriateness application, which would be reviewed pursuant to adopted City procedures to determine whether the proposed change would have a significant adverse environmental effect as defined by CEQA. In addition, the Prior FEIR implemented MM Cultural 1 through MM Cultural 6, which contain special considerations for known and unknown TCRs in the planning area. As such, impacts on TCRs were found to be less than significant.

Proposed Project Analysis and Conclusion

AB 52 consultation was not conducted by the Lead Agency. While the Prior FEIR did not identify specific TCRs, it acknowledges the potential for their existence and recommends mitigation measures to minimize impacts. These measures align with the General Plan Policies HP-1.3, HP-4.3 and LU-4.6 and MM Cultural 1, MM Cultural 2, MM Cultural 3, and MM Cultural 4, which aim to protect TCRs and human remains and ensure compliance with State regulations.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

MM Cultural 1 The City shall actively pursue a survey program to identify and document prehistoric and historical archaeological sites and sites containing Native American human remains. Although a comprehensive survey program may not be economically feasible by the City, the City shall require that all areas slated for development or other ground-disturbing activities be surveyed for archaeological resources by qualified individuals who meet the Secretary of the Interior's Standards and Guidelines regarding archaeological activities and methods prior to the City's approval of project plans. If potentially significant prehistoric archaeological resources are encountered during the archaeological survey, the City shall require that the project proponent consult with Native American Heritage Commission in Sacramento to acquire a list of the appropriate Native American Tribes that may have an interest in these resources; consultation with these Native American Tribes shall also be undertaken.

MM Cultural 2 Avoidance is the preferred treatment for known prehistoric and historical archaeological sites and sites containing Native American human remains. Where feasible, project plans shall be developed to avoid known archaeological resources and sites containing human remains. Where avoidance of construction impacts is possible, the site shall be landscaped in a manner, which will ensure that indirect impacts from increased public availability to these sites are avoided. Where avoidance is selected, archaeological resource sites and sites containing Native American human remains shall be placed within permanent conservation easements or dedicated open space areas.

MM Cultural 3 If, after consultation with the appropriate Tribe, the project archaeologist, and the project engineer/architect, and in accordance with the law, avoidance and/or preservation in place of known prehistoric and historical archaeological resources and sites containing Native American human remains are not feasible management options, the following mitigation measures shall be initiated:

a. Prior to the issuance of a grading permit for a project, the City's consultant shall develop a Phase II (i.e., test-level) Research Design detailing how the archaeological resources investigation will be executed and providing specific research questions that will be addressed through the Phase II Testing Program. In general terms, the Phase II Testing Program should be designed to define site boundaries further and to assess the structure, content, nature, and depth of subsurface cultural deposits and features. Emphasis should also be placed on assessing site integrity, cultural significance and the site's potential to address regional archaeological research questions. These data should be used for two purposes: to discuss culturally sensitive recovery options with the appropriate Tribe(s) if the resource is of Native American origins, and to address the California

Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP) eligibility for the cultural resource and make recommendations as to the suitability of the resource for listing on either Register. The Research Design shall be submitted to the City's Cultural Heritage Board and/or Cultural Heritage Board staff and the appropriate Tribe for review and comment. Tribal comments must be received by the City Planning Division within 45 days. The City shall consider all comments, require revisions, if deemed necessary by the report writer and approve a final Research Design, which shall be implemented. For sites determined ineligible for listing on either the CRHR or NRHP, execution of the Phase II Testing Program would suffice as the necessary level of data recovery and mitigation of project impacts to this resource.

b. A participant-observer from the appropriate Native American Band or Tribe shall be used during all archaeological excavations involving sites of Native American concern.
c. After approval of the Research Design by Cultural Heritage Board staff and prior to the issuance of a grading permit, the City's consultant shall complete the Phase II Testing Program as specified in the Research Design. The results of this Program shall be presented in a technical report that follows the County of Riverside's Outline for Archaeological Testing. The Phase II Report shall be submitted to the appropriate Tribe and the City's Cultural Heritage Board for review and comment.
d. If the cultural resource is identified as being potentially eligible for either the CRHR or NRHP, a Phase III Data Recovery Program to mitigate project effects should be initiated. The Data Recovery Treatment Plan detailing the objectives of the Phase III Program should be developed, in consultation with the appropriate Tribe, and contain specific testable hypotheses pertinent to the Research Design and relative to the sites under study. The Phase III Data Recovery Treatment Plan should be submitted to the City's Cultural Heritage Board and/or Cultural Heritage Board staff and the appropriate Tribe for review and comment. Tribal comments must be received by the City Planning Division within 45 days. The City shall consider all comments, require revisions if necessary by the report writer and approve a final Treatment Plan which shall be implemented.
e. After approval of the Treatment Plan, the Phase III Data Recovery Program for affected, eligible sites should be completed. Typically, a Phase III Data Recovery Program involves the excavation of a statistically representative sample of the site to preserve those resource values that qualify the site as being eligible for listing on the CRHR or NRHP. Again, a participant-observer from the appropriate Native American Band or Tribe shall be used during archaeological data recovery excavations involving sites of Native American concern. At the conclusion of the Phase III Program, a Phase III Data Recovery Report should be prepared, following the County of Riverside's Outline for Archaeological Mitigation or Data

Recovery. The Phase III Data Recovery Report should be submitted to the appropriate Tribe and the City's Cultural Heritage Board for review.

f. All archaeological materials recovered during implementation of the Phase II Testing or Phase III Data Recovery programs would be subject to analysis and/or processing as outlined in the Treatment Plan. If materials are of the type which will be transferred to a curation facility, they should be cleaned, described in detail, and analyzed including laboratory and analytical analysis. Materials to be curated may include archaeological specimens and samples, field notes, feature and burial records, maps, plans, profile drawings, photo logs, photographic negatives, consultants' reports of special studies, and copies of the final technical reports. All project-related collections subject to curation should be suitably packaged and transferred to facility that meets the standards of 36 CFR 79 for long-term storage. Culturally sensitive treatment of certain artifacts may require treatment other than curation and as specified in the Treatment Plan, but it should be noted that provisions of the Native American Graves Protection Repatriation Act (NAGPRA) pertaining to Native American burials, sacred objects, and objects of cultural patrimony would come into effect when ownership of the collections transfer to a curation repository that receives federal funding, unless otherwise agreed to with non-curation methods of treatment.

g. The project proponent should bear the expense of identification, evaluation, and treatment of all cultural resources directly or indirectly affected by project-related construction activity. Such expenses may include, archaeological and Native American monitoring, pre-field planning, field work, post-field analysis, research, interim and summary report preparation, and final report production (including draft and final versions), and costs associated with the curation of project documentation and the associated artifact collections. On behalf of the City and the project proponent, the final technical reports detailing the results of the Phase II Testing or Phase III Data Recovery programs should be submitted to the appropriate Native American Tribe and to the Eastern Information Center (EIC) of the California Historical Resources Information System (CHRIS) for their information and where it would be available to other researchers.

MM Cultural 4 The following mitigation measures should be implemented to reduce project-related adverse impacts to archaeological resources and sites containing Native American human remains that may be inadvertently discovered during construction of projects proposed in the City's General Plan Update:

a. In areas of archaeological sensitivity, including those that may contain buried Native American human remains, a registered professional archaeologist and a representative of the culturally affiliated Native American Tribe, with knowledge in cultural resources, should monitor all project-related ground-disturbing activities that extend into natural sediments in areas determined to have high archaeological sensitivity.

b. If buried archaeological resources are uncovered during construction, all work must be halted in the vicinity of the discovery until a registered professional archaeologist can visit the site of discovery and assess the significance and origin of the archaeological resource. If the resource is determined to be of Native American origin, the Tribe shall be consulted. If the archaeological resource is determined to be a potentially significant cultural resource, the City, in consultation with the project archaeologist and the Tribe, shall determine the course of action, which may include data recovery, retention in situ, or other appropriate treatment and mitigation depending on the resources discovered.
c. In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, the steps and procedures specified in Health and Safety Code 7050.5, CEQA Guidelines 15064.5(e), and Public Resources Code Section 5097.98 must be implemented. Specifically, in accordance with Public Resources Code Section 5097.98, the Riverside County Coroner must be notified within 24 hours of the discovery of potentially human remains. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with PRC Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification. Whenever the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the MLD and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

MM Cultural 5 To address potential impacts to historic resources that may be adversely affected by future development allowed by the proposed project, mitigation including, but not limited to, the following shall be considered:

For adverse impacts to individual historic resources, such as: those on the National Register, California Register or City Landmark, Structure of Merit eligible, mitigation considered shall include in the order of preference:

a. Avoidance
b. Changes to the structure provided pursuant to the Secretary of the Interior's Standards.

c. Relocation of the Structure
d. Recordation of the structure to HABS/HAER standard if demolition is allowed.

For adverse impacts to individual historic resources, such as: those on the National Register, California Register or City Landmark, Structure of Merit eligible, mitigation considered shall include in the order of preference:

a. Avoidance
b. Recordation of the properties to HABS/HAER standard if demotion is allowed
c. Demotion is to be considered only if mitigation as described above is not feasible.

Project-specific Conditions of Approval

The following project-specific COA is consistent with MM Cultural 4.a of the Prior FEIR. Implementation of COA CUL-1 would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

COA CUL-1 Prior to the initiation of construction activities, all construction personnel conducting ground disturbance at the site shall be provided a Worker Environmental Awareness Program (WEAP) cultural resources “tailgate” training. The training shall include visual aids, a discussion of applicable laws and statutes relating to archaeological resources, types of resources that may be found within the project site, and procedures to be followed in the event such resources are encountered. The training shall be conducted by an Archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology and may include a Native American Monitor or representative(s) consulting on the project.

A qualified Archaeological Monitor, reporting to the Project Archaeologist, shall be present during clearing and grubbing activities to identify any inadvertent exposure of cultural materials and to check for the inadvertent exposure of cultural materials. A Native American Monitor or consulting Tribal representative may also be included.

In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic monitoring, as determined by the Archaeologist, in collaboration with any consulting Native American Monitor.

Conclusion

With regards to Cultural Resources and Tribal Cultural Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. MM Cultural 1 through MM Cultural 4 from the Prior FEIR would be required and would reduce potential impacts to below a level of significance consistent with the analysis in the Prior FEIR. Additionally, the proposed project would implement MM Cultural 5 to further reduce the already less than significant impacts.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.6 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?	No significant impact identified	No	No	No	No
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	No significant impact identified	No	No	No	No

a) Energy Use

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

Summary of Prior FEIR

The Prior FEIR did not specifically analyze impacts related to energy resources in a dedicated section. However, a discussion of energy can be found in the discussion of Utilities in the Prior FEIR and in the Findings of Fact. In discussing potential impacts to Utilities, the City evaluated its proactive plan for future growth in energy use and demand Potential impacts for development projects contemplated under the General Plan are reduce to less than significant levels by implementing General Plan policies such as OS-8.1 to OS-8.11, which encourage renewable energy and energy-efficient development, and adherence to the Implementation Plan Tools such as OS-30 to OS-32, which promote energy-efficient programs that conserve energy 15 percent above Title 24 requirements. Additionally, the Prior FEIR discusses energy efficiency in the Air Quality discussion. The programs listed in the Local Programs section under Related Regulations and policies located in the Related General Plan Policies section will help reduce vehicle trips and increase energy efficiency throughout the Planning Area. Examples include the Residential Shade Tree Program and the Community Energy Efficient Program, which help increase energy efficiency and reduce fossil fuel

consumption. In addition, General Plan policies such as OS-8.1 to OS-8.11 encourage renewable energy and energy-efficient development. Further, Implementation Plan Tools such as OS-30 to OS-32 promote energy-efficient programs that conserve energy 15 percent above Title 24 requirements. These and other policies in the General Plan will reduce energy demand. Policies like AQ-1.7 continue to promote planned residential development and infill housing, which reduce vehicle trips. Accordingly, the City determined that demand can be reduced from projected levels and, with implementation of General Plan policies and mitigation measures in the General Plan, impacts related to energy would be less than significant. As such, at the time of its certification, the Prior FEIR identified no significant impact related to the potential for buildout of development contemplated in the General Plan to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Proposed Project Analysis and Conclusion

Short-term Construction Impacts

For the purpose of this analysis, construction of the proposed project was estimated to begin in January 2026 and conclude in February 2028 and was modeled based on based on an applicant-provided preliminary schedule; see Appendix A. If the construction schedule moves to later years, construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment. The proposed project would require demolition, site preparation, grading, utility installation, paving, building construction, and architectural coating. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the site (e.g., site clearing, and grading), and the actual construction of the buildings. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, front-end loaders, forklifts, and cranes. On-site, off-road construction equipment is estimated to consume a total of approximately 42,842 gallons of diesel fuel over the entire construction duration (Appendix A).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to and from the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB Emissions Factors (EMFAC) mobile source emission model. In total, the proposed project is estimated to generate approximately 267,579 Vehicle Miles Traveled (VMT) and a combined 19,900 gallons of combined gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. City of Riverside Municipal Code Section 7.35.020(G) restricts construction activities between the hours of 7:00 a.m. and 7:00 p.m. on

weekdays. As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would be minimal.

The overall construction processes are already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. Therefore, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

Long-term Operational Impacts

The proposed project would consume energy as part of building operations and transportation activities. Operation of the proposed project would consume an estimated 887,899 kilowatt hours (kWh) of electricity. Energy consumption values were estimated without taking any reductions for the existing land uses or reductions from on-site renewable energy. The proposed project would include demolition of existing buildings currently occupying the project site. Thus, the proposed project's incremental increase in electricity consumption would be estimated to be lower than 887,899 kWh because the existing land use currently consumes electricity. In addition, 887,899 kWh represents the amount of electricity that would be used by the proposed project on an annual basis and not the amount that would need to be sourced from the energy grid. The proposed residential buildings would be built all-electric, and the proposed project would install solar photovoltaic (PV) systems that would generate renewable energy to offset the building's energy consumption. The proposed project's residences would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Building Energy Efficiency Standards. The Title 24 Building Energy Efficiency Standards, specifically the 2022 update, set forth comprehensive requirements for energy efficiency in residential buildings, including townhomes. These standards are designed to ensure that buildings meet specific energy performance criteria to reduce energy consumption and GHG emissions. The Title 24 standards include requirements related to the building envelope, mechanical systems (such as requiring high-efficiency HVAC and water heating systems), indoor and outdoor lighting, and renewable energy. The Title 24 standards are widely regarded as the most advanced Building Energy Efficiency Standards and the proposed project's compliance with these standards would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Consistent with the project-specific trip generation rates presented in the transportation analysis prepared by Urban Crossroads, the proposed project was estimated to generate approximately 514 daily vehicle trips for the 56-unit residential project.[26] Project-related vehicle trips would result in an estimated 1,058,470 VMT annually and would consume an estimated 66,658 gallons of gasoline and

[26] Urban Crossroads. La Sierra Residential Focused Traffic Analysis, City of Riverside. December 31, 2025.

diesel annually. The proposed project would involve activities and travel routes typical of a residential project in the region.

As detailed in Section 4.17–Transportation, development of the proposed project would result in a less than significant impact on VMT. Furthermore, the 2022 Title 24 standards applicable to the proposed project also include provisions for electric vehicle (EV) charging infrastructure in single-family homes with private garages. This requirement would encourage the use of EVs by future residents. Because the proposed project's operations would involve activities and travel routes typical of a residential project, coupled with the finding that the proposed project would have a less than significant impact in regard to VMT, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

Summary

In summary, the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Energy Efficiency and Renewable Energy Standards Consistency

Would the project: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Summary of Prior FEIR

The Prior FEIR did not analyze impacts related to energy resources. As such, at the time of its certification, the Prior FEIR identified no significant impact related to the potential for buildout of development contemplated in the General Plan to conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Proposed Project Analysis and Conclusion

During construction, the proposed project would be required to comply with standards for new construction established by the State and SCAQMD and development standards in the California Energy Code, the California Green Building Standards Code (CALGreen), the Municipal Code, and other applicable federal, State, and local laws.

As detailed in Impact 4.8(b), the proposed project would be consistent with the Riverside Restorative Growthprint Climate Action Plan (RRG-CAP), including the City's strategies for renewable energy and energy efficiency. The proposed project would be built all-electric and would not include natural gas plumbing. In addition, the proposed project would include solar installation intended to meet the power needs of the proposed project. Furthermore, the proposed project would be designed and constructed consistent with the State's Title 24 Building Energy Efficiency Standards and would be required to incorporate a series of renewable energy design and energy efficiency features. As detailed in Impact 4.6(a), the proposed project would not result in wasteful, inefficient, or unnecessary

consumption of energy resources. In addition, while not required to reduce any energy-related impacts under the Prior FEIR or the proposed project analysis, MM Air 8 to MM Air 10 from the Air Quality section of the Prior FEIR are relevant to the proposed project and have co-benefits to energy resources.

Considering the information presented above, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

The Prior FEIR did not analyze impacts related to energy resources and, therefore, did not identify any mitigation measures solely intended to reduce impacts to energy resources. However, while not required to reduce any energy-related impacts, MM Air 8 to MM Air 10 from the Air Quality section of the Prior FEIR have co-benefits to energy resources.

MM Air 8 To reduce GHG emissions through reduced energy consumption and the procurement of lower-emission resources, Riverside Public Utilities (RPU) shall join the California Climate Action Registry (www.climateregistry.org) and comply with GHG regulations developed by the California Air Resources Board (ARB) and the California Energy Commission (CEC) pursuant to AB 32. RPU shall perform yearly GHG inventories according to the Power/Utility Protocol to identify and implement conservation measures and resource procurement practices that will reduce its GHG emissions.

MM Air 9 To reduce GHG emissions, the City's Environmental Relations Manager, working in conjunction with RPU shall develop, enhance, and/or implement programs to reduce energy consumption. Some examples of programs may be, but are not limited to:

- Replacing incandescent light bulbs with compact fluorescent lamps;
- Participating in the Energy Star Programs;
- Promotion of the use of energy-efficient equipment and vehicles;
- Promotion of commercial and residential solar energy rebate programs; and
- Performance based, commercial/ industrial energy efficiency rebate program.

MM Air 10 The City will implement an incentive based program, Green Builder Program, by the end of 2008 to reduce GHG emissions through the energy consumption of proposed new development. A Riverside Green Builder home must meet five criteria:

- Energy Efficiency–built to exceed California Title 24 energy efficiency standards by 15%;
- Water Conservation–conserving 20,000 gallons of water per home per year;

- Waste Reduction–at least 50% of construction waste diverted from landfills;
- Wood Conservation–wood must be from a certified sustainable source and engineered wood products must be used; and
- Indoor Air Quality–Heating, Ventilating and Air Conditioning (HVAC) designed by a licensed engineer to Air Conditioning Contractors of America (ACCA) manual J, S and D or equivalent Sheet Metal and Air Conditioning Contractor's National Association (SMACNA) or American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) standards.

Conclusion

With regards to Energy, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant. MM Air 8 to MM Air 10, identified in the Prior FEIR to reduce air quality impacts, are relevant to the proposed project and have co-benefits to energy resources.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.7 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?	No impact	No	No	No	No
ii) Strong seismic ground shaking?	Less than significant impact	No	No	No	No
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact	No	No	No	No
iv) Landslides?	Less than significant impact	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No
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?	Less than significant impact with mitigation incorporated	No	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant impact	No	No	No	No

The analysis in this section is based, in part, on the Geotechnical Due Diligence Exploration and Preliminary Design Recommendations Report (Geotechnical Exploration) by SA Geotechnical, Inc., dated December 22, 2023. The Geotechnical Exploration can be found in Appendix D.

a) Earthquake Hazards

Would the project: 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; (ii) Strong Seismic Ground Shaking; (iii) Seismic-related ground failure, including liquefaction; or (iv) Landslides.

i) Fault Rupture

The Prior FEIR indicated that there are no Alquist-Priolo zones in the City of Riverside and or its SOI. Therefore, no impact would related to Alquist-Priolo Earthquake Fault Zone.

Proposed Project Analysis and Conclusion

As described above, the City and its SOI do not contain any fault zones. The project-specific Geotechnical Exploration states that the site is not located within a fault rupture hazard zone as defined by the Alquist-Priolo Special Studies Zones Act, there are no active faults mapped at the site.

Furthermore, the proposed project would comply with the California Building Standard Code (CBC), as well as local, State, and federal policies, regulations, and standards to ensure that project residents are not affected by fault rupture. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

ii) Strong Seismic Ground Shaking

The Prior FEIR indicated that the San Jacinto Fault Zone in the northeastern portion and the Elsinore fault zone in the southern portion of the City have the potential to cause moderate to large earthquakes that would cause intense ground shaking in its vicinity. Policies in the General Plan limit the densities and intensity of land use in these areas to minimize adverse effects. New developments would be required to comply with building design standards of Chapter 33 of the CBC which includes requirements for the construction of new buildings and structures related to seismicity. Furthermore, new development would implement specific engineering design and measures related to seismicity intended to anticipate and avoid potential impacts from seismic activity. Compliance with CBC regulations and policies included in the General Plan would ensure that impacts related to strong seismic ground shaking would be less than significant.

Proposed Project Analysis and Conclusion

The project lies in the northeastern border of the City and its SOI, placing it about 8 miles northwest to the San Jacinto Fault. The project site has not been evaluated by the California Geologic Survey

for Earthquake Zones of Required Investigation.[27] The project-specific Geotechnical Exploration acknowledges the site has potential for strong seismic shaking during an earthquake event. It is categorized as a "Class C" for seismic design, which is used in assessing soil movement. The proposed project would be required to comply with the requirements of the CBC, including Chapter 33 to minimize impacts related to seismicity. Furthermore, the proposed project would adhere to the recommendations of the Geotechnical Exploration related to design and construction of the proposed project. Per the City's standard practice, the City Engineer shall implement these recommendations in accordance with applicable City engineering review and approval procedures. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

iii) Seismic-related ground failure, including liquefaction

The Prior FEIR indicated that the City is underlain by areas susceptible to varying degrees of liquefaction, ranging from moderate to very high (areas along the Santa Ana River), while most of the SOI is not susceptible to liquefaction. Liquefaction potential does not necessarily limit development potential as site-specific geotechnical studies would be required to determine the soil properties and specific potential for liquefaction in specific areas prior to individual development. Compliance with the standards in the current CBC would require an assessment of liquefaction hazards and the incorporation of design measures into structures to mitigate hazards if development were considered to be feasible. Furthermore, the General Plan includes policies to minimize the risk of injury, loss of life, and property damage caused by earthquake hazards or geologic disturbances. With compliance with applicable regulations and General Plan policies, impacts would be less than significant.

Proposed Project Analysis and Conclusion

The Geotechnical Exploration found that the site is located within an area of "high" liquefaction susceptibility according the County of Riverside.[28] However, Geotechnical Exploration found that the potential for liquefaction at the project site was considered to be very low due to the shallow bedrock condition and absence of groundwater within potentially liquefiable soils (older alluvium). The Geotechnical Exploration also noted that the alluvium in Boring H-6 encountered to a depth of 21.5 feet generally consisted of fine-grained clayey soils that are typically not considered prone to liquefaction. As described previously, the proposed project would be required to adhere to the CBC, applicable General Plan policies, and the recommendations of the Geotechnical Exploration related to project design and construction. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

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[27] California Department of Conservation. 2024. Earthquake Zone of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed January 15, 2025.

[28] Riverside County. 2024. Map My County. Website: https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public. Accessed January 27, 2025.

iv) Landslides

The Prior FEIR indicated that areas in northeastern Riverside are designated with low to locally moderate susceptibility to landslides and rock falls. CBC standards require assessments of hazards related to landslides and the incorporation of design measures to mitigate this hazard. The Municipal Code requires provisions regarding grading and development on or near hillsides. Furthermore, the General Plan Public Safety Element includes policies to minimize the risk of injury, loss of life, and property damage caused by earthquake hazards or geologic disturbances. With compliance with applicable regulations as well as policies identified in the General Plan, impacts were considered to be less than significant.

Proposed Project Analysis and Conclusion

The project site is not located immediately adjacent to any slopes. However, hillsides are located approximately 0.11 mile to the west. The project site has a small portion of its northwestern border inside a level 1 risk zone for possible landslide and a smaller portion on its western border in a level 2 risk zone for probable landslide. Further west toward the La Sierra Hills, the risk extends up to Level 8, a high confidence in the extent or nature of a landslide within 0.2 mile of the project site. [29]

The proposed project would be required to adhere to the recommendations of the Geotechnical Exploration, as well as the requirements of the Riverside Municipal Code and General Plan, which would ensure that impacts related to landslides are reduced. Per the City's standard practice, the City Engineer shall implement these recommendations in accordance with applicable City engineering review and approval procedures. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Erosion

Would the project: Result in substantial soil erosion or the loss of topsoil?

The Prior FEIR indicated substantial amounts of construction project erosion and loss of topsoil could occur during development. All individual construction project activities greater than one acre will be subject to the State's General Permit for Construction Activities that is administered by the California Regional Water Quality Control Board (RWQCB) and would be required to comply with National Pollutant Discharge Elimination System (NPDES) regulations concerning the discharge of eroded materials and pollutants from construction sites and prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). A SWPPP would require the implementation of BMPs to limit the extent of eroded materials from a construction site.

[29] United States Geological Survey (USGS). 2024. U.S. Landslide Inventory and Susceptibility Map. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d. Accessed January 15, 2025.

Furthermore, the City's Grading Code (Title 17) and Subdivision Code (Title 18) set forth erosion control standards and BMPs to which all development activity must comply. Compliance with the policies contained in the General Plan, Grading Code, and Subdivision Code would further ensure that new development would not result in substantial soil erosion or loss of topsoil. For operational activities, compliance with a project-specific Water Quality Management Plan would minimize effects from erosion and ensure consistency with NPDES requirements. Therefore, impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the proposed project would be subject to the NPDES General Permit because the proposed project would disturb more than one acre of land. It would also follow the NPDES General Permit that requires a SWPPP and associated BMPs, which include erosion and sediment controls, runoff water quality monitoring, proper waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, and identification of maintenance responsibilities, as well as non-stormwater management controls. Furthermore, the Geotechnical Exploration provides recommendations to reduce erosion. Adherence to the recommendations of the Geotechnical Exploration, the Riverside Subdivision Code, and the Grading Code would ensure that erosion resulting from the proposed project would be reduced. Per the City's standard practice, the City Engineer shall implement these recommendations in accordance with applicable City engineering review and approval procedures. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Unstable Soils or Geologic Units

Would the project: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse?

The Prior FEIR indicated that there is no specific data in the City that can accurately identify locations that are vulnerable to subsidence. Subsidence risk would need to be evaluated on a site-by-site basis. Most of the City is generally flat and thus not vulnerable to landslides. However, the northeastern, southern and western Riverside have areas with slopes greater than 30 percent which are susceptible to landslides. As described in the Subdivision Code (Section 18.090.050), the City requires completed reports written by a registered soil professional of soil conditions at specific construction sites to identify potentially unsuitable soil conditions including landslides, liquefaction and subsidence, and measures to eliminate inappropriate soil conditions must be applied. Design foundation support must conform to the analysis and implementation criteria outlined in CBC Chapter 15. If development is proposed on sites with slopes greater than 10 percent, development would be required to comply with Title 17, Grading, of the Riverside Municipal Code. Compliance with the City's existing codes and policies contained in the General Plan would ensure the maximum practical

protection available for users of buildings and infrastructure. With these requirements, impacts would be less than significant.

Proposed Project Analysis and Conclusion

As described previously, liquefaction potential at the site is considered to be very low. The project site is not located immediately adjacent to any slopes. However, hillsides are located approximately 0.11 mile to the west. The project site has a small portion of its northwestern border inside a level 1 risk zone for possible landslides and a smaller portion on its western border in a level 2 risk zone for probable landslide. The risk increases as you travel west toward the La Sierra foothills. According to the County of Riverside, the site is susceptible to subsidence. 30 The Geotechnical Evaluation states that ground subsidence is estimated to be on the order of 0.1-foot. The proposed project would be required to adhere to the recommendations of the Geotechnical Exploration related to design and construction, the requirements of the Riverside Municipal Code, and the CBC. Adherence to these requirements would ensure that impacts related to landslides, liquefaction, subsidence, lateral spreading, and collapse are reduced. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Expansive Soils

Would the project: Be located on expansive soil, creating substantial direct or indirect risks to life or property?

The Prior FEIR indicated that within the City and SOI, expansive soils are widely scattered and are found in hillside areas and low-lying alluvial basing. Development under the General Plan would be required to comply with the applicable provisions of the Subdivision Code and the CBC with regard to soil hazards such as expansive soil. Policies included in the General Plan would also help reduce impacts related to expansive soils. Therefore, impacts were considered to be less than significant.

Proposed Project Analysis and Conclusion

The Geotechnical Exploration noted that at the completion of grading, on-site souls would have low to very low expansion potential. The Geotechnical Exploration provides recommendations for construction in areas of expansive soils within the project site. These recommendations implement the requirements of the CBC General Plan Policy PSE-1, and Riverside Subdivision Code, which would reduce impacts associated with expansive soils. Per the City's standard practice, the City Engineer shall implement these recommendations in accordance with applicable City engineering review and approval procedures.

[30] Riverside County. 2024. Map My County. Website: https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public. Accessed January 27, 2025.

Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Septic Tanks

Would the project: Have soils incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available?

The Prior FEIR indicated that septic tanks are typically located in areas with deep water tables and moderately permeable soil. Some of the City and SOI are on septic systems and have soils capable of sustaining septic tanks. However, the majority of the City of Riverside is served by developed sewer infrastructure, and it is anticipated the majority of the new development in the City would not require the use of septic tanks.

The Prior FEIR noted that areas in the North Orange Area are restricted from having any on-site sewage disposal due to the potential risk of contamination to groundwater in the North Orange Well Field. New development in this area must connect to a public sewer as required by Ordinance No. 6623, unless the location of the development does not pose any potential risk to the drinking water wells in the area. Development in the North Orange Area would require adherence to MM GEO-1, which requires an investigation by a registered hydrologist and geotechnical or soils engineer to address the site's suitability for septic systems and its impact to groundwater supplies, to reduce project impacts to a less than significant level Impacts related to septic systems and alternative wastewater systems were found to be less than significant with the implementation of MM GEO-1.

Proposed Project Analysis and Conclusion

As noted in the Geotechnical Exploration, verbal communication with the current landowner revealed that the existing on-site residences rely on septic tanks and leach fields for sewage management. Wells (if any), septic tanks, seepage pits, and related appurtenances would need to be properly removed and/or abandoned in accordance with County of Riverside Department of Environmental Health requirements (or other governing agency) and the project environmental consultant's recommendations anticipated during demolition and grading as outlined in the project-specific Geotechnical Exploration.

Following removal/abandonment of the on-site septic tanks and any other infrastructure and adherence to applicable requirements and regulations, the proposed project would connect to existing City sewer infrastructure along the project frontages. The proposed project would not require the use of a septic system or alternative wastewater disposal system, and as such, MM GEO-1 from the Prior FEIR is not applicable to the proposed project. Therefore, development as proposed would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

f) Destruction of Paleontological Resource or Unique Geologic Feature

Would the project: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Summary of Prior FEIR

The Prior FEIR indicated that paleontological resources may be present in fossil-bearing soils and rock formations below the ground surface. Several locations in the City have a variety of known significant paleontological resources and ground-disturbing activities have the potential to damage or destroy paleontological resources that may be present. Therefore, any activities resulting from implementation of the proposed General Plan Update, including construction-related and earth-disturbing actions could damage or destroy fossils in rock units. Damage and destruction of paleontological resources can have a significant impact; as with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines Section 15064.5(a)(3)(D).

General Plan Policy HP-1.3 is in place to protect paleontological resources. This policy states that the City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process. Compliance with the Policy HP-1.3 and existing regulations would reduce impacts to paleontological resources to a less than significant level by ensuring paleontological resources would be subject to scientific recovery and evaluation, which would ensure that important scientific information that could be provided be provided by these resources. Therefore, impacts would be less than significant.

Proposed Project Analysis and Conclusion

Geologic mapping by Morton et al. and T.W. Dibblee and J.A. Minch indicates that the deposits underlying the project site are mapped as middle to late Pleistocene-age alluvial fan deposits. These deposits are characterized as indurated, reddish-brown, sandy alluvial fan deposits.

A records search of the University of California Museum of Paleontology (UCMP) online fossil locality database revealed four invertebrate fossil localities, one plant fossil locality, and five vertebrate fossil localities from unnamed Pleistocene-age sedimentary deposits in Riverside County. Based on the listed locality names (i.e., Corona East, Blythe, Carr Ranch, Bastenchury Ranch, and Riverside), none are within the project site boundaries. These localities are also reported by George T. Jefferson in *A Catalogue of Late Quaternary Vertebrates from California* and include gopher tortoise (*Gopherus*), mammoth (*Mammuthus*), California vole (*Microtus californicus*), and pack rat (*Neotoma*).

The Natural History Museum of Los Angeles County collections are available online through the Integrated Digitized Biocollections (iDigBio). According to iDigBio, there are several localities in the Perris area with three vertebrate fossil localities within 1.5 miles from the project site (0.62 mile west, 0.62 mile southwest, and 1.24 miles southwest). Therefore, the paleontological analysis determined that the proposed project would adhere to the Prior FEIR General Plan Policy HP-1.3.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Geology and Soils, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.8 Greenhouse Gas Emissions *Would the project:*					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and unavoidable impact	No	No	No	No
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and unavoidable impact	No	No	No	No

a) Greenhouse Gas Emissions

Would the project: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Summary of Prior FEIR

The City, in certifying the Prior EIR, found that development consistent with the General Plan would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal or State ambient air quality standard, and result in a cumulatively considerable increase in GHG emissions. As such, the air quality analysis conclusions in the Prior FEIR indicate that buildout of development facilitated by the General Plan would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. MM Air 8 through MM Air 10 were identified in the Air Quality section of the Prior EIR to reduce GHG emissions.

Proposed Project Analysis and Conclusion

Thresholds of Significance for the Proposed Project

Section 15064.4(b) of the CEQA Guideline amendments for GHG emissions state that a lead agency may take into account the following three considerations in assessing the significance of impacts from GHG emissions.

- **Consideration No. 1**: The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- **Consideration No. 2**: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration No. 3**: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The SCAQMD developed interim recommended significance thresholds for GHGs for local lead agency consideration (SCAQMD draft local agency threshold) in 2008; however, the SCAQMD Board has not approved the thresholds as of the date of this analysis.

The SCAQMD provided substantial evidence is support of its threshold approach. Notably, the SCAQMD's draft threshold uses the Executive Order S-3-05 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap carbon dioxide (CO_2) concentrations at 450 parts per million (ppm), thus stabilizing global climate.

The SCAQMD Tier 3 threshold was expanded to include non-industrial projects, as explained in the minutes from the most recent working group meeting: [31]

> Similarly, with regard to numerical residential/commercial GHG significance thresholds, at the 11/19/2009 stakeholder working group meeting staff presented two options that lead agencies could choose: option #1—separate numerical thresholds for residential projects (3,500 MT CO_2e/year), commercial projects (1,400 MT CO_2e/year), and mixed use projects (3,000 MT CO_2e/year) and; option #2—a single numerical threshold for all non-industrial projects of 3,000 MTCO_2e/year. If a lead agency chooses one option, it must consistently use that same option for all projects where it is lead agency. The

[31] South Coast Air Quality Management District (SCAQMD). 2010. Greenhouse Gas CEQA Threshold Stakeholder Working Group Meeting No. 15. September 28.

current staff proposal is to recommend the use of option #2, but allow lead agencies to choose option #1 if they prefer that approach.

To determine whether the proposed project would have a significant impact with respect to the generation of GHG emissions, this analysis utilizes the SCAQMD's draft local agency Tier 3 threshold of 3,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year.

Project Emissions

Construction

Although construction-related GHG emissions are temporary in nature, the total amount of emissions could have a substantial contribution to a project's total GHG emissions. SCAQMD recommends that construction-related GHG emissions be amortized over the life of the project, which is defined as 30 years, and added to annual operational emissions. Construction-related GHG emissions would occur from fossil fuel combustion for heavy-duty construction equipment, material delivery and haul trucks, and construction worker vehicles. As vehicle and equipment fuel efficiencies and emission control standards continue to incrementally improve each year, project construction emissions would be likely to decrease nominally from what is shown in Table 10 should the construction schedule move to later years. Therefore, the construction GHG emissions contained in Table 10 represent a conservative assessment of project construction emissions.

Table 10: Proposed Project Construction GHG Emissions

Year	Total GHG Emissions (MT CO_2e per year)
2026	370
2027	205
2028	32
Total Construction Emissions	**607**
Emissions Amortized Over 30 Years[1]	***20***

Notes:
MT CO_2e per year = metric tons of carbon dioxide equivalent per year
Unrounded numbers were used in calculations, including reported totals.
[1] Pursuant to the South Coast Air Quality Management District's (SCAQMD's) guidance, total construction emissions are amortized over the 30-year life of the proposed project.
Source: Appendix A.

Operations

Following the buildout of the project, long-term operational emissions would be generated from area-, energy-, and mobile source emissions. Emissions associated with water consumption and solid waste disposal would also be generated by the proposed residential development. Table 11 presents the

project's annual operational emissions along with the amortized construction emissions. Pursuant to the SCAQMD's guidance, the sum of these emissions should be used to compare with the applicable threshold of significance.

Table 11: Annual Operational Greenhouse Gas Emissions

GHG Emissions Source	GHG Emissions (MT CO_2e per year)
Area	1
Energy	352
Mobile	610
Waste	11
Water	16
Refrigerants	0
Amortized Construction Emissions	20
Total Annual Project Emissions	**1,010**
Applicable SCAQMD Threshold	**3,000**
Potentially Significant?	**No**

Notes:
GHG = greenhouse gas
MT CO_2e = metric tons carbon dioxide equivalent
SCAQMD = South Coast Air Quality Management District
Source: Appendix A.

As shown in Table 11, the proposed project's annual operational plus amortized construction emissions would generate 1,010 MT CO_2e per year, which would not exceed the SCAQMD's screening threshold of 3,000 MT CO_2e per year. This is, therefore, considered a less than significant impact, resulting in an impact that is less severe than the significant and unavoidable impact identified in the Prior FEIR.

Summary

As shown in Table 11, the proposed project's annual operational plus amortized construction emissions would generate 1,010 MT CO_2e per year, which would not exceed the SCAQMD's screening threshold of 3,000 MT CO_2e per year. Therefore, the proposed project's contribution to GHG emissions would result in a less than significant impact and would be reduced compared to the impacts disclosed in the Prior EIR. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Greenhouse Gases Emissions Reduction Plan Conflict

Would the project: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Summary of Prior FEIR

The City, in certifying the Prior EIR, found that development consistent with the General Plan would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal or State ambient air quality standard, resulting in a cumulatively considerable increase in GHG emissions.

In evaluating whether the proposed project has site-specific or project-specific impacts, this consistency analysis evaluates the proposed project's direct and indirect contributions to GHG emissions and consistency with applicable plan, policy, or regulation. Although the Prior EIR did not evaluate this specific CEQA Guidelines Appendix G question, the air quality analysis of the Prior EIR determined development consistent with the General Plan would result in a cumulatively considerable increase in GHG emissions. MM Air 8 through MM Air 10 were identified in the Air Quality section of the Prior EIR to reduce GHG emissions.

Proposed Project Analysis and Conclusion

An evaluation of the proposed project's consistency with the Riverside Restorative Growthprint Climate Action Plan (RRG-CAP) and ARB's 2022 Scoping Plan is provided below.

Riverside Restorative Growthprint Climate Action Plan

The City of Riverside adopted the Riverside Restorative Growthprint (RRG) on January 5, 2016. The RRG combines two plans: the Economic Prosperity Action Plan (RRG-EPAP) and the RRG-CAP and is used to promote entrepreneurship and smart growth while advancing the City of Riverside's GHG emission reduction goals. As a document intended to be a qualified GHG reduction strategy, the RRG-CAP builds upon the emission reduction target, goals, and policies established for the City in the 2014 Western Riverside Council of Government's Subregional Climate Action Plan (WRCOG-CAP) to demonstrate consistency with the Assembly Bill (AB) 32 goal of reducing emissions to 1990 levels. The RRG-CAP remains committed to the emissions reduction target set forth in the WRCOG-CAP of achieving 15 percent below the City's 2010 GHG emissions levels by 2020. The RRG-CAP further establishes a 2035 target of 49 percent below the City's 2007 baseline GHG emissions levels in order to meet the requirements of AB 32 and Executive Order S-3-05, which calls for 80 percent below 1990 levels by 2050. [32] The RRG-CAP includes reduction measures that would enable the City

[32] City of Riverside. 2016. Riverside Restorative Growthprint: Climate Action Plan. Riverside, CA. Website: https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/other-plans/2016%20Riverside%20Restorative%20Growthprint%20Economic%20Proposerity%20Action%20Plan%20and%20Climate%20Action%20Plan.pdf. Accessed February 11, 2025.

to achieve the AB 32 goal. As such, project consistency with the applicable reduction measures of the RRG-CAP is assessed below in Table 12.

Table 12: Project Consistency with the Riverside Restorative Growthprint Climate Action Plan

Measure	Description	Project Consistency
State level		
SR-2	2013 California Building Energy Efficiency Standards (Title 24, Part 6). Mandatory energy efficiency standards for buildings through energy-efficient lighting, heating, cooling, ventilation, and water heating solutions.	**Consistent.** The proposed project would, at a minimum, comply with the 2022 Title 24 energy efficiency standards. The 2022 Title 24 energy efficiency standards introduced several key updates, such as establishing electric-ready requirements for new homes and expanding solar photovoltaic and battery storage standards. The 2026 Title 24 standards, which will be effective starting January 1, 2026, are expected to build on these improvements.
SR-13	Construction and Demolition Waste Diversion: Assumes compliance with CALGreen requirements to divert 50 percent of construction and demolition (C&D) waste. The measure assumes that 90 percent of new and applicable retrofit projects will achieve 50 percent diversion by 2020 and increase diversion to 75 percent by 2035.	**Consistent.** The proposed project would comply with CALGreen requirements to achieve 50 percent C&D waste diversion, increasing to 75 percent over time.
T-1	Bicycle Infrastructure Improvements: Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.	**Consistent.** Development of the proposed project would comply with the development standards for the City of Riverside.
W-1	Water Conservation and Efficiency: Reduce per capita water use by 20 percent by 2020.	**Consistent.** The proposed project would comply with the applicable water conservation and efficiency measures in the 2022 California Green Building Standards Code, codified in the City of Riverside Municipal Code Chapter 16.07. The project would also comply with the Water Efficient Landscaping and Irrigation requirements under the Municipal Code Chapter 19.57.
Source of measures: City of Riverside. 2016. Riverside Restorative Growthprint: Climate Action Plan.		

As shown above in Table 12, the proposed project would comply with the applicable reduction measures of the RRG-CAP.

ARB's 2022 Scoping Plan

The 2022 Scoping Plan identifies additional GHG reduction actions and strategies necessary to achieve AB 1279 target of 85 percent below 1990 levels by 2045. These actions and strategies build upon those identified in the first update to the Scoping Plan (2013) and in the second update to the Scoping Plan (2017). Although a number of these measures are currently established as statewide regulations, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve Statewide GHG emissions targets. An evaluation of applicable reduction actions/strategies by emissions source category was conducted to determine how the proposed project would be consistent with reduction actions/strategies outlined in the 2022 Scoping Plan. The proposed project's consistency with those measures is provided below in Table 13.

Table 13: Consistency with the 2022 Scoping Plan

GHG Inventory Sector and Scoping Plan Action	Project Consistency
GHG Emissions Reductions Relative to the Senate Bill (SB) 32 Target	
40 percent below 1990 levels by 2030.	**Consistent.** The proposed project's GHG emissions would not exceed the applicable threshold of significance (see Table 11) and would, therefore, not conflict with the State's ability to achieve GHG emission reduction targets. SB 1020 requires that, by end of 2035, 90 percent of electricity; and by end of 2045, 100 percent of electricity, is generated from renewable and zero-carbon resources. As such, the proposed project would not conflict with this strategy.
Smart Growth/Vehicle Miles Traveled	
VMT per capita reduced 25 percent below 2019 levels by 2030 and 22 percent below 2019 levels by 2045.	**Consistent.** A Vehicle Miles Traveled (VMT) Analysis for the proposed project was prepared by Urban Crossroads, Inc., on February 5, 2025, and is included in Appendix H of this document. As detailed in the project-specific VMT Analysis, development of the proposed project would result in a less than significant impact on VMT. Specifically, the VMT Analysis identifies that the proposed project would generate VMT per capita that would not result in potential transportation impacts.
Light-duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100 percent of LDV sales are ZEV by 2035.	**Not Applicable.** Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2035. The proposed project would not include any vehicle sales activities.

GHG Inventory Sector and Scoping Plan Action	Project Consistency
Truck ZEVs	
100 percent of medium-duty/heavy-duty commercial sales are ZEV by 2040 (Assembly Bill [AB] 74 University of California Institute of Transportation Studies report).	**Not Applicable.** Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2045. The proposed project would not include any truck sales activities.
Aviation	
10 percent of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	**Not Applicable.** The proposed project would not utilize any aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25 percent of OGVs utilize hydrogen fuel cell electric technology by 2045.	**Not Applicable.** The proposed project would not utilize any OGVs.
Port Operations	
100 percent of cargo handling equipment is zero-emission by 2037. 100 percent of drayage trucks are zero-emission by 2035.	**Not Applicable.** The proposed project would not impact any operations at any ports.
Freight and Passenger Rail	
100 percent of passenger and other locomotive sales are ZEV by 2030. 100 percent of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	**Not Applicable.** The proposed project would not impact any freight or passenger rail operations.
Oil and Gas Extraction	
Phase out oil and gas extraction operations by 2045.	**Not Applicable.** The proposed project would not impact any oil and gas extraction activities.
Petroleum Refining	
Carbon capture and storage (CCS) on majority of petroleum refining operations by 2030.	**Not Applicable.** The proposed project would not impact any petroleum refining activities.

GHG Inventory Sector and Scoping Plan Action	Project Consistency
Production reduced in line with petroleum demand.	
Electricity Generation	
Electric sector GHG target of 38 million metric tons (MMT) carbon dioxide equivalent (CO_2e) in 2030 and 31 MMT CO_2e in 2045. Retail sales load coverage	**Consistent.** Senate Bill 1020 requires that 100 percent of retail sales of electricity be generated by renewable or zero-carbon source of electricity by December 1, 2045. As such, the proposed project would not conflict with this strategy.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial).	**Consistent.** The proposed project would be an all-electric development and would not include any natural gas hookups.
Existing Residential Buildings	
80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035. Appliances are replaced at end of life**.**	**Not applicable.** The proposed project would not include the operations of any existing residential buildings. The proposed project would replace existing structures with new residential buildings.
Existing Commercial Buildings	
80 percent of appliance sales are electric by 2030, and 100 percent of appliance sales are electric by 2045. Appliances are replaced at end of life.	**Not applicable.** At project buildout, the proposed project would not include any existing commercial buildings.
Food Products	
7.5 percent of energy demand electrified directly and/or indirectly by 2030; 75 percent by 2045.	**Not applicable.** The proposed project would not include any commercial food production activities.
Construction Equipment	
25 percent of energy demand electrified by 2030 and 75 percent electrified by 2045.	**No conflict.** Executive Order N-79-20 requires all off-road vehicles and equipment to transition to 100 percent zero-emission equipment, where feasible, by 2035. All construction equipment fleets utilized during construction of the proposed project are required to be registered with ARB and meet ARB's current emission reductions regulations, which are anticipated to be updated to meet Executive Order N-79-20 requirements. As such, the proposed project would not conflict with this strategy.
Chemicals and Allied Products; Pulp and Paper	
Electrify 100 percent of boilers by 2045.	**Not applicable.** The proposed project would not include any pulp and paper production activities.

GHG Inventory Sector and Scoping Plan Action	Project Consistency
Hydrogen for 25 percent of process heat by 2035 and 100 percent by 2045. Electrify 100 percent of other energy demand by 2045.	
Stone, Clay, Glass, and Cement	
CCS on 40 percent of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	**Not applicable.** The proposed project would not include any stone, clay, glass and cement production activities.
Other Industrial Manufacturing	
0 percent energy demand electrified by 2030 and 50 percent by 2045.	**Not applicable.** The proposed project would not include any other industrial manufacturing activities.
Combined Heat and Power	
Facilities retire by 2040.	**Not applicable.** The proposed project would not include any existing combined heat and power facilities.
Agriculture Energy Use	
25 percent energy demand electrified by 2030 and 75 percent by 2045.	**Not applicable.** The proposed project would not include any commercial agriculture activities.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	**Not applicable.** The proposed project would not include any production of fuels for transportation.
Low Carbon Fuels for Buildings and Industry	
In 2030s, renewable natural gas (RNG) blended in pipeline. Renewable hydrogen blended in natural gas pipeline at 7 percent energy (approximately 20 percent by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	**Not applicable.** The proposed project would not include any production of fuels for buildings and industry.
Non-combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75 percent of organic waste from landfills by 2025.	**Not applicable.** The proposed project would not include the operation of any landfill or dairy.

GHG Inventory Sector and Scoping Plan Action	Project Consistency
Oil and gas fugitive methane emissions reduced 50 percent by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	
High Global Warming Potential (GWP) Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating hydrofluorocarbon (HFC) emissions.	**Not applicable.** The proposed project would not include the manufacturing of appliances that use low GWP refrigerants.
Compensate for Remaining Emissions	
Carbon Dioxide Removal (CDR) demonstration projects deployed by 2030. CDR scaled to compensate for remaining GHG emissions in 2045.	**Not applicable.** The proposed project would not include any CDR demonstration projects.
Source: California Air Resources Board (ARB). 2022. 2022 Scoping Plan for Achieving Carbon Neutrality.	

As demonstrated in Table 12, while most of the measures are not applicable, the proposed project would be consistent with the appliable measures outlined in the 2022 Scoping Plan. Therefore, the proposed project would be consistent with the 2022 ARB Scoping Plan and potential impacts would be less than significant.

Summary

The proposed project would not conflict with the City's RRG-CAP. Furthermore, the proposed project would be consistent with the State's climate planning and reduction measures identified in ARB's 2022 Scoping Plan. As supported by the analysis provided above, impacts would be less than significant.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

The following mitigation measures were identified in the Air Quality section of the Prior EIR to reduce GHG emissions.

MM Air 8 To reduce GHG emissions through reduced energy consumption and the procurement of lower-emission resources, Riverside Public Utilities (RPU) shall join the California Climate Action Registry (www.climateregistry.org) and comply with GHG regulations developed by the California Air Resources Board (ARB) and the

California Energy Commission (CEC) pursuant to AB 32. RPU shall perform yearly GHG inventories according to the Power/Utility Protocol to identify and implement conservation measures and resource procurement practices that will reduce its GHG emissions.

MM Air 9 To reduce GHG emissions, the City's Environmental Relations Manager, working in conjunction with RPU shall develop, enhance, and/or implement programs to reduce energy consumption. Some examples of programs may be, but are not limited to:

- Replacing incandescent light bulbs with compact fluorescent lamps;
- Participating in the Energy Star Programs;
- Promotion of the use of energy-efficient equipment and vehicles;
- Promotion of commercial and residential solar energy rebate programs; and
- Performance based, commercial/ industrial energy efficiency rebate program.

MM Air 10 The City will implement an incentive based program, Green Builder Program, by the end of 2008 to reduce GHG emissions through the energy consumption of proposed new development. A Riverside Green Builder home must meet five criteria:

- Energy Efficiency – built to exceed California Title 24 energy efficiency standards by 15%;
- Water Conservation–conserving 20,000 gallons of water per home per year;
- Waste Reduction–at least 50% of construction waste diverted from landfills;
- Wood Conservation–wood must be from a certified sustainable source and engineered wood products must be used; and
- Indoor Air Quality–Heating, Ventilating and Air Conditioning (HVAC) designed by a licensed engineer to Air Conditioning Contractors of America (ACCA) manual J, S and D or equivalent Sheet Metal and Air Conditioning Contractor's National Association (SMACNA) or American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) standards.

Conclusion

With regards to Greenhouse Gas Emissions, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.

4. MM Air 8 through MM Air 10 from the Prior FEIR would be required and would reduce potential impacts to below a level of significance, which results in an impact that is less severe than the significant and unavoidable impact identified in the Prior FEIR.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.9 Hazards and 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?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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?	Less than significant impact	No	No	No	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	No
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	Less than significant impact	No	No	No	No

The analysis in this section is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA), and the Limited Phase II Subsurface Investigation Report prepared by Hillmann Consulting, LLC (Hillmann), on January 25, 2024. These reports can be found in Appendix E. Their findings are summarized below.

Phase I ESA

Hillmann discovered that the property has historically been used as a lemon grove from approximately 1931 to 1990 with remnant orchards still on the project site. Because of a concern of shallow soil impacts resulting from cumulative applications of pesticides at the site, the historic agricultural use was considered to be *de minimis* in connection with the property. Hillmann recommended a Limited Phase II investigation prior to redevelopment for any potential impacts from the pesticides.

Two inactive water wells were identified on the project site during site reconnaissance. Additionally, all three residences on-site have active septic systems that are serviced every few years by Westend Pumping. Given the site use history and lack of identified prior industrial or other high-risk site uses, septic systems on the project site would not be considered to be a Recognized Environmental Condition (REC) in connection with the property.

Phase II ESA

Hillmann collected twenty individual soil samples, which were then composited into five samples and analyzed for Title 22 metals, and organochlorine pesticides (OCPs). Results of the OCP analysis indicated several concentrations above laboratory detection limits. The detected concentrations were compared to the EPA Regional Screening Levels (RSLs), which were developed by the EPA and modified for use by the California Department of Toxic Substances Control (DTSC). RSLs developed by EPA are based on human health toxicity factors for residential and commercial settings. None of the heavy metal or pesticide concentrations exceeded their respective conservative screening levels for residential or commercial applications or the DTSC established background concentrations. Based on these results, Hillmann recommended no further sampling in the areas tested.

a) Routine Transport, Use, or Disposal of Hazardous Materials

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

Summary of Prior FEIR

The Prior FEIR indicated that although the overall quantity of hazardous materials and waste generated in the City could increase as a result of implementation of the 2025 General Plan, all new developments that handle or use hazardous materials would be required to comply with the regulations, standards, and guidelines established by the EPA, the State, and City of Riverside related to storage, use, and disposal of hazardous materials.

The Prior FEIR also noted that both federal and State governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to a regulating agency. Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The plan needs to identify the procedures to follow for immediate notification to all appropriate agencies and personnel in the event of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. The City's Fire Department conducts yearly inspections of all these businesses to confirm that their business plan is in order and up to date. In addition, the Public Safety Element of the General Plan includes a variety of policies that reduce the potential exposure of people and the

environment to hazardous materials. As such, the Prior FEIR identified a less than significant impact related to the routine transport, use, or disposal of hazardous materials.

Proposed Project Analysis and Conclusion

The proposed project may utilize hazardous materials, such as fuels or solvents, during construction. During operation, residents may also routinely use commonly available hazardous substances, like fuels, lubricants, and household cleaners. As discussed above, potential hazards arising from the transport, use, and disposal of these hazardous materials would be minimized and regulated in accordance with local, State, and federal policies, regulations, and standards. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Risk of Upset

Would the project: 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?

Summary of Prior FEIR

The Prior FEIR indicated that the transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion. It is possible that licensed vendors would bring some hazardous materials to and from new retail-commercial sites in the Planning Area as a result of the projects constructed pursuant to the proposed General Plan Update. However, appropriate documentation for all hazardous waste that is transported in connection with specific project site activities would be provided as required for compliance with existing hazardous materials regulations codified in Titles 8, 22, and 26 of the California Code of Regulations and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code. In addition, specific project site developers would be required to comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to Title 49 of the Code of Federal Regulations. Hazardous materials are also required to be stored in designated areas designed to prevent accidental release to the environment. The CBC requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. The Prior FEIR found that compliance with all applicable federal and State laws related to the transportation of hazardous materials, would reduce the likelihood and severity of accidents during transit, thereby impacts were found to be less that significant.

Proposed Project Analysis and Conclusion

The proposed project would include the transport, use, and storage of hazardous materials during the temporary construction phase. As described above, residents may also routinely use and store commonly available hazardous substances, like fuels, lubricants, and household cleaners. Compliance with CBC requirements related to the safe storage of hazardous materials, as well as conformance to all laws and regulations related to hazardous materials found in the California Code

of Regulations, and the Code of Federal Regulations, would ensure that impacts related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would remain less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Exposure of Schools to Hazardous Materials or Emissions

Would the project: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Summary of Prior FEIR

The Prior FEIR indicated that under the 2025 General Plan, the increase of residential and mixed-use land uses, as well as the potential increase in commercial uses, could increase the quantity of sensitive receptors, including schools, in areas adjacent to industrial and commercial land uses, thereby potentially increasing the risk of exposure to hazardous materials, waste, or emissions. Consequently, hazardous materials sites may be located within 0.25-mile of school sites.

As indicated in the Prior FEIR, all businesses that handle or have on-site transportation of hazardous materials would be required to comply with the provisions of the City's Fire Code and any additional element as required in the California Health and Safety Code Article 1 Chapter 6.95 for the Business Emergency Plan. Both federal and State governments require all businesses that handle more than specified amount of hazardous materials to submit a business plan to a regulating agency. Additionally, individual school districts are responsible for siting schools away from hazardous sites. Therefore, the Prior FEIR found that with compliance to existing federal and State regulations and because school districts are responsible for siting school locations away from hazardous waste/generators, impacts associated with the exposure of schools to hazardous materials were considered less than significant.

Proposed Project Analysis and Conclusion

The project site lies 0.1 mile west of Loma Vista Middle School, across La Sierra Avenue. The proposed project may utilize hazardous materials (i.e., fuels or solvents) during construction. During operation, residents may also routinely use commonly available hazardous substances (i.e., fuels, lubricants, and household cleaners).

As discussed above, the Prior FEIR found that compliance with all applicable federal, State, and local laws and regulations related to the use of hazardous materials, including the City's Fire Code and the California Health and Safety Code Article 1 Chapter 6.95, would reduce potential adverse effects on schools within 0.25 mile of construction activities. [33] Therefore, there are no environmental effects that

[33] California Legislative Information. 2024. California Health and Safety Code Article 1 Chapter 6.95. Website: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=20.&chapter=6.95.&lawCode=HSC&article=1. Accessed January 3, 2025.

are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Hazardous Materials Sites

Would the project: 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?

Summary of Prior FEIR

The Prior FEIR indicated that the City contains sites that have been identified as being contaminated from the release of hazardous substances in the soil, including sites containing leaking underground storage tanks, and large and small-quantity generators of hazardous waste. Implementation of the 2025 General Plan could lead to development of these sites that could create a significant hazard to the public or environment. However, the Prior FEIR found that, once discovered, these sites would be required to undergo remediation and cleanup under the DTSC and the Santa Ana RWQCB before construction activities can begin. If contamination at any specific project were to exceed regulatory action levels, the individual proponent would be required to undertake remediation procedures prior to grading and development under the supervision of the DTSC or the Santa Ana RWQCB, depending upon the nature of any identified contamination. Therefore, the Prior FEIR found that since there already are regulations in place, which would be the framework in which environmentally hazardous sites would be dealt with to reduce impacts to the public and environment, impacts were considered to be less than significant. In addition, the Prior FEIR implemented MM HAZ-1, which requires soils testing to be conducted by a qualified soils engineer on sites containing hazardous materials and/or sites where known hazardous materials contamination may have existed that may be inadvertently discovered during construction. MM HAZ-2, requiring soils testing on sites where known agriculture or related activities or weed abatement occurred was also implemented. Finally, the Prior FEIR implemented MM HAZ-3, which requires the City to notify an applicant of the applicant's responsibility to comply with any applicable regulations related to demolition under the EPA's Universal Waste Rule and the California Code of Regulations, further reducing the already less than significant impact.

Proposed Project Analysis and Conclusion

As detailed in the Phase I Environmental Site Assessment prepared for the proposed project, the project site was previously used as a lemon grove from 1931–1990 and involved the use of pesticides on the property. The Limited Phase II Subsurface Investigation Report determined through soil sampling that the remaining concentrations of pesticides on the project site did not exceed their respective conservative screening levels for residential or commercial applications. As such, any remaining pesticide concentrations on the project site would not pose a threat to new residents or the environment.

The proposed project is not located on or near any known hazardous materials sites listed under Government Code Section 65962.5.[34, 35, 36] Should any previously unknown contamination be discovered during construction, the project site would be required to undergo remediation and cleanup under DTSC and Santa Ana RWQCB requirements prior to resuming construction. However, MM HAZ-1, MM HAZ-2, and MM HAZ-3 are not applicable to the proposed project because there is no history of contamination on the site. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Airports

Would the project: 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?

Summary of Prior FEIR

As indicated in the Prior FEIR, there are three airports with influence areas that intersect with the Planning Area: Riverside Municipal Airport, Flabob Airport, and the March Air Reserve Base (MARB). Riverside Municipal Airport is the primary airport serving the City. There are no private air strips within the Planning Area. The Riverside County Airport Land Use Compatibility Plan designates zones of airport-influenced areas for airports in Riverside County and proposed a series of policies and compatibility criteria to promote, where feasible, compatible aviation. The Riverside Airport Master Plan demonstrates the importance of the Riverside Municipal Airport to the community and region, as well as associated challenges inherent in accommodating future aviation needs. The Prior FEIR found that the City would continue to use the Master Plan to guide development on the airport to ensure the airport's long-term viability and to reduce the risk of potential aircraft-related hazards.

With regard to MARB, the Air Installations Compatible Use Zones (AICUZ) study performed by the United States Air Force designates a Clear Zone and two Airport Protection Zones based on landing thresholds for each runway at the base. The March Joint Land Use Study for the joint use of MARB/March Inland Port will become the compatibility plan incorporated into the Riverside County Airport Land Use Compatibility Plan. In the event of an aviation hazard, any potential hazard will be significantly reduced by fast, coordinated, and skilled response operations of all available emergency

[34] California Department of Toxic Substances Control (DTSC). 2024. EnviroStor Database. Website: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=la+sierra+and+alhambra+avenue+riverside+CA. Accessed January 21, 2025.

[35] California State Water Resources Control Board (State Water Board). Geotracker. Website: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=la+sierra+and+alhambra+avenue+riverside+CA. Accessed January 21, 2025.

[36] Hazardous Waste and Substances Site List. (Cortese List). Website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29. Accessed January 21, 2025.

services. In the event of an aviation hazard, mutual aid would most likely be required for law enforcement, Coroner, fire suppression, and medical operations. In addition, the airports are protected by an on-site fire service as required by the Federal Aviation Administration (FAA) regulations.

The Prior FEIR identified that individual development projects within or near the safety and/or compatibility zones would be required to ensure consistency from the Airport Land Use Commission to comply, and be compatible with, the land use standards in the applicable airport compatibility plan. The Land Use and Urban Design Element of the 2025 General Plan was developed to avoid allowing intensive new uses within the airport influence areas of the three airports. Policies include development controls limiting development within areas subject to height noise levels and limiting the intensity and height of development within aircraft hazard zones. The Prior FEIR found that with compliance with General Plan policies, and since individual development projects would be required to comply with existing County and City Airport Plans, impacts related to hazards from airports were found to be less than significant.

Proposed Project Analysis and Conclusion

The Riverside Municipal Airport is approximately 3.23 miles east of the project site. The project site, however, is outside the boundaries of the airport's land use compatibility plan.[37] As such, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

f) Emergency Response and Evacuation

Would the project: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Summary of Prior FEIR

According to the Prior FEIR, implementation of the 2025 General plan could result in traffic conditions becoming more congested. In the event of an accident or natural disaster, the increase in traffic in the City may impede the rate of evacuation for the residents. Also, the response times for emergency medical or containment services could also be adversely affected by the increased traffic conditions in the City.

According to the City of Riverside's Fire Department, in the event of a disaster, the location of a shelter will only be established if needed; otherwise, a "shelter-in-place" order will be enacted to provide protection. "Shelter-in-place" is intended to protect public safety by encouraging people to remain indoors. In certain circumstances, local officials may direct people to go to a community shelter for safety purposes. The City of Riverside has developed an extensive Emergency Operations

[37] Riverside County. 2004. Riverside County Airport Land Use Compatibility Plan. October 14. Accessed January 3, 2025.

Plan, created by the Emergency Management Office. The City's Fire Department promotes a high level of multi-jurisdictional cooperation and communication for emergency planning and response management through activation of the Standardized Emergency Management System (SEMS). The 2025 General Plan also provides policies to identify methods of implementing the emergency plan. The Prior FEIR found that with continued use of the SEMS and implementation of proposed 2025 General Plan policies enforcing compliance with the Emergency Operations Plan, impacts to emergency response plans were found to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would have adequate vehicle circulation via a 36-foot-wide private street, as well as a 36-foot-wide entryway on La Sierra Avenue, both of which would include adequate space for emergency vehicle turning radius. As described in the Prior FEIR, the proposed project would be required to adhere to the City's Emergency Operations Plan, Local Hazard Mitigation Plan (LHMP), and applicable policies of the Public Safety Element of the General Plan.[38] Furthermore, the proposed project would be reviewed by Riverside Fire Department (RFD) to ensure that adequate emergency access is provided. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

g) Wildland Fires

Would the project: Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

Summary of Prior FEIR

The Prior FEIR identified that urban fires within the City have the potential to spread to other structures or areas, particularly if not extinguished promptly. Proactive efforts, such as fire sprinkler systems, fire alarms, fire-resistant roofing and construction methods, can collectively lessen the likelihood and reduce the severity of urban fires. The Prior FEIR also identified WUI areas which may expose urban structures to wildland fires. The major WUI areas of fire risk include Mount Rubidoux, the Santa Ana River Basin, Lake Hills, Mockingbird Canyon/Monroe Hills, Sycamore Canyon, Box Springs Mountain, and La Sierra/Norco Hills.

The RFD takes proactive and preventive measures to reduce fire risks and is a first responder to fire emergencies. In addition, the Riverside County Fire Department and California Department of Forestry and Fire Protection provide mutual aid to the City for fire protection to unincorporated territory within the City's SOI. Toads around structures subject to the fire hazards are required to meet the minimum roadway widths of Title 18 of the revised Subdivision Code, and clearance around any structures will be reviewed on a case-by-case basis as part of the review of the proposed project.

[38] The General Plan is in the process of being updated. Phase I of the General Plan Update was adopted in 2021, which includes an updated Public Safety Element.

The Prior FEIR found that through the implementation of 2025 General Plan policies, the City would continue to reduce the potential for damage by dangerous fires by providing adequate firefighting services, by protecting hillsides and WUI areas, by encouraging residents to plant and maintain drought-resistant, fire-retardant plant species on slopes to reduce the risk of brush fire and soil erosion and by working with the Fire Department to control hazardous vegetation. This coupled with compliance with existing codes and standards, and with continuation of current City and fire station practices, impacts from wildland fires were considered less than significant.

Proposed Project Analysis and Conclusion

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones in State Responsibility Area map, and the project site is not within an Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area (SRA).[39] However, the project site is within a High and Very High FHSZ in a Local Responsibility Area (LRA).[40] As such, the proposed project would be required to comply with the rules and regulations outlined in Title 14 of the California Code of Regulations that govern safety standards for new developments in Very High FHSZs in LRAs. Title 14 includes engineering and construction requirements for structures, as well as standards for emergency access, signage, landscaping and defensible space, and water supply.[41] The proposed project would also be required to comply with fire protection measures included in the policies and programs within the 2025 General Plan and the Municipal Code and to adhere to requirements of the California Fire Code to minimize fire hazards. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

FEIR Mitigation Measures

None required.

Conclusion

With regards to Hazards and Hazardous Materials, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.

[39] California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zones in State Responsibility Area web viewer. Website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed January 3, 2025.

[40] California Department of Forestry and Fire Protection (CAL FIRE). 2026. Fire Hazard Severity Zones. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed May 15, 2026.

[41] Riverside County Fire. 2021. California Code of Regulations, Title 14 Fire Safe Regulations. July. Website: https://rvcfire.org/search?q=fire+safe+regulations&action=. Accessed June 5, 2025.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.10 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?	Significant and Unavoidable impact	No	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant impact	No	No	No	No
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:	Less than significant impact	No	No	No	No
(i) result in substantial erosion or siltation on- or off-site;	Less than significant impact	No	No	No	No
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse 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	Less than significant impact	No	No	No	No
(iv) impede or redirect flood flows?	Less than significant impact	No	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than significant impact	No	No	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No significant impact identified	No	No	No	No

The analysis in this section is based, in part, on the Preliminary Hydrology and Hydraulics Report[42] and Water Quality Management Plan (WQMP)[43] prepared by Kimley-Horn and Associates, Inc. These reports are included in Appendix F.

[42] Kimley-Horn and Associates, Inc. 2024. Preliminary Hydrology & Hydraulics Report. November

[43] Kimley-Horn and Associates, Inc. 2025. Projects-specific Water Quality Management Plan. April.

a) Water Quality

Would the project: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Summary of Prior FEIR

As identified in the Prior FEIR, individual projects developed under the 2025 General Plan would be required to comply with applicable federal, State, and local water quality regulations including compliance with NPDES requirements related to construction and operation measures to prevent erosion, siltation and transport of urban pollutants. All new development would also undergo individual City review and would be required to comply with the RWQCB NPDES Permit No. CAG998001, which sets forth BMPs for new development and redevelopment projects. Currently, the City of Riverside follows State standards for water quality and does not have their own specific standards. During construction, projects would be required to obtain coverage under the State's General Permit for Construction Activities that is administered by the Santa Ana RWQCB. Stormwater management measures would be required to be identified and implemented that would effectively control erosion and sedimentation and other construction-related pollutants during construction. Other management measures, such as construction of infiltration/detention basins, would be required to be identified and implemented that would effectively treat pollutants that would be expected for the post-construction land use. Although stormwater management measures reduce impacts of stormwater pollutants and discharges, the regulations imposed by the NPDES and Santa Ana RWQCB do not prevent all discharges of storm and non-stormwaters. New and existing developments may add small amounts of pollutants to runoff into the Santa Ana River and San Jacinto River (Canyon Lake and Lake Elsinore), which are impaired receiving waters. Therefore, impacts related to exceeding water quality standards or waste discharge requirements related to implementation of the 2025 General Plan were found to be significant and unavoidable.

Proposed Project Analysis and Conclusion

The proposed project would involve grading, excavation, and removal of vegetative cover that has the potential to result in runoff that contains sediment and other pollutants that could degrade surface and groundwater quality if not properly controlled. Furthermore, the proposed project would include a private street system and 56 new single-family homes, which would increase the impervious surface area within the project site from 9,162 to 223,570 square feet.

According to the site-specific WQMP, the proposed project would be split into two drainage management areas (DMAs): DMA-A and DMA-C. DMA-A comprises much of southern portion of the project site and would include underground stormwater infiltration chambers for storage with drainage routed along the streets to surface bioretention in the front parcel over the underground chambers. DMA-C comprises the northern estate properties on La Sierra Avenue and would include bioretention areas on each of the estate properties. Stormwater from rooftops would also be directed into the bioretention areas throughout the site. As stated above, the proposed project would be required to employ BMPs set forth by the NPDES and obtain coverage under the Santa Ana RWQCB general permit.

As such, impacts would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Groundwater

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

Summary of Prior FEIR

The Prior FEIR indicated that drinking water supplies are provided to the City by Riverside Public Utilities (RPU). In addition to water service by the RPU, approximately 9 square miles within the southeast portion of the City of Riverside are served by Western Municipal Water District (WMWD), 0.9 square mile is served by the Eastern Municipal Water District (EMWD), and the majority of the northern sphere area is served by Riverside Highland Water Company (RHWC). Domestic water is primarily supplied to the City by RPU, while the majority of water supplied by WMWD is supplied from Metropolitan Water District (MWD) via imported water from the Colorado River and State Water Project. The primary source of RPU's water supply is groundwater from the Bunker Hill, Colton, Riverside North, and Riverside South groundwater basins. None of these basins are overdrafted, nor are they projected to become so. According to the Prior FEIR, recharge areas for the primary groundwater aquifer that RPU uses for its domestic supply are located in other jurisdictions, therefore implementation of the 2025 General Plan would have no effect on the basin's recharge capabilities, even as new development is constructed. Furthermore, new development would utilize recycled water for various uses such as landscape irrigation, which would reduce domestic water demand.

Therefore, the Prior FEIR determined that because safe yield would be maintained in the groundwater basins and none of the basins are overdrafted (nor are they projected to become so), other forms of conservation such as recycled water will be developed, and because the 2025 General Plan has no direct impacts to groundwater recharge, the buildout of the plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level and impacts were found to be less than significant.

Proposed Project Analysis and Conclusion

According to the Geotechnical Investigation prepared for the proposed project, groundwater was encountered during subsurface exploration at a depth of 26.5 feet below ground surface (BGS). The proposed project would also include 223,570square feet of impervious surfaces. According to the site-specific WQMP, the proposed project would be split into two DMAs. The northern DMA-C would direct runoff into bioretention areas and underground stormwater infiltration chambers to reduce groundwater contamination. The southern DMA-A section would have stormwater discharge points and underground chambers for storage, but drainage will be routed along the streets to surface bioretention in the front parcel over the underground chambers.

As discussed in the Prior FEIR, recharge areas for the primary aquifer used by the City are outside city limits, as such water infiltration on the project site would not feed into the basin. As such the proposed project would not have a significant effect on groundwater recharge. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Drainage

Would the project: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

Summary of Prior FEIR

The Prior FEIR indicated that future development consistent with the 2025 General Plan would involve construction on previously undeveloped land, which could increase the risk of erosion and siltation. All new development would be subject to NPDES General Permit (Order WQ 2022-0057-DWQ); areas of 1 acre or more of disturbance in the Planning Area are subject to preparing and implementing a SWPPP and its associated BMPs. The Prior FEIR concluded that compliance with the NPDES and SWPPP requirements and the policies and actions included in the 2025 General Plan policies that address areas near Arroyos and the Santa Ana River would ensure impacts related to erosion and siltation would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. This could result in an increase in stormwater runoff and the potential to cause erosion. Additionally, the proposed project would include 223,570square feet of new impervious surface. Construction activities and the addition of impervious surface could increase erosion and siltation at the project site.

As discussed above, the proposed project would be subject to the NPDES General Permit (Order WQ 2022-0057-DWQ) because the proposed project would disturb one acre or more of land surface. Also discussed above, the NPDES General Permit requires a SWPPP and associated BMPs, which include erosion and sediment controls, runoff water quality monitoring, proper waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, and identification of maintenance responsibilities, as well as non-stormwater management controls.

There are no streams or rivers on or near the project site. According to the project-specific WQMP, the receiving water for the project site would be the La Sierra Channel. The proposed project would be required to employ BMPs set forth by the NPDES and SWPPP, which would reduce the effects of

stormwater runoff and erosion on the La Sierra Channel. The site is not located in an arroyo nor near the Santa Ana River. Therefore, the proposed project would not result in any environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Summary of Prior FEIR

The Prior FEIR indicated that most of the City consists of urban and built up land, and impacts related to flooding and runoff would not be significant for projects developed as infill within already urbanized areas. However, some parts of the City remain rural or undeveloped, and development in these areas would increase the risk of flooding and runoff. As discussed above, all new development would be subject to NPDES General Permit (Order WQ 2022-0057-DWQ); areas of 1 acre or more of disturbance are subject to preparing and implementing a SWPPP and its associated BMPs to reduce flooding and runoff impacts. The City also requires development pads to be elevated above potential flood levels. The City's underground storm drains and streets are designed to accommodate the 10-year storm from curb to curb, while 100-year storms are accommodated within street right-of-way. As such, impacts related to flooding and stormwater runoff were found to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would include the addition of 223,570square feet of new impervious surfaces. The addition of this impervious surface could lead to an increase in the amount of surface runoff. According to the Federal Emergency Management Agency (FEMA) Flood Map for the area, the project site is mapped within Zone X—an area of minimal flood risk.[44]

The proposed project would be subject to the NPDES General Permit, which would require the development of a SWPPP and associated BMPs, since the project site is greater than one acre. Also discussed above, the project site would be split into two DMAs, the northern DMA-C would direct storm drainage into designated retention systems, such as bioretention areas on the estate parcels. The southern DMAs would have slightly different approach due to lower infiltration rates. They would retain the underground chambers for storage but drainage would be routed along the streets to surface bioretention in the front parcel over the underground chambers. Roof drains and site drainage would be routed to adjacent landscaping to the maximum extent possible.

Landscaping would include trees, shrubs, grasses, and groundcover, which would improve water quality by intercepting and storing rainfall on leaves and branch surfaces thereby reducing runoff volumes and delaying the onset of peak flows. In addition, the uptake of water from trees through transpiration would reduce the amount of runoff from the project site. The landscaping design would

[44] Federal Emergency Management Agency (FEMA). 2024. FEMA National Flood Hazard Layer (NFHL) Viewer. Website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed January 6, 2025.

be required to meet State standards for water efficiency. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

(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;

Summary of Prior FEIR

The Prior FEIR indicated that most of the City consists of urban and built up land, and impacts related to flooding and runoff would not be significant for projects developed as infill within already urbanized areas. However, some parts of the City remain rural or undeveloped, and development in these areas would increase the risk of runoff. Development consistent with the 2025 General Plan would also significantly increase the amount of impervious surface area in the City and Sphere Areas.

As discussed above, all new development would be subject to NPDES General Permit (Order WQ 2022-0057-DWQ); areas of 1 acre or more of disturbance are subject to preparing and implementing a SWPPP and its associated BMPs to reduce flooding and runoff impacts. All new development proposed under the 2025 General Plan is also required to prepare and implement a WQMP. Preliminary BMP's, in compliance with the WQMP, must be approved before the development can be approved and finalized prior to grading permit issuance. The purpose of this requirement is to ensure treatment BMPs are installed/constructed, as part of the project so that the pollutants it generates will be treated in perpetuity.

With regards to exceeding capacity, development consistent with the 2025 General Plan would significantly increase the amount of runoff into the existing storm drains. As result of this, facilities would need to be expanded and/or new facilities would need to be constructed to accommodate both existing and planned development. The City has developed a 5-year Capital Improvement Program (CIP), which includes a Strom Drain Program. This particular program will include improvement projects that eliminate flooding during major storm events. Construction of these improvements will be in coordination with Riverside County Flood Control and Water Conservation District projects and in support of economic development projects.

The General Plan reinforces the City's CIP program with policies that address anticipated increase in runoff due to the General Plan implementation. In addition, to avoid flooding and/or placing new developments within flood areas, the City requires development pads to be elevated above flood levels. Underground storm drains and streets are designed to accommodate the 10-year storm from curb to curb, while 100-year storms are accommodated within street right-of-way. Therefore, impacts related to stormwater facilities' capacity were found to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would include the installation of new storm drainage infrastructure to serve the proposed development, which would connect to the City's existing system at La Sierra Avenue and

Alhambra Avenue. The project-specific WQMP also separates the project site into two DMAs. The northern DMA-C would direct storm drainage into designated retention systems, such as bioretention areas on the estate parcels. The southern DMAs would have slightly different approach due to lower infiltration rates. They would retain the underground chambers for storage but drainage would be routed along the streets to surface bioretention in the front parcel over the underground chambers. The proposed project would also be subject to the NPDES General Permit, requiring the development of a SWPPP which would reduce impacts on stormwater systems. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

(iv) impede or redirect flood flows?

Summary of Prior FEIR

The Prior FEIR indicated that all development projects proposed under the General Plan would be required to implement a WQMP, which would reduce the effects of erosion in the Planning Area.

The 2025 General Pla includes several policies, such as OS-6.3, OS-7.6, and LU-5.1-5.6, which are intended to protect drainage patterns and watersheds within the City related to Arroyos and the Santa Ana River. Additionally, all future development consistent with the General Plan would be evaluated on a project-by-project basis for impacts related to flooding and would mitigate impacts as appropriate. Therefore, the potential for loss, injury, or death from impeding flood flows would be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the proposed project would include an additional 223,570square feet of new impervious surface. The site is not located in an Arroyo, nor is it near the Santa Ana River. Additionally, the project site is in an area of minimal flood risk (Zone X).[45] Although the proposed project would include new impervious surfaces, which could lead to an increase in surface runoff that could lead to flooding, the site-specific WQMP separated the project site into two DMAs which would redirect flood flows into bioretention areas and stormwater infiltration chambers. The proposed project would also be subject to the NPDES General Permit, which would require a SWPPP and associated BMPs which would further reduce the harmful effects of potential runoff on flood patterns in the area. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[45] Federal Emergency Management Agency (FEMA). 2024. FEMA National Flood Hazard Layer (NFHL) Viewer. Website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed January 6, 2025.

d) Risk of Pollutant Release Due to Inundation

Would the project: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Summary of Prior FEIR

As indicated in the Prior FEIR, the most likely area that could be subject to seiche is Lake Mathews and Lake Evans in Fairmont Park. The land uses proposed in the General Plan for the areas surrounding Lake Mathews are predominately open space/conservation. Because Lake Evans is surrounded by park area and directly outlets into the Santa Ana River, the damage related to a seiche in Lake Evans and Lake Mathews is considered minimal. Since the project area is not located in a coastal area, no impacts due to tsunamis would occur.

The Prior FEIR did not indicate any areas within the proposed project that are at risk of significant mudflows associated with erosion and fire damage, being confined to areas near the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain area, and nine arroyos. The General Plan has designated these areas for open space and recreation uses. As stated in General Plan Policies LU-5.1 through 5.5, the arroyos of the City would be fully protected and preserved in their natural state to the extent possible. Limited nuisance mudflows may occur throughout the City in the event of an extreme storm resulting in erosion of urban landscaping. The City would require standard construction BMPs to control erosion and protect areas with steep slopes for all new development.

To avoid flooding and/or placing new development within flood areas, the City requires development pads to be elevated above flood levels. In addition, City storm drains and streets have been designed to accommodate the 10-year storm from curb to curb, while 100-year storms are accommodated within street right-of-way. The runoff from proposed development would be required to be attenuated on a project-specific basis so that the off-site discharge is the same as the undeveloped condition. As such the Prior FEIR determined that impacts related to seiches, tsunamis, mudflows and flooding would be less than significant.

Proposed Project Analysis and Conclusion

The nearest body of water to the project site is the Santa Ana River, which is 1.78 miles to the north, and the site is not in proximity to any large bodies of water (i.e., lakes) such that the project site would be impacted from a seiche. Lake Matthews is approximately 6.75 miles southeast of the proposed project. According to the FEMA Flood Map for the area, the project site is mapped within Zone X—indicating an area of minimal flood risk.[46] The proposed project is not located in an area identified with potential for significant mudflows and does not contain any arroyos. Furthermore, the proposed project does not include the storage of hazardous materials or pollutants. Therefore, there are no

[46] Federal Emergency Management Agency (FEMA). 2024. FEMA National Flood Hazard Layer (NFHL) Viewer. Website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed January 6, 2025.

environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Water Quality Control or Sustainable Groundwater Management Plans Consistency

Would the project: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to conflict with or obstruction of a water quality control plan or sustainable groundwater management plan.

Proposed Project Analysis and Conclusion

The proposed project would be subject to the NPDES General Permit, which requires a SWPPP. This includes the requirement of BMPs that reduce the proposed project's effects on groundwater quality and runoff pollution. As discussed above, recharge areas for the primary aquifer used by the City are outside city limits, as such water infiltration on the project site would not feed into the basin. The proposed project has also prepared a site-specific WQMP, which contains measures to increase stormwater retention and reduce the impact of runoff pollution in local waters. This includes separating the project site into two DMAs and channeling stormwater into bioretention areas and a stormwater infiltration chambers. The proposed project's compliance with NPDES permit requirements, adherence to the Municipal Code, and implementation of General Plan goals, policies, and actions would ensure that impacts related to groundwater and water quality degradation from construction activities remain less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Hydrology and Water Quality, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.11 Land Use and Planning *Would the project:*					
a) Physically divide an established community?	Less than significant	No	No	No	No
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?	Less than significant	No	No	No	No

a) Division of an Established Community

Would the project: Physically divide an established community?

Summary of Prior FEIR

The Prior FEIR indicated that the physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development was built which was inconsistent with the land uses in the community such that it divides the community. The General Plan enforces preservation and revitalization of its recognized 28 neighborhoods within the City through the Land Use and Urban Design Element, the Circulation and Community Mobility Element, the Historic Preservation Element, and the Revised Zoning Code. The General Plan includes policies that help guide the goals of reinforcing and strengthening these neighborhoods.

Adherence to General Plan Policy CCM-1.1 could result in a new major roadway within the Southern Sphere area known as the Mid-County Parkway (formerly known as the Ramona Expressway/Cajalco Road Corridor). Because the final alignment location was unknown, a speculative programmatic analysis was conducted for this roadway. However, the Southern Sphere is less densely populated, and implementation of General Plan policies would ensure that new connections would be designed to prevent cut-through traffic in local neighborhoods.

The City would prioritize infill developments through three forms: construction on undeveloped land, intensification of current land uses, and through the conversion of economically under performing and obsolete development to more appropriate land uses. The neighborhoods with the potential for the most change/improvement include: Arlanza, Arlington, Arlington South, Casa Blanca, Downtown, Eastside, Hawarden Hills, Hunter Industrial Park, La Sierra, La Sierra Acres, La Sierra South, Magnolia Center, Northside, and Sycamore Canyon Business Park – Canyon Springs, and University.

General Plan policies for these areas aim at strengthening, not dividing, these neighborhood communities. The General Plan encourages the intensification of major development corridors within the City. Because these are existing major development corridors, no new division of communities would occur through providing advanced public transportation or more intense development. Furthermore, no substantial demolition of existing residential uses is proposed under the General Plan, and there are no new proposed land uses under the General Plan that would physically divide an existing community. Furthermore, the Citywide Design and Sign Guidelines reinforce the physical image of the City. The Guidelines maintain and protect the value of property and neighborhoods. Through the design of individual projects, connectivity to surrounding neighborhoods would be promoted. Therefore, impacts related to the physical division of an established community were found to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project is located in the La Sierra neighborhood. The proposed project consists of the construction of 56 single-family homes and associated amenities on a site with existing single-family homes. The proposed project would include private roadways, common space and amenity areas, landscaping, and pedestrian walkways throughout the site. The proposed project would also provide improvements to the existing roadways adjacent to the site, further improving access to and around the site. The proposed project does not involve the removal or alteration of existing roadways or the construction of any features which would reduce connectivity. It includes open space and landscaped areas throughout the site including frontage improvements along La Sierra Avenue that would enhance the neighborhood community. Furthermore, the proposed project would not divide an existing community, causing division. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Conflict with Applicable Land Use Plans, Policies, or Regulations

Would the project: 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?

Summary of Prior FEIR

The Prior FEIR identified that the implementation of the General Plan would not conflict with any land use plans, policies or regulations, including those under the California Water Code Sections 10910-10915, SCAG Regional Comprehensive Plan and Guide, SCAQMD AQMP, Riverside County Airport

Land Use Compatibility Plan (ALUCP), City of Riverside Subdivision Code, and Riverside Redevelopment Agency. Implementation of Specific Plans, the Zoning Code Update, Subdivision Code Update, Noise Code Amendment, Magnolia Specific Plan, and Citywide Design and Sign Guidelines would also be less than significant, as they are consistent with and implement the General Plan. Therefore, impacts were found to be less than significant.

Proposed Project Analysis and Conclusion

The General Plan land use designation for the project is split among its parcels. APNs 149-052-11 and -012 are designated as SRR, while APNs 149-052-004, -009, -013, and -014 are designated as MDR. The SRR designation is intended for large lot single-family development while allowing enough space for animal keeping as an auxiliary use. The SRR designation supports a maximum density of 2.1 dwelling units per acre, with the potential to support 3.3 dwelling units per acre with a PRD Permit).[47] This designation aligns will the planned estate parcels that have lower density and allow for animal-keeping facilities. This aligns will the zoning designation and does not require any amendments.

The MDR designation is intended for the development of single-family residences, town houses, and row houses. The MDR designation supports a maximum density of 6.2 dwelling units per acre, with the potential to support eight dwelling units per acre with a PRD Permit.[48] The project applicant would utilize Density Bonus Law and a PRD Permit to allow for development of the site with a blended density. As described previously, four single-story residences would be arranged so that those that are on the parcel zoned RR, which has the lowest allowed density (3.3 du/acre with a PRD), sit on larger estate sized parcels. The remaining 52 residences would be oriented toward a looping street within the community. This arrangement, along with the utilization of a PRD Permit, SDBL, and waivers of setback, common space, and fencing requirements described in Section 2, Project Description, would allow for the construction of up to a maximum of 57 residences on-site.

The proposed project would not require an amendment to the General Plan land use designation of the project site and would be consistent with the PRD Permit. The proposed project is residential in nature and would therefore be consistent with the permitted uses of the 2025 General Plan land use designations. As such, the proposed project would be consistent with the uses contemplated for the project site in the 2025 General Plan. Therefore, there are no environmental effects that are peculiar

[47] City of Riverside. 2007. Land Use and Urban Design Element. Single-Family Residential Land Use Designations. Semi-Rural Residential (SRR). Website: https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf. Accessed December 30, 2024.

[48] City of Riverside. 2007. Land Use and Urban Design Element. Single-Family Residential Land Use Designations. Medium Density Residential (MDR). Website: https://www.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf. Accessed December 30, 2024.

to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Land Use and Planning, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.12 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?	Less than significant impact	No	No	No	No
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?	No impact	No	No	No	No

a, b) Loss of Minerals Resources of Statewide or Local Importance

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?

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?

Summary of Prior FEIR

The Prior EIR indicates that State-classified Mineral Resource Zones (MRZ)-2 and MRZ-4 areas are found in the City. MRZ-2 zones are zones where significant mineral deposits are present or there is a high likelihood for their presence and development should be controlled. MRZ-4 zones are zones where there is insufficient data to assign any other MRZ designation. The proposed General Plan Land Use Policy Map provides for the preservation of the majority of MRZ-2 land as either open space or parks/recreation, both of which do not preclude mining activities. The six General Plan land use designations for the MRZ-2 land are Open Space/Natural Resources, Public Parks, Public Facilities/Institutional, MDR, Office and Private Recreation. The majority of these designations assist

in protecting the natural resources, with only a small portion being in the Public Facilities/Institutional designation, which allows for schools, hospitals, libraries, utilities, and government institutions.

The Prior FEIR Land Use Plan has taken the MRZ-2 designated area into consideration, and the land use designations do not preclude the mining of the underlain resources. Additionally, it is unknown and therefore unlikely that there are significant mineral deposits in the MRZ-4 areas that would be affected by the implementation of the General Plan. Furthermore, there are no specific areas within the City or Sphere Area, which have locally important mineral resource recovery sites. Therefore, impacts were found to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would not involve the extraction of mineral resources. The proposed project is designated as MRZ-4, indicating that there is insufficient data to assign any other MRZ designation.

As noted above, it is unknown and therefore unlikely that there are significant mineral deposits in the MRZ-4 areas that would be affected by the implementation of the General Plan. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Mineral Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.13 Noise *Would the project:*					
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?	Significant and unavoidable impact.	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than significant impact.	No	No	No	No
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?	No impact.	No	No	No	No

The analysis in this section is based on the Noise Impact Analysis Report by FCS on February 26, 2025. The Noise Impact Analysis Report can be found in Appendix G.

Existing Noise Environment

The project site is surrounded by single-family homes to the north, east, and west, and La Sierra Avenue to the south.

Short-term noise monitoring was conducted by Vista Environmental between 11:09 a.m. and 11:43 a.m. on Tuesday, January 30, 2024.[49] The noise measurements were taken during the midday hours, as the midday hours typically have the highest daytime noise levels in urban environments. It should be noted that peak noise hours often vary slightly from peak traffic hours, as peak noise hours more closely align with high volume traffic that is still free flowing; while peak traffic hours often result in slower vehicle speeds due to the volume of traffic on the roadway. The short-term existing noise measurement results are summarized in Table 14.

Table 14: Existing Ambient Noise Levels on the Project Site

Site ID #	Description	Primary Noise Sources	L_{eq}	L_{max}
ST-1	Located near the northwest corner of the project site, approximately 30 feet east of Alhambra Avenue centerline.	Vehicles on La Sierra Avenue (650 feet to the east)	49.3	70.3
ST-2	Located on the east side of the project site, approximately 50 feet west of La Sierra Avenue centerline.	Vehicles on La Sierra Avenue	67.9	79.0

Notes:
L_{eq} = equivalent sound level
L_{max} = maximum noise level
Source: Vista Environmental. 2024. Due Diligence Noise and Vibration Assessment for the Proposed La Sierra and Alhambra Residential Project. February 4.

a) Noise Levels in Excess of Adopted Standards

Would the project result in: 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?

Summary of Prior FEIR

Construction

The Prior FEIR indicated that construction activities could generate noise exceeding the City's established noise performance standards. However, Municipal Code Section 9.04.100 exempts construction noise from noise performance standards during specified hours, provided equipment noise does not exceed 83 dBA (A-weighted decibel) at 25 feet or the noise level at the property line does not exceed 86 dBA.

[49] Vista Environmental. February 4. City of Oceanside – Due Diligence Noise and Vibration Assessment for the Proposed La Sierra and Alhambra Residential Project. 2024.

Two types of short-term noise impacts were identified: (1) noise from increased traffic flow due to construction-related trips and (2) noise from site preparation, grading, and construction activities. The Prior FEIR determined that while construction trips would generate temporary noise, they would not double existing traffic volumes or cause a perceptible increase in hourly or daily average traffic noise levels. Additionally, construction activities must comply with City regulations that restrict hours and intensity of noise. The City's Code Enforcement system addresses construction noise complaints, ensuring compliance. Therefore, the Prior FEIR concluded that short-term construction noise impacts would be less than significant.

Operation

Traffic Noise Impacts

The Prior FEIR indicated that a significant impact would occur if project-related traffic caused a substantial increase in ambient noise levels. The General Plan states that an exterior noise increase of more than 4 dBA is considered significant. The Prior FEIR found that no roadway segment would experience an increase exceeding this threshold under existing plus project and cumulative plus project conditions. Therefore, the impact would be less than significant.

Substantial Permanent Increase in Ambient Noise Levels

The Prior FEIR found that noise levels in some locations already exceed City standards and would continue to do so with future development. While policies such as avoiding noise-sensitive land uses in impacted areas and implementing noise reduction measures would minimize impacts for new development, they would not eliminate noise exposure for existing sensitive receptors.

Future noise contours indicate that some areas will experience noise levels exceeding 65 dBA due to increased traffic and rail operations. Noise increases of up to 8 dBA CNEL are projected in certain locations. Since a 3 dBA increase is typically noticeable and a 5 dBA increase is considered significant, the projected increase in noise levels meets the threshold for a substantial impact. The Prior FEIR concluded that projected increases in population, traffic, and commercial activity would result in noise increases of up to 8 dBA CNEL in some areas, exceeding the 5 dBA threshold for significance. Therefore, impacts to ambient noise levels would be significant and unavoidable.

Proposed Project Analysis and Conclusion

Short-term Construction Impacts

A significant impact would occur if implementation of the proposed project would expose persons working or residing at the project site or in the project vicinity to noise levels in excess of established standards.

Municipal Code Section 7.35.020(G) exempts all construction-related noise from permitted construction activities that take place between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays. Section 7.35.020(G) also prohibits all construction activities on Sundays and federal holidays.

While the City does not establish noise level thresholds for temporary construction activities, this analysis uses the noise limits established by the Federal Transit Administration (FTA) to identify the potential for impacts due to substantial temporary construction noise. The FTA identifies construction noise limits in the Transit Noise and Vibration Impact Assessment Manual. [50] During daytime hours, a significant temporary increase would be an increase in excess of the average daily noise levels of 80 dBA equivalent sound level (L_{eq}) as measured at a receiving residential land use.

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Construction-related Traffic Noise

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. One type of short-term noise impact that could occur during project construction would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site. The transport of workers and construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. Typically, a doubling of the Average Daily Traffic (ADT) hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels; which, as discussed in the characteristics of nose discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments.

According to the Focused Traffic Analysis prepared by Urban Crossroads, [51] documented existing trips on La Sierra Avenue are 12,800 ADT trips while reasonable worst-case daily construction trips for the proposed project would range up to 500 trips per day. [52] Therefore, project-related construction trips would not double the daily traffic volumes along any roadway segment in the project vicinity and, as a result, would cause a less than 3 dBA increase in traffic noise levels. For this reason, short-term intermittent noise from construction trips would not be expected to result in a perceptible increase in hourly- or daily average traffic noise levels in the project vicinity. Therefore, short-term construction-related noise impacts associated with the transportation of workers and equipment to the project site would be less than significant.

Construction Equipment Operational Noise

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the

[50] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

[51] Urban Crossroads. 2025. La Sierra Residential Focused Traffic Analysis. December 31.

[52] Based on the default CalEEMod runs prepared for the project.

character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings. Impact equipment, such as impact pile drivers, are not expected to be used during construction of this project. This Noise Impact Analysis focuses on analyzing the loudest phase of construction and demonstrates that impacts would be reduced to less than significant.

The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings.

Construction of the proposed project is expected to require the use of a variety of equipment, the loudest being a grader, excavator, and bulldozer, all of which generate maximum reference noise levels of 85 dBA maximum noise level (L_{max}) at 50 feet.

A conservative but reasonable assumption is that this equipment would operate simultaneously and continuously over at least a 1-hour period in the vicinity of the closest existing sensitive receptors but would move linearly over the project site as they perform their earthmoving operations, spending a relatively short amount of time adjacent to any one receptor. A characteristic of sound is that each doubling of sound sources with equal strength increases a sound level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from the acoustic center of a construction area. The acoustical center reference is used because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level. These operations would be expected to result in a reasonable worst-case hourly average of 86 dBA L_{eq} at a distance of 50 feet from the acoustic center of a construction area. These worst-case construction noise levels would only occur during the site preparation phase of development.

The closest noise-sensitive receptor to the proposed project site is a single-family home located south of the project site. This closest receptor would be located approximately 50 feet from the nearest acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate simultaneously at the project site. At this distance and assuming minimal shielding from the existing 6-foot concrete block wall on the southern side of the project site, reasonable worst-case construction noise levels could range up to approximately 79 dBA L_{eq}, at the façade of the nearest sensitive receptor. The noise calculation sheets are provided in Appendix G.

The calculated worst-case construction noise levels do not exceed the FTA's 80 dBA L_{eq} threshold as measured at the nearest residential receptors. Furthermore, the proposed project will comply with the City's standard permissible hours for construction (7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays), which would ensure that construction noise would not result in a substantial increase in nighttime noise levels in the project vicinity. In addition, the proposed project must also comply with MM Noise 4 of Prior FEIR, which would ensure construction noise impacts are even further reduced. Therefore, temporary or periodic noise impacts from construction activities associated with implementation of the proposed project would be less than significant.

Mobile Source Operational Noise

A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the proposed project. Typically, a doubling of the hourly or daily average traffic volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels, which, as discussed in the characteristics of nose discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments. Therefore, for the purposes of this analysis, a doubling of the existing ADT volumes would result in a substantial permanent increase in traffic noise levels.

Operation of the proposed project is anticipated to create noise from generation of additional vehicle trips onto La Sierra Avenue. According to the La Sierra Residential Focused Traffic Analysis, prepared by Urban Crossroads and dated December 31, 2025, the proposed project is anticipated to generate a net increase of 514 average daily trips per day. La Sierra Avenue in the vicinity of the project site currently has 12,800 average daily trips. As such, the proposed project would increase the traffic on La Sierra Avenue by a maximum of 4 percent.

Therefore, project trips would not result in a doubling of trips on access roadway segments in the project vicinity. In fact, the project's net increase of 514 average daily trips would result in a less than 1 dBA increase in existing traffic noise levels. Therefore, implementation of the proposed project would not result in a substantial increase in traffic noise levels compared with traffic noise levels existing without the project, and project traffic noise impact would be less than significant and no mitigation would be necessary.

Stationary Source Operational Noise

A significant impact would occur if operational noise levels generated by stationary noise sources at the project site would exceed the following exterior noise levels as measured at residential properties in the project vicinity:

- 55 dBA L_{eq} between the hours of 7:00 a.m. and 10:00 p.m.; or
- 45 dBA L_{eq} between the hours of 10:00 p.m. and 7:00 a.m.

Furthermore, a significant impact would also occur if the proposed project would result in noise levels in excess of 45 dBA L_{eq} from 7:00 a.m. to 10:00 p.m. and to 35 dBA L_{eq} from 10:00 p.m. to 7:00 a.m., as measured in the interior of receiving residences in the project vicinity.

The primary new stationary noise source associated with implementation of the proposed project would be new mechanical ventilation system operations associated with the proposed residential uses. Potential impacts associated with this new noise source are analyzed below.

Mechanical Ventilation Equipment

Implementation of the proposed project would include operation of new mechanical ventilation equipment. At the time of this analysis, details were not available pertaining to proposed mechanical ventilation systems for the project; therefore, a reference noise level for typical mechanical ventilation systems was used. Noise levels from typical residential mechanical ventilation equipment range up to approximately 70 dBA L_{eq} at a distance of 3 feet.

Proposed mechanical ventilation equipment could be located as close as approximately 60 feet from the nearest off-site receptor, a single-family residential home on the southern border of the project site. At this distance, and assuming minimal shielding for the existing 6-foot-high concrete block wall, noise generated by mechanical ventilation equipment would attenuate to below 31 dBA L_{eq} at the nearest off-site residential receptors. The calculation spreadsheet with the detailed modeling assumptions is included in Appendix G.

These project reasonable worst-case stationary source operational noise levels would not exceed the City most restrictive exterior nighttime noise limit of 45 dBA L_{eq}, as measured at the nearest residential receptor. In addition, they would clearly also not exceed the City's most restrictive interior noise level threshold of 35 dBA L_{eq} as measured at the interior of the nearest residential receptor. Therefore, the proposed project's mechanical ventilation equipment operations would not generate a substantial permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance; and the impact of noise produced by project-related mechanical ventilation equipment operations to off-site sensitive receptors would be less than significant and no mitigation would be necessary.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Groundborne Vibration

Would the project result in: **Generation of excessive groundborne vibration or groundborne noise levels?**

Summary of Prior FEIR

Short-term Construction Vibration Impacts to Off-site Receptors

The Prior FEIR indicated that future construction activities could generate groundborne vibration, potentially impacting nearby buildings and occupants. Construction-related vibration could be significant in cases where sensitive receptors are immediately adjacent to construction sites, particularly if activities such as pile driving or heavy equipment operation occur.

The Prior FEIR concluded that construction impacts are location-specific and temporary. The City's Municipal Code restricts construction hours, and Implementation Plan Tool N-2 ensures project-level assessment and mitigation of construction-related vibration impacts. Therefore, with these measures in place, construction vibration impacts are considered less than significant at the General Plan programmatic level.

Operational Vibration Impacts

The Prior FEIR identified that impacts related to excessive vibration to existing land uses currently do occur, proposed mitigation can reduce vibration impacts for some proposed development; however, it is not feasible to relocate every existing sensitive receptor located within the 65 VdB contour shown on Figure 5.11-4 with respect to train routes. Future infill projects along train routes may also be affected by vibration; therefore, there is no feasible mitigation available for this impact. Impacts would be significant yet intermittent to existing and proposed sensitive land uses located adjacent to rail lines. Implementation of MM Noise 3 will reduce, but not eliminate, impacts; therefore, impacts would remain significant.

Proposed Project Analysis and Conclusion

Groundborne Vibration/Noise Levels

This section analyzes both construction and operational groundborne vibration and noise impacts. Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. Groundborne noise is generated when vibrating building components radiate sound, or noise generated by groundborne vibration. In general, if groundborne vibration levels do not exceed levels considered to be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City has not adopted criteria for groundborne vibration impacts. Therefore, for purposes of this analysis, the FTA's vibration impact criteria are utilized. The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual. [53]

Short-term Construction Vibration Impacts

Of the variety of equipment used during construction, the small vibratory rollers anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 inches per second (in/sec) PPV at 25 feet from the operating equipment.

[53] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

The closest off-site structure is a single-family home located along the southern border of the project site, approximately 50 feet from the nearest construction footprint where a small vibratory roller would potentially operate. At this distance, groundborne vibration levels could range up to 0.03 in/sec PPV from operation of a small vibratory roller. This is well below the FTA's Construction Vibration Impact Criteria of 0.2 in/sec PPV for buildings of this type (structures of nonengineered timber construction). Therefore, potential construction vibration impacts to this off-site structure would be less than significant.

Therefore, construction of the proposed project would not generate excessive groundborne vibration levels, and the impact of groundborne vibration levels on off-site receptors would be less than significant.

Operational Vibration Impacts

Implementation of the proposed project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be noticeable without instruments at the lot line of the project. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity. The proposed project is not located along a train route and, therefore, MM Noise 3 is not applicable to the proposed project. Thus, project operations would not generate excessive groundborne vibration levels or expose proposed uses to excessive groundborne vibration levels, and groundborne vibration impacts would be less than significant.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Airport or Private Airstrip Noise

Would the project result in:	**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?**

Summary of Prior FEIR

The Prior FEIR identified that General Plan Policies N-1.5, CCM-11.7, N-2.1, N-2.2, N-2.5, N-3.2 thru 3.4, and LU-22.3 through 22.5 (listed below) aim to ensure that future residential or sensitive land uses would be restricted from developing within any existing airport influence areas.

Circulation and Community Mobility Element

Policy CCM-11.7 Ensure environmental impacts such as noise, air quality, pollution, traffic congestion, and public safety hazards associated with continued operation of local airports are mitigated to the extent practicable.

Noise Element

Policy N-1.5 Avoid locating noise-sensitive land uses in existing and anticipated noise impacted areas.

Policy N-2.1 Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Table 5.11-D, Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions.

Policy N-2.2 Avoid placing noise-sensitive land uses (e.g., residential uses, hospitals, assisted living facilities, group homes, schools, day care centers, etc.) within the high noise impact areas (over 60 dB CNEL) for Riverside Municipal Airport and Flabob Airport in accordance with the Riverside County Airport Land Use Compatibility Plan.

Policy N-2.5 Utilize the Airport Protection Overlay Zone, as appropriate, to advise landowners of special noise considerations associated with their development.
Policy N-3.2: Work with the Riverside County Airport Land Use Commission and the March Joint Powers Authority to develop noise/land use guidelines and City land use plans that are consistent with ALUC policies.

Policy N-3.3 Carefully consider planned future operations of the March Air Reserve Base and March Inland Port in land use decisions for properties located within the airport-influenced area.

Policy N-3.4 Support the noise/land use policies for the area adjacent to the March Air Reserve Base/March Inland Port through the adoption of the March ALUS into the Riverside County Airport Land Use Compatibility Plan.

Land Use Element

Policy LU-22.3 Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise.

Policy LU-22.4 Adopt and utilize an Airport Protection Overlay Zone and the Riverside County Airport Land Use Compatibility Plan as it affects lands within the City of Riverside.
Policy LU-22.5: Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted on Figure PS-6 – Airport Safety Zones and Influence Areas (in the General Plan) for consistency with all applicable Airport Land Use Compatibility Plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.

The General Plan establishes the noise/land use compatibility guidelines for outdoor noise, which includes airport noise. The maximum threshold for residential land use is 65 dBA. Therefore, because the General Plan land uses are sensitive to the documented noise contours for the applicable airports in the Planning Area and future development near the two airports are subject to ALUC conditions, as well as by implementing the General Plan policies and the City's Municipal Code, the Prior FEIR concluded that exposure of people residing or working in an airport land use plan area to excessive noise is considered less than significant.

Furthermore, there are no private airstrips in the vicinity of the Planning Area. Therefore, the Prior FEIR concluded that implementation of the proposed General Plan and Noise Code Amendment will not expose people residing or working in the planning area to excessive noise levels related to a private airstrip and would have no impact.

Proposed Project Analysis and Conclusion

Noise Levels from Airport Activity

A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an Airport Land Use Compatibility Plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The nearest airport to the project site is Riverside Municipal Airport, located approximately 2.8 miles east of the project site. Because of the distance from and orientation of the airport runways, the project site is located well outside of the 65 dBA CNEL airport noise contours. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for residential land use development, and there would be no project impact associated with airport noise.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

The Prior FEIR mitigation measures were evaluated for their applicability to the proposed project. The following noise mitigation measures required by the City for implementation of the General Plan apply to the proposed project:

MM Noise 4 To mitigate for temporary noise from construction activities to existing sensitive receptors when a variance is granted related to construction times, additional measures shall be applied by the City, to the extent feasible, to reduce noise impacts to sensitive receptors. Additional measures could include, but are not limited to:

locating work at night away from sensitive receptors, limiting the duration of work needing to be completed under the variance, and ensuring construction equipment is properly fitted and maintained with mufflers.

Conclusion

With regards to Noise, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.14 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)?	Significant and unavoidable impact.	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant impact.	No	No	No	No

a) Growth Inducement

Would the project: Induce substantial 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)?

Summary of Prior FEIR

According to the City's General Plan estimates for the Planning Area, the population of the City and its SOI is projected to increase under the typical development scenario to 383,077 persons, which would equate to approximately 127,692 households and 865,341 employed persons by 2025. If projected at the maximum development possible, then the population would be approximately 585,926 persons, or approximately 195,309 households and 1,177,625 persons employed. The maximums, which include PRDs, are designed for worst-case scenarios and are not reasonably foreseeable due to existing development and planning limitations.

State law requires cities in Southern California to facilitate new housing construction according to goals set by SCAG. In the Prior FEIR, SCAG projected the City would have an estimated population

of 353,397 persons. The Prior FEIR determined that the City would have a 33 percent higher population than SCAG's projections when analyzing the worst-case scenario, but the City projected a slightly lower population to SCAG's projections under the typical development scenario.

The Prior FEIR determined that the implementation of the General Plan would directly and indirectly induce population growth even though that growth was anticipated by SCAG in its population projections and regional planning efforts. Therefore, the Prior FEIR concluded that impacts would be significant and unavoidable.

Proposed Project Analysis and Conclusion

The current population of the City is approximately 318,858 persons as of July 2023.[54] According to the Prior FEIR, the City has a projected population of 383,077 persons at buildout in 2025. The proposed project would construct 56 single-family residences, which would produce an estimated 184 residents based on an average persons per household of 3.27.[55] Therefore, the proposed project would account for approximately 0.06 percent of the City's current population and approximately 0.05 percent of the City's projected population, representing a nominal increase which has been accounted for within the Prior FEIR. Therefore, the proposed project would not result in substantial unplanned population growth in the City, and the proposed project would have less than significant impacts in this regard.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Displacement of Persons or Housing

Would the project: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Summary of Prior FEIR

The Prior FEIR states that development under the General Plan would occur under three scenarios: (1) on sparse/vacant developable land, (2) by intensifying current land uses, and (3) through the conversion of land uses of economically underperforming and obsolete development. However, no substantial demolition of existing residential uses is specifically included under the General Plan.

Infill projects would not displace businesses or residents, and while the General Plan does not specifically plan for substantial demolition of existing residential uses, the Prior FEIR determined that revitalization of underutilized sites could displace residents and businesses over time. This

[54] United States Census Bureau. 2023. QuickFacts: Riverside City, California. Website: https://www.census.gov/quickfacts/fact/table/riversidecitycalifornia/INC110221. Accessed January 2, 2024.

[55] Ibid.

displacement would not be considered significant as new housing would be provided at those locations alongside complementary commercial uses.

The General Plan proposes mixed-use development on underutilized nonresidential sites, which would be achieved through the implementation of three new mixed-use land use designations that allow various residential densities. Policies to keep existing neighborhoods properly maintained and vital would also discourage the need for demolition and replacement, including Housing Element Policies 1.1 and 1.2 that promote repair, improvement, rehabilitation, and maintenance of both owner-occupied and rental housing.

The Prior FEIR concluded that the implementation of the General Plan would not result in significant direct displacing of housing or create a need for replacement housing that is not already planned for. Therefore, the Prior FEIR determined that displacement impacts would be less than significant.

Proposed Project Analysis and Conclusion

The project site currently contains three existing single-family residences with associated animal-keeping structures and an in-ground swimming pool. These residences would be demolished before development. However, the proposed project would replace the three residences with 56 single-family residences.

The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the proposed project would have a less than significant impact.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Population and Housing, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.15 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?	Less than significant impact.	No	No	No	No
b) Police protection?	Less than significant impact with mitigation incorporated.	No	No	No	No
c) Schools?	Less than significant impact.	No	No	No	No
d) Parks?	Less than significant impact.	No	No	No	No
e) Other public facilities?	Less than significant impact with mitigation incorporated.	No	No	No	No

a) Fire Protection

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 fire protection?

Summary of Prior FEIR

The RFD provides fire protection services to the City under five divisions consisting of Administration, Prevention, Operations, Special Services, and Training. There are 14 fire stations located throughout the City, as well as Administration/Prevention offices, an Emergency Operation Center (EOC), and a training center. As part of the Riverside Renaissance Initiative, a new Fire Station 1 and a new Public Safety Administration building would be constructed under the implementation of the General Plan.

The Prior FEIR determined that the average on-site response time is 5 minutes and 30 seconds while RFD's goal is to maintain a 5-minute response time for the first arriving units 90 percent of the time for all emergency medical services and fire related incidents. RFD has an automatic aid agreement with the Riverside County Fire Department. RFD also provides emergency medical services (EMS) as a part of the Special Services Division. Private ambulance services are also available within the City limits.

RFD policy states that units will be located and staffed such that an effective response force of four units with 12 personnel minimum shall be available to all areas of the City within a maximum of 10 minutes (total response time). In 2006, RFD drafted a Strategic Plan, which helps RFD determine how many stations will be required to maintain efficient Total Response Times. According to the Strategic Plan, in order to maintain the current level of services and improve response times, four additional fire stations along with additional personnel and equipment would be necessary. However, the appropriate locations are dependent on City growth, and the Prior FEIR determined that the exact locations could not be determined at the time of the Prior FEIR.

The Prior FEIR determined that as specific annexations and projects are proposed pursuant to the General Plan, RFD would analyze its service standards and adjust facilities, personnel, and equipment as necessary. New developments are also required to pay impact fees per Ordinance 5948 § 1, 1991, (Fire Code 16.52), which can go toward purchasing land and constructing new fire facilities.[56] The Prior FEIR determined that the combined effect of General Plan Policies and impact fees would reduce impacts on fire protection and emergency services to less than significant levels.

Proposed Project Analysis and Conclusion

The closest fire station to the project site, Station 8 La Sierra, is located at 11076 Hole Avenue, approximately 2.1 miles south. The proposed project would be constructed pursuant to the 2022 California Fire Code as adopted and amended by the City. The proposed project would also pay the appropriate development fees and be subject to inspection and approval by RFD prior to construction. While the development of the proposed project would generate increased demand for fire protection and EMS, the proposed project would be consistent with the allowed density for the site under the existing General Plan land use designation and zoning. Therefore, the addition of these residences has already been accounted for in the Prior FEIR. With the payment of required fees, the proposed project would have less than significant impacts related to fire protection and EMS. Thus, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[56] City of Riverside. 2024. Development Fees for Fire Stations. Website: https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT16BUCO_CH16.52DEFEFIST_16.52.040PAFE. Accessed January 2, 2025.

b) Police Protection

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 police protection?

Summary of Prior FEIR

The Riverside Police Department (RPD) provides police protection services to the City. There are a total of four stations that provide police protection to the City in four centers: Central, East, North, and West. RPD's operating standard for response times is within 7 minutes for priority calls and within 12 minutes for second priority calls according to the Prior FEIR.

To improve response rate times, RPD has moved away from a centralized form of organization and implemented a decentralized Neighborhood Policing Center (NPC) Model. Toward this end, RPD plans to build new operational bases in the North and East NPCs to provide four precinct offices, as identified in the Prior FEIR.

The Prior FEIR determined that the response time standards could be met with the implementation of General Plan. Additionally, the General Plan discusses how opportunities for crime can be reduced through architectural and environmental design by promoting developments with natural surveillance, and defensible space. Compliance with the Crime Prevention Through Environmental Design (CPTED) principles would be required as MM PS 1 and would reduce impacts related to police services. Additionally, the Prior FEIR determined that, as specific annexations and projects are proposed, RPD would analyze its service standards and adjust facilities and personnel as necessary. Therefore, the Prior FEIR concluded that impacts related to the need for new police facilities would be less than significant with mitigation incorporated.

Proposed Project Analysis and Conclusion

The proposed project is located in the West center and is served by the Magnolia Station at 10540-B Magnolia Avenue, approximately 4 miles south of the project site. It is the base of operations for Central and West NPC Field Operations, Central and Special Investigations, Traffic Division, Special Operations, Community Policing, Training, and the Records Bureau.

The project site is located in a suburban area currently served by RPD. While the development of the proposed project would generate increased demand for police protection, the proposed project would be consistent with the allowed density for the site under the existing General Plan land use designation and zoning. Therefore, the addition of these residences has already been accounted for in the Prior FEIR.

Furthermore, the proposed project would implement MM PS 1, which requires CPTED principles to be applied to development projects within the City. Additionally, MM PS 1 requires the proposed

project to be reviewed by RPD and the Planning Division against CPTED principles. Therefore, the proposed project would have a less than significant impact on the demand for police department facilities and services with mitigation incorporated. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Schools

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 schools?

Summary of Prior FEIR

There are two main school districts, Riverside Unified School District (RUSD) and Alvord Unified School District (AUSD), which serve the majority of the City and its SOI; however, there are a total of six separate school districts within the City and its SOI. The Prior FEIR focused on RUSD and AUSD as they serve the vast majority of students. Individual school site planning, CEQA compliance, and construction of new school facilities are undertaken by the individual school districts, not the City. Therefore, the Prior FEIR did not cover the precise construction or physical impacts associated with school construction and instead addressed the student generation that would occur as a result of the implementation of the General Plan.

The projected population increase from the General Plan would require additional portable classrooms or acquiring additional land to accommodate for the increase, which is dependent on the availability of sufficient land. The main challenges AUSD faces are already overcrowded schools and finding new school sites, the most critical being new elementary school facilities. To minimize the costs of planning and development, the Prior FEIR determined that the City would work proactively with AUSD to identify school sites in the community, as required by Policy ED-1.2 of the General Plan.

The Prior FEIR determined that RUSD would also need to augment its facilities in response to growth within the City, but it is already planning new elementary schools for Downtown and Eastside.

The Prior FEIR stated that funding of school facilities has been affected by Senate Bill (SB) 50 (California Government Code Section 65995), which limits the amount of impact fees and site dedication that school districts can require of developers to offset the impact of new development on the school system. Future development projects under the General Plan would be required to complete an environmental analysis pursuant to CEQA, as well as pay applicable school impact fees. The Prior FEIR concluded that impacts related to new school facilities would be less than significant with the payment of school impact fees and adherence to the policies of the General Plan.

Proposed Project Analysis and Conclusion

The proposed project would be served by AUSD, which when using the same generation factor found in the Prior FEIR, has a generation rate per dwelling unit of 0.2 for elementary, 0.11 for middle, 0.12 for high school, and 0.43 overall.[57] At 56 units, the proposed project would generate approximately 12 elementary school students, 7 middle school students, 7 high school students, and 25 students overall. While these students would generate increased demand for school services in AUSD, the proposed project is consistent with the General Plan land use designation and zoning for the project site. Therefore, the increase is consistent with the planned growth accounted for within the Prior FEIR. With the payment of applicable school impact fees, the proposed project would not result in significant adverse effects related to school facilities, and impacts would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Parks

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 parks?

Summary of Prior FEIR

The Prior FEIR determined that implementation of the General Plan would entail maintenance, enhancement, and continued funding for existing open space and recreational facilities to suite the needs of current and future City residents. The General Plan would also result in population increases, which would result in increased demand for recreational facilities and parks. The Prior FEIR stated that the General Plan recommended park sites on City-owned undeveloped lands, totaling approximately 297 acres. However, specific environmental impacts associated with park construction and implementation would be reviewed pursuant to CEQA on a project-by-project basis. Therefore, the Prior FEIR concluded that through the requirement of future environmental review pursuant to CEQA, the implementation of the General Plan would result in less than significant impacts related to the need for new or expanded parks.

Proposed Project Analysis and Conclusion

The proposed project would include approximately 12,858 square feet of on-site park amenity areas, including picnic tables, a children's play area, a dog park, fitness nodes, a bocce ball court, and a putting green. The proposed project would also include 2,900 square feet of common areas and 21,171 square feet of slope plantings. Trees and shrubs would be planted throughout the site and

[57] City of Riverside. Albert Webb Associates. 2007. Table 5.13-G Student Generation for RUSD and AUSD By Education Level. Website: https://riversideca.gov/cedd/planning/general-plan. Accessed January 21, 2025.

along public parkways and medians. On-site open space would total 36,929 square feet, and off-site landscaping within the median would total 25,274 square feet. Therefore, the proposed project would provide sufficient open space to serve the proposed project. Additionally, the proposed project would be consistent with the allowed density for the site under the existing General Plan land use designation and zoning. Therefore, the addition of these residences has already been accounted for in the Prior FEIR with regard to the need for new or expanded park facilities. Furthermore, the proposed project would be required to pay all applicable development impact fees, which would reduce potential impacts to the need for new or expanded parks to less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Other 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 other public services?

Summary of Prior FEIR

Libraries

The Riverside Public Library system provides over 600,000 books, online materials, classes, and other library services. The Prior FEIR found that the Riverside Public Library has indicated that six out seven adopted standards for library service are not being met under existing conditions. The lapsing service standards were:

- Develop sufficient main and branch library locations to serve all residents within a 3-mile travel distance;
- Design branch facilities to serve between 20,000 and 60,000 persons;
- Two books per capita served;
- 0.6 square feet per capita served;
- Minimum eight full-time staff at each branch; and
- One public workstation per 2,000 residents.

In order to address these lapses, the Prior FEIR determined that funding for the library needs to be maintained and enhanced. However, at the time of the Prior FEIR, the City's tax of $19 per parcel, was set to end in 2012. Implementation of Tool 38 would require the City to search for and address funding mechanisms to support library needs. Thus, the Prior FEIR implemented MM PS 2, which requires the City to ensure adequate funding for library services through various measures to lessen

the impact. With the implementation of MM PS 2 and various General Plan policies related to library services, the Prior FEIR concluded that impacts to library services would be less than significant.

Community Centers

The Prior FEIR determined that the increase in development and population caused by the implementation of the General Plan would result in additional demand for community centers in the City and its SOI. However, the General Plan contains various policies which require that the City reviews and ensure that the community center programs and infrastructure adequately meet the need of the neighborhood served. Therefore, the Prior FEIR concluded that impacts related to community centers would be less than significant.

Proposed Project Analysis and Conclusion

Libraries

The La Sierra Library, located at 4600 La Sierra Avenue, is the closest library to the project site, located approximately 2.6 miles south. The La Sierra Library has approximately 11,000 square feet of space, traditional library resources, and community meeting rooms.

While the development of the proposed project would generate increased demand for library services, the proposed project would be consistent with the allowed density for the site under the existing General Plan land use designation and zoning. Therefore, the addition of these residences has already been accounted for in the Prior FEIR. Furthermore, the proposed project would be required to pay all applicable development impact fees and/or parcel tax for libraries in accordance with the requirements of MM PS 2, which would reduce potential impacts to the need for new or expanded library facilities.

Community Centers

The closest community centers to the project site are: Arlanza Community Center approximately 3.3 miles southeast; Renck Community Center approximately 4.5 miles southeast; and La Sierra Senior Center approximately 1.6 miles south.

While the development of the proposed project would generate increased demand for community centers, the proposed project would be consistent with the allowed density for the site under the existing General Plan land use designation and zoning. Therefore, the addition of these residences has already been accounted for in the Prior FEIR. The proposed project would be required to pay all applicable development impact fees, which would reduce potential impacts to the need for new or expanded community centers.

Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

MM PS 1 Crime Prevention Through Environmental Design (CPTED) will be applied to development projects requiring a Site Plan Review Permit and any other large development project proposed under the General Plan and MASP that the Zoning Administrator deems would benefit from such a review. The project will be required to be reviewed by RPD and Planning Division against CPTED principles. As long as these new development projects adhere to the needed principles in the CPTED, then impacts related to increased demand for police services will be reduced.

MM PS 2 The parcel tax for libraries, aka “Measure C”, was successfully approved by the voters with the commitment that the revenue would expand and support existing library services including extended hours at all locations and the staffing to keep library branches open during those hours, computer and electronic database purchases, programs and services for youth. Prior to expiration of the library parcel tax, Measure C, the City will ensure adequate funding for library services through implementation of at least one of the following options, unless some other equally effective source is identified and implemented:

i. a renewal of Measure C with or without an increase in the parcel tax;
ii. ii. combination of the renewal of Measure C and increased general fund support; and/or
iii. iii. having the Library Department’s funding being 100% general fund supported with funding service levels determined by the Council.

Conclusion

With regards to Public Services, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. Implementation of PS 1 from the Prior FEIR would be required and would reduce potential impacts to below a level of significance, consistent with the analysis in the Prior FEIR.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.16 Recreation *Would the project:*					
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?	Significant and unavoidable impact.	No	No	No	No
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?	Less than significant impact.	No	No	No	No

a, b) Existing Neighborhood and Regional Parks and Recreational Facilities

Would the project:

a) 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; or

b) include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Summary of Prior FEIR

Effects of Increased Use of Parks

The Prior FEIR determined that the implementation of the General Plan could result in increased population within the City and thereby an increased use of park and recreational facilities. The General Plan provides goals and policies to address potential deterioration of parks and recreational

facilities, such as Goal PR-1, which requires a diverse range of park and recreational facilities that are responsive to the needs of the City.

The Prior FEIR found that the City's current parkland standard is 3 developed acres of parkland per 1,000 residents. The Prior FEIR determined that the implementation of MM Rec 1, which requires future development to provide parks as part of their project approvals, would ensure that there would not be a parkland deficient in regard to any new development. Implementation Tool 42 also requires that the Parks, Recreation and Community Services Department revisit its threshold to adequately current means of providing recreational facilities to its residents.

However, the Prior FEIR determined that there is an existing deficiency in neighborhood parks, community parks, and recreational facilities. The continued implementation of the Renaissance Project would continue to address deterioration within existing parks throughout the City.

The Prior FEIR further determined that the implementation of MM Rec 1 and MM Rec 2, which requires the provision of parks or the payment of applicable Park Development Fees by all future development and the City to reevaluate Park Development Impact Fees on an annual basis to ensure that the fees collected appropriately pay for the development of the required park acreage, would reduce impacts from new development but would not correct the existing shortage.

The Prior FEIR concluded that compliance with the City Park Development Impact Fees, the Riverside Renaissance Strategic Investment Plan (SIP), and General Plan policies, as well as the implementation of the Park and Recreation Master Plan, would decrease impacts to existing parks and require that adequate parks be provided in the future. Despite this, it is possible that the required improvements would not be constructed in time to mitigate the General Plan's cumulative impacts to below the level of significance. Therefore, the Prior FEIR concluded that the implementation of the General Plan would result in significant and unavoidable impacts.

Provision of Parks and Recreational Facilities

The Prior FEIR determined that implementation of the General Plan would entail maintenance, enhancement, and continued funding for existing open space and recreational facilities to suit the needs of current and future City residents. The General Plan would also result in population increases, which would result in increased demand for recreational facilities and parks.

The Prior FEIR stated that the General Plan recommended park sites on City-owned undeveloped lands, totaling approximately 297 acres. However, specific environmental impacts associated with park construction and implementation would be reviewed pursuant to CEQA on a project-by-project basis.

Therefore, the Prior FEIR concluded that through the requirement of future environmental review pursuant to CEQA, the implementation of the General Plan would result in less than significant impacts related to the need for new or expanded parks.

Proposed Project Analysis and Conclusion

The proposed project would construct 56 single-family residences, which produces an estimate of around 184 residents based on an average persons per household of 3.27. [58] Following the goal of 3 acres of developed parkland per 1,000 residents, the proposed project would be required to provide a minimum of 0.55 acres. The proposed project includes approximately 36,929 square feet of on-site open space and approximately 25,274 square feet of off-site landscaping within the median. Therefore, the proposed project would provide approximately 1.04 acres of on-site open space and approximately 0.58 acres of off-site open space. As such, the proposed project would provide a sufficient amount of open space to meet the City's parkland standards.

Additionally, the proposed project's impact on parkland is already accounted for in the Prior FEIR because the proposed project is consistent with the General Plan land use designation and zoning for the project site. By providing open space and community park areas on the project site, the proposed project would comply with MM Rec 1, which requires development to provide developed parks as part of their project approvals. Therefore, impacts related to parks would be less than significant. Thus, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

MM Rec 1 All future development shall provide developed parks as part of their project approvals at the discretion of the City Parks, Recreation and Community Services Department, or pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department prior to issuance of building permits.

Conclusion

With regards to Recreation, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. Rec 1 from the Prior FEIR would be required and would reduce potential impacts to below a level of significance, consistent with the analysis in the Prior FEIR.

[58] United States Census Bureau. 2023. QuickFacts: Riverside City, California. Website: https://www.census.gov/quickfacts/fact/table/riversidecitycalifornia/INC110221. Accessed January 2, 2024.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.17 Transportation *Would the project:*					
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Significant and Unavoidable impact	No	No	No	No
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Less than significant impact	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	less than significant impact	No	No	No	No
d) Result in inadequate emergency access?	Less than significant impact	No	No	No	No

The analysis in this section is based, in part, on the Focused Traffic Analysis and Vehicle Miles Traveled (VMT) Analysis prepared by Urban Crossroads, Inc., on December 31, 2025, and June 10, 2026, respectively. These reports can be found in Appendix H.

a) Congestion Management Plan

Would the project: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Summary of Prior FEIR

Several 2025 General Plan policies aim to improve and encourage use of public transit facilities, such as CCM-9.2 (supporting RTA's bus rapid transit proposal), CCM-9.5 (requiring incorporation of alternative transportation facilities into new development), and CCM-9.8 (preserving options for future transit use when designing improvements for roadways). Therefore, the Prior FEIR found that impacts to transit policies were less than significant.

As a part of the 2025 General Plan, the City would implement a Bicycle Master Plan, which would ensure adequate Class I and Class II bicycle facilities are provided as an alternate form of transportation. Additionally, the Land Use and Urban Design Element of the 2025 General Plan, as well as the Magnolia Avenue Specific Plan, direct growth to infill sites along established transportation corridors. Much of the infill development would create more mixed-use projects, which offer residents access to shops and services without needing to drive. Thus, the Prior FEIR found that the 2025 General Plan encouraged pedestrian transportation.

The Prior FEIR indicated that the implementation of the 2025 General Plan would exceed Level of Service (LOS) thresholds established by the plan and the City of Riverside Public Works Department on the majority of roadways within the City. Therefore, implementation of MM TRANS-1 was required, which mandates the preparation of a project-specific traffic study for projects that generate 50 trips or more at an intersection in the PM peak-hour and, for projects that affect intersections which currently or as a result of a proposed development project will operate at LOS E or F, determination of appropriate and feasible mitigation required by the City to reach LOS D. As a result, the Prior FEIR determined that the 2025 General Plan would conflict with the established ordinance for LOS. Because of this, impacts related to conflicts with a program plan, ordinance, or policy of the circulation system were found by the Prior FEIR to be significant and unavoidable.

Proposed Project Analysis and Conclusion

Study Intersections

The Focused Traffic Analysis analyzed potential deficiencies to traffic and circulation for the following conditions: [59]

- Existing (2024) Conditions

[59] The Focused Traffic Analysis included an additional analysis of the project with two alternate site plans (Alternative 1 and Alternative 2). Alternative 1 vehicular access will be provided via one right-in/right-out access driveway on La Sierra Avenue. Alternative 2 vehicular access will be provided via one full access driveway on La Sierra Avenue (allowing left turns into and out of the project site). Refer to Appendix H for details.

- Background (Near-Term) Without Cumulative Projects and Without Project
- Background (Near-Term) With Cumulative Projects and Without Project
- Background (Near-Term) With Cumulative Projects and With Project–Right-in/Right-out Driveway (Alternative 1)
- Background (Near-Term) With Cumulative Projects and With Project–Full Access Driveway (Alternative 2)

It was determined that there would be no peak-hour intersection operational deficiencies for existing or future traffic conditions and impacts would be less than significant consistent with the findings for the General Plan.

Trip Generation

Trip generation represents the amount of traffic which is both attracted to and produced by a development. Determining traffic generation for a specific project is based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses being proposed for a given development. As shown in Table 15 below, the proposed project is anticipated to generate 514 two-way trip-ends per day with 38 AM peak-hour trips (7:00–9:00 a.m.), 38 midday PM peak-hours trips (1:30–3:30 p.m.), and 51 PM peak-hour trips (4:00–6:00 p.m.).

Table 15: Project Trip Generation Summary

Land Use	Quantity	Units	AM Peak-hour			Midday PM Peak-hour			PM Peak-hour			Daily
			In	Out	Total	In	Out	Total	In	Out	Total	
135'x145' Minimum Estate Homes	4	DU	1	2	3	2	1	3	2	1	3	38
45'x80' Minimum Lots (Single-Family Detached Residential)	49	DU	9	25	34	20	14	34	29	17	46	462
45'x80' Minimum Lots (Affordable Housing)	3	DU	0	1	1	1	0	1	1	1	2	14
Total			**10**	**28**	**38**	**23**	**15**	**38**	**32**	**19**	**51**	**514**

Notes:
DU = dwelling units

Vehicular Site Access and Circulation

Access to the project site would be provided via an entryway on La Sierra Avenue to the east. According to the Focused Traffic Analysis prepared for the proposed project, in order to ensure adequate site access, the entryway would include new stop signs to control eastbound traffic. Access

to the single-family homes within the project site would be provided by two 36-foot-wide private streets, which would service the majority of the development. Access to the four estate parcels would be provided via Alhambra Avenue. Impacts would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Pedestrian Access, Bicycle Access, and Circulation

The proposed project would construct 5-foot-wide sidewalks along both sides of each of the internal streets. Pedestrians will also be able to access the interior of the project site through the proposed entryway on La Sierra Avenue from existing sidewalks on La Sierra Avenue. Residents of the estate parcels would be able to access their residences directly from Alhambra Avenue. According to the City of Riverside Master Plan of Trails and Bikeways found in the 2025 General Plan, there is a designated Class II bikeway that runs along La Sierra Avenue. As such, adequate bicycle access would be provided to the project site and impacts would be less than significant, consistent with the findings for the General Plan.

Transit Facilities

The proposed project is directly adjacent to the La Sierra FS Alhambra RTA bus stop servicing Route 15 on the eastern side of the project site, and 0.4 mile north of the La Sierra FS Francisco stop. As indicated in the Focused Traffic Analysis, the proposed project would coordinate with the RTA to install bus stop amenities at the La Sierra FS Alhambra stop. As such, the proposed project would be adequately served by transit facilities and impacts would be less than significant consistent, with the findings for the General Plan.

Conclusion

There are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Inconsistent with CEQA Guidelines Section 15064.3

Would the project: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Summary of Prior FEIR

The Prior FEIR did not analyze VMT impacts since it was certified in 2007, and CEQA Guidelines Section 15064.3, subdivision (b) was implemented in 2020. As such, at the time of its certification, the Prior FEIR identified no significant impact related to conflict with CEQA Guidelines Section 15064.3, subdivision (b). The following discussion is provided for informational purposes.

Proposed Project Analysis and Conclusion

The proposed project does not meet the applicable screening criteria detailed in Riverside City Guidelines; therefore, a VMT Analysis was prepared. At the time of the VMT Analysis, the City was in

the process of updating their VMT guidance, which includes a new baseline VMT per capita. The VMT Analysis evaluated the proposed project with the anticipated revised City thresholds. The City's current VMT per capita and impact threshold was calculated to be 16.2 using the Riverside County Transportation Model (RIVCOM). Using an estimated population of 164 people resulting from the proposed project,[60] the proposed project's VMT per capita was calculated to be 14.4 and therefore would not exceed the City's VMT threshold. As a result, the proposed project's impacts on VMT would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Roadway Safety Hazards

Would the project: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Summary of Prior FEIR

The Prior FEIR identified that since there were no site-specific project plans at the time it was prepared, ongoing development proposals must be reviewed on a case-by-case basis as they arise, and as such details such as driveway location or intersection modification become known. Although there are circulation improvements proposed by the 2025 General Plan, none of these improvements would introduce new safety hazards at intersections or along roadway segments as most would increase capacity and flow. Policies within the Circulation Element of the 2025 General Plan provide for maintaining and enhancing existing roadways, increasing safety of roadways, and balancing safety, quality of life, and efficiency in the design of circulation and access. These policies of the 2025 General Plan would help reduce hazards due to design features. As such, the Prior FEIR identified a less than significant impact related to a substantial increase in hazards due to a design feature or incompatible uses.

Proposed Project Analysis and Conclusion

The proposed project would be accessed via a 36-foot-wide entryway on La Sierra Avenue. This driveway would include stop signs to control eastbound traffic. The proposed project would also include approximately 0.36 acres of roadway and frontage improvements. The private streets within the proposed development would also be consistent with City standards, measuring 36 feet in width and including a 5-foot sidewalk on both sides.

To further improve roadway safety, the project applicant would be required to coordinate with City of Riverside Traffic Division to implement red curb parking restrictions along the inside of the horizontal curve of Alhambra Avenue approaching the first proposed single-family residence along with advance curve ahead warning signage and centerline striping. The proposed project would also include a new solar speed feedback sign for the northbound traffic on La Sierra Avenue based on the location of

[60] 56 x 2.93 persons = 164.08

Loma Vista Middle School. As such, no roadways associated with the proposed project would substantially increase hazards due to a design feature or incompatible uses. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Emergency Access

Would the project: Result in inadequate emergency access?

Summary of Prior FEIR

The Prior FEIR indicated that traffic conditions could become more congested as a result of anticipated growth in the City's population as result from implementation of the 2025 General Plan. In the event of an accident or natural disaster, the increase in traffic in the City may impede the rate of evacuation for the residents. Also, the response times for emergency medical or containment services could also be adversely affected by the increased traffic conditions in the City.

The City would continue to implement its adopted road standards, the State of California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code. As a result, new and improved roadways would be designed to avoid unsafe design and to provide adequate emergency access. In the case of an emergency, the City's Fire Department has the authority to issue a "shelter-in-place" order, which would reduce congestion on roads, freeing space for emergency vehicles. The City has developed an extensive Emergency Operations Plan, created by the Emergency Management Office. The City's Fire Department promotes a high level of multi-jurisdictional cooperation and communication for emergency planning and response management through activation of the SEMS. Therefore, the Prior FEIR determined that, coupled with proposed 2025 General Plan policies enforcing the Emergency Management Plan, the 2025 General Plan would not result in a significant impact on emergency access.

Proposed Project Analysis and Conclusion

As described above, the proposed project would have adequate vehicle circulation, including adequate circulation for large vehicles such as fire trucks. The proposed project would be required to comply with all applicable goals and policies relating to emergency access in the 2025 General Plan as well as the City's Municipal Code and Fire Code. In addition, the proposed project would not interfere with guidelines set forth in the City's Emergency Operations Plan. Residents of the proposed project would be required to adhere to any shelter-in-place orders in the event of an emergency. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Transportation, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.18 Utilities and Service Systems *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 telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant impact with mitigation incorporated	No	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than significant impact with mitigation incorporated	No	No	No	No
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	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
provider's existing commitments?					
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?	Less than significant impact	No	No	No	No
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	No impact	No	No	No	No

a), c) Water, Wastewater, and Stormwater Facilities and Wastewater Treatment Capacity

Would the project: Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Would the project: 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?

Summary of Prior FEIR

Water

The Prior FEIR indicated that development consistent with the 2025 General Plan would result in an increase of residential and nonresidential water users over existing conditions, requiring the extension

or maintenance of, or new water filtration, treatment, and/or distribution facilities. According to the Prior FEIR the City's water system would need improvements to accommodate for future upgrades and projected growth. Adherence to 2025 General Plan Policies that promote water conservation, as well as Policies PF-1.1 and PF-1.3, which ensure improvements to the water system are tied to new development, would lessen impacts to the water system, but the Prior FEIR noted that until improvements are implemented under the Draft Water Supply Master Plan (WSMP), existing deficiencies related to water pressure, fire flow, and storage capacity would be significant and unavoidable. Adherence and implementation of policies related to water conservation would reduce demands on existing water infrastructure. Therefore, impacts related to the construction of expansion of water facilities would be less than significant.

Wastewater

RPU noted in its 2005 UWMP that it would have capacity once upgraded to treat wastewater generated within the City through the year 2025. However, portions of the planning area are not currently served with adequate infrastructure (trunk sewer lines) to accommodate the growth anticipated in the General Plan. New and/or expanded sewer collection lines may be required to serve proposed land uses. Additionally, delivery lines for the resulting recycled water will also need to be upgraded to accommodate the additional treated wastewater. All future projects would be consistent with the General Plan and would incorporate mitigation and policies presented in the Prior FEIR as appropriate.

Implementation of 2025 General Plan Policies PF-3.1, which requires the City to coordinate the demands of new development with the capacity of the wastewater system, and Policy PF-3.2, which requires new development to fund fair share costs associated with wastewater services, would help reduce impacts on wastewater capacity at the Regional Water Quality Control Plant (RWQCP). Therefore, impacts from the construction or expansion of wastewater facilities as a result of the General Plan would be less than significant.

Stormwater Drainage Capacity

As indicated in the Prior FEIR, increased development within the planning area would result in an increase of impervious surface areas. Increased impervious surface area would generate increased stormwater flows with potential to impact drainage facilities and require the provision of additional facilities. However, the Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund which is maintained by Riverside County Flood Control and Water Conservation District. Fees are required to be paid as part of the conditions of approval/waiver for filing a final map or parcel map.

Policies PF 4.1 and PF 4.3 of the 2025 General Plan require the City to continue to routinely monitor its storm drain system and to fund and improve those systems as identified in the City's Capital Improvement Plan. The Prior FEIR found that implementation of these policies would ensure that the planning area is adequately served by drainage systems, and impacts related to construction of new facilities are considered less than significant.

Electric Power, Natural Gas, and Telecommunications

The Prior FEIR indicated that implementation of the 2025 General Plan would increase use of electricity in the planning area, particularly the demand for electricity to light, heat, and air condition residential, commercial, and business development. The City has proactively planned for future growth in energy use and demand. Approximately every 2 years RPU assesses its current and future electricity demand and capacity. In addition, at the time of the Prior FEIR's certification, RPU was in the process of contracting for a 25-year electric system master plan that was to be completed in 2008. It includes the long-term needs of the City's electric customers/owners. Also, at the time of the Prior FEIR's certification, RPU was in the preliminary design stages of the Riverside Transmission Reliability Project (RTRP), a coordinated project between RPU and Southern California Edison (SCE). The objective of the RTRP is to increase the inlet capacity to the City and reinforce RPU's transmission system. The RTRP would provide adequate electrical capacity as well as a reliable electrical supply for future growth by doubling existing inlet capacity. The Prior FEIR also implemented MM UTL 3, which requires the City to review population and development trends with respect to electricity consumption approximately every 2 years to assure that growth and demand are occurring as expected. The Prior FEIR found that with completion of the RTRP and implementation of 2025 General Plan policies and MM UTL 3, impacts related to electric energy capacity were less than significant.

The Prior EIR identified that implementation of the General Plan will result in increased demand on existing telephone, internet, wireless communication, fiber optics, and cable television service providers. Implementation of General Plan policies PF-7.1 through 7.9 would help ensure that residents, the business community, and educational institutions have access to internet and telecommunication services. Therefore, impacts were less than significant.

Proposed Project Analysis and Conclusion

The proposed project would consist of 56 new single-family units, which would result in the addition of 183 new residents.[61, 62] This accounts for 0.03 percent of the maximum projected population growth with PRD Permit indicated in Section 5.12, Population and Housing, of the Prior FEIR. As such, the proposed project would not have a significant effect on energy capacity in the City.

The proposed project would include the addition of new water, sanitary sewer, and stormwater lines. The proposed project's water mains would connect to existing lines under La Sierra Avenue and Alhambra Avenue. Water would be supplied to the project site by RPU, and sanitary sewer service would be provided by the City. The proposed project would include a new storm drainage system, which would direct water to on-site bioretention areas and underground stormwater infiltration chambers, with overflow to be fed into existing storm drainage facilities on La Sierra Avenue. RPU

[61] United States Census Bureau. 2024. Quickfacts–Riverside City, California. Website: https://www.census.gov/quickfacts/fact/table/riversidecitycalifornia/DIS010223. Accessed January 8, 2025.

[62] 3.27 persons per household (Census average) x 56 new households = 183 new residents

would also provide electricity services, and gas would be provided by Southern California Gas Company.

The proposed project would also be required to pay drainage impact fees in accordance with Subdivision Code (Title 18, Section 18.48.020) to offset any potential impacts on storm drainage capacity. The proposed project would also be required to comply with 2025 General Plan Policy PF-3.2, which requires new development to fund fair share costs associated with wastewater services.

According to the Hydraulic Analysis prepared for the proposed project, the proposed drainage system would be installed to accommodate all flows during all 100-year storm events. No additional existing system pipeline improvements would be required to adequately supply the proposed project. As such, the proposed project would not result in a significant impact on storm drainage system capacity.

New proposed on-site wastewater systems would be installed to adequately serve the demand of the expected population. Because the proposed project would result in 0.03 percent of the projected maximum population increase analyzed in the Prior FEIR, the proposed project would not result in a significant effect on wastewater treatment capacity. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Water Supply

Would the project: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Summary of Prior FEIR

The Prior FEIR indicated that the two main suppliers of water for the City, RPU and WMWD, project that adequate water supplies would be available for the Planning Area through the year 2025 at typical projected development levels for the 2025 General Plan. However, should the plans buildout reach maximum or maximum with PRD Permit development levels, water demand may exceed supply. In this scenario, the City would require expanded entitlements for water supply. The Prior FEIR implemented MM UTL 1, which requires the City to review population and development trends with respect to water sources and supply in 2015 and 2020 to ensure that growth is occurring as expected under the Typical Project development scenario which can be accommodated with the present and expected water sources. Should the water demand of the increasing population exceed the current available supply, mitigations such as RPU purchasing more water from WMWD, and enforcing water conservation regulations would be implemented. Additionally, some policies within the 2025 General Plan address water supply within the planning area. Policies OS-10.1 through 10.5, OS-10.8, and PF-1.3 through 1.7 require coordination with other entities, both public and private, regarding consumption, water quality and quantity of groundwater, and coordinated service. Policies PF 1.5, PF-2.1, and PFS 2.2 address demand reduction strategies. As such, the Prior FEIR found that effects on available water supplies were less than significant.

Proposed Project Analysis and Conclusion

The proposed project would connect directly to existing water mains under La Sierra Avenue and Alhambra Avenue operated by RPU. The proposed project would result in 56 new single-family homes and 183 new residents.[63] This population increase would make up 0.04 percent of the population projected at typical development of the 2025 General Plan. Therefore, the increase in water demand from the proposed project would be negligible. The proposed project would also be required to comply with all 2025 General Plan Policies relating to water conservation as stated above. As such impacts on water demand would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Solid Waste Reduction Goals Consistency

Would the project: 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?

The Prior FEIR determined that, at typical development, the buildout of the 2025 General Plan would constitute an 8 percent increase in daily solid waste contributions to landfills serving the City. Landfill capacity for both the Badlands Landfill and Lamb Canyon Landfill is expected to increase in the future to accommodate higher demand. Adherence to and implementation of 2025 General Plan Policies PF 5.1 through 5.3 above (which deal with a goal of 100 percent recycling, recycling service provided to all residents, and donation or reuse of some items in lieu of landfill disposal, respectively) would also substantially lessen solid waste impacts.

The Prior FEIR also implemented MM UTL 4, which requires the City to review the County Waste Management Annual Reports to California Integrated Waste Management Board (CIWMB) every 5 years to ensure that projections still show adequate capacity to and through the year 2025. If levels show that landfill capacity is becoming limited or exhausted, then the City shall increase efforts to divert waste from landfills. Implementation of mitigation, along with adherence to 2025 General Plan policies, would reduce the impacts on solid waste capacity to less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the proposed project would include the addition of 183 new residents. This constitutes 0.04 percent of the projected population growth at typical development levels. Adherence to the 2025 General Plan policies related to solid waste would ensure impacts on solid waste capacity remain less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[63] 3.27 persons per household (Census average) x 56 new households = 183 new residents

e) Solid Waste Regulations Consistency

Would the project: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Summary of Prior FEIR

The Prior FEIR determined that at typical development, the buildout of the 2025 General Plan would constitute an 8 percent increase in daily solid waste contributions to landfills serving the City. Landfill capacity for both the Badlands Landfill and Lamb Canyon Landfill is expected to increase in the future to accommodate higher demand. Adherence to and implementation of 2025 General Plan Policies PF 5.1 through 5.3 above (which deal with a goal of 100 percent recycling, recycling service provided to all residents, and donation or reuse of some items in lieu of landfill disposal, respectively) would also substantially lessen solid waste impacts.

The Prior FEIR would also implement MM UTL 4, which requires the City to review the County Waste Management Annual Reports to CIWMB every 5 years to ensure that projections still show adequate capacity to and through the year 2025. If levels show that landfill capacity is becoming limited or exhausted, then the City shall increase efforts to divert waste from landfills. Implementation of mitigation along with adherence to 2025 General Plan policies would reduce the impacts on solid waste capacity to less than significant.

The Prior FEIR also determined that implementation of the 2025 General Plan would not conflict with any federal, State, or local regulations related to solid waste, including the California Integrated Waste Management Act under the Public resource Code which requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. At the time of preparation of the Prior FEIR, the City was currently achieving a 60 percent diversion rate. As such the Prior FEIR found that impacts related to compliance with federal, State, and local management and reduction statutes and regulations related to solid waste would not occur.

Proposed Project Analysis and Conclusion

As discussed above, the proposed project would include the addition of 183 new residents. This constitutes 0.04 percent of the projected population growth at typical development levels. Adherence to the 2025 General Plan policies referenced above would ensure impacts on solid waste capacity remain less than significant. The proposed project would also be required to comply with all federal, State, and local management and reduction statutes and regulations related to solid waste; as such, impacts would be less than significant. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Utilities and Service Systems, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.19 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?	No significant impact identified	No	No	No	No
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?	No significant impact identified	No	No	No	No
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?	No significant impact identified	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse 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?	No significant impact identified	No	No	No	No

a) Emergency Response/Evacuation Plan Consistency

Would the project: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to impairment of an adopted emergency response plan or emergency evacuation plan for projects located in or near State responsibility lands. The Prior FEIR noted that the growth of the City's population could result in traffic conditions that could become more congested. This could impede the rate of evacuation for the residents and adversely affect the response times for emergency medical or containment services. According to the City of Riverside's Fire Department, in the event of a disaster, "shelter-in-place" will be the primary response, with the location of an outside shelter only be established if needed.

The City of Riverside has developed an extensive Emergency Operations Plan, created by the Emergency Management Office. The City's Fire Department promotes multi-jurisdictional cooperation and communication for emergency planning and response management through activation of the SEMS. The General Plan also provides policies to identify methods of implementing the emergency plan. With continued use of the SEMS and implementation of the above General Plan policies enforcing compliance with the Emergency Operations Plan, impacts to emergency response plans would be reduced.

Proposed Project Analysis and Conclusion

As described previously, the proposed project site is not located in an SRA, but the project site is within a High and Very High FHSZ in an LRA.[64] The proposed project would have adequate vehicle circulation via a 36-foot-wide private street, as well as a 36-foot-wide entryway on La Sierra Avenue, both of which would include adequate space for emergency vehicle turning radius. Public streets, private streets (Street A and Street B), driveways, and entrance road widths would comply with RFD standards and California Fire Code Sections 503 and 503.2. Minimum clearance width of 20 feet and vertical clearance of 13 feet 6 inches would also be maintained. Dead end streets exceeding 150 feet would provide approved turnarounds per Riverside standards. Additionally, the proposed project would not include any features that would impede access to the site such as security gates or dead end roads. Furthermore, the proposed project would include 20-foot-wide EVA originating from Alhambra Avenue onto Street A, which would further promote access to the site in the event of an emergency.

As described in the Prior FEIR, the proposed project would be required to adhere to the City's Emergency Operations Plan, LHMP, and applicable policies of the Public Safety Element of the General Plan. The proposed project would also implement a Fuel Modification Plan, which would reduce hazardous fuel loads on the project site and create defensible space around the proposed housing units (Exhibit 9). The Fuel Modification Plan would establish Fuel Modification Zones (FMZs) compliant with Riverside County Fire Department guidelines. These FMZs would include Zone 0 (from zero to five feet, non-combustible), Zone 1 (from five to 30 feet, irrigated, fire-resistant landscaping), and Zone 2 (from 30 to 100 feet, thinned vegetation). All proposed structures would maintain required setbacks and defensible space zones which would be enforced by the Homeowner's Association (HOA). Furthermore, the proposed project would be reviewed by RFD to ensure that adequate emergency access is provided. The proposed project would also be required to adhere to the requirements of the 2023 Wildfire Mitigation Plan and the California Fire Code. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[64] California Department of Forestry and Fire Protection (CAL FIRE). 2026. Fire Hazard Severity Zones. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed May 15, 2026.

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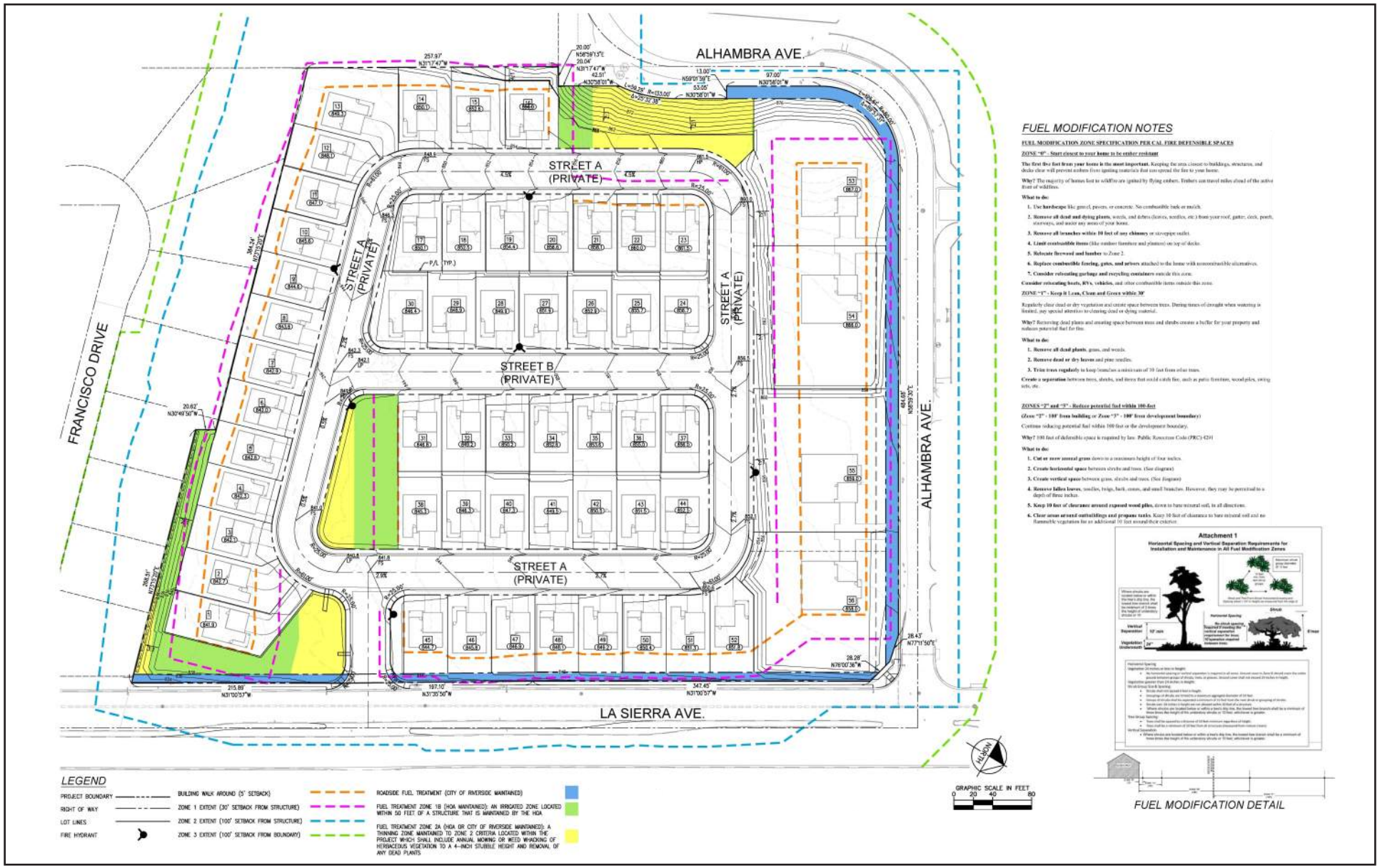

Source: Kimley Horn, 07/02/2025.

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Exhibit 9
Fuel Modification Plan

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b) Expose Project Occupants to Pollutant Concentrations from Wildfire

Would the project: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Proposed Project Analysis and Conclusion

As described previously, the proposed project site is not located in a SRA, but the project site is within a High and Very High FHSZ in a LRA.[65] The lands within these zones are developed urban areas with major freeways creating additional line barriers, which reduces wildfires risk by reducing the amount of dry vegetation available. The degree of wildland fire hazard would not substantially change with the implementation of this proposed project, and current hazards would not be significantly increased. The proposed project would be built in accordance with the regulations set forth in the CBC and the California Fire Code in order to reduce potential impacts. The proposed project would also implement a Fuel Modification Plan that would reduce hazardous fuel loads on the project site and create defensible space around the proposed housing units (Exhibit 9). The Fuel Modification Plan would establish FMZs compliant with Riverside County Fire Department guidelines, as described above. All proposed structures would maintain required setbacks and defensible space zones, which would be enforced by the HOA. The proposed project would be required to comply with applicable goals and policies from the Public Safety Element of the General Plan to reduce fire hazards and maintain safe emergency response and evacuation plans. In addition, the proposed project would also not interfere with guidelines set forth in the 2023 LHMP, the 2023 Wildfire Mitigation Plan, or Chapters 16.32 and 16.52 of the Municipal Code. The proposed project would also be built in accordance with the CBC and the California Fire Code. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[65] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed May 30, 2025.

c) Infrastructure that Exacerbates Fire Risk

Would the project: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to the requirement of 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.

Proposed Project Analysis and Conclusion

As stated above, the project site is within a High and Very High FHSZ in a LRA.[66] The site is currently occupied by three residential buildings and would connect to existing overhead power lines along the edge of the project site. The proposed project would include the installation of new water, sewer, and water quality infrastructure, but these utilities would not increase wildfire risk.

The proposed project would be required to comply with applicable goals and policies from the Public Safety Element of the General Plan to reduce fire related risks. In addition, the proposed project would also comply with the 2023 Wildfire Mitigation Plan or Chapter 16.32, Fire Prevention, of the Municipal Code. The proposed project would also be built in accordance with the regulations set forth in the CBC and the California Fire Code. The proposed project would also implement a Fuel Modification Plan, which would reduce hazardous fuel loads on the project site and create defensible space around the proposed housing units (Exhibit 9). The Fuel Modification Plan would establish FMZs compliant with Riverside County Fire Department guidelines, as described above. All proposed structures would maintain required setbacks and defensible space zones which would be enforced by the HOA. The proposed project would undergo review by the RFD to ensure that there is adequate emergency access at the site and that the proposed project is designed in a manner that would reduce the risk of wildfire. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

[66] California Department of Forestry and Fire Protection (CAL FIRE). 2026. Fire Hazard Severity Zones. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed May 15, 2026.

d) Flooding and Landslide Hazards Due To Post-fire Slope Instability/Drainage Changes

Would the project: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?

Summary of Prior FEIR

The Prior FEIR identified no significant impact related to the exposure of 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.

Proposed Project Analysis and Conclusion

As stated above, the project site is within a High and Very High FHSZ in an LRA.[67] The project site is not located immediately adjacent to any slopes. However, hillsides are located approximately 0.11 mile to the west. The project site has a small portion of its northwestern border inside a level 1 risk zone for possible landslides and a smaller portion on its western border in a Level 2 risk zone for probable landslides. Further west toward the La Sierra Hills, the risk extends up to Level 8, a high confidence in the extent or nature of a landslide within 0.2 mile of the project site.[68] Compliance with regulations in the CBC would help reduce potential impacts related to landslides on the project site.

As mentioned in Section 4.10, Hydrology, according to FEMA Flood Map for the area, the project site is within Zone X—indicating an area of minimal flood risk.[69] The proposed project would be subject to the NPDES General Permit, which would require the development of a SWPPP and associated BMPs. Also discussed above, the project site would be split into two DMAs, which would direct storm drainage into designated retention systems, such as bioretention areas on the estate parcels, and underground stormwater infiltration chambers on the southeastern corner of the site.

These flooding prevention measures would help reduce impacts from runoff, post-fire slope instability, or drainage changes. This would minimize exposure of people or structures to significant risks, including downslope or downstream flooding or landslides.

The proposed project would also implement a Fuel Modification Plan that would reduce hazardous fuel loads on the project site and create defensible space around the proposed housing units (Exhibit

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[67] California Department of Forestry and Fire Protection (CAL FIRE). 2026. Fire Hazard Severity Zones. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed May 15, 2026.

[68] United States Geological Survey (USGS). 2024. U.S. Landslide Inventory and Susceptibility Map. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d. Accessed January 15, 2025.

[69] Federal Emergency Management Agency (FEMA). 2024. FEMA National Flood Hazard Layer (NFHL) Viewer. Website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed January 6, 2025.

9). The Fuel Modification Plan would establish FMZs compliant with Riverside County Fire Department guidelines, as described above. All proposed structures would maintain required setbacks and defensible space zones, which would be enforced by the HOA. The proposed project would be required to comply with applicable goals and policies from the Public Safety Element of the General Plan to reduce fire related hazards. Furthermore, the proposed project would also be built in accordance with the CBC and the California Fire Code. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Prior FEIR Mitigation Measures

None required.

Conclusion

With regards to Wildfire, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. No mitigation measures would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.20 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 endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	Less than significant impact	No	No	No	No
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	Significant and unavoidable impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?					
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	Significant and unavoidable impact	No	No	No	No

a) Potential Degradation to Environment and Examples of California History or Prehistory

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 endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

Summary of Prior FEIR

The Prior FEIR determined that development consistent with the Riverside General Plan would result in a less than significant impact related to biological resources with the implementation of MM Bio 1. The Prior FEIR also determined that development consistent with the Riverside General Plan would result in a less than significant impact related to cultural resources with implementation of MM Cultural 1 through MM Cultural 5.

Proposed Project Analysis and Conclusion

The proposed project would comply with the MBTA and Fish and Game Code through pre-construction nesting bird surveys conducted no more than 7 days prior to the start of ground

disturbance and avoidance of active avian nests if found during the surveys. Compliance would ensure that potential impacts to nesting birds protected under the Fish and Game Code and/or the MBTA remain less than significant. With implementation of existing regulations, impacts related to biological resources would remain less than significant. With regard to cultural resources, the proposed project would implement COA CUL-1 and MM Cultural 1 through 5 from the Prior FEIR, which would ensure any potential impacts on archaeological and Tribal Cultural Resources remain less than significant. With the implementation of the COA and mitigation measures and compliance with applicable rules and regulations, the proposed project would have less than significant impacts.

b) Cumulatively Considerable Impacts

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)?

Summary of Prior FEIR

The Prior FEIR identified that for impacts to air quality, agricultural lands, water quality, dam inundation, noise, parks, and transportation, adherence to and implementation of General Plan policies, mitigation measures, and other project features would substantially lessen but will not completely avoid significant cumulative impacts. In other words, contribution of development consistent with the Riverside General Plan to cumulatively significant air quality, agricultural lands, water quality, dam inundation, noise, parks, and transportation, impacts would remain cumulatively considerable.

Proposed Project Analysis and Conclusion

Because the proposed project considered herein is a single site, as compared to the overall buildout of the Riverside General Plan considered under the Prior FEIR, the geographic scope for the cumulative consideration of the proposed project is much smaller than that of the Prior FEIR. Therefore, the potential for cumulative contribution is smaller. Nonetheless, the proposed project would contribute to the air quality, water supply, and transportation related cumulative impacts. As indicated herein, the proposed project is within the cumulative scope analyzed in the Prior FEIR, and therefore, its contributions to the cumulative impacts were analyzed and considered. Because the proposed project is consistent with the analyses of the Prior FEIR as evidenced herein, it does not have any features that would result in a cumulatively considerable contribution different from what was disclosed and mitigated to the fullest extent possible in the Prior FEIR. Additionally, the proposed project would be consistent with the analysis contained within the Prior FEIR with respect to cumulative air quality, water supply, and transportation impacts because, as discussed above, it would not create new impacts or increase impacts and there is no new information of substantial importance.

c) Adverse Effects on Human Beings?

Does the project: Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Summary of Prior FEIR

The Prior FEIR identified that implementation of the Riverside General Plan may have potential impacts, directly or indirectly, to human beings with respect to agricultural lands, air quality, noise, population and housing, and traffic. No feasible mitigation was available to reduce potential impacts related to agricultural resources and population and housing. As such, impacts would remain significant and unavoidable.

To reduce impacts related to air quality, noise, and traffic, the Prior FEIR implemented MM AIR 1 though MM AIR 13, MM Noise 1 through MM Noise 4, and MM Trans 1 and 2. However, these mitigation measures were found by the Prior FEIR to be insufficient to reduce impacts to reduce air quality, noise, and traffic impacts to a less than significant level. As such, the Prior FEIR concluded that impacts to air quality and traffic would remain significant and unavoidable.

Proposed Project Analysis and Conclusion

Significant impacts relating to agricultural lands, air quality, noise, population and housing, and traffic could cause substantial adverse effects on human beings. The proposed project would not result in any significant impacts related to agriculture, traffic, or population and housing; therefore, no impacts on human beings would occur in this regard. In regard to air quality and noise, the proposed project would be required to comply with Prior FEIR MM Air 1, MM Air 2, MM Air 4, MM Air 7, MM Air 8, MM Air 9, MM Air 10, MM Air 11, MM Air 13, and MM Noise 4. In addition, the proposed project would include PDF AIR-1. Compliance with the applicable Prior FEIR mitigation measures, in conjunction with PDF AIR-1, would ensure no new significant impacts outside of the analysis of the Prior FEIR would occur.

As stated under Section 4, Environmental Checklist, the proposed project would comply with all uniformly applied federal and State measures. With the implementation of the above COAs and compliance with applicable rules and regulations, the proposed project would be consistent with the conclusions of the Prior FEIR. There are no project-specific effects that fall outside the scope of the Prior FEIR and the proposed project would not result in new or increased impacts as compared to the Prior FEIR. No further analysis is required.

Prior FEIR Mitigation Measures

MM Air 1, MM Air 2, MM Air 4, MM Air 7, MM Air 8, MM Air 9, MM Air 10, MM Air 11, MM Air 13, MM Cultural 1, MM Cultural 2, MM Cultural 3, MM Cultural 4, MM Noise 4.

Project-specific Project Design Features

PDF AIR-1.

Project-specific Conditions of Approval

COA CUL-1.

Conclusion

With regards to Mandatory Findings of Significance, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Prior FEIR.
4. All applicable mitigation measures from the Prior FEIR have been made a condition of project approval.

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5 - LIST OF PREPARERS

FirstCarbon Solutions
967 Kendall Drive, #A-537
San Bernardino, CA 92407
Phone: 714.508.4100

Project Director	Mary Bean
Project Manager	Angela Wolfe
Project Manager	Brittany Perez, MBA
Legal Counsel	Megan Starr
Senior Air Quality Scientist	Kimberly Johnson
Senior Biologist	Joseph Vu
Biologist	Hannah Carney
Noise Associate	Sara Landucci
Director of Cultural Resources	Dana DePietro, PhD, RPA
Senior Archaeologist	Stefanie Griffin
Archaeologist	Natalie Adame
Director of Noise and Air Quality	Phil Ault, LEED® AP
Environmental Services Analyst	David Salloum
Environmental Services Analyst	Henry Welch
Environmental Services Analyst	Juliana Romano-Silverstein
Senior Managing Editor	Susie Harris
Publications Manager	Alec Harris
Technical Editor	Sarah Vine
Technical Document Manager	Melissa Ramirez
GIS/Graphics	Karlee McCracken

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